

ESTTA Tracking number: **ESTTA767782**

Filing date: **08/31/2016**

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

Proceeding.	91222989
Applicant	Plaintiff M&D Wholesale Distributors, Inc.
Other Party	Defendant BRAZIL Network GmbH
Have the parties held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2)?	Yes

## Motion for an Extension of Answer or Discovery or Trial Periods With Consent

The Close of Discovery is currently set to close on 08/31/2016. M&D Wholesale Distributors, Inc. requests that such date be extended for 30 days, or until 09/30/2016, and that all subsequent dates be reset accordingly.

Time to Answer :	CLOSED
Deadline for Discovery Conference :	CLOSED
Discovery Opens :	CLOSED
Initial Disclosures Due :	CLOSED
Expert Disclosure Due :	08/31/2016
Discovery Closes :	09/30/2016
Plaintiff's Pretrial Disclosures :	11/14/2016
Plaintiff's 30-day Trial Period Ends :	12/29/2016
Defendant's Pretrial Disclosures :	01/13/2017
Defendant's 30-day Trial Period Ends :	02/27/2017
Plaintiff's Rebuttal Disclosures :	03/14/2017
Plaintiff's 15-day Rebuttal Period Ends :	04/13/2017

The grounds for this request are as follows:

- *Parties are engaged in settlement discussions*

M&D Wholesale Distributors, Inc. has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

M&D Wholesale Distributors, Inc. 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.

## Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by Facsimile or email (by agreement only) on this date.

Respectfully submitted,

/Bradford C. Craig/  
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08/31/2016