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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	09/03/2015
Attachments	N1865_Consented Motion - 30 Day EOT_150907.pdf(151659 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 August 15, 2015, the parties request this further extension in good faith. Counsel for Opposer and Counsel for Applicant have largely finalized a settlement regarding the parties’ trademark use and rights for an amicable resolution of this Opposition and remain engaged in discussions to finalize the language of the agreement in order 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 Opposer’s counsel had been awaiting senior management authorization from Opposer to confirm the language of agreement for consideration by 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 has received management authorization approving one of the outstanding settlement terms proposed by Applicant. Opposer is now considering a revision to the language of the only remaining term of the agreement. Provided this language is approved, counsel for Opposer will provide it to counsel for Applicant for consideration. Counsel for Opposer and believes that the settlement is in its very final stages. 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 approve 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	September 19, 2015
Plaintiff's 30-day Trial Period Ends:	November 3, 2015
Defendant's Pretrial Disclosures	November 18, 2015
Defendant's 30-day Trial Period Ends:	January 2, 2016
Plaintiff's Rebuttal Disclosures	January 17, 2016
Plaintiff's 15-day Rebuttal Period Ends	February 16, 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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September 3, 2015

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September 3, 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 3rd Day of September, 2015:

Martin B. Pavane, Esq.  
Lisa A. Ferrari, Esq.  
COZEN O'CONNOR  
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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