

ESTTA Tracking number: **ESTTA262796**

Filing date: **01/26/2009**

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

Proceeding	92045935
Party	Defendant Nissan Jidosha Kabushiki Kaisha
Correspondence Address	Gary D. Krugman Sughrue Mion, PLLC 2100 Pennsylvania Avenue N.W. Washington, DC 20037-3202 UNITED STATES
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Gary D. Krugman
Filer's e-mail	gkrugman@sughrue.com, mperry@sughrue.com
Signature	/Gary D. Krugman/
Date	01/26/2009
Attachments	201052 Request for Suspension of Proceedings.pdf ( 3 pages )(84717 bytes )

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

In re the Matter of: Registration No.: 2,933,421  
Mark Sought To Be Cancelled: TITAN

TITAN INTERNATIONAL, INC.,

Petitioner,

v.

NISSAN JIDOSHA KABUSHIKI KAISHA  
TA NISSAN MOTOR CO., LTD.,

Registrant.

Cancellation No. 92/045,935

**REQUEST FOR SUSPENSION OF PROCEEDINGS**

Registrant, by its attorney, hereby requests that proceedings herein be suspended in order to maintain the status quo while the parties continue to finalize a settlement of this cancellation proceeding.

Registrant notes that, in the Board's August 12, 2008 Order resuming proceedings herein, the Board required that any further extension of time or suspension of time must be supported with a detailed report on the progress of the settlement discussions between the parties.

Registrant, with the consent of Petitioner, hereby requests that proceedings be suspended for six months, subject to the right of either party to request resumption at any time prior thereto.

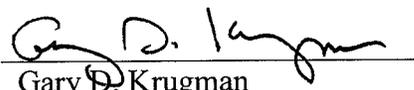
In this regard, regarding the progress of the settlement discussions, Registrant had earlier sent to Petitioner a settlement proposal which, if accepted, would resolve the issues raised in this cancellation proceeding.

On Monday, January 19, 2009, counsel for Petitioner sent proposed revisions to the draft settlement agreement to the undersigned. On January 21, 2009, the undersigned sent the proposed revisions to Registrant with comments. It is noted that the proposed revisions to the draft settlement agreement are not extensive and it is anticipated that the parties are well on their way to successfully resolving their differences, which will result in termination of the cancellation proceeding. Nevertheless, since the proposed revisions have only recently been transmitted and received, additional time is needed in order to work out the remaining details and finalize and execute a Settlement Agreement. Accordingly, the parties wish that proceedings again be suspended in order to allow additional time to finalize and execute the settlement papers.

Such action is respectfully requested, and the Board is respectfully requested to suspend proceedings for six months in order to maintain the status quo while the matter is finalized.

Respectfully submitted,

NISSAN JIDOSHA KABUSHIKI KAISHA t/a  
NISSAN MOTOR CO., LTD.

By:   
Gary D. Krugman  
Attorney for Registrant  
SUGHRUE MION, PLLC  
2100 Pennsylvania Avenue, N.W.  
Washington, DC 20037-3213  
T 202.293.7060  
F 202.293.7860

Date: January 26, 2009

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing  
**REQUEST FOR SUSPENSION OF PROCEEDINGS** has been served on Applicant this 26<sup>th</sup>  
day of January, 2009 via first class mail, postage prepaid to:

Emily E. Harris  
Davis, Brown, Koehn, Shors & Roberts, P.C.  
The Davis Brown Tower  
215 10<sup>th</sup> Street, Suite 1300  
Des Moines, IA 50309-3993  
Attorney for Petitioner



---

Gary D. Krugman

cc: Micol Cecchi