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Filing date: **06/29/2015**

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

Proceeding	91216086
Party	Plaintiff Karisma Hotels & Resorts Corporation, Ltd.
Correspondence Address	J MICHAEL HURST KEATING MUETHING & KLEKAMP PLL ONE EAST FOURTH STREET, SUITE 1400 CINCINNATI, OH 45202 UNITED STATES mhurst@kmklaw.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	J. Michael Hurst
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Date	06/29/2015
Attachments	CABO AZUL - 29June2015 Stipulation.pdf(90963 bytes)

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

<p>Karisma Hotels & Resorts Corporation, Ltd.</p> <p style="text-align: center;">Opposer,</p> <p style="text-align: center;">v.</p> <p>Riviera Mi Vida S. De R.L.</p> <p style="text-align: center;">Applicant.</p>	<p>Opposition No. 91216086</p> <p>Serial No.: 86/077476 Mark: CABO AZUL</p>
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STIPULATED MOTION TO SUSPEND FOR SETTLEMENT DISCUSSIONS

The parties in the above-captioned opposition jointly request that the proceedings in the matter be suspended for a period of 90 days. The parties are actively engaged in settlement negotiations, and the additional time is needed for the parties to continue their efforts in attempting to reach a settlement. The parties respectfully request that the Board re-set the dates in this case as follows:

Initial Disclosures Due:	9/28/2015
Expert Disclosures Due:	1/26/2016
Discovery Closes:	2/25/2016
Plaintiff's Pretrial Disclosures:	4/10/2016
Plaintiff's 30-day Trial Period Ends:	5/25/2016
Defendant's Pretrial Disclosures:	6/09/2016
Defendant's 30-day Trial Period Ends:	7/24/2015
Plaintiff's Rebuttal Disclosures:	8/08/2016
Plaintiff's 15-day Rebuttal Period Ends:	9/07/2016

The Trademark Trial and Appeal Board Manual of Procedure (TBMP) instructs that “[o]rdinarily, a consented motion to extend or reopen will be granted by the Board.” See TBMP § 509.02. Accordingly, the parties respectfully submit that this joint motion, which has both parties’ consent, should be granted. There is also the good cause and reasonableness necessary for the parties’ motion to extend those deadlines that have not yet passed. See *id.* at 509.01(a) (outlining standard for motion to extend time). The parties agree that in the unlikely event that these matters are not amicably resolved, disclosures will be exchanged and the case will begin expeditiously and without any delay.

Respectfully submitted,

Dated: 29 June 2015

ALVARADOSMITH APC

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CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing was served by first class mail, postage prepaid, on 29 June 2015, upon counsel for Applicant:

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/s/ Laura Evans

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