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Filing date: **07/31/2023**

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

Proceeding no.	91281389
Party	Defendant Shanghai Zhenglang Technology Co., Ltd.
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Submission	Stipulated/Consent Motion to Extend
Filer's name	Rose Kautz
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Signature	/Rose Kautz/
Date	07/31/2023
Attachments	2023.07.31 Consented Motion to Extend Deadlines_91281389.pdf(131264 bytes )

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

HANGZHOU MENGKU TECHNOLOGY,  
CO., LTD.,

Opposer,

v.

SHANGHAI ZHENGLANG  
TECHNOLOGY CO., LTD.,

Applicant.

**Opposition No. 91281389 (Parent)**

Mark: App. Ser. No. 90866064



*Consolidated with:*

*Opp. No. 91281390 (Child)*

*App. Ser. No. 90868193*



**CONSENTED MOTION FOR EXTENSION OF DEADLINES**

Defendant Shanghai Zhenglang Technology Co., Ltd. respectfully moves the Board for an order extending the deadlines in this opposition proceeding by thirty (30) days. Good cause exists for the requested extension, as Defendant's lead counsel has unexpectedly taken leave and a new lead attorney for Defendant has been appointed from the same firm. Defendant's undersigned new counsel is filing a Notice of Appearance and Substitution with the Board concurrently with this Consent Motion. In addition, both sides in this opposition have served discovery requests and desire additional time to complete and serve their responses.

On July 27, 2023, Defendant obtained the express consent of Plaintiff, through Plaintiff's counsel, to extend all deadlines by thirty (30) days, including the deadline for the close of the discovery period, and all subsequent deadlines. Accordingly, the parties request that the deadlines be reset as follows:

	<b>Current Date</b>	<b>Proposed Date</b>
Discovery period closes:	August 2, 2023	September 01, 2023
Plaintiff's pretrial disclosures due:	September 16, 2023	October 16, 2023
Plaintiff's testimony period opens:	October 1, 2023	October 31, 2023
Plaintiff's testimony period ends:	October 31, 2023	November 30, 2023
Defendant's pretrial disclosures due:	November 15, 2023	December 15, 2023
Defendant's testimony period opens:	November 30, 2023	December 30, 2023
Defendant's testimony period ends:	December 30, 2023	January 29, 2024
Plaintiff's rebuttal disclosures due:	January 14, 2024	February 13, 2024
Plaintiff's rebuttal testimony period opens:	January 29, 2024	February 28, 2024
Plaintiff's rebuttal testimony period ends:	February 13, 2024	March 14, 2024
Plaintiff's brief due:	April 13, 2024	May 13, 2024
Defendant's brief due:	May 13, 2024	June 12, 2024
Plaintiff's reply brief due:	May 28, 2023	June 27, 2024
Request for oral hearing due:	June 07, 2024	July 07, 2024

In addition, the parties hereby memorialize their stipulation to an extension of the deadline to respond to all pending discovery requests by thirty (30) days.

The parties therefore respectfully request that this Consent Motion be approved and that the deadlines be reset as indicated above.

Dated: July 31, 2023

Respectfully submitted,

/Rose Kautz/  
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CO., LTD.,

Opposer,

v.

SHANGHAI ZHENGLANG  
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**Opposition No. 91281389 (Parent)**

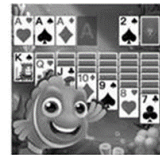
Mark: App. Ser. No. 90866064



*Consolidated with:*

*Opp. No. 91281390 (Child)*

*App. Ser. No. 90868193*



**CERTIFICATE OF TRANSMITTAL AND SERVICE**

I certify that on July 31, 2023, a true and correct copy of the foregoing **CONSENTED MOTION FOR EXTENSION OF DEADLINES** is being filed electronically with the TTAB and served to counsel for Opposers by electronic mail at:

*jigang.jin@jfuslaw.com; qianan.li@bigcool.com*

Dated: July 31, 2023

/Kris Teilhaber/  
Kris Teilhaber

Kilpatrick Townsend & Stockton LLP