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

Proceeding no.	91265500
Party	Defendant Zenwork, Inc
Correspondence address	PATRICK C. STEPHENSON KUTAK ROCK LLP 1650 FARNAM STREET OMAHA, NE 68102 UNITED STATES Primary email: trademarks.stephenson@kutakrock.com 402-346-6000
Submission	Stipulated/Consent Motion to Extend
Filer's name	Patrick C. Stephenson
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Signature	/Patrick C. Stephenson/
Date	12/20/2021
Attachments	Zencanna - Motion to Extend.pdf(10063 bytes)

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

JEMIE B.V.,

Opposer

v.

ZENWORK, INC.,

Applicant

Opposition No. 91265500

MOTION TO EXTEND WITH CONSENT

The parties are actively engaged in negotiations for the settlement of this matter. Opposer's counsel e-mailed a redlined revision of a proposed settlement agreement to Applicant's counsel on December 6, 2022. The revised agreement raised issues related to the registration of Applicant's trademark that had not been fully addressed before. These revisions are under consideration by Applicant and it is expected that these remaining issues will be resolved within the next 30 days. The parties believe that they have nearly resolved issues relating to the subject U.S. trademark application and related matters.

On December 16, 2022, Applicant's counsel requested, and was provided via e-mail, an execution draft of a proposed settlement agreement and was informed that Opposer is unable to sign via DocuSign. Notwithstanding the limited issues remaining, in light of the approaching holidays, and the difficulties presented by the lock-down in Holland where Opposer is located, the parties will not be able to finalize settlement and obtain necessary signatures from both parties prior to the current December 23, 2021 answer date. As such, the parties request what they expect and hope to be a final 30-day extension of trial dates as follows:

Time to Answer

1/22/2022

Deadline for Discovery Conference	2/21/2022
Discovery Opens	2/21/2022
Initial Disclosures Due	3/23/2022
Expert Disclosures Due	7/21/2022
Discovery Closes	8/20/2022
Plaintiff's Pretrial Disclosures Due	10/4/2022
Plaintiff's 30-day Trial Period Ends	11/18/2022
Defendant's Pretrial Disclosures Due	12/3/2022
Defendant's 30-day Trial Period Ends	1/17/2023
Plaintiff's Rebuttal Disclosures Due	2/1/2023
Plaintiff's 15-day Rebuttal Period Ends	3/3/2023
Plaintiff's Opening Brief Due	5/2/2023
Defendant's Brief Due	6/1/2023
Plaintiff's Reply Brief Due	6/16/2023
Request for Oral Hearing (optional) Due	6/26/2023

Opposer's counsel, Jonathan Jennings has consented to the foregoing motion.

Dated this 20th day of December, 2021

Respectfully submitted,

By: /Patrick C. Stephenson/
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Counsel for Applicant

Certificate of Service

I hereby certify that a true and complete copy of the foregoing MOTION TO EXTEND WITH CONSENT has been served on Opposer, Jemie B.V., by emailing the same to Opposer's counsel at the following e-mail addresses: PB@pattishall.com, jsj@pattishall.com, docket@pattishall.com

/Patrick C. Stephenson/
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