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

Proceeding	91233165
Party	Defendant Park Hotels & Resorts, Inc.
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Signature	/AKS/
Date	12/21/2018
Attachments	Opposition to Motion to Extend.pdf(10796 bytes )

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

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

Park Hotel Management Pte Ltd. )

Opposition No. 91233165

Opposer, )

v. )

Park Hotels & Resorts Inc. )

Applicant. )

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**APPLICANT'S OPPOSITION TO OPPOSER'S MOTION  
TO EXTEND DATES IN PROCEEDING**

Applicant, Park Hotels & Resorts Inc., by and through its undersigned attorney, hereby opposes Opposer Park Hotel Management Pte. Ltd.'s motion for a thirty (30) day extension of all deadlines in this proceeding, as requested in Opposer's Motion to Extend Dates in Opposition Proceeding, filed on December 20, 2018 (the "Motion").

Among the grounds articulated for the requested extension are Applicant's filing of "thousands of pages of documents" during its testimony period, "the majority of which were improperly filed under seal" and Applicant's purported delay in providing redacted versions of such documents. Motion, p. 1. However, Opposer waited until December 10, 2018 - ten days after Applicant filed and served such testimonial submissions - to request redacted versions of Applicant's declarations, which are less than ten pages each. Further, at that time, Opposer made no mention of the allegedly improper filing of any testimonial documents. Applicant provided the redacted versions of such declarations to counsel for Opposer on December 20, 2018.

Opposer also alleges that Applicant improperly filed “the majority” of its testimonial submissions under seal. Motion, p. 1. This is incorrect. Applicant filed its witnesses’ declarations and the exhibits thereto under seal because these documents contain both public and confidential information. To avoid the burden and inefficiency of individually filing hundreds of confidential and non-confidential documents with the Board, thereby submitting the documents piecemeal and making it more difficult for the documents themselves to be reviewed by the Board, Applicant filed these documents in ten parts (due to file size limitations), but clearly indicated on the declarations and exhibit cover sheets whether the document in question was confidential, as required under the Protective Order. As such, the only documents which required redaction were two witness declarations, each less than ten (10) pages in length, which have been provided to Opposer.

As set forth in Opposer’s Motion, Applicant respectfully objects to the extension and the unnecessary delay that will result and respectfully requests that the Board maintain the already extended deadlines currently set in this proceeding.

Date: December 21, 2018

Respectfully submitted,

/AKS/

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Attorneys for Applicant  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on December 21, 2018, a copy of the foregoing was served by email, addressed to the following attorneys of record for Opposer:

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