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Filing date: **06/10/2022**

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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Date	06/10/2022
Attachments	91265875 - Consent Motion To Extend 10JUN22.pdf(144340 bytes)

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

SOLAR TURBINES INCORPORATED,)
)
 Opposer,)
)
v.)
)
BJ ENERGY SOLUTIONS, LLC,)
)
 Applicant.)
)
)
)

Opposition No. 91265875

CONSENT MOTION TO EXTEND

The Time to Answer is currently set to close on 06/13/2022. Applicant BJ Energy Solutions, LLC and Opposer Solar Turbines Incorporated jointly request that such date be extended for 60 days, or until 08/12/2022, and that all subsequent dates be reset accordingly.

The proposed schedule is set forth below:

Time to Answer	08/12/2022
Deadline for Discovery Conference	09/11/2022
Discovery Opens	09/11/2022
Initial Disclosures Due	10/11/2022
Expert Disclosures Due	02/08/2023
Discovery Closes	03/10/2023
Plaintiff's Pretrial Disclosures Due	04/24/2023
Plaintiff's 30-day Trial Period Ends	06/08/2023
Defendant's Pretrial Disclosures Due	06/23/2023
Defendant's 30-day Trial Period Ends	08/07/2023

Plaintiff's Rebuttal Disclosures Due	08/22/2023
Plaintiff's 15-day Rebuttal Period Ends	09/21/2023
Plaintiff's Opening Brief Due	11/20/2023
Defendant's Brief Due	12/20/2023
Plaintiff's Reply Brief Due	01/04/2024
Request for Oral Hearing (optional) Due	01/14/2024

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. Counsel for Applicant contacted counsel for Opposer on June 7, 2022 to inquire about the status of the agreement. Counsel for Opposer indicated that additional time is needed to complete Opposer's review of the agreement.
5. The parties continue to work together to resolve this opposition and require additional time to conclude the agreement.

Date: June 10, 2022

Respectfully submitted,

/Randy Springer/
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Attorneys for Applicant BJ Energy Solutions, LLC

Respectfully submitted,

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Attorney for Opposer Solar Turbines Incorporated

CERTIFICATE OF SERVICE

I do hereby certify that on June 8, 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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/Danny Vara/ _____
Danny Vara, Trademark Paralegal