

ESTTA Tracking number: **ESTTA1028604**

Filing date: **01/13/2020**

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

Proceeding No.	92071349
Filing Party	Defendant Irina S. Kozodaeva
Other Party	Plaintiff NT-MDT LLC
Pending Motion	There is no motion currently pending and no other motion is being filed concurrent with this consent motion.

Consent Motion to Extend

The Expert Disclosures Due is currently set to close on 01/13/2020. Irina S. Kozodaeva requests that such date be extended for 30 days, or until 02/12/2020, and that all subsequent dates be reset accordingly.

Time to Answer	07/12/2019 (CLOSED)
Deadline for Discovery Conference	08/12/2019 (CLOSED)
Discovery Opens	08/12/2019 (CLOSED)
Initial Disclosures Due	09/11/2019 (CLOSED)
Expert Disclosures Due	02/12/2020
Discovery Closes	03/14/2020
Plaintiff's Pretrial Disclosures Due	04/29/2020
Plaintiff's 30-day Trial Period Ends	06/13/2020
Defendant's Pretrial Disclosures Due	06/28/2020
Defendant's 30-day Trial Period Ends	08/12/2020
Plaintiff's Rebuttal Disclosures Due	08/27/2020
Plaintiff's 15-day Rebuttal Period Ends	09/26/2020
Plaintiff's Opening Brief Due	11/25/2020
Defendant's Brief Due	12/25/2020
Plaintiff's Reply Brief Due	01/09/2021
Request for Oral Hearing (optional) Due	01/20/2021

The grounds for this request are as follows:

- *Parties are unable to complete discovery/testimony during assigned period*
- *In light of the numerous purported oral licenses and assignments identified for the first time in the Amended Petition, Respondents believe that an extension of time of at least one month of all dates in the schedule in the Cancellation Proceeding are in order to allow for the investigation of such licenses and assignments. Via email correspondence dated Jan. 13, 2020, counsel for Petitioner agreed to a thirty-day extension of time.*

Irina S. Kozodaeva has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Certificate of Service

The undersigned hereby certifies that a copy of this filing has been served upon all parties, at their address of record by Email on this date.

Respectfully submitted,
/Kenneth Michael Motolenich-Salas/
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01/13/2020