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

Proceeding	92075173
Party	Defendant Tower Health PPO
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Submission	Stipulated/Consent Motion to Extend
Filer's Name	Elliott J. Stein
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Signature	/varlawyer/
Date	12/03/2020
Attachments	TOWERHEALTH-TowerHealthPPO-TM - BERKSHIREHEALTHPARTNERS-Default-MOTION -12032020.pdf(300022 bytes)

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

BERKSHIRE HATHAWAY SPECIALTY) INSURANCE COMPANY,)) Petitioner,)) vs.)) TOWER HEALTH PPO,)) Registrant.) <hr style="border-top: 1px solid black;"/>)	Cancellation No. 92-075173 Mark: BHP BERKSHIRE HEALTH PARTNERS & Design Registration No.: 3,556,352
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**CONSENT MOTION OF REGISTRANT TO FURTHER EXTEND
TIME FOR REGISTRANT TO RESPOND TO PETITIONER'S
MOTION FOR ENTRY OF DEFAULT JUDGMENT**

NOW COMES, TOWER HEALTH PPO (the "Registrant"), the Registrant of the Registered Trademark "BHP BERKSHIRE HEALTH PARTNERS" & Design (Registration No. 3,556,352) and moves to further extend the time for Registrant to respond to Petitioner's Motion for Entry of Default Judgment filed on October 29, 2020 (Docket Entry No. 4) through and including December 17, 2020, insofar as the parties are discussing a potential settlement of the dispute.

Counsel for the Petitioner has consented to the granting of this Motion. :

Date: December 3, 2020

/s/ Elliott J. Stein
Elliott J. Stein
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Attorneys for Tower Health PPO

CERTIFICATE OF SERVICE

I, Elliott J. Stein, certify that a true and correct copy of the foregoing CONSENT MOTION OF REGISTRANT TO FURTHER EXTEND TIME FOR REGISTRANT TO RESPOND TO PETITIONER’S MOTION FOR ENTRY OF DEFAULT JUDGMENT was served, electronically via the Electronic System for Trademark Trials and Appeals (“ESTTA”) and via electronic mail upon the following counsel of record:

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Date: December 3, 2020

/s/ Elliott J. Stein
Elliott J. Stein