

ESTTA Tracking number: **ESTTA1066223**

Filing date: **07/06/2020**

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

Proceeding	91239139
Party	Defendant 3 Square, Inc.
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Submission	Motion to Extend
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Date	07/06/2020
Attachments	San Pasqual v. 3 Square - Motion for Extension Without Consent 07-06-2020.PDF(89526 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
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SAN PASQUAL CASINO DEVELOPMENT :
GROUP, INC. :

Plaintiff :

v. : Opposition No. 91239139 (Parent)

3 SQUARE, INC., : Concurrent Use No. 94002916

Defendant :

**DEFENDANT’S MOTION FOR EXTENSION OF TIME
WITHOUT CONSENT**

Defendant 3 Square, Inc. hereby moves that dates in the above referenced proceeding be extended 30 days and reset as follows:

	Current Dates as Requested in 06/03/2020 Motion for Extension	Proposed Dates
Time to Answer	07/03/2020	08/02/2020
Deadline for Discovery Conference	08/02/2020	09/01/2020
Discovery Opens	08/02/2020	09/01/2020
Initial Disclosures Due	09/01/2020	10/01/2020
Expert Disclosures Due	12/30/2020	01/29/2021
Discovery Closes	01/29/2021	02/28/2021
Plaintiff’s Pretrial Disclosures Due	03/15/2021	04/14/2021
Plaintiff’s 30-day Trial Period Ends	04/29/2021	05/29/2021
Defendant’s Pretrial Disclosures Due	05/14/2021	06/13/2021
Defendant’s 30-day Trial Period Ends	06/28/2021	07/28/2021
Plaintiff’s Rebuttal Disclosures Due	07/13/2021	08/12/2021
Plaintiff’s 15-day Rebuttal Period Ends	08/12/2021	09/11/2021
Plaintiff’s Opening Brief Due	10/12/2021	11/11/2021
Defendant’s Brief Due	11/10/2021	12/10/2021
Plaintiff’s Reply Brief Due	11/25/2021	12/25/2021
Request for Oral Hearing (optional) Due	12/05/2021	01/04/2022

The additional time is needed due to the difficulty communicating during the current COVID-19 health emergency and the impact it has had on Defendant's business and similar food service establishments.

The parties have not held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2).

Date: July 6, 2020

3 SQUARE, INC.

By: /s/ Michael A. Grow

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CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing Motion For Extension Of Time Without Consent (re Opp. No. 91239139 (Parent) / Concurrent Use No. 94002916) is being served upon Plaintiff's counsel Hillary A Brooks of Brooks Quinn LLC at hillary@brooksquinn.com and docketing@brooksquinn.com on July 6, 2020.

/s/ Michael A. Grow