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

Proceeding	92058287
Party	Plaintiff Echo Health, Inc. and Simplicity Payment Alliance, Inc.
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Submission	Withdrawal of Cancellation
Filer's Name	James B. Niehaus
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Signature	/James B. Niehaus/
Date	03/13/2015
Attachments	Notice of Withdrawal of Petition for Cancellation with Consent (Final) (3-13-15).pdf(87240 bytes )

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

<b>Simplicity Payment Alliance, Inc. and</b>	)	
<b>ECHO Health Inc.,</b>	)	<b>Cancellation No. 92058287</b>
	)	
<b>Petitioners,</b>	)	<b>Mark: SIMPLICITY HEALTH PLANS</b>
	)	<b>Registration No. 3,965,689</b>
<b>v.</b>	)	<b>Date registered May 24, 2011</b>
	)	
<b>QuickPayNet, Ltd. d/b/a</b>	)	
<b>Simplicity Health Plans,</b>	)	
	)	
<b>Registrant.</b>	)	

**EXPRESS WITHDRAWAL OF PETITION FOR CANCELLATION WITH CONSENT  
OF REGISTRANT**

Petitioners, Simplicity Payment Alliance, Inc. and ECHO Health Inc. (“Petitioners”) provide notice to the Trademark Trial and Appeal Board of the express withdrawal of its petition for cancellation of the SIMPLICITY HEALTH PLANS mark (Registration No. 3,965,689), the subject trademark of this cancellation proceeding.

Pursuant to a settlement agreement with Registrant, QuickPayNet, Ltd. (“QuickPayNet”), Petitioners and QuickPayNet have agreed to a trademark co-existence arrangement. Further, QuickPayNet consents to the express withdrawal without prejudice of the petition for cancellation.

Dated this 13<sup>th</sup> day of March 2015.

/James B. Niehaus/

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on this 13<sup>th</sup> day of March 2015, a copy of the foregoing Express Withdrawal of Petition for Cancellation With Consent of Registrant was served via e-mail and regular U.S. mail upon:

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/James B. Niehaus/  
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