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

Proceeding	91210542
Party	Plaintiff Tissot SA
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Submission	Stipulated/Consent Motion to Extend
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Date	08/04/2015
Attachments	N1865_Consented Motion - EOT_150804.pdf(153331 bytes)

**UNITED STATES PATENT AND TRADEMARK OFFICE
TRADEMARK TRIAL AND APPEAL BOARD**

TISSOT S.A.,

Opposer,

v.

TOUCHDOME, LLC,

Applicant.

Opposition No.: 91210542
Serial No. 85643792

Mark: TOUCHDOME

MOTION FOR SUSPENSION FOR SETTLEMENT WITH CONSENT

Opposer, Tissot S.A., and Applicant, TouchDome LLC, by their attorneys, hereby move the Trademark Trial and Appeal Board for an order to suspend all dates in the subject proceeding in order to allow the parties to finalize a settlement. Both parties consent to this request.

Pursuant to the Trademark Trial and Appeal Board (“TTAB”) Suspension Order issued on July 16, 2015, the parties request this further extension in good faith. Counsel for Opposer and Counsel for Applicant have largely established and finalized the structure of a settlement regarding the parties’ trademark use and rights for an amicable resolution of this Opposition and remain engaged in discussions to finalize an agreement embodying these terms to cooperatively conclude this matter.

Pursuant to the Board’s recent order, the parties hereby submit the following report setting forth the progress the parties have made towards settlement during the previous period of suspension. As reported in the parties’ most recent Consented Motion, Counsel for Opposer and Counsel for Applicant have evaluated an updated settlement proposal from Applicant, a counter-

offer and proposed letter agreement document from Opposer and proposed final changes to the terms and settlement document from Applicant.

As an update regarding the status of the settlement negotiations, the parties advise that since the parties' most recent Consented Motion, Opposer's counsel is awaiting Opposer's senior management authorization to confirm the language of agreement for consideration by Applicant and believes that the settlement is in its final stages of approval. As Counsel for Opposer and Counsel for Applicant have agreed on all of the major points of resolution, the parties believe that, in light of this stage of settlement, this extension of time should allow the parties to jointly consider and resolve the terms and execute a final agreement.

Because the report establishes good cause by showing that the parties are actively engaged in good faith negotiations for the settlement of this matter, the parties hereby request that this proceeding be further suspended for a further thirty (30) days to allow the parties to continue their settlement efforts. The parties anticipate that a suspension of thirty days should provide the necessary timetable for the terms of settlement to be approved and finalized so as to conclude this Opposition without the need for discovery motions, further proceedings, or Board involvement.

Accordingly, the parties respectfully and jointly request a thirty day suspension to allow the parties to finalize and execute a settlement. A further suspension is warranted given the advanced status of settlement per the report above, and thus will conserve the Board's time and avoid unnecessary expense to the parties. Therefore, the parties respectfully request that all deadlines be suspended thirty days, and that all subsequent dates be reset pursuant to the schedule below:

Plaintiff's Pretrial Disclosures	August 20, 2015
Plaintiff's 30-day Trial Period Ends:	October 4, 2015
Defendant's Pretrial Disclosures	October 19, 2015
Defendant's 30-day Trial Period Ends:	December 3, 2015
Plaintiff's Rebuttal Disclosures	December 18, 2015
Plaintiff's 15-day Rebuttal Period Ends	January 17, 2016

This motion is not being filed for purpose of delay. The parties believe that, based on their intentions to settle this proceeding, they have established good cause and respectfully request the Board grant this motion to extend.

Respectfully Submitted,

COLLEN IP

Attorneys for Opposer Tissot SA

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August 4, 2015

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August 4, 2015

Certificate of Service

I, Lisa A. McAndrews, hereby certify that I caused a true and correct copy of the foregoing Motion for Suspension for Settlement with Consent to be filed electronically with the Trademark Trial and Appeal Board, and to be served upon the Applicant and the following counsel of record, via e-mail (by prior agreement of the parties) this 4th Day of August, 2015:

Martin B. Pavane, Esq.
Lisa A. Ferrari, Esq.
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A handwritten signature in blue ink, appearing to read "L. A. McAndrews", is written over a horizontal line.

Lisa A. McAndrews