

ESTTA Tracking number: **ESTTA984008**

Filing date: **06/27/2019**

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

Proceeding	92065427
Party	Plaintiff PEI Licensing, LLC
Correspondence Address	MONICA GUTIERREZ NORVELL IP LLC PO BOX 2461 CHICAGO, IL 60690 UNITED STATES officeactions@norvellip.com, tmonagan@norvellip.com, jnorvell@norvellip.com, asimmons@norvellip.com, mgutierrez@norvellip.com 773-796-5257
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Tom Monagan
Filer's email	tmonagan@norvellip.com, officeactions@norvellip.com, jnorvell@norvellip.com, asimmons@norvellip.com, dhbernstein@debevoise.com, csford@debevoise.com
Signature	/Tom Monagan/
Date	06/27/2019
Attachments	190627 Consent Motion to Extend Time.pdf(78746 bytes)

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

In re Registration Nos. 4,209,005 and 4,209,004
Registered: September 18, 2012



Mark: VERA CUBA and

PEI LICENSING, INC.)	
)	
Petitioner,)	
)	Cancellation No. 92065427
v.)	
)	
HAVANA CLUB HOLDING, S.A.,)	
)	
Respondent.)	

**PETITIONER'S CONSENTED MOTION TO EXTEND TIME TO RESPOND ON CROSS
MOTIONS FOR SUMMARY JUDGMENT**

Pursuant to TBMP § 502.02(b), TBMP § 528.02 and Fed. R. Civ. P. 6(b)(1)(A), Petitioner PEI Licensing, Inc., with the consent of Respondent Havana Club Holding, S.A., hereby requests a 30-day extension of time, until August 9, 2019, to file a combined Reply in Support of its Motion for Summary Judgment (Dkt. No. 18) and Response in opposition to Respondent's Cross Motion for Summary Judgment (Dkt. No. 21). This extension is necessary to accommodate the travel schedules and workloads of counsel. Further, Petitioner previously consented to an extension of Respondent's time to file its Response to Petitioner's Motion for Summary Judgment. (Dkt. No. 19) In addition, the filing of a joint Reply and Response in this situation is efficient for the Board and the Parties, as Respondent's Cross Motion addresses many of the same issues presented in Petitioner's

Motion. Petitioner, through its counsel at Debevoise & Plimpton LLP has specifically consented to this Motion.

Respectfully submitted,
PEI LICENSING, INC.

Dated: June 27, 2019

By: /Tom Monagan/
Joseph V. Norvell
Tom Monagan
Angela Simmons
NORVELL IP LLC
P.O. Box 2461
Chicago, Illinois 60690
Telephone: (888) 315-0732
officeactions@norvellip.com

Attorneys for
PEI LICENSING, INC.