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

Proceeding no.	91273266
Party	Defendant National Cable Communications LLC
Correspondence address	SHANE M RUMBAUGH RUMBAUGH LAW PLLC 2400 ANSYS DRIVE, SUITE 102 CANONSBURG, PA 15317 UNITED STATES Primary email: trademarks@rumbgh.com Secondary email(s): shane@rumbgh.com, nick@rumbgh.com 724-912-6781
Submission	Stipulated/Consent Motion to Extend
Filer's name	Shane Rumbaugh
Filer's email	trademarks@rumbgh.com, shane@rumbgh.com
Signature	/Shane Rumbaugh/
Date	03/06/2023
Attachments	NCC - Request for Extension with TP March 2023.pdf(148207 bytes )

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

THE & PARTNERS GROUP LIMITED,	)	
	)	Opposition No. 91273266
Opposer,	)	
	)	
v.	)	
	)	
NATIONAL CABLE	)	
COMMUNICATIONS LLC,	)	
	)	
Applicant.	)	

**CONSENTED MOTION TO EXTEND TIME TO  
ANSWER AND ALL REMAINING DEADLINES**

Applicant with the consent of Opposer, pursuant to TBMP § 509, hereby requests that the deadline for Applicant to answer Opposer’s Notice of Opposition be extended an additional 30 days, until April 8, 2023, and that all of the remaining deadlines be further extended by 30 days and reset as set forth below.

Counsel for Opposer agreed to this extension in an email with the undersigned counsel on March 3, 2023.

Further to the Board’s Order dated February 7, 2023 (31 TTABVUE 2), Applicant submits that there is good cause for an additional extension of time because the parties are still actively engaged in settlement discussions. Specifically, Applicant and Opposer exchanged further drafts of proposed settlement terms on February 16, 2023 and exchanged draft long form agreements on March 6, 2023. The parties are continuing to review and discuss these terms, the direct negotiations of which continue to be held by the principals themselves.

In compliance with the Board’s Order, Applicant states that no discovery has been taken to date.

The reset deadlines are as follows:

	Current Schedule	Proposed Schedule
Time to Answer	03/09/2023	04/08/2023
Deadline for Discovery Conference	04/08/2023	05/08/2023
Discovery Opens	04/08/2023	05/08/2023
Initial Disclosures Due	05/08/2023	06/07/2023
Expert Disclosures Due	09/05/2023	10/05/2023
Discovery Closes	10/05/2023	11/04/2023
Plaintiff's Pretrial Disclosures Due	11/19/2023	12/19/2023
Plaintiff's 30-day Trial Period Ends	01/03/2024	02/02/2024
Defendant's Pretrial Disclosures Due	01/18/2024	02/17/2024
Defendant's 30-day Trial Period Ends	03/03/2024	04/02/2024
Plaintiff's Rebuttal Disclosures Due	03/18/2024	04/17/2024
Plaintiff's 15-day Rebuttal Period Ends	04/17/2024	05/17/2024
Plaintiff's Opening Brief Due	06/16/2024	07/16/2024
Defendant's Brief Due	07/16/2024	08/15/2024
Plaintiff's Reply Brief Due	07/31/2024	08/30/2024
Request for Oral Hearing (optional) Due	08/10/2024	09/09/2024

Wherefore, it is requested that this motion be granted.

Respectfully submitted,

Date: March 6, 2023

RUMBAUGH LAW PLLC

/Shane Rumbaugh/

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*Counsel for National Cable Communications LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and complete copy of the foregoing was served on the date  
below by forwarding said copy via email to:

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Date: March 6, 2023

/Shane Rumbaugh/\_\_\_\_\_

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*Counsel for National Cable Communications LLC*