

ESTTA Tracking number: **ESTTA742706**

Filing date: **04/27/2016**

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

Proceeding	91217527
Party	Defendant MMI-IPCO, LLC
Correspondence Address	PHI LAN TINSLEY K&L GATES LLP STATE STREET FINANCIAL CENTER, ONE LINCOLN ST BOSTON, MA 02111 UNITED STATES philan.tinsley@klgates.com, ttablitigation@klgates.com, tmboston@klgates.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	philan tinsley
Filer's e-mail	ttablitigation@klgates.com
Signature	/philan tinsley/
Date	04/27/2016
Attachments	April Stipulated Motion to Suspend.pdf(9473 bytes ) JSutherland Email.pdf(60434 bytes )

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

In the matter of Trademark Application Serial No.: 86/106,091  
Filed: November 2, 2013  
For the Mark: POWER GRID  
Published in the *Official Gazette*: March 25, 2014

SAUCONY, INC.,	:	
	:	
Opposer,	:	
	:	
v.	:	Opposition No. 91217527
	:	
MMI-IPCO, LLC	:	
	:	
Applicant.	:	
	:	

**STIPULATED MOTION TO SUSPEND OPPOSITION PROCEEDING WITH CONSENT**

MMI-IPCO, LLC (“Applicant”) and Saucony, Inc. (“Opposer”) hereby stipulate and move to suspend the above referenced Opposition No. 91217527, in order to provide the Opposer with additional time to execute the settlement agreement between the parties. The parties have resolved the issues between them and have agreed to a settlement agreement that only requires a signature from the Opposer. Julia Sutherland, counsel for the Opposer, consents to the filing of this stipulated motion.

The parties agree to suspend these proceedings for 60 days in order to provide Opposer’s client to execute the settlement agreement by this week, see attached email. This motion is filed not for the purposes of delay but to allow the parties the necessary time to get the required signature on the settlement agreement. The parties respectfully request that the board grant the Stipulated Motion to Suspend Opposition Proceeding with Consent and reset all dates of the proceeding by 60 days, making the next scheduled due date, **June 27, 2016, Applicant’s Time to Answer.**

Respectfully submitted,

POLARTEC LLC

By their attorney,

/s/ phi lan tinsley

Phi Lan M. Tinsley

K&L Gates LLP

State Street Financial Center

One Lincoln Street

Boston, Massachusetts 02111

(617) 261-3100

April 27, 2016

**CERTIFICATE OF SERVICE**

I, Phi Lan M. Tinsley, hereby certify that on the 27th day of April, 2016, I caused a true and correct copy of the foregoing to be served on the following counsel via first class mail and by email (by agreement):

Julia K. Sutherland  
Seyfarth Shaw LLP  
131 South Dearborn Street  
Suite 2400  
Chicago, IL 60603-5577

jsutherland@seyfarth.com  
(counsel of record)

/s/ phi lan tinsley

Phi Lan M. Tinsley

**Tinsley, Phi Lan M.**

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**Subject:** FW: URGENT Re: Polartec-Saucony Agreement

-----Original Message-----

From: Sutherland, Julia K [<mailto:JSutherland@seyfarth.com>]

Sent: Wednesday, April 27, 2016 11:42 AM

To: Tinsley, Phi Lan M.

Subject: RE: URGENT Re: Polartec-Saucony Agreement

Hi Phi Lan.

The agreement should be signed tomorrow. I understand if you need to file an Answer to protect your client's rights. As I mentioned before, there has been quite a bit of turnover at Wolverine. Wolverine considers the terms agreed upon and final. It's just a matter of getting the agreement signed.

Best,  
Julia

Julia K Sutherland | Partner (Admitted in Illinois) | Seyfarth Shaw (UK) LLP CityPoint | One Ropemaker Street | London EC2Y 9AW

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