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Filing date: **06/27/2011**

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

Proceeding	91161183
Party	Plaintiff ING Direct Bancorp (by change of name from ING USA HOLDING CORPORATION)
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Submission	Motion to Suspend for Settlement Discussions
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Date	06/27/2011
Attachments	91-161183.pdf ( 4 pages )(111409 bytes )

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

ING DIRECT BANCORP (by change of name from ING USA HOLDING CORPORATION),	)	
	)	CONSOLIDATED
Opposer,	)	Opposition Nos. 91-161,183 (Parent)
	)	91-162,981
v.	)	91-163,494
	)	91-163,523
ORANGE BRAND SERVICES LIMITED,	)	91-164,137
	)	91-164,807 <sup>1</sup>
Applicant.	)	
	)	

**STIPULATION TO SUSPEND PROCEEDINGS FOR SETTLEMENT**

Opposer, ING DIRECT Bancorp (“ING DIRECT”), and Applicant, Orange Brand Services Limited (“OBSL”), the current parties of record in this Consolidated Opposition Proceeding, by and through their respective counsel, move for an order suspending this Consolidated Opposition Proceeding for a period of six (6) months, to be calculated from today’s date, June 27, 2011.

As the Board is aware, the parties settled this matter on April 4, 2011. Under the terms of their agreement, however, the parties cannot withdraw this Consolidated Opposition Proceeding until they have satisfied certain requirements. For this reason, the Board suspended this Consolidated Opposition Proceeding on May 2, 2011 for a period of six (6) months, ending on October 22, 2011.

On May 10, 2011, OBSL, with ING DIRECT’s consent, moved to amend the identifications of services in certain Application Serial Nos. (the “Applications”). On

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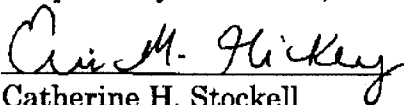
<sup>1</sup> Opposition No. 91-185,077 was dismissed without prejudice on May 26, 2011 after Opposer expressly abandoned Serial No. 77/159,882.

May 26, 2011, the Board issued an order acknowledging the amendments made by OBSL, and requesting the parties to advise the Board whether they will be withdrawing the Consolidated Opposition Proceeding as a result of the amendments made by OBSL.

As the parties explained to the Board during a telephonic conference on June 27, 2011, they still cannot withdraw the Consolidated Opposition Proceeding because they have not satisfied all of their requirements under the settlement agreement yet. One of these outstanding requirements is that the Examining Attorney assigned to OBSL's Applications approve and enter the amendments OBSL made.

Accordingly, the parties move for an order further suspending this Consolidated Opposition Proceeding for a period of six (6) months, to be calculated from today's date, June 27, 2011. If the Board enters the order, and unless either party requests resumption before the six-month period expires, the parties respectfully request that all deadlines be re-set in accordance with this Stipulation to Suspend Proceedings for Settlement.

Respectfully submitted,



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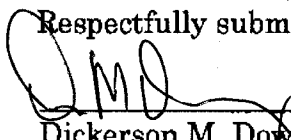
Dated: June 27, 2011

SO ORDERED:

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Trademark Trial and Appeal Board

Respectfully submitted,



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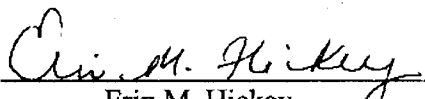
Dated: June 27, 2011

**CERTIFICATE OF SERVICE**

This is to certify that, on this 27th day of June 2011, a true copy of the foregoing **STIPULATION TO SUSPEND PROCEEDINGS FOR SETTLEMENT** has been sent by electronic mail, to Applicant's attorneys of record, with their consent:

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By:   
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