

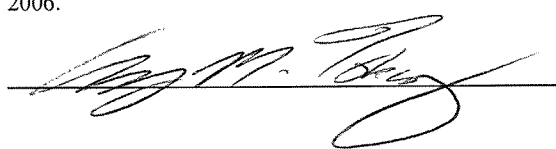
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91167939
Party	Defendant Great Lakes Financial Resources, Inc. Great Lakes Financial Resources, Inc. 4600 W. Lincoln Highway Matteson, IL 60443
Correspondence Address	JULIE A. KATZ WELSH & KATZ, LTD. 120 S. RIVERSIDE PLAZA, 22ND FLOOR CHICAGO, IL 60606
Submission	Motion to Suspend for Settlement Discussions
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Date	10/30/2006
Attachments	939 motion-10302006-050057PM.pdf (3 pages)(116980 bytes)

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

In re Trademark Application Serial No. 76/589,211) by Great Lakes Financial Resources) Filed on April 27, 2004;) for the Mark) <u>“GREAT LAKES BANK OF CHOICE and Design</u>) Great Lakes Financial Resources, Inc.) Applicant,)	Opposition No. 91,167,939 I hereby certify that this paper is being transmitted by electronic mail to the United States Patent and Trademark Office http://www.uspto.gov on this date: October 30, 2006.
v.)	
Citigroup, Inc.) Opposer)	

BOX TTAB/NO FEE
Commissioner for Trademarks
2900 Crystal Drive
Arlington, VA 22202-3514

CONSENTED MOTION TO SUSPEND PROCEEDINGS UNDER § 2.117(c)

Applicant, Great Lakes Financial Resources, Inc., hereby respectfully moves that the Board suspend this Opposition proceeding pursuant to 37 C.F.R. Ch.1 §2.117(c) on the grounds that Applicant and Opposer are in the process of pursuing a possible settlement agreement concerning this proceeding. Counsel for Opposer consents to this motion for the reasons set forth herein.

ARGUMENT

Rule 2.117(c) states that “[p]roceedings may also be suspended, for good cause, upon motion or a stipulation of the parties approved by the Board.” In this regard, the Board may suspend proceedings “in order to allow the parties to pursue settlement... [or] when it appears that actual efforts at settlement are proceeding or progress is being made.” Gilson, Trademark Protection and Practice, Vol. 1, Section 3.05[2][c].

In the present proceeding, the parties are continuing to explore reasonable settlement terms in an effort to conclude this opposition proceeding in an expeditious manner. Therefore, good cause being shown, the parties hereto move for suspension of this opposition proceeding.

CONCLUSION

For the reasons stated in this Consented Motion to Suspend Proceedings, Applicant respectfully requests on behalf of both parties that the Board suspend this opposition proceeding for a period of 6 months from resolution of this Motion.

The parties also request that discovery be stayed during the suspension period and that all discovery due dates be reset for 30 days beyond the date of the removal of this proceeding from suspension.

Dated: October 30, 2006

Respectfully submitted,

GREAT LAKES FINANCIAL RESOURCES, INC.

By 
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 30, 2006, a copy of the foregoing CONSENTED MOTION TO SUSPEND PROCEEDINGS UNDER §2.117(c) was served by first class mail, postage prepaid, on the following:

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