

ESTTA Tracking number: **ESTTA1161537**

Filing date: **09/23/2021**

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

Proceeding No.	91268133
Filing Party	Defendant Apassionata World GmbH
Other Party	Plaintiff Cavalía Inc.
Pending Motion	Yes, there is a motion currently pending or another motion is being filed concurrent with this consent motion.

### Consent Motion to Extend

The Expert Disclosures Due is currently set to close on 10/18/2021. Apassionata World GmbH requests that such date be extended for 90 days, or until 01/16/2022, and that all subsequent dates be reset accordingly.

Time to Answer	04/21/2021 (CLOSED)
Deadline for Discovery Conference	05/21/2021 (CLOSED)
Discovery Opens	05/21/2021 (CLOSED)
Initial Disclosures Due	06/20/2021 (CLOSED)
Expert Disclosures Due	01/16/2022
Discovery Closes	02/15/2022
Plaintiff's Pretrial Disclosures Due	04/01/2022
Plaintiff's 30-day Trial Period Ends	05/16/2022
Defendant's Pretrial Disclosures Due	05/31/2022
Defendant's 30-day Trial Period Ends	07/15/2022
Plaintiff's Rebuttal Disclosures Due	07/30/2022
Plaintiff's 15-day Rebuttal Period Ends	08/29/2022
Plaintiff's Opening Brief Due	10/28/2022
Defendant's Brief Due	11/27/2022
Plaintiff's Reply Brief Due	12/12/2022
Request for Oral Hearing (optional) Due	12/22/2022

The grounds for this request are as follows:

- *Parties are unable to complete discovery/testimony during assigned period*

Apassionata World GmbH has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

### Certificate of Service

The undersigned hereby certifies that a copy of this submission has been served upon all parties, at their address of record by Email on this date.

Respectfully submitted,

/johnlwelch/

John L Welch

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09/23/2021