

ESTTA Tracking number: **ESTTA361154**

Filing date: **08/02/2010**

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

Proceeding	91193064
Party	Plaintiff FN Herstal
Correspondence Address	BURTON S. EHRILICH LADAS & PARRY LLP 224 S MICHIGAN AVE STE 1600 Chicago, IL 60604 UNITED STATES burte@ladas.net
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Burton S. Ehrlich
Filer's e-mail	CHIUSTM@LADAS.NET, burte@ladas.net
Signature	/bsehrlich/
Date	08/02/2010
Attachments	FN Herstal.pdf ( 3 pages )(121984 bytes )

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

FN HERSTAL ) Opposition No.: 91193064  
 )  
Opposer/Respondent )  
 )  
v. )  
 )  
SAEILO ENTERPRISES, INC., )  
 )  
Applicant/Counterclaimant. )

**AGREED MOTION FOR SUSPENSION OF PROCEEDINGS BY  
SIXTY (60) DAYS BEGINNING WITH THE RESPONSE DATE  
FOR THE COUNTERCLAIM FOR CANCELLATION**

Now comes Opposer/Respondent, FN HERSTAL, by and through its attorneys Burton S. Ehrlich of Ladas & Parry LLP and herein with the consent to this suspension of counsel for the Applicant it is hereby requested that all proceedings be suspended for sixty (60) days beginning from the present date, pending the disposition of settlement negotiations between the parties. Should settlement not occur then the parties request the resetting of time periods beginning with the date for the Opposer to answer or otherwise plead to the counterclaim for cancellation with said response becoming due thirty days after the reinstatement of the proceedings, and with all subsequent time periods to be also reset as per this suspension. The following rationale is provided for this suspension:

The parties through their respective legal counsel have been in communication regarding possible settlement for this matter and after some settlement communications, a settlement offer was

received by counsel for the Opposer. The Opposer needs additional time to confer with the foreign based client representatives and the foreign based principals regarding the possible settlement offer. Continued focus at settlement, rather than detracting from settlement and advancing discovery or other matters in these opposition proceedings is, at this time, believed appropriate by the respective counsel for the parties. The possible settlement of this matter will alleviate the need for the pursuit of the opposition proceedings and the counterclaim for cancellation. Additional time would be necessary to negotiate a possible settlement, draft the settlement papers, obtain signatures of the parties upon settlement papers, and to possibly seek the Trademark Office's approval of a revised application which might need to be filed in accordance with the terms of a potential proposed settlement between the parties.

The parties reserve the right to resume proceedings at an earlier date by either party requesting the resetting of all time periods, should these negotiations fail. Should proceedings be reset the answer to the opposition petition will become due thirty (30) days after the resetting of dates by the USPTO.

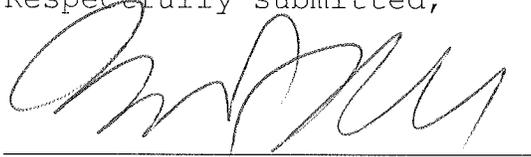
This Motion is not being submitted for any purpose of delay.

As this Motion is consented to by Applicant's counsel, it is respectfully requested that it be granted and this case be suspended for sixty (60) days beginning with the resetting of the

date for the Opposer to answer or otherwise please in response to the counterclaim to be set to become due thirty days following the reinstatement of proceedings and with all subsequent time periods being accordingly reset.

Respectfully submitted,

By:



One of Opposer's attorneys

Burton S. Ehrlich  
Ladas & Parry LLP  
224 S. Michigan Avenue  
Suite 1600  
Chicago, IL 60604  
(312) 427-1300

**CERTIFICATE OF ELECTRONIC FILING**

I hereby certify that this paper is being electronically filed with the United States Patent and Trademark Office on this 2nd day of August, 2010.



Burton S. Ehrlich

**CERTIFICATE OF SERVICE**

The undersigned, one of Opposer's attorneys, hereby certifies that on August 2, 2010, he caused a true and correct copies of the foregoing AGREED MOTION FOR SUSPENSION OF PROCEEDINGS BY SIXTY (60) DAYS BEGINNING WITH THE RESPONSE DATE FOR THE COUNTERCLAIM FOR CANCELLATION to be served upon Applicant by First Class mail, postage pre-paid, at the following address:

Nancy Kennedy, Esq.  
Alix, Yale & Ristas, LLP  
750 Main Street  
Hartford, CT 06103



Burton S. Ehrlich