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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91221093
Party	Defendant P3 ingenieurgesellschaft mbH
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Submission	Motion to Extend
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Date	08/29/2017
Attachments	20170829 Motion to Extend Time To Respond to Motion P3 Opp 91-221093.pdf(132942 bytes )

**IN THE U.S. PATENT & TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL & APPEAL BOARD**

P3 INTERNATIONAL CORP.,

Opposer,

v.

P3 INGENIEURGESSELLSCHAFT MBH,

Applicant.

Consolidated Oppositions Nos.

91-221093

91-221702

**Motion for an Extension of Time for Applicant To Respond to Opposer's Motion for Judgment and To Dismiss**

The Applicant's time to respond to Opposer's Motion for Judgment Sustaining Opposition and to Dismiss Counterclaims With Prejudice is August 29, 2017. Applicant P3 Ingenieurgesellschaft Mbh requests that such date be extended for 30 days, or until September 29, 2017, and that all subsequent dates be reset accordingly.

The grounds for this request are as follows:

*- Parties continue to be engaged in settlement discussions and have made progress. Specifically, the parties are in the process of attempting to finalize the terms of settlement as set forth in a detailed and comprehensive draft settlement agreement that has been exchanged between the parties. Moreover, the parties previously reached a consensus and preliminary agreement with respect to almost all of the terms of this proposed settlement agreement, and are currently continuing to engage in the process of trying to iron out the wording of one final provision.*

Applicant P3 Ingenieurgesellschaft Mbh was not able to secure the express consent of the opposer before the filing of this motion, but is hoping to hear from opposer's counsel in the next day or two, at which point Applicant hopes to be in a position to supersede this motion with the filing of a *Stipulated Consent* Motion to extend the time to respond and to otherwise secure the extension and resetting of deadlines and dates requested herein.

Applicant has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

Thank you for your time and consideration.

Respectfully submitted,

By:         /Darren M. Geliebter/  
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*Attorneys for Applicant*

Dated: August 29, 2017

**CERTIFICATE OF TRANSMISSION**

I hereby certify that the foregoing *Motion for an Extension of Time for Applicant to Respond to Opposer's Motion for Judgment and to Dismiss* is being electronically transmitted via the Electronic System for Trademark Trials and Appeals ("ESTTA") at <http://estta.uspto.gov/> on the date noted below:

Date: August 29, 2017  
By:         /Darren M. Geliebter/  
Darren M. Geliebter  
*Attorney for Applicant,*  
P3 INGENIEURGESSELLSCHAFT MBH

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing *Stipulated/Consent Motion for an Extension of Time for Applicant To Respond to Opposer's Motion for Judgment and To Dismiss* has been served electronically (via email), this 29th day of August, 2017 upon counsel for Opposer:

JAMES A. POWER JR.  
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Date: August 29, 2017

/Darren M. Geliebter/  
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