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

Proceeding	91233165
Party	Plaintiff Park Hotel Management Pte Ltd.
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Date	08/08/2018
Attachments	H00278OpposersReplyinSupportofMotiontoExtendDatesinProceeding.pdf(37097 bytes)

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

In re: Application Serial No. 87057391
Mark: PARK HOTELS & RESORTS

Park Hotel Management Pte Ltd.,	:	
	:	
Opposer,	:	
	:	Opposition No.: 91233165
v.	:	
	:	
Park Hotels & Resorts, Inc.,	:	
	:	
Applicant.	:	
	:	

**OPPOSER'S REPLY IN SUPPORT OF
MOTION TO EXTEND DATES IN OPPOSITION PROCEEDING**

Opposer, by its attorney, hereby submits this reply brief in support of its motion to extend the dates in the opposition proceeding. This reply brief is provided for by Trademark Rule 2.127(a) and is submitted in response to Applicant's opposition to Opposer's motion to extend dates in proceeding.

Opposer did not file its motion for purposes of delay, as detailed in Opposer's motion. At the end of June, Applicant provided comments to Opposer regarding the proposed settlement. Opposer continues to consider those comments and will respond. Opposer waited over four months for Applicant to respond to its settlement proposal. Opposer has essentially had Applicant's counterproposal for a month. Opposer needs additional time to consider that proposal.

Applicant's counsel and Opposer's counsel discussed a further extension of time for the remaining dates on July 13, 2018. At that time, the undersigned advised Applicant's counsel that

Opposer would seek an extension whether or not Applicant consented because Opposer continued to review Applicant's revised settlement terms, which were forwarded to Opposer less than a week before Opposer's testimony period opened.

The undersigned contacted Opposer on July 13, 2018 to advise of Applicant's position regarding consent to an extension request. From July 21 to July 27, 2018, the undersigned was in Japan for business. The undersigned return to her office on July 30, 2018. She received Opposer's instructions to proceed with an extension request on July 31, 2018. On August 1, 2018, the undersigned telephoned counsel for Applicant and left a voicemail message advising that she was filing an extension request the following day. Applicant's counsel returned that call at 5:30 PM on August 2, 2018, after the extension had been filed and after Opposer's counsel had left the office for the day.

As detailed above, Opposer did not wait until the last minute to file its extension request for the purposes of delay. The request was timely filed, and the request is made with good cause. Settlement, if concluded, will obviate the need for this proceeding to continue.

For the reasons provided above and for the reasons set forth in Opposer's motion of August 2, 2018, Opposer's request for an extension should be granted.

Respectfully submitted,

PARK HOTEL MANAGEMENT PTE LTD.



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Date: August 8, 2018

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing **OPPOSER'S REPLY IN SUPPORT OF MOTION TO EXTEND DATES IN OPPOSITION PROCEEDING** has been served via email on this 8th day of August 2018 to:

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