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

Proceeding no.	91281631
Party	Plaintiff Aston Martin Lagonda Limited LLC
Correspondence address	JESSICA A EKHOFF PATTISHALL MCAULIFFE NEWBURY HILLIARD & GERALDSON LLP 200 S WACKER DR STE 2900 CHICAGO, IL 60606 UNITED STATES Primary email: jae@pattishall.com Secondary email(s): pb@pattishall.com, pam@pattishall.com, bam@pattishall.com 312-554-8000
Submission	Stipulated/Consent Motion to Extend
Filer's name	Jessica A. Ekhoﬀ
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Signature	/Jessica A. Ekhoﬀ/
Date	03/05/2025
Attachments	Joint Motion to Extend - 631.pdf(38425 bytes)

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

In the Matter of Application Serial No. 90638409: AMR COLLECTION

ASTON MARTIN LAGONDA LIMITED)	
)	
Opposer,)	
)	
v.)	Opposition No. 91281631
)	
THE CORYN GROUP II, LLC)	
)	
Applicant)	
)	

JOINT MOTION TO EXTEND

Opposer, Aston Martin Lagonda Limited (“AML”), and Applicant, The Coryn Group II, LLC (collectively, the “Parties”), hereby jointly request an extension of all current deadlines by sixty (60) days, such that the new deadlines would be as set forth below:

Time to Answer	12/17/2022 (CLOSED)	
Deadline for Discovery Conference	12/06/2024 (CLOSED)	
Discovery Opens	12/06/2024 (CLOSED)	
Initial Disclosures Due	03/06/2025	May 5, 2025
Expert Disclosures Due	07/04/2025	September 2, 2025
Discovery Closes	08/03/2025	October 2, 2025
Plaintiff’s Pretrial Disclosures Due	09/17/2025	November 16, 2025
Plaintiff’s 30-day Trial Period Ends	11/01/2025	December 31, 2025
Defendant’s Pretrial Disclosure Due	11/16/2025	January 15, 2026
Defendant’s 30-day Trial Period Ends	12/31/2025	March 1, 2026
Plaintiff’s Rebuttal Disclosures Due	01/15/2026	March 16, 2026
Plaintiff’s 15-day Rebuttal Period Ends	02/14/2026	April 15, 2026

Plaintiff's Opening Brief Due	04/15/2026	June 14, 2026
Defendant's Brief Due	05/15/2026	July 14, 2026
Plaintiff's Reply Brief Due	05/30/2026	July 29, 2026
Request for Oral Hearing (optional) Due	06/09/2026	August 8, 2026

On December 30, 2024, the Board issued an order requiring that any future motion to extend the deadlines in this opposition be supported by a detailed report establishing good cause. 32 TTABVUE. As set forth below, there is good cause to grant the instant joint motion, which is not being filed to cause delay or for any other improper purpose.

The Coryn Group made its latest settlement offer on December 9, 2024. Declaration of Jessica Ekhoﬀ ("Ekhoﬀ Dec."), ¶ 2. The last motion for extension was filed on December 23, 2024. 31 TTABVUE. Since that date, AML has been internally considering The Coryn Group's offer, which was delayed because of the holidays, and is complicated by the international scope of the issues presented and multiple law firm involvement in this matter. *Id.*, ¶ 3.

The Parties have been engaged in good-faith negotiations to resolve this matter since November 18, 2021. *Id.*, ¶ 4. The Parties have successfully resolved many issues during the course of negotiations, with only two issues remaining: 1.) the circumstances under which the Parties will provide each other with letters of consent if one of their prior filings blocks the other's application, and 2.) whether The Coryn Group's withdrawal of its opposed application will be with or without prejudice. *Id.*, ¶ 5.

AML is currently considering its position with respect to these two issues and will make a good-faith effort to fully resolve this matter by the extended deadline the Parties request herein for the exchange of initial disclosures.

Accordingly, the Parties respectfully ask the Board to grant the instant motion so they can focus their efforts on continuing negotiation and resolution of this matter.

Dated: March 5, 2025

Respectfully submitted,

PATTISHALL, MCAULIFFE,
NEWBURY, HILLIARD & GERALDSON
LLP

By: /Jessica A. Ekhoﬀ/

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Attorneys for The Coryn Group II, LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing JOINT MOTION TO EXTEND was served upon the counsel for The Coryn Group II, LLC identified below by email on March 5, 2025:

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/Jessica A. Ekhoff/

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BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

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ASTON MARTIN LAGONDA LIMITED)	
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Opposer,)	
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v.)	Opposition No. 91281631
)	
THE CORYN GROUP II, LLC)	
)	
Applicant)	
)	

**DECLARATION OF JESSICA EKHOFF IN SUPPORT OF JOINT MOTION TO
EXTEND**

1. I am a partner in the law firm of Pattishall, McAuliffe, Newbury, Hilliard & Geraldson LLP, counsel for Aston Martin Lagonda Limited (“AML”), the Opposer in this matter. I have personal knowledge of the facts stated herein and could, if called as a witness, testify competently as to them.

2. The Coryn Group made its latest settlement offer on December 9, 2024.

3. Since that date, AML has been internally considering The Coryn Group’s offer, which was delayed because of the holidays, and is complicated by the international scope of the issues presented and multiple law firm involvement in this matter.

4. The Parties have been engaged in good-faith negotiations to resolve this matter since November 18, 2021.

5. The Parties have successfully resolved many issues during the course of negotiations, with only two issues remaining: 1.) the circumstances under which the Parties will

provide each other with letters of consent if one of their prior filings blocks the other's application, and 2.) whether The Coryn Group's withdrawal of its opposed application will be with or without prejudice.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Chicago, Illinois, on March 5, 2025.

/s/ Jessica A. Ekhoff