

ESTTA Tracking number: **ESTTA1118549**

Filing date: **03/05/2021**

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

Proceeding No.	91256218
Filing Party	Defendant Hub Pen Company, LLC
Other Party	Plaintiff Hirsch Gift, 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 03/12/2021. Hub Pen Company, LLC requests that such date be extended for 60 days, or until 05/11/2021, and that all subsequent dates be reset accordingly.

Time to Answer	07/15/2020 (CLOSED)
Deadline for Discovery Conference	08/14/2020 (CLOSED)
Discovery Opens	08/14/2020 (CLOSED)
Initial Disclosures Due	09/13/2020 (CLOSED)
Expert Disclosures Due	05/11/2021
Discovery Closes	06/10/2021
Plaintiff's Pretrial Disclosures Due	07/25/2021
Plaintiff's 30-day Trial Period Ends	09/08/2021
Defendant's Pretrial Disclosures Due	09/23/2021
Defendant's 30-day Trial Period Ends	11/07/2021
Plaintiff's Rebuttal Disclosures Due	11/22/2021
Plaintiff's 15-day Rebuttal Period Ends	12/22/2021
Plaintiff's Opening Brief Due	02/20/2022
Defendant's Brief Due	03/22/2022
Plaintiff's Reply Brief Due	04/06/2022
Request for Oral Hearing (optional) Due	04/16/2022

The grounds for this request are as follows:

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

Hub Pen Company, 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,

/s/ Peter M. de Jonge/

Peter M. de Jonge

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