

ESTTA Tracking number: **ESTTA1274803**

Filing date: **03/28/2023**

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

Proceeding No.	91282978
Filing Party	Defendant Bombarda Rum USA Inc
Other Party	Plaintiff Drake's Organic Spirits, Inc.
Pending Motion	There is no motion currently pending and no other motion is being filed concurrent with this consent motion.

### Consent Motion to Extend

The Time to Answer is currently set to close on 04/04/2023. Bombarda Rum USA Inc requests that such date be extended for 30 days, or until 05/04/2023, and that all subsequent dates be reset accordingly.

Time to Answer	05/04/2023
Deadline for Discovery Conference	06/03/2023
Discovery Opens	06/03/2023
Initial Disclosures Due	07/03/2023
Expert Disclosures Due	10/31/2023
Discovery Closes	11/30/2023
Plaintiff's Pretrial Disclosures Due	01/14/2024
Plaintiff's 30-day Trial Period Ends	02/28/2024
Defendant's Pretrial Disclosures Due	03/14/2024
Defendant's 30-day Trial Period Ends	04/28/2024
Plaintiff's Rebuttal Disclosures Due	05/13/2024
Plaintiff's 15-day Rebuttal Period Ends	06/12/2024
Plaintiff's Opening Brief Due	08/11/2024
Defendant's Brief Due	09/10/2024
Plaintiff's Reply Brief Due	09/25/2024
Request for Oral Hearing (optional) Due	10/05/2024

The grounds for this request are as follows:

- *Parties are engaged in settlement discussions*

Bombarda Rum USA Inc has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

### Certificate of Service

The undersigned hereby certifies that a copy of this submission has been served upon all parties, at their address of record by Email on this date.

Respectfully submitted,  
/Nicholas Raffaele/  
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03/28/2023