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

Proceeding	92070264
Party	Plaintiff Syneco S.p.A
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Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Rebecca Gan
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Signature	/rgan/
Date	05/06/2019
Attachments	Motion to Suspend for Settlement without Consent - 92070264.pdf(220250 bytes)

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

SYNECO S.P.A.,

Petitioner,

v.

SYNCO CHEMICAL CORPORATION,

Respondent.

Cancellation No. **92070264**

Registration No. 1,262,798

Mark: **SYNCO**

MOTION TO SUSPEND FOR SETTLEMENT WITHOUT CONSENT

Pursuant to 37 C.F.R. §2.117(c) and TBMP §510.03(a), Petitioner, Syneco S.p.A., through counsel, hereby respectfully moves the Board for a continued suspension of the above-captioned cancellation proceeding for a period of another sixty (60) days.

The Parties are engaged in active settlement negotiations. The Parties have corresponded extensively. Accordingly, Board participation in a Discovery Conference would not serve to accelerate the process.

Furthermore, due to the following: religious and national holidays in Europe for Petitioner's foreign counsel (an Italian law firm) and Petitioner itself (an Italian company); Petitioner's U.S. counsel's Board and Appellate schedule, including an Appellate Oral Argument in an unrelated proceeding on May 8, 2019; Petitioner's U.S. counsel's recent office move¹; and Petitioner's U.S. counsel's travel related to the upcoming INTA Annual Meeting in Boston;

¹ Petitioner's U.S. counsel's move to a completely new office space has encountered numerous logistical and technological problems, including server failures, and the inability to place or receive telephone calls and access voicemails, which has made corresponding with Petitioner's foreign counsel, Petitioner, and Respondent's counsel difficult.

Petitioner wishes to continue the suspension of the proceeding in order to focus on finding mutually agreeable settlement terms, and avoid opening the discovery period and engaging in formal discovery.

Moreover, Petitioner believes that neither Party will be prejudiced by the granting of the Motion to Suspend for Settlement without Consent requested herein.

Petitioner's U.S. counsel has contacted Respondent's counsel and requested consent to this Motion to Suspend for Settlement; however, Petitioner's U.S. counsel has not heard back from Respondent's counsel and, therefore, must assume that Respondent either does not consent, or is unable to contact Petitioner's U.S. counsel due to logistical difficulties related to Petitioner's U.S. counsel's move.

Accordingly, Petitioner respectfully moves the Board to continue suspension of the above-captioned cancellation proceeding for a period of sixty (60) days.

Dated: May 6, 2019

Respectfully submitted,



Rebecca Gan, Esq.
Counsel for Petitioner

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CERTIFICATE OF SERVICE

I, Christopher Emond, hereby certify that on this 6th day of May 2019, a true and complete copy of the foregoing Motion to Suspend for Settlement without Consent, has been served on Respondent's counsel, Jonathan J. Ross, Esquire, via electronic mail (as prescribed by law), addressed as follows:

jross@feldman-law.com

 /cpe/
Christopher Emond