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

Proceeding	91217589
Party	Defendant J & N Sales, LLC
Correspondence Address	JAMES A POWER JR POWER DEL VALLE LLP 233 WEST 72ND STREET NEW YORK, NY 10023-2788 UNITED STATES jp@powerdel.com, james_power@verizon.net
Submission	Motion to Amend Application
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Date	04/22/2016
Attachments	Motion Amend Goods.pdf(43550 bytes)

UNITED STATES PATENT AND TRADEMARK OFFICE
TRADEMARK TRIAL AND APPEAL BOARD

_____)	
RHYTHM HOLDING LIMITED,)	Opposition No. 91-217589
)	
Opposer,)	
)	In the Matter of:
v.)	
)	Application No. 86/050,581
J & N SALES, LLC,)	
)	Mark: RHYTHM IN BLUES
Applicant.)	
_____)	

Attorney Ref. 256.612

**CONSENT MOTION TO AMEND APPLICATION
AND TO SUSPEND PROCEEDING PENDING SETTLEMENT**

Applicant J & N Sales, LLC hereby moves, with the consent of opposer Rhythm Holding Ltd. and pursuant to a settlement agreement between the parties, to amend the description of goods in the opposed application as follows:

[description as it currently appears in the opposed application]

Coats; Denim jackets; Denims; Gloves; Hats; Head wear; Hooded sweatshirts;
Jackets; Jeans; Knit tops; Mittens; Pants; Rain wear; Scarves; Shirts; Shorts;
Sweat shirts; Sweaters; T-shirts; Woven tops

[description showing proposed changes]

~~Coats;~~ Denim jeans for women; denim jackets for women; denim vests for women; denim skirts for women; denim dresses for women; which goods shall not be marketed to the active youth consumer market, namely consumers of surf apparel, skateboard apparel, snowboard apparel, streetwear, and other active youth apparel ~~Gloves; Hats; Head wear; Hooded sweatshirts; Jackets; Jeans; Knit tops; Mittens; Pants; Rain wear; Scarves; Shirts; Shorts; Sweat shirts; Sweaters; T-shirts; Woven tops~~

[description as proposed]

Denim jeans for women; denim jackets for women; denim vests for women; denim skirts for women; denim dresses for women; which goods shall not be marketed to the active youth consumer market, namely consumers of surf apparel, skateboard apparel, snowboard apparel, streetwear, and other active youth apparel

Applicant, with the consent of opposer, further moves to stay this proceeding pending the Board's determination of this motion and finalization of settlement.

Respectfully submitted,

New York, New York
April 22, 2016

/jpower/
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Certificate of Service

I hereby certify that, on April 22, 2016, a copy of the foregoing Consent Motion to Amend Application and to Suspend Proceeding was served upon opposer's counsel of record by first class mail, postage prepaid, in an envelope addressed to:

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