

ESTTA Tracking number: **ESTTA1044641**

Filing date: **03/24/2020**

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

Proceeding No.	92073049
Filing Party	Defendant Shenzhen Topgreen Technology Co., Ltd.
Other Party	Plaintiff Pax Labs, Inc.
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 Initial Disclosures Due is currently set to close on 04/01/2020. Shenzhen Topgreen Technology Co., Ltd. requests that such date be extended for 60 days, or until 05/31/2020, and that all subsequent dates be reset accordingly.

Time to Answer	02/01/2020 (CLOSED)
Deadline for Discovery Conference	03/02/2020 (CLOSED)
Discovery Opens	03/02/2020 (CLOSED)
Initial Disclosures Due	05/31/2020
Expert Disclosures Due	09/28/2020
Discovery Closes	10/28/2020
Plaintiff's Pretrial Disclosures Due	12/12/2020
Plaintiff's 30-day Trial Period Ends	01/26/2021
Defendant's Pretrial Disclosures Due	02/10/2021
Defendant's 30-day Trial Period Ends	03/27/2021
Plaintiff's Rebuttal Disclosures Due	04/11/2021
Plaintiff's 15-day Rebuttal Period Ends	05/11/2021
Plaintiff's Opening Brief Due	07/10/2021
Defendant's Brief Due	08/09/2021
Plaintiff's Reply Brief Due	08/24/2021
Request for Oral Hearing (optional) Due	09/03/2021

The grounds for this request are as follows:

- *Parties are unable to complete discovery/testimony during assigned period*
- *Respondent Shenzhen Topgreen Technology Co., Ltd. is based in China, and Respondent is unable to access and/or obtain all necessary documents in China due to the Coronavirus situation. Respondent has obtained the consent of PAX Labs, Inc.*

Shenzhen Topgreen Technology Co., Ltd. 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,

/David T. Ching/
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03/24/2020