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

Proceeding no.	91273297
Party	Plaintiff Lenovo PC International
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Submission	Stipulated/Consent Motion to Extend
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Signature	/Kristin J. Achterhof/
Date	03/14/2025
Attachments	Opposers Consented Motion to Extend Time to File Trial Briefs - 3_13_25 - THINQ - Opposition No. 91273297.pdf(130721 bytes )

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

Lenovo PC International,

Opposer,

v.

LG Electronics Inc.,

Applicant.

Opposition No.: 91/273,297

Application No. 87/796,227

**OPPOSER’S CONSENTED MOTION TO EXTEND TIME  
TO FILE TRIAL BRIEFS**

Opposer, Lenovo PC International, by and through its undersigned counsel, hereby moves that the time for filing Plaintiff’s Trial Brief (and all subsequent trial dates in the above-captioned matter) be extended 60 days from March 15, 2025, to and including May 14, 2025.

In support of its motion, Opposer states as follows:

1. The Opposition was filed on December 6, 2021.
2. Opposer respectfully submits that good cause exists for granting the extension of time requested by this Motion. Specifically, counsel for both parties are pursuing settlement discussions.
3. Furthermore, neither party will be prejudiced by the requested extension of time, and the extension is not necessitated by any lack of diligence or any intent on the part of either party to unreasonably delay the proceedings.
4. For purposes of reporting on the status of negotiations, the parties have had multiple discussions concerning settlement in an effort to reach a comprehensive resolution that will resolve all pending opposition proceedings and other matters. The parties, through their U.S. counsel, have exchanged various versions of a proposed settlement document and consent agreement. Opposer is reviewing the latest version of

the settlement papers received from Applicant. Although the parties have agreed to the terms of a Consent to Registration in connection with another pending proceeding, the parties continue to disagree as to whether LG—as part of any settlement—must amend its opposed applications to remove certain goods that Lenovo has identified as overlapping with Lenovo’s goods, including computers and computer-related goods in Class 9. Counsel for Opposer is hopeful that the parties ultimately will agree on the proposed amendments or some form thereof. Counsel is in the process of scheduling another call for further discussion. Following the call, counsel undoubtedly will need to follow-up with their respective clients to get confirmation on whether the amendments being discussed are acceptable. Counsel will work diligently to obtain this information and ascertain whether this last issue can be resolved such that this opposition proceeding, along with other proceedings involving LG’s applications for registration of marks comprised of “THINQ,” can be dismissed.

5. Counsel for Applicant has consented to a 60-day extension of time for Opposer to file its Trial Brief.

WHEREFORE, Opposer respectfully requests that it be granted an extension of time until May 14, 2025, to file its Trial Brief and that all subsequent dates in the above-referenced matter be extended accordingly.

Dated: March 14, 2025

Respectfully submitted,

/s/ Kristin J. Achterhof  
One of the attorneys for Opposer  
Kristin J. Achterhof

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**CERTIFICATE OF SERVICE**

I, Ian Farias, a paralegal, hereby certify that on today's date I caused a copy of the foregoing OPPOSER'S CONSENTED MOTION TO EXTEND TIME TO FILE TRIAL BRIEFS to be served upon counsel for Applicant via email, at the following:

Michael T. Smith  
Birch Stewart Kolasch & Birch LLP  
mailroom@bskb.com, msmith@bskb.com

Dated: March 14, 2025

/s/ Ian Farias