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Filing date: **11/23/2012**

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

Proceeding	91182207
Party	Plaintiff Johnson & Johnson and Roc International S.A.R.L.
Correspondence Address	BRIAN A COLEMAN DRINKER BIDDLE REATH LLP 1500 K STREET NW, SUITE 1100 WASHINGTON, DC 20005 1209 UNITED STATES dctrademarks@dbr.com, jaye.campbell@dbr.com, brian.coleman@dbr.com, tmlitdocket@dbr.com, gayne.zimmerman@dbr.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Jaye S. Campbell
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Date	11/23/2012
Attachments	J&J_WDS Consent Motion to Suspend 112312.pdf (4 pages)(61964 bytes)

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

JOHNSON & JOHNSON and	:	
ROC INTERNATIONAL S.A.R.L.	:	
Opposers/Respondents,	:	
v.	:	Opp. No. 91/182,207 (parent)
		91/184,467
OBSHESTVO S OGRANITCHENNOY;	:	
OTVETSTVENNOSTIU "WDS",	:	
Applicant/Petitioner.	:	
	:	

CONSENT MOTION TO SUSPEND PROCEEDINGS FOR 30 DAYS

Opposers and Counterclaim Respondents, Johnson & Johnson and RoC International s.a.r.l. ("Respondent"), with consent of Applicant and Counterclaim Petitioner ("Petitioner") hereby move to suspend the instant consolidated proceeding for thirty (30) days while the parties complete settlement.

Petitioner recently engaged Buchanan Ingersoll & Rooney PC ("Buchanan") as additional counsel on this matter. New counsel has now filed a Notice of Appearance in the instant consolidated opposition. Respondent understands that Petitioner's original counsel, Erik Pelton, remains co-counsel on behalf of Petitioner. Respondent is presently reviewing the revised agreement sent by Petitioner, and the parties are investigating a potential ethical issue raised by Respondent in connection with Buchanan's representation. The parties respectfully submit that additional time is warranted to address these issues. Petitioner's counsel, Bruce McDonald, consented to this request via e-mail on November 20, 2012. Petitioner's counsel, Erik Pelton, also consented to this request via e-mail.

Accordingly, Respondent moves, with Petitioner's consent, for a thirty (30) day suspension of the consolidated proceeding in order to provide the parties additional time to complete settlement. The parties believe that settlement will be fully concluded in the very near term.

The parties' respectfully request that dates be reset as follows:

Answer to Counterclaim due:	December 23, 2012
Plaintiff's Pretrial Disclosures due:	January 30, 2013
30-day testimony period for defendant and plaintiff in the counterclaim to close:	March 15, 2013
Defendant/Counterclaim Plaintiff's Pretrial Disclosures due:	March 30, 2013
30-day testimony period for defendant and plaintiff in the counterclaim to close:	May 15, 2013
Counterclaim Defendant's and Plaintiff's Rebuttal Disclosures due:	May 29, 2013
30-day testimony period for defendant in the counterclaim and rebuttal testimony period for plaintiff to close	July 14, 2013
Counterclaim Plaintiff's Rebuttal Disclosures Due:	July 29, 2013
15-day rebuttal period for plaintiff in the counterclaim to close	August 28, 2013
Brief for plaintiff Due	October 26, 2013
Brief for defendant and plaintiff in the counterclaim due:	November 26, 2013
Brief for defendant in the counterclaim and reply brief, if any, for plaintiff due:	December 26, 2013
Reply brief, if any, for plaintiff in counterclaim due:	January 9, 2014

Respectfully submitted,

JOHNSON & JOHNSON and
ROC INTERNATIONAL S.A.R.L.

By: /s/ Jaye S. Campbell
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **CONSENT MOTION TO SUSPEND PROCEEDINGS FOR 30 DAYS** was served on Applicant's counsel of record this 23rd day of November 2012, via first-class mail to:

Erik M. Pelton Esq.
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/s/ Jaye S Campbell