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Filing date: **12/12/2023**

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

Proceeding no.	91281621
Party	Defendant Helena Holding Company
Correspondence address	JENNIFER FRASER DYKEMA GOSSETT PLLC 1301 K STREET, N.W., SUITE 1100 WEST WASHINGTON, DC 20005 UNITED STATES Primary email: dykema-tm@dykema.com Secondary email(s): jfraser@dykema.com, mkulprasertrat@dykema.com 202-906-8712
Submission	Motion to Suspend for Settlement Discussions
Filer's name	Jennifer Fraser
Filer's email	dykema-tm@dykema.com, jfraser@dykema.com, jpisigan@dykema.com
Signature	/Jennifer Fraser/
Date	12/12/2023
Attachments	consent motion 121223.pdf(494923 bytes)

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

In the Matter of Trademark Application Serial No. 97/141,301
Published on October 11, 2022

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Syngenta Crop Protection AG	:	
	:	
Opposer,	:	
	:	Opposition No.: 91281621
v.	:	
	:	
Helena Holding Company	:	
	:	
Applicant.	:	
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CONSENT MOTION FOR EXTENSION OF ALL DEADLINES

Applicant, Helena Holding Company (“Helena”), now hereby requests a further 30-day extension of all deadlines. Opposer, Syngenta Crop Protection AG (“Syngenta”), has expressly consented to this further 30-day extension. The current deadline for submitting an Answer is December 12, 2023. The parties request that such date be extended for 30 days, or until January 11, 2024, and that all subsequent dates be reset accordingly:

Time to Answer	01/11/2024
Deadline for Discovery Conference	02/10/2024
Discovery Opens	02/10/2024
Initial Disclosures Due	03/11/2024
Expert Disclosures Due	07/09/2024
Discovery Closes	08/08/2024
Plaintiff's Pretrial Disclosures Due	09/22/2024
Plaintiff's 30-day Trial Period Ends	11/06/2024
Defendant's Pretrial Disclosures Due	11/21/2024
Defendant's 30-day Trial Period Ends	01/05/2025
Plaintiff's Rebuttal Disclosures Due	01/20/2025
Plaintiff's 15-day Rebuttal Period Ends	02/19/2025
Plaintiff's Opening Brief Due	04/20/2025
Defendant's Brief Due	05/20/2025
Plaintiff's Reply Brief Due	06/04/2025
Request for Oral Hearing (optional) Due	06/14/2025

The parties agree to the proposed dates listed above. The Board's Order dated November 14, 2023 requested that future motions to extend time include a detailed progress report on the progress the parties have made towards settlement. In December 2022, there were some initial discussions between business people about a resolution of this matter that has continued until at least early 2023, and counsel for Helena then provided information about the proposed goods by email to Syngenta's counsel in February. Since then, in June 2023, Syngenta provided a draft Agreement by email to Helena for resolution of this matter and, as recently as on or about November 8, 2023 Helena provided revisions to this Agreement. Opposer now needs further time to review this revised draft of the proposed Agreement to resolve this matter, particularly with the upcoming holidays. The parties require additional time to negotiate and finalize the terms of the Agreement. Thus, the parties require additional time to work towards settlement. Applicant submits that these ongoing settlement efforts constitute good cause for this further 30-day extension of all deadlines.

Respectfully submitted this 12th day of December 2023.

Helena Holding Company

By: /jennifer fraser/
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CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2023, I electronically filed the foregoing document entitled CONSENT MOTION FOR EXTENSION OF ALL DEADLINES using the Electronic System for Trademark Trials and Appeals system and that a copy has been served on Jovan Jovanovic, counsel for Opposer, by emailing said copy on December 12, 2023 to docketing@watson-ip.com and jjovanovic@watson-ip.com.

/jennifer fraser/