ESTTA Tracking number: **ESTTA339862**

Filing date: **03/30/2010**

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

Proceeding	91185991
Party	Plaintiff Cirrus System, LLC
Correspondence Address	Robert M. Wasnofski, Jr. Dorsey & Whitney LLP 250 Park Avenue, 15th Floor New York, NY 10177 UNITED STATES ny.trademark@dorsey.com,wasnofski.robert@dorsey.com,mitrione.gianfranco@dorsey.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Gianfranco G. Mitrione
Filer's e-mail	ny.trademark@dorsey.com,wasnofski.robert@dorsey.com,mitrione.gianfranco@dorsey.com
Signature	/ggm/
Date	03/30/2010
Attachments	MasterCard - Jumeirah - 60 day Suspension request.pdf (3 pages)(14266 bytes)

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

CIRRUS SYSTEM, LLC,	:	
Opposer,	:	Opposition No. 91185991
v.	:	
JUMEIRAH INTERNATIONAL LLC,	:	
Applicant.	:	

MOTION FOR SUSPENSION FOR SETTLEMENT WITH CONSENT

The parties have held a 26(f) conference in this proceeding and are actively engaged in discussions for settlement of this matter. The parties therefore request that this proceeding be suspended for a period of 60 days to allow the parties to continue their settlement efforts, as follows:

Proceedings Resume	06/04/2010
Initial Disclosures Due	06/30/2010
Expert Disclosures Due	10/26/2010
Discovery Closes	11/25/2010
Plaintiff's Pretrial Disclosures	01/09/2011
Plaintiff's 30-Day Trial Period Ends	02/23/2011
Defendant's Pretrial Disclosures	03/10/2011
Defendant's 30-Day Trial Period Ends	04/24/2011

Plaintiff's Rebuttal Disclosures 05/09/2011

Plaintiff's 15-Day Rebuttal Period Ends.....06/08/2011

This request is made for good cause and is not made merely for purposes of delay. The parties have been in settlement discussions in order to achieve a settlement agreement addressing their respective marks. A draft version of a settlement agreement was transmitted to Applicant's counsel in October, 2009. Since then counsel for the respective parties have conferred by telephone to negotiate the terms of the settlement agreement. Opposer expects to receive Applicant's proposed revisions to the draft agreement shortly. In view of the foregoing, Opposer respectfully requests that the Board grant the parties' consented motion to suspend the proceeding for 60 days.

Cirrus System, LLC has secured the express consent of all other parties to this proceeding for the suspension requested herein.

Date: March 30, 2010

DORSEY & WHITNEY LLP

By:_____/ggm/_____

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Attorneys for Opposer

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

CIRRUS SYSTEM, LLC, Opposer, v. JUMEIRAH INTERNATIONAL LLC, Applicant.	:	Opposition No. 91185991

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion for Suspension for Settlement with Consent is being served upon the counsel for Applicant by sending a true copy thereof by electronic mail, addressed to:

Thomas Carulli
Kaplan Von Ohlen & Massamillo
555 5th Avenue, 15th Floor
New York, NY 10017

tcarulli@kvolaw.com

on March 30, 2010.

/ggm/
Gianfranco G. Mitrione