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

Proceeding	91185991
Party	Plaintiff Cirrus System, LLC
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Submission	Motion to Suspend for Settlement Discussions
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Signature	/ggm/
Date	09/07/2011
Attachments	MasterCard - Jumeirah - 9-7-2011 30 day Suspension for Settlement with Consent.pdf (4 pages)(15960 bytes)

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

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 30 days to allow the parties to continue their settlement efforts, as follows:

Proceedings Resume:	10/07/2011
Initial Disclosures Due:	11/06/2011
Expert Disclosures Due:	02/25/2012
Discovery Period to Close:	03/26/2012
Plaintiff Pretrial Disclosures:	05/10/2012
Plaintiff's 30-day Trial Period Ends:	06/24/2012
Defendant's Pretrial Disclosures:	07/09/2012
Defendant's 30-day Trial Period ends:	08/23/2012

Plaintiff's Rebuttal Disclosures:	09/07/2012
Plaintiff's 15-day Rebuttal Period Ends:	10/07/2012

The parties have been in settlement discussions in order to achieve a settlement agreement addressing their respective marks. In particular, in October 2008 the parties held a formal telephone conference to discuss the settlement terms. Following the parties' conference, Cirrus sent Jumeirah a communication setting forth the proposed settlement terms. In February 2009, Jumeirah sent Cirrus a proposed draft settlement agreement and, in April 2009, Cirrus relayed to Jumeirah its comments and revisions to the draft agreement. Subsequently, in October 2009, Cirrus sent a revised draft version of a settlement agreement to Jumeirah's counsel. In late April, 2010, Jumeirah's counsel provided comments to Cirrus in regards to the draft agreement. Shortly thereafter, on May 25, 2010, counsel for both parties met in person in Boston, Massachusetts to further discuss the terms of the draft agreement. On June 22, 2010, Jumeirah's counsel contacted Cirrus counsel about certain terms of the settlement agreement and the parties exchanged emails regarding same during the following days.

The business divisions of both Cirrus and Jumeirah continue to discuss business issues involving the potential settlement directly. Specifically, representatives from both Cirrus and Jumeirah met in person on February 3, 2011 to discuss these issues. Counsel for the parties met in person on May 16, 2011 to further discuss terms of settlement. Cirrus received a proposed amended settlement agreement from Jumeirah at the end of June, 2011 and counsel for the parties have communicated by telephone in July and August to discuss same. Cirrus provided Jumeirah with its comments and changes to the latest draft proposed settlement agreement on

September 6, 2011. The terms of the proposed settlement agreement and the remaining issues to be resolved are highly confidential and cannot be disclosed.

In view of the foregoing, Opposer respectfully requests that the Board grant the parties' consented motion to suspend the proceeding for 30 days. Cirrus System, LLC has secured the express consent of all other parties to this proceeding for the suspension requested herein.

Date: September 7, 2011

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By: /ggm/

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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

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on September 7, 2011.

/ggm/
Gianfranco G. Mitrione