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

Proceeding	92061934
Party	Defendant Townsquare Commerce, LLC
Correspondence Address	TOWNSQUARE COMMERCE LLC 1851 N GREENVILLE AVE, STE 100 RICHARDSON, TX 75081 UNITED STATES tmhou@conleyrose.com
Submission	Reply in Support of Motion
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Signature	/Darlene Ghavimi/
Date	09/17/2015
Attachments	HOUSTON-#647513-v1-Reply_ISO_Motion_to_Suspend.pdf(140008 bytes )

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

In the Matter of U.S. Trademark Reg. No. 3,895,241 (SEIZE THE DEAL)  
Registered: December 21, 2010

GROUPON, INC.	§	
	§	
Petitioner,	§	
	§	
v.	§	Cancellation No. 92061934
	§	
TOWNSQUARE COMMERCE, LLC,	§	
	§	
Registrant.	§	
	§	

**REGISTRANT’S REPLY IN SUPPORT OF MOTION TO SUSPEND  
PROCEEDING PENDING OUTCOME OF CIVIL ACTION**

Registrant Townsquare Commerce, LLC (“Registrant” or “Townsquare”), by and through its undersigned counsel, hereby submits this Reply in support of its motion for suspension of this proceeding pursuant to 37 C.F.R. § 2.117 and T.B.M.P. 510.02(a), pending the final determination of *Townsquare Commerce, LLC v. Groupon, Inc.*, Civil Action 3:15-cv-1870-P, pending in the United States District Court for the Northern District of Texas.

Townsquare respectfully brings to the Board’s attention that Townsquare’s Motion to Suspend a related cancellation proceeding, Cancellation No. 92062023, was granted in a decision issued on September 16, 2015. The motion was based on the same federal court litigation cited in this proceeding and the marks are owned by the same registrant, Townsquare.

As explained in Townsquare’s Motion to Suspend, Townsquare requests suspension of these cancellation proceedings because the currently pending federal court litigation will address and resolve all of the issues raised by Groupon in this cancellation proceeding. Resolution of the issues presented in this cancellation proceeding will not dispose of all issues present in the

federal court litigation and would be unnecessary duplication of judicial resources. Townsquare therefore respectfully requests that, in the interests of judicial economy and to avoid inconsistent results, this cancellation proceeding be suspended pending a final determination in the federal court litigation.

DATE: September 17, 2015

Respectfully Submitted,

/s/ Darlene Ghavimi

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*Attorneys For Townsquare Commerce, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and complete copy of the foregoing Registrant's Motion to Suspend Proceedings Pending Outcome of Civil Action has been served on counsel of record for Groupon by e-mail, per agreement, on September 17, 2015.

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/s/ Darlene Ghavimi