

ESTTA Tracking number: **ESTTA921989**

Filing date: **09/13/2018**

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

| | |
|---------------------------|---|
| Proceeding | 92064951 |
| Party | Plaintiff Grishko, Inc. |
| Correspondence Address | BRIAN P KINDER THE KINDER LAW GROUP APC 19200 VON KARMAN AVE FOURTH FLOOR IRVINE, CA 92612 UNITED STATES bkinder@tklglaw.com 949-216-3070 |
| Submission | Stipulated/Consent Motion to Extend |
| Filer's Name | Brian P. Kinder |
| Filer's email | bkinder@tklglaw.com |
| Signature | /BPK/ |
| Date | 09/13/2018 |
| Attachments | 2018.09.13 - stip to extend - FINAL.pdf(42744 bytes) |

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

In the Matters of:

Trademark Registration No. 4746900

For the Mark: 2007 GRISHKO (STANDARD CHARACTER)

Date Registered: June 2, 2015

GRISHKO, INC.

Petitioner,

v.

I.M. WILSON, INC.,

Registrant.

Cancellation Proceeding No. 92064951

STIPULATED MOTION FOR AN EXTENSION OF TIME

With the consent of Registrant I.M. Wilson, Inc., Petitioner Grishko, Inc. requests that all outstanding deadlines in this proceeding be extended for 60 days pursuant to the following Proposed Schedule:

| | |
|--|------------|
| Expert Disclosures Due: | 11/09/2018 |
| Discovery Closes: | 12/09/2018 |
| Plaintiff's Pretrial Disclosures Due: | 01/23/2019 |
| Plaintiff's 30-day Trial Period Ends: | 03/09/2019 |
| Defendant's Pretrial Disclosures Due: | 03/24/2019 |
| Defendant's 30-day Trial Period Ends: | 05/08/2019 |
| Plaintiff's Rebuttal Disclosures Due: | 05/23/2019 |
| Plaintiff's 15-day Rebuttal Period Ends: | 06/22/2019 |
| Plaintiff's Opening Brief Due: | 08/21/2019 |
| Defendant's Brief Due: | 09/20/2019 |
| Plaintiff's Reply Brief Due: | 10/05/2019 |
| Request for Oral Hearing Due: | 10/15/2019 |

The parties are engaged in settlement discussions and are also working cooperatively to complete discovery/testimony. Counsel for the parties mutually enjoy a professional and cordial working relationship and each are working diligently to coordinate discovery despite the geographic complexities of the case with Plaintiff in Russia, Counsel for Plaintiff in California, Defendant in Pennsylvania and Counsel for Defendant in Washington D.C. While settlement discussions are taking place, the parties have also exchanged written discovery and are in the process of completing the production of documents with deposition scheduling to follow.

Petitioner has secured the express consent of Registrant to this proceeding for the extension and resetting of dates requested herein.

Dated: September 13, 2018

Respectfully submitted,

THE KINDER LAW GROUP, APC



Brian P. Kinder, Esq.
19200 Von Karman Ave., Fourth Floor
Irvine, California 92612
T: (949) 216-3070
F: (949) 216-3074
E: bkinder@tklglaw.com
Attorneys for Petitioner

CERTIFICATE OF TRANSMISSION AND SERVICE

I certify that on September 13, 2018, the foregoing PETITION TO CANCEL is being electronically filed via the Trademark Trial and Appeal Board's Electronic System for Trademark Trials and Appeals ("ESTTA").

It is further certified that on September 13, 2018, the foregoing PETITION TO CANCEL is being served by electronic mail as follows:

Brian Coleman, Esq.
Drinker Biddle & Reath LLP
1500 K Street NW, Suite 1100
Washington, DC 20005
Brian.Coleman@dbr.com

Executed on September 13, 2018, in Irvine, California.



Brian P. Kinder, Esq.
The Kinder Law Group, APC
19200 Von Karman Ave., Fourth Floor
Irvine, California 92612
T: (949) 216-3070
F: (949) 216-3074
E: bkinder@tklglaw.com
Attorneys for Petitioner