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Filing date: **12/31/2015**

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

Proceeding	91222989
Party	Defendant BRAZIL Network GmbH
Correspondence Address	KARIN SEGALL LEASON ELLIS LLP ONE BARKER AVENUE 5TH FLOOR WHITE PLAINS, NY 10601 UNITED STATES tmdocket@leasonellis.com, segall@leasonellis.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Karin Segall
Filer's e-mail	tmdocket@leasonellis.com,segall@leasonellis.com,pecsenye@blankrome.com
Signature	/karinsegall/
Date	12/31/2015
Attachments	Consent Motion to Extend for Settlement Discussions (01424959).PDF(52815 bytes )

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

M&D WHOLESALE DISTRIBUTORS,  
INC.,

*Opposer,*

v.

BRAZIL NETWORK GMBH,

*Applicant.*

Opposition No. 91222989

Serial No. 79152327

Mark: CAMPO BAHIA

**CONSENT MOTION FOR EXTENSION**

BRAZIL Network GMBH (“Applicant”) by and through its attorneys, Leason Ellis LLP, hereby moves the Board for a thirty (30) day extension of all deadlines herein as follows:

Initial Disclosures Due	2/3/2016
Expert Disclosures Due	6/2/2016
Discovery Closes	7/2/2016
Plaintiff's Pretrial Disclosures	8/16/2016
Plaintiff's 30-day Trial Period Ends	8/31/2016
Defendant's Pretrial Disclosures	9/15/2016
Defendant's 30-day Trial Period Ends	11/29/2016
Plaintiff's Rebuttal Disclosures	12/14/2016
Plaintiff's 15-day Rebuttal Period Ends	1/13/2017

M&D Wholesale Distributors, Inc. (“Opposer”) agreed to the extension through its counsel, Timothy D. Pecsénye, by email on December 23, 2015, to enable the parties to continue their settlement negotiations.

Dated: December 31, 2015  
White Plains, New York

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Karin Segall".

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Karin Segall  
LEASON ELLIS LLP  
One Barker Avenue – Fifth Floor  
White Plains, New York 10601  
T.914.821.9072  
F.914.288.0023  
segall@LeasonEllis.com

*Attorneys for Applicant*

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Consent Motion to Extension was served this 31 day of December, 2015 on Opposer's counsel at the email address below as agreed by the parties:

[Pecsenye@BlankRome.com](mailto:Pecsenye@BlankRome.com)



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