

ESTTA Tracking number: **ESTTA490893**

Filing date: **08/24/2012**

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

Proceeding	91201511
Party	Defendant Premier Grocery, Inc.
Correspondence Address	FRANK G LONG GREENBERG TRAUIG LLP 2375 E CAMELBACK RD , STE 700 PHOENIX, AZ 85016-9000 UNITED STATES longf@gtlaw.com
Submission	Motion to Suspend for Settlement Discussions
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Date	08/24/2012
Attachments	Motion for Suspension for Settlement with Consent - Aug 24 2012.pdf ( 3 pages ) (104532 bytes )

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

In the matter of Application Serial No. 85/197,617  
For the mark SECRET STASH  
Published in the *Official Gazette* on May 10, 2011

Paramount Farms International, LLC	)	Opposition No. 91201511
Opposer,	)	
	)	
vs.	)	
	)	
Premier Grocery, Inc.	)	
Applicant,	)	
	)	
	)	
	)	
	)	
	)	

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**Motion for Suspension for Settlement With Consent**

The parties are actively engaged in negotiations for the settlement of this matter. Premier Grocery, Inc. requests that this proceeding be suspended for 90 days to allow the parties to continue their settlement efforts.

However, it has come to the parties' attention that the deadline to file Initial Disclosures has been inadvertently marked as closed. Applicant refers to the Board's scheduling order dated March 7, 2012, which set the deadline to file Initial Disclosures as September 13, 2012. In the subsequent Motion for Suspension filed July 27, 2012, the Initial Disclosure deadline was marked as closed.

Therefore, Parties request that the Board approve the following trial schedule, which includes the 30 Day Motion to Suspend on July 27, 2012 (which was granted on July 30, 2012), and the 90 day Motion to Suspend filed herewith.

<b>Proceedings Resume :</b>	11/24/2012
<b>Initial Disclosures Due :</b>	01/11/2013
<b>Expert Disclosure Due :</b>	05/11/2013
<b>Discovery Closes :</b>	06/10/2013

<b>Plaintiff's Pretrial Disclosures :</b>	07/25/2013
<b>30-day testimony period for Plaintiff's testimony to close :</b>	09/08/2013
<b>Defendant/ Counterclaim Plaintiff's Pretrial Disclosures :</b>	09/23/2013
<b>30-day testimony period of the Defendant and Plaintiff in the counterclaim to close :</b>	11/07/2013
<b>Counterclaim Defendant's and Plaintiff's Rebuttal Disclosures Due :</b>	11/24/2013
<b>30-day Trial Period for Counterclaim Defendant and Rebuttal Testimony as Plaintiff ends :</b>	01/06/2014
<b>Counterclaim Plaintiff's Rebuttal Disclosures Due :</b>	01/21/2014
<b>15-day Rebuttal Period for Counterclaim Plaintiff Ends :</b>	02/20/2014
<b>Plaintiff's Trial Brief Due:</b>	04/21/2014
<b>Defendant's Trial Brief and Plaintiff in the Counterclaim Due:</b>	05/21/2014
<b>Brief for Defendant in the Counterclaim and Reply Brief, if any, for Plaintiff Due:</b>	06/20/2014
<b>Reply Brief, if any, for Plaintiff in the Counterclaim Due:</b>	07/05/2014

Premier Grocery Inc. has secured the express consent of all other parties to this proceeding for the suspension and resetting of dates requested herein.

Respectfully submitted,

GREENBERG TRAURIG, LLP

Dated: August 24, 2012

By: /frank g. long/  
 Frank G. Long

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