

ESTTA Tracking number: **ESTTA1013995**

Filing date: **11/06/2019**

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

Proceeding	91233700
Party	Plaintiff NFL Properties LLC and Houston NFL Holdings, L.P.
Correspondence Address	KRISTIN H ALTOFF MORGAN LEWIS & BOCKIUS LLP 1111 PENNSYLVANIA AVE NW WASHINGTON, DC 20004 UNITED STATES trademarks@morganlewis.com, kristin.altoff@morganlewis.com, seth.rappaport@morganlewis.com, jennifer.evans@morganlewis.com, hope.carlisle@morganlewis.com 202-739-5093
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Kristin H. Altoff
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Signature	/Kristin H. Altoff/
Date	11/06/2019
Attachments	USE ONLY Extension Request - November 2019.pdf(102734 bytes)

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

NFL Properties LLC and Houston NFL Holdings, L.P.

NFL Properties LLC and New York Football Giants, Inc.

NFL Properties and Philadelphia Eagles LLC

NFL Properties LLC and Chicago Bears Football Club,
Inc.

NFL Properties LLC and New England Patriots LLC

NFL Properties LLC and The Los Angeles Rams, LLC

Arizona Cardinals Football Club LLC and NFL Properties
LLC

NFL Properties LLC and New York Jets LLC

Opposers,

v.

Joshua F Morell,

Applicant.

Opposition No. 91233700 (parent)
Opposition No. 91235399
Opposition No. 91235401
Opposition No. 91235535
Opposition No. 91235537
Opposition No. 91235540
Opposition No. 91235542
Opposition No. 91235543

**MOTION FOR AN EXTENSION OF ANSWER OR
DISCOVERY OR TRIAL PERIODS WITH CONSENT**

Pursuant to TBMP § 509.01(a), Opposers hereby requests a 60-day extension of time for all current discovery and trial deadlines in the above consolidated proceeding. The next deadline is for the parties to exchange Initial Disclosures on November 9, 2019. Applicant Joshua Morell (“Applicant”) expressly consented to this 60-day extension request via email on November 5, 2019.

Good cause to grant this consented extension request exists because the parties have been negotiating an amicable resolution of the opposition and have exchanged multiple drafts of a

Settlement Agreement. Since the last extension request was granted, the parties have further narrowed the remaining issues to be negotiated and have exchanged two further drafts of the Settlement Agreement.

The parties have diligently been working to finalize a settlement since the last extension was granted. The requested extension will allow the parties time to continue their efforts to resolve this matter amicably. Applicant therefore respectfully request that the Board grant the requested 60-day extension and reset the deadlines as set forth below:

	Proposed Schedule
Initial Disclosures Due	01/08/2020
Expert Disclosures Due	05/07/2020
Discovery Closes	06/06/2020
Plaintiff's Pretrial Disclosures Due	07/21/2020
Plaintiff's 30-day Trial Period Ends	09/04/2020
Defendant's Pretrial Disclosures Due	09/19/2020
Defendant's 30-day Trial Period Ends	11/03/2020
Plaintiff's Rebuttal Disclosures Due	11/18/2020
Plaintiff's 15-day Rebuttal Period Ends	12/18/2020
Plaintiff's Opening Brief Due	02/16/2021
Defendant's Brief Due	03/18/2021
Plaintiff's Reply Brief Due	04/02/2021
Request for Oral Hearing (optional) Due	04/12/2021

Dated: November 7, 2019

Respectfully submitted,

By: /Kristin H. Altoff/
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Attorneys for Opposers

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for an Extension of Answer or Discovery or Trial Periods with Consent has been sent via email, with consent, this 7th day of November 2019 to:

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PHILADELPHIA, PA 19128
UNITED STATES
josh.morell@gmail.com

/Kristin H. Altoff/