

ESTTA Tracking number: **ESTTA1169511**

Filing date: **11/01/2021**

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

Proceeding	91256586
Party	Defendant One Six Nine, Inc.
Correspondence Address	HOANG-CHI TRUONG PATENT LAW WORKS LLP 310 EAST 4500 SOUTH, SUITE 400 SALT LAKE CITY, UT 84107 UNITED STATES Primary Email: trademarks@patentlawworks.net 650-537-4504
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Hoang-chi Truong
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Signature	/hoangchitruong/
Date	11/01/2021
Attachments	2021-11-01 - Joint request for 60-day EOT for COAST opp.pdf(386134 bytes )

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Coast Acceptance Corporation	:	
Opposer,	:	Opposition No. 91256586
	:	
One Six Nine, Inc.	:	
Applicant.	:	

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**JOINT REQUEST FOR 60-DAY EXTENSION OF THE TRIAL SCHEDULE**

The parties in the above-proceeding jointly request a 60-day extension of the trial schedule for the above-referenced proceeding. For all the reasons discussed below, this extension request is warranted in accordance with the Trademark Trial and Appeal Board Manual of Procedure (TBMP). Since the parties' previous request, they have exchanged a draft settlement agreement.

Given the exchange of a draft settlement agreement, there is no doubt that the parties are negotiating in good faith to resolve this dispute and request an additional time to finalize the settlement terms. Further, the parties also believe that the likelihood of resolving this matter will be maximized if they can devote their attention and efforts to further settlement negotiations and not engage in expensive and time-consuming pleadings and discovery that will expend their

resources and be unnecessary if this matter is resolved amicably. For these reasons, this 60-day extension request is also in the interests of judicial economy.

The parties will endeavor to resolve this dispute in the upcoming 60 days.

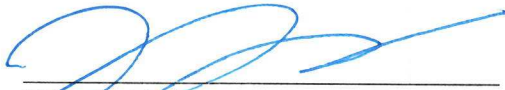
In light of the above, the parties agree that good cause exists for this extension request to be granted in accordance with TBMP §509.01(a). First, because this is a joint extension request, neither party will be prejudiced, and the parties agree there is no danger of an inability to litigate this case. Second, in light of the negotiation progress to date, the parties respectfully submit that the requested extension is warranted and relatively short. Finally, the parties seek this extension request in good faith so they may proceed with their settlement negotiations as expeditiously as possible, and counsel for both parties agree that this motion is not made for the purpose of delay.

In conclusion, the parties request that the trial dates be extended as follows:

Time to Answer	12/30/2021
Deadline for Discovery Conference	1/29/2022
Discovery Opens	1/29/2022
Initial Disclosures Due	2/28/2022
Expert Disclosures Due	6/28/2022
Discovery Closes	7/28/2022
Plaintiff's Pretrial Disclosures Due	9/22/2022
Plaintiff's 30-day Trial Period Ends	10/26/2022
Defendant's Pretrial Disclosures Due	11/10/2022
Defendant's 30-day Trial Period Ends	12/25/2022
Plaintiff's Rebuttal Disclosures Due	1/9/2023
Plaintiff's 15 Rebuttal Period Ends	2/8/2023
Plaintiff's Opening Brief Due	4/9/2023
Defendant's Brief Due	5/9/2023
Plaintiff's Reply Brief Due	5/24/2023
Request for Oral Hearing (optional) Due	6/3/2023

Respectfully submitted,

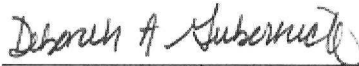
Date: November 1, 2021



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Date: November 1, 2021



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Certificate of Service

I hereby certify that a true and correct copy of the above JOINT REQUEST FOR 60-DAY EXTENSION OF THE TRIAL SCHEDULE was served on Opposer's attorney of record via electronic mail as follows:

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Date: November 1, 2021

By: 

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