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

Proceeding no.	91291217
Party	Defendant Cirkul, Inc.
Correspondence address	CHRISTINA M. LICURSI WOLF, GREENFIELD & SACKS, P.C. 600 ATLANTIC AVENUE BOSTON, MA 02210 UNITED STATES Primary email: cxltrademarks@wolfgreenfield.com Secondary email(s): rmvtrademarks@wolfgreenfield.com 617-646-8000
Submission	Stipulated/Consent Motion to Extend
Filer's name	Ryan M. Van Olst
Filer's email	rmvtrademarks@wolfgreenfield.com
Signature	/Ryan M. Van Olst/
Date	07/02/2025
Attachments	91291217 - Motion to Extend with Consent.pdf(601797 bytes)

DOCKET NO.: C1596.50003US00

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

ADM WILD EUROPE GMBH & CO. KG and WILD FLAVORS, INC., Opposer, v. Cirkul, Inc., Applicant.	Mark: WILD SPLASH Application No. 97808192 Opposition No. 91291217

MOTION TO EXTEND WITH CONSENT

Applicant, Cirkul, Inc., in the above-identified opposition, by and through its respective attorneys, hereby stipulate, subject to the Board's consent, that all dates in this opposition be extended for an additional thirty (30) days. The extension is required to allow the parties additional time to effectuate settlement.

Applicant requests that the schedule be reset as follows:

Action	**Current Deadline**	**New Deadline**
Time to Answer	July 5, 2025	August 4, 2025
Deadline for Discovery Conference	August 4, 2025	September 3, 2025
Discovery Opens	August 4, 2025	September 3, 2025
Initial Disclosures Due	September 3, 2025	October 3, 2025
Expert Disclosures Due	January 1, 2026	January 31, 2026
Discovery Closes	January 31, 2026	March 2, 2026
Plaintiff's Pretrial Disclosures Due	March 17, 2026	April 16, 2026
Plaintiff's 30-day Trial Period Ends	May 1, 2026	May 31, 2026
Defendant's Pretrial Disclosures Due	May 16, 2026	June 15, 2026
Defendant's 30-day Trial Period Ends	June 30, 2026	July 30, 2026
Plaintiff's Rebuttal Disclosures Due	July 15, 2026	August 14, 2026
Plaintiff's 15-day Rebuttal Period Ends	August 14, 2026	September 13, 2026

Plaintiff's Opening Brief Due	October 13, 2026	November 12, 2026
Defendant's Brief Due	November 12, 2026	December 12, 2026
Plaintiff's Reply Brief Due	November 27, 2026	December 27, 2026
Request for Oral Hearing (optional) Due	December 7, 2026	January 6, 2027

In support of the present consented motion to extend deadlines for good cause, Applicant submits that the parties have remained in active and consistent communication, with substantial progress made toward finalizing a global settlement agreement that would resolve this opposition and related foreign proceedings. As detailed in the Joint Status Report attached as Exhibit A, counsel have exchanged multiple rounds of correspondence in recent weeks, including over the past several days, and appear to have resolved nearly all substantive issues. The agreement is now in near-final form and remains under internal review by Applicant. The parties respectfully submit that good cause exists to permit a brief, 30-day extension to allow the parties to finalize execution of the agreement and potentially prepare the related dismissal filings.

Counsel for Opposers, ADM WILD EUROPE GMBH & CO. KG and WILD FLAVORS, INC., consented to this extension request via email on July 1, 2025.

Respectfully submitted,

Date: July 2, 2025

By /Ryan M. Van Olst/
Christina M. Licursi
Ryan M. Van Olst

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Cirkul, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing **MOTION TO EXTEND WITH CONSENT** was served to ADM WILD EUROPE GMBH & CO. KG and WILD FLAVORS, INC., this 2nd day of July, 2025, by sending same via electronic service to:

MARY E. INNIS
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/Ryan M. Van Olst/
Ryan M. Van Olst

Attorney Docket No.: C1596.50003US00

Exhibit A

JOINT STATUS REPORT

Pursuant to the Board's June 5, 2025 Order requiring detailed support for further extensions or suspensions, the parties submit this Joint Status Report in connection with Opposition No. 91291217.

1. **Communications Since Last Motion:**

   The parties have continued to communicate regularly regarding settlement. Specifically, counsel exchanged emails on May 29, June 4, June 18, June 30, and July 1, 2025, among other dates. These discussions have included both procedural coordination and detailed discussions concerning an agreement.

2. **Method of Communication:**

   All communications have occurred via email between counsel for Opposers and counsel for Applicant.

3. **General Nature of Communications:**

   The parties have been working to finalize a comprehensive global settlement agreement. Discussions have focused on finalizing the operative language of the agreement, confirming the status of parallel foreign proceedings, and coordinating execution. As of the latest communication, a near-final version of the agreement remains under internal review by Applicant.

4. **Issues Resolved:**

   The parties appear to have resolved nearly all substantive issues in the agreement.

5. **Issues Remaining:**

   The only remaining matter at this time is Applicant's final internal review and potential

approval/execution of the agreement. The parties are not presently engaged in active dispute over any outstanding contractual terms.

6. **Proposed Timetable:**

   The parties respectfully request 30 additional days to allow Applicant to complete internal approvals, execute the agreement, and if necessary, coordinate filing of dismissal papers with the Board and with relevant foreign trademark offices. The parties anticipate that this will be sufficient to finalize resolution and withdraw the opposition.

Accordingly, the parties jointly request that all current deadlines be extended by 30 days.

Respectfully submitted,

/Ryan M. Van Olst/
Christina M. Licursi
Ryan M. Van Olst

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Attorneys for Applicant
Cirkul, Inc.

Dated: July 2, 2025

/Lisa A. Smith/
Lisa A. Smith

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Attorneys for Opposers
ADM WILD EUROPE GMBH & CO. KG and
WILD FLAVORS, INC.

Dated: July 2, 2025