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Filing date: **10/03/2013**

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

Proceeding	91204124
Party	Plaintiff Threshold Enterprises, Ltd.
Correspondence Address	JEREMY M MCLAUGHLIN ARNOLD & PORTER LLP THREE EMBARCADERO CENTER, 7TH FLOOR SAN FRANCISCO, CA 94111 UNITED STATES jeremy.mclaughlin@aporter.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Jeremy McLaughlin
Filer's e-mail	trademarkdocketing@aporter.com, jeremy.mclaughlin@aporter.com, elisabeth.richards@aporter.com
Signature	/Jeremy McLaughlin/
Date	10/03/2013
Attachments	Motion for Suspension of Proceedings with Consent - PLANT HERBAL TREASURES.pdf(29413 bytes )

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

**Threshold Enterprises Ltd.**  
Opposer

v.

Opposition No. 91204124  
Application No. 85/396,136

**Robert Campbell (individual)**  
Applicant.

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United States Patent and Trademark Office  
Trademark Trial and Appeal Board  
P.O. Box 1451  
Alexandria, VA 22313-1451

MOTION FOR SUSPENSION OF PROCEEDINGS WITH CONSENT

The Discovery deadline is currently set to close on October 4, 2013. Threshold Enterprises Ltd. requests that such date be extended for 60 days, or until December 3, 2013, and that all other dates be reset accordingly and as listed below.

Time to Answer: CLOSED

Deadline for Discovery Conference: CLOSED

Discovery Opens: CLOSED

Initial Disclosures Due: CLOSED

Expert Disclosures Due: 11/03/2013

Discovery Closes: 12/03/2013

Plaintiff's Pretrial Disclosures: 01/17/2014

Plaintiff's 30-day Trial Period Ends: 03/03/2014

Defendant's Pretrial Disclosures: 03/18/2014

Defendant's 30-day Trial Period Ends: 05/02/2014

Plaintiff's Rebuttal Disclosures: 05/17/2014

Plaintiff's 15-day Rebuttal Period Ends: 06/16/2014



**PROOF OF SERVICE**

I am over eighteen years of age and not a party to this action. I am employed in Washington, D.C. My business address is 555 Twelfth Street, NW, Washington, D.C. 20004-1206. I am readily familiar with the practice of this office for collection and processing of correspondence for mail delivery, and they are deposited that same day in the ordinary course of business.

On October 3, 2013, I served the following document(s):

**MOTION FOR SUSPENSION OF PROCEEDINGS  
WITH CONSENT**

I served the document(s) on the following person(s):

Kuscha Hatami  
LegalForce RAPC Worldwide  
Raj Abhyanker P.C.  
1580 W. El Camino Real Suite 13  
Mountain View, CA 94040

- (BY MAIL) by causing a true and correct copy of the above to be placed in the United States Mail at Washington, D.C. in sealed envelope(s) with postage prepaid, addressed listed above.

I declare under penalty of perjury under the laws of Washington, D.C. that the foregoing is true and correct.

Dated: October 3, 2013

Signature: \_\_\_\_\_

Type or Print Name: Elisabeth E. Richards

