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Filing date: **11/23/2020**

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

Proceeding	92070407
Party	Plaintiff AWP USA Inc.
Correspondence Address	DAVID LUDWIG DUNLAP BENNETT & LUDWIG PLLC 211 CHURCH STREET SE LEESBURG, VA 20175 UNITED STATES Primary Email: trademarks@dbllawyers.com Secondary Email(s): dludwig@dbllawyers.com 703-777-7319
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Hyung Gyu Sun
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Signature	/Hyung Gyu Sun/
Date	11/23/2020
Attachments	Consent Motion to Extend.pdf(127727 bytes )

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

**IN THE MATTER OF Trademark Reg. No. 5,323,248  
For the mark TRAVELSMART;  
Published for Opposition on August 15, 2017; Registered on October 31, 2017**

<b>AWP USA INC.,</b>	)	
	)	
<b>Petitioner,</b>	)	
	)	
v.	)	
	)	<b>Cancellation No. 92070407</b>
<b>CHUBB INA HOLDINGS INC.,</b>	)	
	)	
<b>Registrant.</b>	)	
_____	)	

**CONSENT MOTION TO EXTEND TIME**

Petitioner AWP USA Inc. (“Petitioner”) and Registrant Chubb INA Holdings Inc. (“Registrant”) hereby consent to a fourteen (14) day extension of the deadlines of all trial dates.

The new dates proposed are as follows:

Plaintiff’s Opening Brief Due	12/7/2020
Defendant’s Brief Due	1/7/2021
Plaintiff’s Reply Brief Due	1/21/2021
Request for Oral Hearing (optional) Due	1/31/2021

Counsel for Petitioner has conferred with Counsel for Registrant, who has agreed to the extension and substance of this motion.

DATED this 23rd day of November 2020.

Respectfully submitted,

AWP USA INC.,  
Petitioner,  
By counsel,

/Hyung Gyu Sun/  
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Hyung Gyu Sun  
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### **CERTIFICATE OF ELECTRONIC FILING**

I hereby certify that this Consented Motion to Extend Deadlines is being electronically filed using the Electronic System for Trademark Trials and Appeals (ESTTA) on this 23rd day of November 2020.

/Hyung Gyu Sun/  
Hyung Gyu Sun

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served upon Petitioner by email, on this 23rd day of November 2020, addressed as follows:

Jenifer deWolf Paine, [paine@fr.com](mailto:paine@fr.com)  
7 Time Square, 20th Floor  
New York, NY 10036  
(212)-765-5070

/Hyung Gyu Sun/  
Hyung Gyu Sun