

ESTTA Tracking number: **ESTTA498167**

Filing date: **10/04/2012**

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

|                        |  |
|------------------------|--|
| Proceeding             | 91204681   |
| Party                  | Plaintiff<br>Entrepreneur Media, Inc.  |
| Correspondence Address | LUCY JEWETT WHEATLEY<br>JONES DAY<br>51 LOUISIANA AVENUE NW<br>WASHINGTON, DC 20001 2113<br>UNITED STATES<br>lwheatley@jonesday.com, mafinkelstein@jonesday.com,<br>dawnbrown@jonesday.com |
| Submission             | Motion to Suspend for Settlement Discussions   |
| Filer's Name           | Lucy Jewett Wheatley   |
| Filer's e-mail         | lwheatley@jonesday.com,mafinkelstein@jonesday.com,pcyngier@jonesday.com  |
| Signature              | /Lucy Jewett Wheatley/   |
| Date                   | 10/04/2012   |
| Attachments            | 10.04.2012 - Motion for 30-Day Suspension for Settlement with Consent.pdf ( 2 pages )(131121 bytes )   |

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

In the matter of  
Trademark Application No.: 85,079,659  
Filed: July 7, 2010  
Published: December 13, 2011  
Mark: NETREPRENEUR

ENTREPRENEUR MEDIA, INC.,

Opposer,

v.

ALIBABA GROUP HOLDING LIMITED,

Applicant.

Opposition No. 91204681

MOTION FOR SUSPENSION FOR SETTLEMENT WITH CONSENT

The parties are actively engaged in negotiations for the settlement of this matter. Entrepreneur Media Inc., with the consent of Alibaba Group Holding Limited, requests that this proceeding be suspended for 30 days to allow the parties to continue their settlement efforts.

Proposed Schedule

Initial Disclosures Due : 12/07/2012  
Expert Disclosures Due : 04/06/2013  
Discovery Period to Close : 05/06/2013  
Plaintiff Pretrial Disclosures : 06/20/2013  
Plaintiff's 30-day Trial Period Ends : 08/04/2013  
Defendant/Counterclaim Plaintiff's Pretrial Disclosures : 08/19/2013  
30-day Trial Period for Defendant and Plaintiff in the Counterclaim : 10/03/2013  
Counterclaim Defendant's and Plaintiff's Rebuttal Disclosures Due : 10/18/2013  
30-day Trial Period for Counterclaim Defendant and Rebuttal Testimony as Plaintiff Ends :  
12/02/2013  
Counterclaim Plaintiff's Rebuttal Disclosures Due : 12/17/2013  
15-day Rebuttal Period for Counterclaim Plaintiff Ends : 01/16/2014  
Plaintiff's Trial Brief Due : 03/17/2014

Defendant's Trial Brief and Plaintiff in the Counterclaim Due : 04/16/2014  
Brief for Defendant in the Counterclaim and Reply Brief, if any, for Plaintiff Due : 05/16/2014  
Reply Brief, if any, for Plaintiff in the Counterclaim Due : 05/31/2014

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

Entrepreneur Media Inc. has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

*Email Addresses for Entrepreneur Media Inc.*  
lwheatley@jonesday.com, mafinkelstein@jonesday.com

*Email Addresses for Alibaba Group Holding Limited*  
EBall@fenwick.com, JDavisRink@fenwick.com, srgarcia@fenwick.com

October 4, 2012

Respectfully submitted,

*Attorney for Entrepreneur Media, Inc.*

/s/ Lucy Jewett Wheatley  
Lucy Jewett Wheatley

Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address of record by email (by agreement) on this date.

October 4, 2012

Respectfully submitted,

*Attorney for Entrepreneur Media, Inc.*

/s/ Lucy Jewett Wheatley  
Lucy Jewett Wheatley