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Filing date: **04/13/2022**

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

Proceeding no.	91265875
Party	Defendant BJ Energy Solutions, LLC
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Submission	Stipulated/Consent Motion to Extend
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Signature	/Randel S. Springer/
Date	04/13/2022
Attachments	BJ Energy - TTAB - TITAN - Consent Motion to Extend - 04-13-2022.pdf(173021 bytes)

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

SOLAR TURBINES INCORPORATED,)	
)	
Opposer,)	
)	
v.)	Opposition No. 91265875
)	
BJ ENERGY SOLUTIONS, LLC,)	
)	
Applicant.)	
)	
)	

CONSENT MOTION TO EXTEND

The Time to Answer is currently set to close on 04/14/2022. Applicant BJ Energy Solutions, LLC and Opposer Solar Turbines Incorporated jointly request that such date be extended for 60 days, or until 06/13/2022, and that all subsequent dates be reset accordingly.

The proposed schedule is set forth below:

Time to Answer	06/13/2022
Deadline for Discovery Conference	07/13/2022
Discovery Opens	07/13/2022
Initial Disclosures Due	08/12/2022
Expert Disclosures Due	12/10/2022
Discovery Closes	01/09/2023
Plaintiff's Pretrial Disclosures Due	02/23/2023
Plaintiff's 30-day Trial Period Ends	04/09/2023
Defendant's Pretrial Disclosures Due	04/24/2023
Defendant's 30-day Trial Period Ends	06/08/2023

Plaintiff's Rebuttal Disclosures Due	06/23/2023
Plaintiff's 15-day Rebuttal Period Ends	07/23/2023
Plaintiff's Opening Brief Due	09/21/2023
Defendant's Brief Due	10/21/2023
Plaintiff's Reply Brief Due	11/05/2023
Request for Oral Hearing (optional) Due	11/15/2023

The grounds for this request are as follows:

1. The parties are engaged in settlement discussions and need additional time to complete their discussions.
2. The parties have reached agreement on key points for resolving this opposition.
3. Applicant provided Opposer with a draft agreement to resolve this opposition on March 31, 2022.
4. Opposer is reviewing the agreement.
5. The parties require additional time to conclude the agreement.

Date: April 13, 2022

Respectfully submitted,

/Randy Springer/
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Respectfully submitted,

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Attorney for Opposer Solar Turbines Incorporated

CERTIFICATE OF SERVICE

I do hereby certify that on April 13, 2022, a true copy of the foregoing CONSENT MOTION TO EXTEND is being served by email upon the following attorney of record for Opposer:

Jonathan M. Gelchinsky
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/Laurie A. Ricci/

Laurie A. Ricci, Senior Trademark Paralegal