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

Proceeding	91238874
Party	Plaintiff NFL Properties LLC, The Oakland Raiders
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Submission	Stipulated/Consent Motion to Extend
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Date	01/14/2019
Attachments	SILVER and BLACK NATION Extension - January 2019.pdf(101047 bytes)

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

THE OAKLAND RAIDERS and NFL
PROPERTIES LLC,

Opposers,

v.

JOSEPH HONG,

Applicant.

In re Application Serial No. 87/439,181
Mark: SILVER & BLACK NATION

Published: September 12, 2017
Opposition No. 91238874

**CONSENTED MOTION FOR AN EXTENSION
OF DISCOVERY AND TRIAL PERIODS**

Pursuant to TBMP § 509.01(a), Opposers The Oakland Raiders and NFL Properties LLC (“Opposers”) hereby requests a 30-day extension of time for the current discovery and trial deadlines in the above proceeding. The next deadline is for the Discovery Period to Close on January 15, 2019. Applicant Joseph Hong expressly consented to this 30-day extension request via email on December 30, 2018.

Good cause to grant this consented extension request exists because the Applicant requested additional time to respond to Opposers’ discovery requests, and Opposers will need additional time in the discovery period to review Applicants responses and determine if the responses are sufficient and to file a Motion to Compel if needed or notice a deposition if warranted.

Opposers therefore respectfully request that the Board grant the requested 30-day extension and reset the deadlines as set forth below.

Current Schedule	Proposed Schedule
Opposers' Discovery Period to Close*	02/14/2019
Plaintiff's Pretrial Disclosures Due	03/31/2019
Plaintiff's 30-day Trial Period Ends	05/15/2019
Defendant's Pretrial Disclosures Due	05/30/2019
Defendant's 30-day Trial Period Ends	07/14/2019
Plaintiff's Rebuttal Disclosures Due	07/29/2019
Plaintiff's 15-day Rebuttal Period Ends	08/28/2019
Plaintiff's Opening Brief Due	10/27/2019
Defendant's Brief Due	11/26/2019
Plaintiff's Reply Brief Due	12/11/2019
Request for Oral Hearing (optional) Due	12/21/2019

* Opposers note that, by agreement between the parties, the Applicant's discovery period closes on January 15, 2019 as originally scheduled.

Dated: January 14, 2019

Respectfully submitted,

By: /Kristin H. Altoff/
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Attorneys for Opposers
 THE OAKLAND RAIDERS and NFL
 PROPERTIES LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Consented Motion for an Extension of Discovery and Trial Periods has been sent via email this 14th day of January 2019 to:

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/Kristin H. Altoff/