

ESTTA Tracking number: **ESTTA638824**

Filing date: **11/13/2014**

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

Proceeding	91215737
Party	Defendant International Watchman, Inc.
Correspondence Address	JOHN D GUGLIOTTA MCCARTHY LEBIT CRYSTAL & LIFFMAN 101 WEST PROSPECT AVE, SUITE 1800 CLEVELAND, OH 44115 UNITED STATES johng@inventorshelp.com, jdj@mccarthylebit.com, mwv@mccarthylebit.com, kmh@mccarthylebit.com
Submission	Other Motions/Papers
Filer's Name	Kristen M. Hoover, Esq.
Filer's e-mail	kmh@mccarthylebit.com
Signature	/kmh/
Date	11/13/2014
Attachments	doc01322320141113162319.pdf(87404 bytes)

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

OLIN CORPORATION

Opposer,

v.

INTERNATIONAL WATCHMAN INC.

Applicant.

Opposition No.: 91215737

Application No.: 85/786149

Mark: NATO

STIPULATED MOTION PURSUANT TO SETTLEMENT AGREEMENT

Pursuant to TBMP §§ 605.02 and 605.03(b), Applicant International Watchman Inc. (“Applicant”) and Opposer Olin Corporation (“Opposer”) hereby request the Board enter the following order with regard to Opposition No. 91215737 (the “Opposition”).

Applicant and Opposer (collectively, the “Parties”) have resolved the Opposition through a settlement agreement (“Settlement Agreement”) and the parties hereto agree to an immediate suspension of the Opposition and ultimate dismissal of the Opposition with prejudice subject to the following conditions:

1. The Parties agree that the description of goods and services in Application Serial No. 85/786149 (the “Application”) shall be amended as follows:

“~~Firearms; ammunition; explosives; guns; rifles; airsoft rifles and guns not for recreational use, bb guns; pellet guns; assault rifles; revolvers; hunting rifles; shotguns; magazines for weapons; gun, rifle, shotgun and machine gun cartridges; Loading clips for small arms; hand guns; bullets; fireworks; gun cases; gun barrels; rifle barrels; bipods for weapons; muskets; holsters~~”

2. The Parties agree that Applicant retains ownership of the Application.

3. The Parties request the Opposition be immediately suspended until the Board enters an appropriate order or orders carrying out the above amendments.

4. After or concurrent with the Board order(s) granting the amendments, the Parties agree to dismissal of the Opposition with prejudice.

5. If the Board denies the amendments, in whole or in part, the Parties request that the Opposition be resumed.

Dated: November 3, 2014

Respectfully submitted,

INTERNATIONAL WATCHMAN INC.

OLIN CORPORATION

/KMH/

/JRS/

Michael W. Vary, Esq.
Kristen M. Hoover, Esq.
John D. Gugliotta, Esq.

Bryan K. Wheelock
Joel R. Samuels

McCarthy, Lebit, Crystal & Liffman, Co., LPA
101 West Prospect Ave. Suite 1800
Cleveland, Ohio 44115
Tel: 216.696.1422
Fax: 216.696.1210
Email: mwv@mccarthylebit.com
kmh@mccarthylebit.com

Harness, Dickey & Pierce, P.L.C.
7700 Bonhomme, Suite 400
St. Louis, Missouri 63105
Tel: (314) 726-7500
Fax: (314) 726-7501
Email: bwheelock@hdp.com
jsamuels@hdp.com

Attorneys for Applicant

Attorneys for Opposer