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Filing date: **12/07/2022**

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	Motion to Suspend for Settlement Discussions
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Date	12/07/2022
Attachments	91265875 - Consent Motion To Extend 07DEC22.pdf(123047 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 12/10/2022. Applicant BJ Energy Solutions, LLC and Opposer Solar Turbines Incorporated jointly request that such date be extended for 30 days, or until 01/09/2023, and that all subsequent dates be reset accordingly.

The proposed schedule is set forth below:

Time to Answer	01/09/2023
Deadline for Discovery Conference	02/08/2023
Discovery Opens	02/08/2023
Initial Disclosures Due	03/10/2023
Expert Disclosures Due	07/08/2023
Discovery Closes	08/07/2023
Plaintiff's Pretrial Disclosures Due	09/21/2023
Plaintiff's 30-day Trial Period Ends	11/05/2023
Defendant's Pretrial Disclosures Due	11/20/2023
Defendant's 30-day Trial Period Ends	01/04/2024

Plaintiff's Rebuttal Disclosures Due	01/19/2024
Plaintiff's 15-day Rebuttal Period Ends	02/18/2024
Plaintiff's Opening Brief Due	04/18/2024
Defendant's Brief Due	05/18/2024
Plaintiff's Reply Brief Due	06/02/2024
Request for Oral Hearing (optional) Due	06/12/2024

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. Opposer provided Applicant a revised draft agreement to resolve this opposition on September 20, 2022.

6. Applicant and Opposer exchanged emails regarding this opposition on September 28, 2022, October 4, 2022, November 9, 2022, and November 10, 2022.

7. Opposer and Applicant discussed the revised agreement by telephone on November 18, 2022.

8. Applicant provided additional comments on the draft by email to Opposer on December 2, 2022.

9. Applicant provided Opposer with a revised agreement on December 7, 2022 with minor revisions to the draft provided previously by Opposer.

10. The parties continue to work together to resolve this opposition and require additional time to conclude the agreement. The parties do not anticipate further extensions will be necessary.

11. Opposer's counsel expressly consented to the motion by email on December 2, 2022.

December 7, 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 December 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:

Jonathan M. Gelchinsky
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Email: Trademark@pierceatwood.com

/Danny Vara/ _____
Danny Vara, Trademark Paralegal