

ESTTA Tracking number: **ESTTA1387725**

Filing date: **10/04/2024**

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

Proceeding no.	91281621
Party	Defendant Helena Holding Company
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Submission	Stipulated/Consent Motion to Extend
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Signature	/Jennifer Fraser/
Date	10/04/2024
Attachments	30 Day Consent Motion to Extend - Opp. No. 91281621.pdf(96483 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.	:	
-----X		

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 October 7, 2024. The parties request that such date be extended for 30 days, or until November 6, 2024, and that all subsequent dates be reset accordingly:

	Current Schedule	Proposed Schedule
Time to Answer	10/07/2024	11/06/2024
Deadline for Discovery Conference	11/06/2024	12/06/2024
Discovery Opens	11/06/2024	12/06/2024
Initial Disclosures Due	12/06/2024	01/05/2025
Expert Disclosures Due	04/05/2025	05/05/2025
Discovery Closes	05/05/2025	06/04/2025
Plaintiff's Pretrial Disclosures Due	06/19/2025	07/19/2025
Plaintiff's 30-day Trial Period Ends	08/03/2025	09/02/2025
Defendant's Pretrial Disclosures Due	08/18/2025	09/17/2025
Defendant's 30-day Trial Period Ends	10/02/2025	11/01/2025
Plaintiff's Rebuttal Disclosures Due	10/17/2025	11/16/2025
Plaintiff's 15-day Rebuttal Period Ends	11/16/2025	12/16/2025
Plaintiff's Opening Brief Due	01/15/2026	02/14/2026
Defendant's Brief Due	02/14/2026	03/16/2026
Plaintiff's Reply Brief Due	03/01/2026	03/31/2026
Request for Oral Hearing (optional) Due	03/11/2026	04/10/2026

The parties agree to the proposed dates listed above. The Board's Order dated September 11, 2024 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 2023. 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. On March 11, 2024, Syngenta also obtained new counsel in this matter. On April 26, 2024 Syngenta provided further comments and revisions on the draft Agreement. On September 4, 2024 Helena provided some revisions to

the draft and on September 5, 2024, Syngenta provided another revision. Thereafter, Helena proposed another revision and Syngenta accepted that change. The parties are close to resolving the matter but require additional time to finalize the terms of the Agreement and arrange for execution of the Agreement. Thus, the parties require additional time to finalize the settlement. Applicant submits that these ongoing settlement efforts constitute good cause for this further 30-day extension of all deadlines.

Respectfully submitted this 4th day of October 2024.

Helena Holding Company

By: /jennifer fraser/
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CERTIFICATE OF SERVICE

I hereby certify that on October 4, 2024, 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 Paul Cosmovici, Esq., counsel for Opposer, by emailing said copy on the same date to usmark@cosmovici-ip.com.

/Jeremy Pisigan/
Jeremy Pisigan