

ESTTA Tracking number: **ESTTA1085077**

Filing date: **09/29/2020**

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

|                |  |
|----------------|--|
| Proceeding No. | 91253103   |
| Filing Party   | Defendant<br>Ex Hacienda Los Camichines, S.A. De C.V.  |
| Other Party    | Plaintiff<br>Express, LLC  |
| 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 Deadline for Discovery Conference is currently set to close on 09/29/2020. Ex Hacienda Los Camichines, S.A. De C.V. requests that such date be extended for 60 days, or until 11/28/2020, and that all subsequent dates be reset accordingly.

|   |                     |
|---|---------------------|
| Time to Answer                          | 02/01/2020 (CLOSED) |
| Deadline for Discovery Conference       | 11/28/2020          |
| Discovery Opens                         | 11/28/2020          |
| Initial Disclosures Due                 | 12/28/2020          |
| Expert Disclosures Due                  | 04/27/2021          |
| Discovery Closes                        | 05/27/2021          |
| Plaintiff's Pretrial Disclosures Due    | 07/11/2021          |
| Plaintiff's 30-day Trial Period Ends    | 08/25/2021          |
| Defendant's Pretrial Disclosures Due    | 09/09/2021          |
| Defendant's 30-day Trial Period Ends    | 10/24/2021          |
| Plaintiff's Rebuttal Disclosures Due    | 11/08/2021          |
| Plaintiff's 15-day Rebuttal Period Ends | 12/08/2021          |
| Plaintiff's Opening Brief Due           | 02/06/2022          |
| Defendant's Brief Due                   | 03/08/2022          |
| Plaintiff's Reply Brief Due             | 03/23/2022          |
| Request for Oral Hearing (optional) Due | 04/02/2022          |

The grounds for this request are as follows:

- *Parties are engaged in settlement discussions*

Ex Hacienda Los Camichines, S.A. De C.V. 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,  
/erh/

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09/29/2020