

ESTTA Tracking number: **ESTTA1024460**

Filing date: **12/20/2019**

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

Proceeding No.	91247656
Filing Party	Plaintiff Tavistock Freebirds, LLC
Other Party	Defendant MobileOffer, Inc.
Pending Motion	There is no motion currently pending and no other motion is being filed concurrent with this consent motion.

Consent Motion to Extend

The Expert Disclosures Due is currently set to close on 12/25/2019. Tavistock Freebirds, LLC requests that such date be extended for 90 days, or until 03/24/2020, and that all subsequent dates be reset accordingly.

Time to Answer	06/28/2019 (CLOSED)
Deadline for Discovery Conference	07/28/2019 (CLOSED)
Discovery Opens	07/28/2019 (CLOSED)
Initial Disclosures Due	08/27/2019 (CLOSED)
Expert Disclosures Due	03/24/2020
Discovery Closes	04/23/2020
Plaintiff's Pretrial Disclosures Due	06/07/2020
Plaintiff's 30-day Trial Period Ends	07/22/2020
Defendant's Pretrial Disclosures Due	08/06/2020
Defendant's 30-day Trial Period Ends	09/20/2020
Plaintiff's Rebuttal Disclosures Due	10/05/2020
Plaintiff's 15-day Rebuttal Period Ends	11/04/2020
Plaintiff's Opening Brief Due	01/03/2021
Defendant's Brief Due	02/02/2021
Plaintiff's Reply Brief Due	02/17/2021
Request for Oral Hearing (optional) Due	02/27/2021

The grounds for this request are as follows:

- *Parties are unable to complete discovery/testimony during assigned period*

Tavistock Freebirds, LLC has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Certificate of Service

The undersigned hereby certifies that a copy of this filing has been served upon all parties, at their address of record by Email on this date.

Respectfully submitted,
/ltm/

Lori T. Milvain
lmilvain@lathamluna.com
12/20/2019