

ESTTA Tracking number: **ESTTA1099285**

Filing date: **12/03/2020**

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

Proceeding	91263393
Party	Plaintiff Enterprise Holdings, Inc.
Correspondence Address	LISABETH H. COAKLEY HARNESS, DICKEY & PIERCE, P.L.C. 5445 CORPORATE DRIVE, SUITE 200 TROY, MI 48098 UNITED STATES Primary Email: troymailroom@hdp.com Secondary Email(s): coakley@hdp.com, tjcomparoni@hdp.com 2486411600
Submission	Stipulated/Consent Motion to Reopen
Filer's Name	Elizabeth K. Brock
Filer's email	ebrocks@hdp.com, coakley@hdp.com, troymailroom@hdp.com
Signature	/ekb/
Date	12/03/2020
Attachments	EHI suspension.pdf(111212 bytes)

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

Enterprise Holdings, Inc.,)	
Opposer,)	
v.)	Opposition No. 91263393
)	Serial No. 88305341
Big Truck Rental, LLC,)	Mark: BIG TRUCK RENTAL
)	ANY TIME, ANY WAY TRUCK
Applicant.)	SOLUTION.
)	

CONSENTED MOTION TO REOPEN ANSWER DATE AND SUSPEND

Opposer, Enterprise Holdings, Inc., respectfully requests that the Board reopen Applicant’s time to Answer and suspend proceedings for a period of sixty (60) days in order to allow the parties time to pursue settlement in this matter subject to the right of either party to request resumption at any time. Dean A. Kent of Trenam Law, counsel for Applicant, consented to this Motion to Reopen Answer Date and Suspend by telephone on November 23, 2020.

Since the parties are engaged in settlement discussions and since this request is made for good cause and not made simply for purposes of delay, it is respectfully requested that the Board reopen Applicant’s time to Answer, suspend proceedings, and reset trial dates as indicated below:

Time to Answer.....12/22/2020

Deadline for Discovery Conference.....1/21/2021

Discovery Opens.....1/21/2021

Initial Disclosures Due2/20/2021

Expert Disclosures Due.....6/20/2021

Discovery Closes7/20/2021

Plaintiff’s Pretrial Disclosures9/3/2021

Plaintiff's 30-Day Trial Period Ends10/18/2021
 Defendant's Pretrial Disclosures.....11/2/2021
 Defendant's 30-Day Trial Period Ends.....12/17/2021
 Plaintiff's Rebuttal Disclosures1/1/2022
 Plaintiff's 15-Day Rebuttal Period Ends.....1/31/2022
 Plaintiff's Brief Due.....4/1/2022
 Defendant's Brief Due5/1/2022
 Plaintiff's Reply Brief Due5/16/2022
 Request for Oral hearing (optional)5/26/2022

Opposer has secured the express consent of all other parties to this proceeding and all other parties to this proceeding have agreed to the Answer, disclosure, discovery and trial dates set forth above.

Respectfully submitted,

Date: December 3, 2020

By: /Lisabeth H. Coakley/
 Lisabeth H. Coakley
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Attorneys for Enterprise Holdings, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Consented Motion to Reopen Answer Date and Suspend has been served on Monica B. Mason of Trenam Law, counsel for Applicant, Big Truck Rental, LLC, by forwarding said copy on December 3 2020, via email addressed to: mmason@trenam.com, dhayes@trenam.com

/Elizabeth K. Brock/
Elizabeth K. Brock