

ESTTA Tracking number: **ESTTA1253377**

Filing date: **12/12/2022**

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

Proceeding no.	91281581
Party	Defendant Giddings Hawkins Maintenance Service LLC; Tileston, Reid L
Correspondence address	JOSHUA M. GERBEN, ESQ. GERBEN PERROTT, PLLC 1050 CONNECTICUT AVE NW, SUITE 500 WASHINGTON, DC 20036 UNITED STATES Primary email: jgerben@gerbenlawfirm.com Secondary email(s): filings@gerbenlawfirm.com No phone number provided
Submission	Motion to Extend
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Signature	/Chad C. Jalandoni, Esq./
Date	12/12/2022
Attachments	TTAB - Motion to Extend Without Consent 30-Days - GRIT IT DONE 907709 77 - Oppn No. 91281581 09804-0002 - 12.12.2022.pdf(79066 bytes )

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

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GIT-R-DONE PRODUCTIONS INC.,

Opposer,

v.

Grit It Done LLC,

Applicant,

Opposition No.: 91281581

Mark: GRIT IT DONE

Serial No: 90770977

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**APPLICANT’S REQUEST TO EXTEND TIME TO ANSWER AND TRIAL DATES**

Grit It Done LLC (“Applicant”) respectfully requests that the Board extend the time to answer and discovery and trial dates by thirty (30) days as set forth below:

	Current Schedule	Proposed Schedule
Time to Answer	12/12/2022	01/11/2023
Deadline for Discovery Conference	01/11/2023	02/10/2023
Discovery Opens	01/11/2023	02/10/2023
Initial Disclosures Due	02/10/2023	03/12/2023
Expert Disclosures Due	06/10/2023	07/10/2023
Discovery Closes	07/10/2023	08/09/2023
Plaintiff’s Pretrial Disclosures Due	08/24/2023	09/23/2023
Plaintiff’s 30-day Trial Period Ends	10/08/2023	11/07/2023
Defendant’s Pretrial Disclosures Due	10/23/2023	11/22/2023
Defendant’s 30-day Trial Period Ends	12/07/2023	01/06/2024
Plaintiff’s Rebuttal Disclosures Due	12/22/2023	01/21/2024
Plaintiff’s 15-day Rebuttal Period Ends	01/21/2024	02/20/2024
Plaintiff’s Opening Brief Due	03/21/2024	04/20/2024
Defendant’s Brief Due	04/20/2024	05/20/2024

Plaintiff's Reply Brief Due	05/05/2024	06/04/2024
Request for Oral Hearing (optional) Due	05/15/2024	06/14/2024

Applicant needs additional time to discuss with counsel and review the claims made in the Opposer's November 2, 2022, Notice of Opposition. Applicant's counsel was in phone discussions on Thursday, December 8, 2022, with opposing counsel regarding discussing the claims and Applicant requested a consent motion to extend the time to answer, but opposing counsel denied that request from Applicant.

Applicant believes that the particularity of these facts are said to constitute good cause for the requested extension. This request is not due to the party's own lack of diligence or unreasonable delay in taking the required action during the time previously allotted therefor. Thus, the Applicant's submits then that good cause has been shown. *See* Fed. R. Civ. P. 6(b), TBMP Section 509.01(a).

Applicant does not believe that this extension would prejudice the Opposer, as the parties are in the initial stages of this proceeding. Applicant asks that this extension be granted according to the proposed trial schedule above.

Respectfully submitted,

Date: December 12, 2022



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**CERTIFICATE OF SERVICE**

I hereby certify that on December 12, 2022, a true and correct copy of the foregoing APPLICANT'S REQUEST TO EXTEND DATES is being served by electronic mail on Opposer as shown in the correspondence record in the Office, as follows:

HERMAN HUDSON, ESQ.  
[hh@hudsonlegalstudio.com](mailto:hh@hudsonlegalstudio.com)

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'J. Gerben', with a long horizontal flourish extending to the right.

Dated: December 12, 2022

Josh Gerben, Esq.  
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