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

Proceeding	91171252
Party	Plaintiff Converse Inc.
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Submission	Other Motions/Papers
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Date	08/20/2008
Attachments	Motion to Suspend.pdf (2 pages)(17244 bytes)

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

CONVERSE INC.,	:	
	:	
Opposer,	:	
	:	Opposition No. 91171252
v.	:	
	:	Directed to Serial No. 79/012,813
BAPE CO., LTD.,	:	
	:	
Applicant.	:	

OPPOSER'S AND APPLICANT'S
JOINT MOTION TO SUSPEND PROCEEDINGS

The parties jointly request that this Opposition be suspended pending a determination of a certain, contemporaneously filed motion to consolidate in a related Cancellation proceeding, No. 92049343. In support, the parties state:

1. On May 31, 2006, Opposer Converse Inc. (“Converse”) filed this Opposition against the application of Bape Co., Ltd. for a star trademark in connection with shoes.
2. On May 13, 2008, Opposer filed a cancellation proceeding against Nowhere Co., Ltd., No. 92049343. In that action, Converse seeks to cancel registration of a star trademark in connection with shoes.
3. The ownership of the subject application of Bape Co., Ltd. was transferred to Nowhere Co., Ltd. and recorded in the USPTO records on February 1, 2007. As a result, the opposed application and petitioned registration are now both owned by Nowhere Co., Ltd.
4. As the issues in these two matters are essentially the same, the parties have consented to consolidating them into the cancellation proceeding and have, contemporaneously with this filing, filed a motion to do so.

5. The parties request that this case be suspended until the consent motion to consolidate is ruled on.

WHEREFORE, the parties request this proceeding be suspended pending determination of their motion to consolidate filed in Cancellation No. 92049343.

Respectfully,

PRYOR CASHMAN LLP

Respectfully,

GALLOP, JOHNSON & NEUMAN, L.C.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies a true and correct copy for the foregoing has been served upon the following applicant by first class mail on the 20th day of August, 2008.

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/Kenneth Solomon/