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Filing date: **01/18/2022**

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
Filer's email	trademarks.stephenson@kutakrock.com
Signature	/Patrick C. Stephenson/
Date	01/18/2022
Attachments	Zencanna Motion to Extend.pdf(61731 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 and the undersigned counsel believe that the parties have agreed upon the terms of a settlement agreement. On December 16, 2021, Opposer's counsel sent an execution draft of a settlement agreement to Applicant's counsel which was signed by Applicant and returned to Opposer's counsel on December 24, 2021. Opposer's counsel anticipates that a countersigned settlement agreement could be provided by Opposer very soon and possibly this week, but in the event that such countersigned settlement agreement is not timely received because of the continued lock-down issues in Holland where Opposer is based or due to other unforeseen logistical problems, the parties will require one more extension of time to finalize their settlement.

As such, the parties request a 30-day extension of trial dates as follows:

Time to Answer	2/21/2022
Deadline for Discovery Conference	3/23/2022
Discovery Opens	3/23/2022
Initial Disclosures Due	4/22/2022
Expert Disclosures Due	8/20/2022

Discovery Closes	9/19/2022
Plaintiff's Pretrial Disclosures Due	11/3/2022
Plaintiff's 30-day Trial Period Ends	12/18/2022
Defendant's Pretrial Disclosures Due	1/2/2023
Defendant's 30-day Trial Period Ends	2/16/2023
Plaintiff's Rebuttal Disclosures Due	3/3/2023
Plaintiff's 15-day Rebuttal Period Ends	4/2/2023
Plaintiff's Opening Brief Due	6/1/2023
Defendant's Brief Due	7/1/2023
Plaintiff's Reply Brief Due	7/16/2023
Request for Oral Hearing (optional) Due	7/26/2023

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

Dated this 18<sup>th</sup> day of January, 2022.

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 this 18th day of January, 2022.

/Patrick C. Stephenson/  
Patrick C. Stephenson