

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

THE CHAMBER OF COMMERCE OF
THE UNITED STATES OF AMERICA

Opposer,

v.

UNITED STATES HISPANIC CHAMBER
OF COMMERCE FOUNDATION,

Applicant.

Opposition No.: 91/156,321

Serial No.: 78/081,731



06-07-2004
U.S. Patent & TMO/TM Mail Rcpt Dt. #22

MOTION ON CONSENT TO SUSPEND PROCEEDINGS

Pursuant to TBMP Section 510 and Trademark Rule 2.117, Opposer, The Chamber of Commerce of the United States of America, respectfully requests that the above-referenced opposition proceeding be suspended, subject to the right of either party to request resumption at any time. Opposer seeks the suspension of these proceedings to afford the parties time to pursue potential settlement negotiations that, if successful, would obviate the need for a formal proceeding at the Trademark Trial and Appeal Board. Counsel for Applicant, the United States Hispanic Chamber of Commerce Foundation, has consented to the requested suspension. Further, Opposer submits that it has shown good cause for why the consolidated proceeding should be suspended. *Accord MacMillan Bloedel Ltd. v. Arrow-M Corp.*, 203 USPQ 952 (TTAB 1979).

However, should the Board disagree, or should the pending *Motion to Suspend* be otherwise denied, Opposer requests in the alternative that the discovery and trial dates for

the pending proceeding be reset such that the discovery period (which at present is set to close on June 20, 2004) close no less than sixty (60) days following the Board's decision on the instant motion, and that the deadline for Opposer to file its reply to Applicant's counterclaims (which at present are due June 7, 2004) be reset to a date that is no less than thirty (30) days following any such decision. Opposer believes that in the event the present *Motion* is denied, the additional time requested would be needed to facilitate the orderly presentation of the evidence in this case and submits that this alternative request is not being made for the purposes of mere delay but, rather, for the good cause stated above.

Respectfully submitted,

Date: June 7, 2004



Edward T. Colbert
William M. Merone
KENYON & KENYON
1500 K Street, N.W.; Suite 700
Washington, D.C. 20005
Tel.: (202) 220 - 4200
Fax: (202) 220 - 4201

*Counsel for Opposer, The Chamber of
Commerce of the United States of America*

CERTIFICATE OF SERVICE

I hereby certify that the required number of copies of the foregoing *Motion on Consent to Suspend Proceedings* was served on the parties or counsel on the date and as indicated below:

By First Class Mail (Postage Prepaid)

Evan R. Sotiriou
Marta I. Burgin
ARMSTRONG TEASDALE L.L.P.
One Metropolitan Square
Suite 2600
St. Louis, Missouri 63102-2740

Date: June 7, 2004


Edward T. Colbert
William M. Merone
KENYON & KENYON
1500 K Street, N.W.; Suite 700
Washington, D.C. 20005
Tel.: (202) 220 - 4200
Fax: (202) 220 - 4201

*Counsel for Opposer, The Chamber of
Commerce of the United States of America*

TTAB



Anne Grosheitsch
Direct 202.220.4282
agrosheitsch@kenyon.com

1500 K Street, NW
Suite 700
Washington DC 20005-1257
202.220.4200
Fax 202.220.4201



June 7, 2004



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Commissioner for Trademarks
2900 Crystal Drive
Arlington, Virginia 22202-3513
BOX TTAB
NO FEE

Re: MOTION ON CONSENT TO SUSPEND PROCEEDINGS

Opposer	:	The Chamber of Commerce of The United States of America
Applicant	:	United States Hispanic Chamber of Commerce Foundation
Opposition No.	:	91/156,321
Our File No.	:	11904-8

Dear Madam:

Enclosed herewith, is a Motion on Consent to Suspend Proceedings (in triplicate), for the above-referenced matter. Should any fees be required, please charge them to Deposit Account No. 11-0600 (Ref: 11904-8). A duplicate copy of this letter is enclosed for that purpose.

Respectfully submitted,
KENYON & KENYON

Anne Grosheitsch
Trademark Legal Assistant

Enclosure

cc: Edward T. Colbert (without enclosure)
William M. Merone (without enclosure)