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Filing date: **12/16/2020**

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

Proceeding	92065427
Party	Defendant Havana Club Holding, S.A
Correspondence Address	DAVID H BERNSTEIN DEBEVOISE & PLIMPTON LLP 919 THIRD AVENUE NEW YORK, NY 10022 UNITED STATES Primary Email: dhbernstein@debevoise.com Secondary Email(s): csford@debevoise.com, trademarks@debevoise.com 212-909-6696
Submission	Stipulated/Consent Motion to Extend
Filer's Name	David H. Bernstein
Filer's email	dhbernstein@debevoise.com, csford@debevoise.com, cbfels@debevoise.com, trademarks@debevoise.com
Signature	/David H. Bernstein/
Date	12/16/2020
Attachments	121620 Consent Motion to Extend Time.pdf(5337 bytes)

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

PEI LICENSING, INC.,

Petitioner,

v.

HAVANA CLUB HOLDING, S.A.,

Respondent.

Cancellation No. 92,065,427

Reg. Nos. 4,209,004 & 4,209,005

**CONSENTED MOTION TO EXTEND TIME FOR FILING MOTION
IN OPPOSITION TO PEI'S MOTION TO COMPEL**

In light of the Board's decision denying Petitioner's Motion for Reconsideration (Dkt. 36), Respondents are preparing to respond to Petitioner's Motion to Compel Discovery Responses and Extend Discovery Period for Good Cause. Due to the upcoming holidays, and scheduled travel for both Respondent and Counsel, additional time is required to fully brief Respondent's opposition to Petitioner's motion. Accordingly, pursuant to Fed. R. Civ. P. 6(b), 37 C.F.R. § 2.116, and T.B.M.P. §§ 509.01 and 509.02, Respondent requests, with Petitioner's consent, that the period for Respondent to submit its opposition to Petitioner's motion in this action be extended for a period of 30 days.

Dated: December 16, 2020
New York, New York

DEBEVOISE & PLIMPTON LLP

By: /s/ David H. Bernstein
David H. Bernstein (dhbernstein@debevoise.com)
Christopher S. Ford (csford@debevoise.com)
Clifton B. Fels (cbfels@debevoise.com)
919 Third Avenue, New York, N.Y. 10022
(212) 909-6696

Attorneys for Respondent Havana Club Holding, S.A.

CERTIFICATE OF SERVICE

This is to certify that, on December 16, 2020, I caused a copy of the CONSENTED MOTION TO EXTEND DISCOVERY AND SUBSEQUENT TRIAL DEADLINES to be served by email upon:

Joseph V. Norvell, Esq.
Tom Monagan, Esq.
Monica M. Gutierrez, Esq.
Norvell IP LLC
jnorvell@norvellip.com
tmonagan@norvellip.com
mgutierrez@norvellip.com

Executed this 16th day of December, 2020, in New York, New York.

/s/ Christopher S. Ford
Christopher S. Ford