

ESTTA Tracking number: **ESTTA1168292**

Filing date: **10/26/2021**

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

Proceeding No.	92074551
Filing Party	Defendant Khokhlov Dmitry Alexandrovitch
Other Party	Plaintiff Lemon Collections 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 Initial Disclosures Due is currently set to close on 10/27/2021. Khokhlov Dmitry Alexandrovitch requests that such date be extended for 30 days, or until 11/26/2021, and that all subsequent dates be reset accordingly.

Time to Answer	10/26/2020 (CLOSED)
Deadline for Discovery Conference	03/28/2021 (CLOSED)
Discovery Opens	03/28/2021 (CLOSED)
Initial Disclosures Due	11/26/2021
Expert Disclosures Due	03/26/2022
Discovery Closes	04/25/2022
Plaintiff's Pretrial Disclosures Due	06/09/2022
Plaintiff's 30-day Trial Period Ends	07/24/2022
Defendant's Pretrial Disclosures Due	08/08/2022
Defendant's 30-day Trial Period Ends	09/22/2022
Plaintiff's Rebuttal Disclosures Due	10/07/2022
Plaintiff's 15-day Rebuttal Period Ends	11/06/2022
Plaintiff's Opening Brief Due	01/05/2023
Defendant's Brief Due	02/04/2023
Plaintiff's Reply Brief Due	02/19/2023
Request for Oral Hearing (optional) Due	03/01/2023

The grounds for this request are as follows:

- *Parties are engaged in settlement discussions*
- *New counsel for Defendant entered its appearance in this case and it needs more time to get familiar with this case.*

Khokhlov Dmitry Alexandrovitch 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 submission has been served upon all parties, at their address of record by Email on this date.

Respectfully submitted,
/mav/

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10/26/2021