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Filing date: **08/18/2016**

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

Proceeding	92062900
Party	Plaintiff MA Hagerman Brewing Company, LLC
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Signature	/David Ludwig/
Date	08/18/2016
Attachments	Joint Motion to Suspend for execution RHINOCHASER v RHINO CHASERS 4820-4905-9382 v.1.pdf(17606 bytes)

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

MA Hagerman Brewing Company, LLC,)	
)	
)	
)	
vs.)	Cancellation No. 92062900
)	
Lighthorse Trademarks, LLC,)	Registration No. 4,269,933
)	
Registrant.)	
)	

**CONSOLIDATED JOINT MOTION TO SUSPEND PROCEEDINGS
AND CONDITIONAL STIPULATED DISMISSAL**

The parties have entered into an agreement to resolve this cancellation proceeding. Pursuant to that agreement, the parties have entered into a Consent Agreement to be submitted to the United States Patent & Trademark Office (“USPTO”) in connection with United States Trademark Application Serial No. 86/585,995 (“Petitioner’s Application”), which is currently suspended pending the resolution of the present cancellation action, No. 92062900.

The parties jointly request that the Board suspend this proceeding for an additional six (6) months to allow the USPTO sufficient time to consider whether to remove Petitioner’s Application from suspension in light of the Consent Agreement that has been submitted in Application Serial No. 86/585,995.

If the USPTO both (1) removes Petitioner’s Application from suspension in light of the Consent Agreement, and (2) issues a Notice of Publication for Petitioner’s Application, the parties jointly stipulate to the dismissal of this cancellation proceeding, with prejudice.

Pursuant to this Motion, the discovery and testimony dates would be reset as follows:

Time to Answer:	02/18/2017
Deadline for Discovery Conference:	03/17/2017

Discovery Opens:	03/17/2017
Initial Disclosures Due:	04/17/2017
Expert Disclosure Due:	08/14/2017
Discovery Closes:	09/16/2017
Plaintiff's Pretrial Disclosures:	10/30/2017
Plaintiff's 30-day Trial Period Ends:	12/14/2017
Defendant's Pretrial Disclosures:	12/29/2017
Defendant's 30-day Trial Period Ends:	02/13/2018
Plaintiff's Rebuttal Disclosures:	02/28/2018
Plaintiff's 15-day Rebuttal Period Ends:	03/27/2018

Respectfully submitted,

By: /JSM/

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Dated: August 16, 2016

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Dated: August 16, 2016

