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

Proceeding	91245537
Party	Defendant Planet Bingo, Inc.
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Submission	Stipulated/Consent Motion to Extend
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Date	08/09/2019
Attachments	mtn enlarge time ON.pdf(148156 bytes)

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

Oneida Nation,

Opposer,

v.

Planet Bingo, Inc.,

Applicant.

Opposition No. 91/245,537

Marks: JUMBO7 (87/945,357)

SUPER X-TRA KASH (87/945,397)

THREE SISTERS (88/036,911)

BINGO OR BETTER (87/945,338)

PLANETDOWNS (87,945/380)

Filing Dates: June 1, 2018

Published: October 30, 2018

VIA ESTTA General Filings

Applicant Planet Bingo, Inc.’s Consented Motion to Extend Time

Pursuant to TBMP § 509, Applicant Planet Bingo, Inc. (“Applicant”), by and through undersigned counsel and with the consent of Opposer Oneida Nation as evidenced by email correspondence from counsel for Opposer dated August 8, 2019 and attached hereto as Exhibit 1, respectfully moves the Board to extend the time to conduct discovery in this action. The undersigned counsel’s father-in-law passed away on July 14, 2019 and he has been taken away from work responsibilities for approximately two weeks (*viz.*, through approximately July 28, 2019) to tend to familial matters. Moreover, Opposer recently served a first set of requests for admission on August 5, 2019. Applicant would like sufficient time to ensure full compliance with its discovery obligations and to provide both parties additional time in light of related delays. As such, Applicant believes and Opposer agrees that an additional thirty (30) days to complete discovery (with the remaining deadlines pushed out in time accordingly) would achieve these goals.

To that end, Applicant respectfully requests that the Board reset the following milestones to the below-listed proposed new deadlines, with the current milestone deadlines set forth in parentheses:

Discovery Closes:	Oct. 4, 2020 (Sep. 4, 2020)
Opposer’s (Plaintiff’s) Pretrial Disclosures Due:	Nov. 18, 2019 (Oct. 19, 2019)
Opposer’s (Plaintiff’s) 30-Day Trial Period Ends:	Jan. 2, 2020 (Dec. 3, 2019)
Applicant’s (Defendant’s) Pretrial Disclosures Due:	Jan. 17, 2020 (Dec. 18, 2019)
Applicant’s (Defendant’s) 30-Day Trial Period Ends:	Mar. 2, 2020 (Feb. 1, 2020)

Opposer's (Plaintiff's) Rebuttal Disclosures Due: Mar. 17, 2020 (Feb. 16, 2020)
Opposer's (Plaintiff's) 15-Day Rebuttal Period Ends: Apr. 16, 2020 (Mar. 17, 2020)
Opposer's (Plaintiff's) Opening Brief Due: June 15, 2020 (May 16, 2020)
Applicant's (Defendant's) Brief Due: July 15, 2020 (June 15, 2020)
Opposer's (Plaintiff's) Reply Brief Due: July 30, 2020 (June 30, 2020)
Request for Oral Hearing (Option) Due: Aug. 10, 2020 (July 10, 2020)
This is Applicant's first request to extend the time, and the request is made for good

cause.

Dated: August 9, 2019

Respectfully submitted,
Weiss and Moy, P.C.



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CERTIFICATE OF SERVICE

I hereby certify that on August 9, 2019, I filed the foregoing via ESTTA with the Trademark Office Trademark Trial and Appeal Board and that a true and complete copy of the foregoing has been served on counsel for Opposer Oneida Nation by forwarding said copy on such date via email to:

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