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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
Correspondence Address	JESS M COLLEN COLLEN IP THE HOLYOKE-MANHATTAN BUILDING, 80 SOUTH HIGHLAND AVENUE OSSINING, NY 10562 UNITED STATES lmcandrews@collenip.com, docket@collenip.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Jess M. Collen
Filer's e-mail	lmcandrews@collenip.com, docket@collenip.com
Signature	/Jess M. Collen/
Date	12/02/2015
Attachments	N1865_Consented Motion - EOT_151202.pdf(153396 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 November 12, 2015, the parties request this further extension in good faith. Counsel for Opposer and Counsel for Applicant have largely decided upon a settlement for a resolution of this Opposition and remain in discussions to finalize the language of the agreement regarding the parties’ trademark rights and use in order to amicably 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 senior management was finalizing revisions to language regarding the last substantive aspect of this agreement. As an update regarding the status of the settlement negotiations, the parties advise

that since the parties' most recent Consented Motion, Opposer remains in the process of approval regarding the final fundamental term of this settlement agreement. Once counsel for Opposer is able to confirm the management authorization of language in this final aspect of settlement, they will immediately provide the proposed language to counsel for Applicant for potential resolution of the matter. Counsel for Opposer remains confident that the settlement is in its very last stages. As Counsel for Opposer and Counsel for Applicant have agreed on the major points of resolution, the parties believe that, in light of this last element of settlement, this extension of time should allow the parties to resolve the final terms and execute an agreement to resolve this matter.

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 forty five (45) days to allow the parties to continue their settlement efforts. The parties anticipate that a suspension of forty five 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 forty five 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 forty five days, and that all subsequent dates be reset pursuant to the schedule below:

Plaintiff's Pretrial Disclosures:	January 2, 2016
Plaintiff's 30-day Trial Period Ends:	February 16, 2016
Defendant's Pretrial Disclosures:	March 4, 2016
Defendant's 30-day Trial Period Ends:	April 16, 2016
Plaintiff's Rebuttal Disclosures:	May 1, 2016
Plaintiff's 15-day Rebuttal Period Ends:	June 2, 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

By: /Jess M. Collen/
Jess M. Collen, Esq.
Lisa A. McAndrews, Esq.
COLLEN IP
The Holyoke-Manhattan Building
80 South Highland Avenue
Ossining, NY 10562
lmcandrews@collenip.com
docket@collenip.com

December 2, 2015

COZEN O'CONNOR

Attorneys for Applicant TouchDome LLC

By: /Lisa A. Ferrari/
Martin B. Pavane, Esq.
Lisa A. Ferrari, Esq.
COZEN O'CONNOR
277 Park Avenue
New York, New York 10172
mpavane@cozen.com
lferrari@cozen.com

December 2, 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 2nd Day of December, 2015:

Martin B. Pavane, Esq.
Lisa A. Ferrari, Esq.
COZEN O'CONNOR
277 Park Avenue
New York, New York 10172

A handwritten signature in blue ink, appearing to read "L. A. McAndrews", is written over a horizontal line.

Lisa A. McAndrews