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

Proceeding	91217527
Party	Defendant MMI-IPCO, LLC
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Date	07/21/2016
Attachments	TTAB_Motion_to_Set_Aside_Notice_of_Default_and_Suspend_Opposition_.pdf (10441 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.,	:	
	:	
	:	Opposition No. 91217527
Opposer,	:	
	:	
v.	:	
	:	
MMI-IPCO, LLC	:	
	:	
Applicant.	:	
	:	

**CONSENTED TO MOTION TO WITHDRAW NOTICE OF DEFAULT AND
SUSPEND PROCEEDINGS PENDING SETTLEMENT**

Pursuant to Fed. R. Civ. P. 55(c) and §312.02 of the Trademark Board Manual of Procedures, MMI-IPCO, LLC (“Applicant”) and Saucony, Inc. (“Opposer”) through its attorneys, hereby respectfully move and request that the Board: (1) withdraw the Notice of Default; and (2) suspend the present proceeding until July 31, 2009 to allow the parties to fulfill the terms of their Settlement Agreement by filing the requisite motions and requests with the Board in order to conclude this Opposition.

The Board previously suspended proceedings and Applicant’s Answer was due on June 27, 2016. During the suspension and thereafter, while the parties were awaiting execution of the approved Settlement Agreement, Applicant inadvertently failed to request another suspension of

the proceeding to extend the due date for Applicant's Answer. The Notice of Default was entered on July 11, 2016.

Applicant hereby requests that the Board withdraw the Notice of Default and reinstate the proceeding so that a suspension of the proceeding until July 31, 2016, may be accepted and entered to allow the parties the time to file a Motion to Amend trademark application 86/106,091 and ultimately, withdraw this Opposition per the terms of the parties fully executed Settlement Agreement.

Opposer, through its counsel of record, Julia Sutherland, consents to the present motion, as well as reinstatement of the proceeding, acceptance and entry of the suspension.

Respectfully submitted,

MMI-IPCO, LLC

By their attorney,

/s/ phi lan tinsley

Phi Lan M. Tinsley

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July 21, 2016

CERTIFICATE OF SERVICE

I, Phi Lan M. Tinsley, hereby certify that on the 21st day of July, 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):

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/s/ phi lan tinsley

Phi Lan M. Tinsley