

ESTTA Tracking number: **ESTTA1049309**

Filing date: **04/15/2020**

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

Proceeding	91253917
Party	Plaintiff Helix OpCo, LLC
Correspondence Address	JAMI A GEKAS FOLEY & LARDNER LLP 321 NORTH CLARK STREET, SUITE 3000 CHICAGO, IL 60654 UNITED STATES jgekas@foley.com, jrodriguez@foley.com, ipdocketing@foley.com, lbirch@foley.com 3128324500
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Lindsey N. Birch
Filer's email	ipdocketing@foley.com, jgekas@foley.com, lbirch@foley.com
Signature	/Lindsey N. Birch/
Date	04/15/2020
Attachments	Motion to Extend Dates with Consent--HELIX 4813-3290-1562 v.3.pdf(126216 bytes)

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

HELIX OPCO, LLC)	
)	
)	
Opposer,)	
)	
v.)	Opposition No. 91253917
)	Mark: HELIX
Q-IT, LLC)	Serial. No.: 88/197486
)	
Applicant.)	
)	
)	

MOTION TO EXTEND DATES WITH CONSENT

Opposer, Helix OpCo, LLC (“**Opposer**”), through its counsel, and Applicant, Q-IT, LLC (“**Applicant**”) hereby move to extend all deadlines in the above-referenced proceedings for a period of ninety (90) days. The parties have engaged in settlement negotiations and have finalized a written settlement agreement, for which the parties need additional time to collect signatures and implement the terms of the agreement.

The parties request a good cause extension in order to finalize settlement. Opposer has secured the express consent of Applicant to reset all deadlines in the proceeding as follows:

Deadline for Discovery Conference:	7/14/2020
Discovery Opens:	7/14/2020
Initial Disclosures Due:	8/13/2020
Expert Disclosures Due:	12/11/2020
Discovery Closes:	1/10/2021
Plaintiff's Pretrial Disclosures:	2/24/2021
Plaintiff's 30-day Trial Period Ends:	4/10/2021
Defendant's Pretrial Disclosures:	4/25/2021
Defendant's 30-day Trial Period Ends:	6/9/2021

Plaintiff's Rebuttal Disclosures: 6/24/2021
Plaintiff's 15-day Rebuttal Period Ends: 7/24/2021
Plaintiff's Opening Brief Due: 9/22/2021
Defendant's Brief Due: 10/22/2021
Plaintiff's Reply Brief Due: 11/6/2021
Request for Oral Hearing (optional) Due: 11/16/2021

Dated: April 15, 2020

Respectfully submitted,

FOLEY & LARDNER LLP

/Lindsey N. Birch/

Jami A. Gekas

Lindsey N. Birch

FOLEY & LARDNER LLP

321 North Clark Street, Suite 3000

Chicago, IL 60654-4762

312-832-5191

Attorneys for Opposer

Helix OpCo, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing MOTION TO EXTEND DATES WITH CONSENT has been served by electronic mail to Applicant's counsel at hhpc@ptd.net.

April 15, 2020

/Lindsey N. Birch/

Jami A. Gekas

Lindsey N. Birch

Foley & Lardner LLP