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

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| Pachranga International Private Limited, | : | |
| | : | |
| Plaintiff, | : | |
| | : | |
| v. | : | Cancellation No. 92050054 |
| | : | (U.S. Serial No. 78/906,524) |
| | : | |
| M/s Pachranga Syndicate Pvt. Ltd., | : | |
| | : | |
| Defendant. | : | |

MOTION TO SUSPEND

Comes now Pachranga International Private Limited, Petitioner in the referenced cancellation action, and moves the Trademark Trial and Appeal Board ("Board") for an order suspending this cancellation action pending disposition of foreign proceedings between the parties that, on information and belief, will determine ownership rights in the mark at issue and the ability of the parties to use that mark in commerce in the United States.

The parties to this proceeding are currently engaged in litigation in India regarding, *inter alia*, ownership of the mark at issue in this proceeding. Both parties are companies of India. Both parties engage in production and packaging of their products, including any offered under the mark at issue, in the nation of India for domestic and foreign sale. On information and belief, the relevant goods of the parties are not produced in any nation other than India and neither party has an intention to produce goods under the mark at issue in any nation but India.

The mark at issue is associated with products produced in India and this fact is a substantial element of the promotion, advertising and sales success of the products at issue in the United States marketplace. Therefore, on information and belief, the party who is successful in the courts of India is highly likely to become entitled to use the mark at issue in commerce in the United States and the unsuccessful party will no longer be entitled to engage in sales to the United States using the mark at issue and therefore no longer in a position to maintain rights in that mark here.

Under the circumstances, it is submitted that it is in the interest of justice and the economical use of the resources of the Board and the parties that this proceeding be suspended pending disposition of proceedings between the parties in India or until such



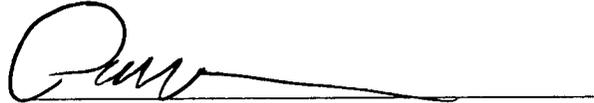
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other time as one of the parties provides adequate grounds for resumption of this cancellation action.

Petitioner has made several attempts to obtain the consent of counsel for Respondent to this motion. To date, Petitioner has not received a substantive response to those requests. Therefore, this motion is made without the consent of Respondent and without knowledge as to whether Respondent will contest the motion.

Respectfully submitted,

HOLLAND & KNIGHT LLP



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CERTIFICATE OF SERVICE

By agreement of the parties, a true copy of this MOTION TO SUSPEND was served upon counsel for Defendant, Charles P. LaPolla, Esq., of Ostrolenk, Faber, Gerb & Soffen, LLP, 1180 Avenue of the Americas, New York, NY 10036-8403, email: CLaPolla@ostrolenk.com, by email on this 8th day of June, 2009.

