

ESTTA Tracking number: **ESTTA1224451**

Filing date: **07/26/2022**

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

Proceeding No.	91276157
Filing Party	Plaintiff ZHS IP Americas SÃ rl
Other Party	Defendant Gamba Vineyards & Winery, LLC
Pending Motion	There is no motion currently pending and no other motion is being filed concurrent with this consent motion.

### Consent Motion to Extend

The Initial Disclosures Due is currently set to close on 08/20/2022. ZHS IP Americas SÃ rl requests that such date be extended for 30 days, or until 09/19/2022, and that all subsequent dates be reset accordingly.

Time to Answer	06/21/2022 (CLOSED)
Deadline for Discovery Conference	07/21/2022 (CLOSED)
Discovery Opens	07/21/2022 (CLOSED)
Initial Disclosures Due	09/19/2022
Expert Disclosures Due	01/17/2023
Discovery Closes	02/16/2023
Plaintiff's Pretrial Disclosures Due	04/02/2023
Plaintiff's 30-day Trial Period Ends	05/17/2023
Defendant's Pretrial Disclosures Due	06/01/2023
Defendant's 30-day Trial Period Ends	07/16/2023
Plaintiff's Rebuttal Disclosures Due	07/31/2023
Plaintiff's 15-day Rebuttal Period Ends	08/30/2023
Plaintiff's Opening Brief Due	10/29/2023
Defendant's Brief Due	11/28/2023
Plaintiff's Reply Brief Due	12/13/2023
Request for Oral Hearing (optional) Due	12/23/2023

The grounds for this request are as follows:

- *Opposer seeks the Board's extension of the deadline for the discovery conference by 5 days. The new deadline will be July 26, 2022. The discovery conference was had on July 26, 2022, and it was delayed due to illness of opposer's attorney. This motion is filed with the consent of Applicant's attorney.*

ZHS IP Americas SÃ rl 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,  
/Patrick K Steele/  
Patrick K. Steele

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07/26/2022