

ESTTA Tracking number: **ESTTA695758**

Filing date: **09/14/2015**

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

Proceeding	92061934
Party	Plaintiff Groupon, Inc.
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Attachments	GrouponResponse'934 Proceeding.pdf(5791 bytes )

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

GROUPON, INC.,  Petitioner,  v.  TOWNSQUARE COMMERCE, LLC,  Registrant.	§ § § § § § § § § §	Registration Number: 3,895,241 Mark: SEIZE THE DEAL Registered: December 21, 2010  Cancellation No.: 92061934

**PETITIONER'S RESPONSE AND OBJECTION TO REGISTRANT'S MOTION TO  
SUSPEND PROCEEDING PENDING OUTCOME OF CIVIL ACTION**

Petitioner, Groupon, Inc. (hereinafter, "Petitioner" or "Groupon") hereby responds to Registrant Townsquare Commerce, LLC's (hereinafter, "Registrant") Motion To Suspend Proceeding Pending Outcome Of Civil Action filed with the Board on September 1, 2015. Pursuant to 37 C.F.R. § 2.116(a) and Federal Rule of Civil Procedure 1, Groupon submits that Registrant's Motion should be denied in view that the Trademark Trial and Appeal Board is the appropriate and most efficient forum for determination of the issues presented by Groupon in its Cancellation Proceeding No. 92061934 against Registrant's U.S. Reg. No. 3,895,241.

In view of the foregoing, Groupon respectfully requests that Registrant's Motion for suspension of the present proceeding be denied by the Board.

Respectfully submitted,

s/Charles E. Phipps/

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Dated: September 14, 2015

**ATTORNEYS FOR  
PETITIONER GROUPON, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing Petitioner's Response And Objection To Registrant's Motion To Suspend Proceeding Pending Outcome Of Civil Action was transmitted and served upon the following counsel for Registrant, per prior agreement and stipulation of the parties, on this 14th day of September, 2015:

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s/Robert E. Nail/  
Robert E. Nail