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Filing date: **11/08/2013**

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

Proceeding	91184803
Party	Plaintiff Converse Inc.
Correspondence Address	B ANNA MCCOY ALLEMAN HALL MCCOY RUSSELL TUTTLE LLP 806 SW BROADWAY, SUITE 600 PORTLAND, OR 97205 UNITED STATES mccoy@ahmrt.com, hartzell@ahmrt.com, docketing@ahmrt.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	B. Anna McCoy
Filer's e-mail	mccoy@ahmrt.com, hartzell@ahmrt.com, docketing@ahmrt.com
Signature	/B. Anna McCoy/
Date	11/08/2013
Attachments	Joint Motion to Suspend Discovery and Trial Periods for 30 Days 11-8-13.pdf(96262 bytes)

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

Converse Inc.,	:	Opposition No. 91184803
	:	
Opposer	:	Mark: 
	:	
v.	:	Application Serial No. 79/038,026
	:	
Unit Enterprises Pty. Ltd.,	:	
	:	
Applicant	:	

JOINT MOTION TO SUSPEND DISCOVERY AND TRIAL PERIODS FOR 30 DAYS

In the opposition no. 91184803, Opposer, Converse Inc., and Applicant, Unit Enterprises Pty. Ltd., hereby jointly move for a 30-day suspension of the opposition proceedings. The joint motion is being filed based on the two parties finalizing and executing a worldwide settlement agreement. The parties have reached a final settlement agreement and are in the process of signing the agreement. The agreement has already been signed by one party.

Specifically, pursuant to the Order dated August 12, 2013, the Expert Disclosures are due on November 8, 2013. The parties jointly request that the opposition be suspended for 30-days and all dates in the opposition suspended accordingly. The new (proposed) dates are set out below.

Time to Answer:	Closed
Deadline for Discovery Conference:	Closed
Discovery Opens:	Closed
Initial Disclosures Due:	Closed
Expert Disclosures Due:	12/8/2013

Discovery Closes:	1/7/2014
Plaintiff's Pretrial Disclosures:	2/21/2014
Plaintiff's 30-day Trial Period Ends:	4/7/2014
Defendant's Pretrial Disclosures:	4/22/2014
Defendant's 30-day Trial Period Ends:	6/6/2014
Plaintiff's Rebuttal Disclosures:	6/21/2014
Plaintiff's 15-day Rebuttal Period Ends:	7/21/2014

Accordingly, Opposer, Converse Inc., and Applicant, Unit Enterprises Pty. Ltd., respectfully jointly submit and sincerely request that the Board allow the proceedings to be suspended for an additional thirty (30) days and to suspend the dates as listed above. This suspension is requested so that the parties may execute and finalize the written agreement which will resolve the issues both in the United States and abroad. Counsel for Opposer, Converse Inc., further provides the certificate of service and Counsel for Unit Enterprises Pty Ltd. has agreed to service of the Joint Motion by electronic mail.

Dated: November 8, 2013

Respectfully submitted,

ALLEMAN HALL MCCOY
RUSSELL AND TUTTLE LLP

NIXON & VANDERHYE, P.C.



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CERTIFICATE OF SERVICE

I, B. Anna McCoy, hereby certify that on November 8, 2013, a true and correct copy of the foregoing Joint Motion To Suspend Discovery And Trial Periods For 30 Days was served via email (by agreement of counsel) upon the following:

Duane M. Byers at:
nixonptomail@nixonvan.com
dmb@nixonvan.com

A handwritten signature in cursive script, appearing to read "B. Anna McCoy", is positioned above a horizontal line.

B. Anna McCoy