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

Proceeding	91264581
Party	Plaintiff The Procter & Gamble Company
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Submission	Stipulated/Consent Motion to Extend
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Date	01/15/2021
Attachments	Opposition 91264581 vs GIENIUS -Gienetix by GENIUS PG- joint stipulation - discovery.pdf(133873 bytes )

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

In the Matter of Application Serial No.: 88/710,830

For the mark: GENIUS

Published: April 14, 2020

THE PROCTER & GAMBLE COMPANY,  
Opposer,

- v. -

GIENETIX LLC,

Applicant.

Opposition No. 91264581

**JOINT STIPULATION**

Opposer, The Procter & Gamble Company, and Applicant, Gienetix LLC conducted a telephonic discovery conference on December 16, 2020. The Parties have agreed to the following stipulations.

- (1) A limit of twenty-five document production requests per party.
- (2) A limit of twenty-five interrogatories per party.
- (3) Parties agree that the first phase of discovery submissions will be submitted no later than January 15, 2021.
- (4) Parties will respond to the first phase of submission no later than February 15, 2021.
- (5) To the extent that the parties have remaining requests or interrogatories reserved of their initial twenty-five, they may submit additional requests no later than March 1, 2021, with responses expected no later than March 15, 2021.
- (6) A limitation on scope of document production to similar trademarks, trademark clearance, marketing, and business plans pertaining to these products and product categories. For the sake of clarity, P&G does not intend to disclose irrelevant information about additional toothbrushes in its portfolio aside from the marketing and business information pertaining to our GENIUS brush.

- (7) A limit of five depositions per party, subject to amendment if the parties reasonably agree that five persons are insufficient to fully address relevant details.
- (8) All requests for depositions to be submitted in writing no later than April 1, 2021, with depositions to be completed no later than May 1, 2021.
- (9) Both parties agree to the new dates set forth herein.
- (10) Video conferences are acceptable media for depositions.
- (11) Documents that are alleged to be privileged but meet discovery and interrogatory requests shall be collected and sequestered. A detailed privilege log will be prepared and shared between the parties of sequestered documents and the basis for assertion of privilege.
- (12) Electronic document sharing is appropriate, using mutually agreed upon document sharing sites with appropriate security and confidentiality.

Dated: January 4, 2020

Respectfully submitted,

THE PROCTER & GAMBLE COMPANY

/jah/  
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