

ESTTA Tracking number: **ESTTA951670**

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

Proceeding	91239143
Party	Defendant L2 Apparel Group LLC
Correspondence Address	JONATHAN E MOSKIN FOLEY & LARDNER LLP WASHINGTON HARBOUR 3000 K STREET NW WASHINGTON, DC 20007-5109 UNITED STATES IPdocketing@foley.com 212-338-3572
Submission	Stipulated/Consent Motion to Extend
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Signature	/Jonathan E. Moskin/
Date	02/01/2019
Attachments	TTAB EXT.pdf(355049 bytes)

Applicant has secured and confirmed today, February 1, 2019, via email to Paul J. Kennedy, Esq., our prior agreement reached by telephone, obtaining the express consent of every other party, namely, the Opposer, W-D Apparel Company, LLC. This motion is supported by good cause and is not for the purpose of delay.

The grounds for this request are as follows:

The grounds for Applicant's request to extend discovery is that Applicant is continuing to attempt to resolve amicably with Opposer perceived deficiencies in Opposer's August 7, 2018 responses to Applicant's initial discovery requests (served July 3), and Opposer's responses to Applicant's supplemental discovery requests, served August 13, 2018. The parties have been discussing the deficiencies in Opposer's responses, and if the matter cannot be resolved, Applicant will move to compel or preclude (or to amend its answer to the Notice of Opposition). The parties are continuing their discussions to attempt to resolve their disagreements, most recently on January 23, 2019, and Applicant is awaiting receipt of amended discovery responses.

Dated: February 1, 2019

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing **MOTION TO EXTEND DISCOVERY** has been served by email on Opposer at the following email addresses:

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February 1, 2019

/s/ Sky G. Schoepfer _____
Sky G. Schoepfer