

ESTTA Tracking number: **ESTTA1095270**

Filing date: **11/13/2020**

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

Proceeding	91255001
Party	Defendant JRM, Inc.
Correspondence Address	BLAKE P HURT TUGGLE DUGGINS PA 100 N. GREENE STREET, SUITE 600 GREENSBORO, NC 27401 UNITED STATES Primary Email: bhurt@tuggleduggins.com Secondary Email(s): pdillon@tuggleduggins.com, afelts@tuggleduggins.com 336-271-5229
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Alan B. Felts
Filer's email	afelts@tuggleduggins.com
Signature	/Alan B. Felts/
Date	11/13/2020
Attachments	JRM Consent Motion for Extension of Time to Respond to Trigon MSJ.pdf (21946 bytes )

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

Trigon Turf Sciences, LLC

Opposer,

v.

JRM, Inc.,

Applicant.

Opposition No. 91255001

Serial No. 88649876

Mark: SAMURAI TINE

**CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO OPPOSER'S  
MOTION FOR SUMMARY JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 6(b) and TBMP § 509, Applicant requests that the Board grant an extension of the deadline for Applicant to respond to Opposer's Motion for Summary Judgment for thirty (30) days, making Applicant's response due on December 22, 2020. Counsel for Opposer has consented to this motion. Good cause exists to extend the deadline for the following reasons:

1. On April 1, 2020, Opposer filed the present Opposition.
2. On October 23, 2020, Opposer filed its Motion for Summary Judgment.
3. Applicant's response to Opposer's Motion for Summary Judgment is currently due on November 22, 2020.
4. Counsel for Opposer is currently in the process of moving to a new physical office.
5. The current deadline currently falls on the week of Thanksgiving, during which the undersigned counsel for Applicant will be travelling.

6. The requested extension of time is necessary because of logistical challenges related to moving offices and scheduling conflicts due to the Thanksgiving holiday.

7. Counsel for Opposer has consented to this motion.

WHEREFORE, Applicant respectfully requests the Board grant Applicant's request for a thirty (30) day extension of time to respond to Opposer's Motion for Summary Judgment through and including December 22, 2020.

Respectfully submitted this the 13<sup>th</sup> day of November, 2020.

/s/ Alan B. Felts  
Alan B. Felts  
afelts@tuggleduggins.com  
Blake P. Hurt  
bhurt@tuggleduggins.com  
*Attorneys for Applicant*

OF COUNSEL:  
TUGGLE DUGGINS P.A.  
P.O. Box 2888  
Greensboro, NC 27402  
Telephone: 336-378-1431  
Facsimile: 336-274-6590

**CERTIFICATE OF SERVICE**

I hereby certify that on November 13, 2020, a copy of this **CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO OPPOSER'S MOTION FOR SUMMARY JUDGMENT** was served via email, on Opposer's attorney of record as of this date:

Joseph A. Uradnik  
Uradnik Law Firm PC  
P.O. Box 525  
Grand Rapids, MN 55744  
Email: [joe@iplawspot.com](mailto:joe@iplawspot.com)  
Phone: 612-865-9449

This the 13<sup>th</sup> day of November, 2020.

\_\_\_\_\_  
*/s/ Alan B. Felts*  
Alan B. Felts  
*Attorney for Applicant*