

ESTTA Tracking number: **ESTTA964278**

Filing date: **04/02/2019**

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	Motion to Extend
Filer's Name	Jonathan E. Moskin
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Signature	/Jonathan E. Moskin/
Date	04/02/2019
Attachments	Motion to Extend.pdf(348351 bytes)

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

In the Matter of Trademark Application Serial No. 86/933,826

Mark: **TERRA LUXE**

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W-D APPAREL COMPANY, LLC,	:
	:
Opposer,	:
	:
v.	:
	:
L2 APPAREL GROUP LLC,	:
	:
Applicant.	:
	:
-----	X

Opposition No.: 91/239,143

MOTION TO EXTEND DISCOVERY WITH CONSENT

The Expert Disclosures Due is currently set to close today, April 2, 2019. L2 Apparel Group LLC and W-D Apparel Company, LLC requests that such date be extended for 30 days, or until May 2, 2019, and that all subsequent dates be reset accordingly.

Expert Disclosures Due	5/2/2019
Discovery Closes	6/1/2019
Plaintiff's Pretrial Disclosures Due	7/12/2019
Plaintiff's 30-day Trial Period Ends	8/30/2019
Defendant's Pretrial Disclosures Due	9/14/2019
Defendant's 30-day Trial Period Ends	10/29/2019
Plaintiff's Rebuttal Disclosures Due	11/13/2019

Plaintiff's 15-day Rebuttal Period Ends	12/13/2019
Plaintiff's Opening Brief Due	2/11/2020
Defendant's Brief Due	3/12/2020
Plaintiff's Reply Brief Due	3/27/2020
Request for Oral Hearing (optional) Due	4/6/2020

Applicant has secured the express consent of every other party, namely, the Opposer, W-D Apparel Company, LLC, today, April 2, 2019, via email by Sean P. McConnell, Esq. 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 our request to extend discovery is the Opposer has responded to further requests, which Applicant is still reviewing. The parties are continuing their discussions to attempt to resolve their disagreements.

Dated: April 2, 2019

Respectfully submitted,

By: FOLEY & LARDNER LLP
/s/ Jonathan E. Moskin
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Attorneys for Applicant
L2 Apparel Group LLC

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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April 2, 2019

/s/ Sky G. Schoepfer
Sky G. Schoepfer