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

Proceeding	91243795
Party	Defendant Shenzhen Mayichuangpin Kejiyouxiangongsi
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Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Shengmao Mu
Filer's email	mousamuel@whitewoodlaw.com
Signature	/Shengmao Mu/
Date	11/29/2020
Attachments	Consent Motion Bitmain v SMK Final-11-29.pdf(66740 bytes)

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

Bitmain Technology Limited and Bitmain Technologies Inc.

v.

Opposition No. 91243795

Shenzhen Mayichuangpin Kejiyouxiangongsi

**CONSENTED MOTION FOR ONE FINAL SIXTY DAY EXTENSION OF ALL
DEADLINES TO COMPLETE SETTLEMENT TALKS**

The parties respectfully request that the Board grant the parties a final sixty-day extension of all date for settlement purposes, beginning with initial disclosures. If granted, the new deadlines set by the Board's order would be as follows:

Initial Disclosures Due 1/30/2021

Expert Disclosures Due 5/30/2021

Discovery Closes 6/29/2021

Plaintiff's Pretrial Disclosures Due 8/13/2021

Plaintiff's 30-day Trial Period Ends 9/28/2021

Defendant's Pretrial Disclosures Due 10/13/2021

Defendant's 30-day Trial Period Ends 11/27/2021

Plaintiff's Rebuttal Disclosures Due 12/11/2021 2

Plaintiff's 15-day Rebuttal Period Ends 1/11/2022

Plaintiff's Opening Brief Due 3/10/2022

Defendant's Brief Due 4/9/2022

Plaintiff's Reply Brief Due 4/24/2022

Request for Oral Hearing (optional) Due 5/3/2022

As required by and since receipt of, the Board's October 8, 2020 order, the parties have been in close communication.

The parties have been in communication on Oct 9, 2020, Oct 19, 2020, Oct 20, 2020, Oct 23, 2020, Nov 2, 2020, Nov 11, 2020, Nov 13, 2020, Nov 16, 2020, Nov 18,2020, Nov 20, 2020, and Nov 25, 2020. The communication method was via email and telephone call. The communication has revolved around one clause of the current settlement agreement. After these efforts, on November 20, 2020, a counterproposal was suggested by SMK's US counsel, to which Bitmain on November 24, 2020 agreed, subject to formal acceptance by SMK. Bitmain is awaiting the response to SMK on this proposal, which if accepted would resolve this entire matter. If this current proposal does not resolve the matter, both parties U.S. counsel have proposed to set up a direct telephonic conference between the parties to facilitate better communication as both parties are Chinese entities working through local and foreign counsel which involves potential miscommunications and delays.

Further, SMK has just appointed new counsel who will need time to become familiar with this matter. The parties greatly appreciate the time the Board has allowed the parties in resolving this matter. In considering this request, the parties respectfully request that the Board consider the following circumstances. The parties are working on a worldwide settlement agreement. The parties appear to be very close to settlement. The parties appear to have resolved all provisions of the written Agreement except for one. Further, the parties are both foreign entities, speaking foreign languages, who are working through layers of local and foreign counsel and foreign law. For these reasons, the parties believe that they have shown good cause for this motion and thus respectfully request that the Board grant same.

Date: November 29, 2020

/SHENGMAO MU/

SHENGMAO MU

WHITEWOOD LAW PLLC

57 WEST, 57TH STREET 3RD AND 4TH FLOORS

NEW YORK, NY 10019

Attorney for Shenzhen Mayichuangpin Kejiyouxiangongs

CERTIFICATE OF SERVICE

The undersigned declares that on November 29, 2020 a true and accurate copy of the foregoing **CONSENTED MOTION FOR ONE FINAL SIXTY DAY EXTENSION OF ALL DEADLINES TO COMPLETE SETTLEMENT TALKS**

was sent by electronic mail to Carla Calcagno at cccalcagno@gmail.com, counsel for Opposer, at her address of record

/Shengmao Mu/ (Signature)