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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	Motion to Suspend for Settlement Discussions
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Date	10/07/2022
Attachments	91265875 - Consent Motion To Extend 07OCT22.pdf(144254 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 10/11/2022. Applicant BJ Energy Solutions, LLC and Opposer Solar Turbines Incorporated jointly request that such date be extended for 60 days, or until 12/10/2022, and that all subsequent dates be reset accordingly.

The proposed schedule is set forth below:

Time to Answer	12/10/2022
Deadline for Discovery Conference	01/09/2023
Discovery Opens	01/09/2023
Initial Disclosures Due	02/08/2023
Expert Disclosures Due	06/08/2023
Discovery Closes	07/08/2023
Plaintiff's Pretrial Disclosures Due	08/22/2023
Plaintiff's 30-day Trial Period Ends	10/06/2023
Defendant's Pretrial Disclosures Due	10/21/2023
Defendant's 30-day Trial Period Ends	12/05/2023

Plaintiff's Rebuttal Disclosures Due	12/20/2023
Plaintiff's 15-day Rebuttal Period Ends	01/19/2024
Plaintiff's Opening Brief Due	03/19/2024
Defendant's Brief Due	04/18/2024
Plaintiff's Reply Brief Due	05/03/2024
Request for Oral Hearing (optional) Due	05/13/2024

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 July 13, 2022 and August 1, 2022 to inquire about the status of the agreement. Counsel for Opposer indicated both times that additional time is needed to complete Opposer's review of the agreement.
5. Applicant provided Opposer a revised draft agreement to resolve this opposition on September 20, 2022.
6. Applicant informed Opposer on October 4, 2022 that additional time is needed to complete Applicant's review of the agreement.

7. The parties continue to work together to resolve this opposition and require additional time to conclude the agreement. Opposer's counsel expressly consented to the motion by email on October 4, 2022.

Date: October 7, 2022

Respectfully submitted,

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

Respectfully submitted,

/Jonathan Gelchinsky/  
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*Attorney for Opposer Solar Turbines Incorporated*

**CERTIFICATE OF SERVICE**

I do hereby certify that on October 7, 2022, a true copy of the foregoing CONSENT MOTION TO EXTEND is being served by email upon the following attorney of record for Opposer:

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*/Danny Vara/* \_\_\_\_\_  
Danny Vara, Trademark Paralegal