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

Proceeding	91194131
Party	Plaintiff Wrangler Apparel Corp.
Correspondence Address	PAUL J KENNEDY PEPPER HAMILTON LLP 3000 2 LOGAN SQ, 18TH ARCH ST PHILADELPHIA, PA 19103 2799 UNITED STATES kennedypp@pepperlaw.com, catalant@pepperlaw.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Paul J. Kennedy
Filer's e-mail	kennedyp@pepperlaw.com, catalant@pepperlaw.com
Signature	/Paul J. Kennedy/
Date	11/09/2012
Attachments	11-09-2012 Consent Motion to Suspend (Wrangler v. Hudson).pdf ( 3 pages )(32196 bytes )

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

WRANGLER APPAREL CORP.

Opposition No. 91194131

Opposer

Marks: MISCELLANEOUS DESIGN

v.

Application Serial No. 77/732069

Published in Official Gazette: September 15, 2009

Filed: May 7, 2009

HUDSON CLOTHING, LLC

Application Serial No. 77/732083

Published in Official Gazette: September 22, 2009

Filed: May 7, 2009

Applicant

## CONSENT MOTION TO SUSPEND PROCEEDINGS

Pursuant to the Order dated September 10, 2012, the proceedings will resume on November 10, 2012. Opposer Wrangler Apparel Corp. and Applicant Hudson Clothing, LLC hereby jointly move for an additional 60-day suspension of the opposition proceeding. As requested by the Board in its Order dated September 10, 2012, the parties jointly submit the following detailed progress report in support of this request to suspend.

Subsequent to the filing of the last Consent Motion on September 4, 2012, the parties have had further communications, most recently on November 6, 2012 and November 7, 2012 in an attempt to settle on terms of resolution. Opposer Wrangler has submitted a detailed settlement proposal to Applicant Hudson Clothing. Counsel for Applicant Hudson Clothing advises that he will need to discuss some of the terms of the agreement further with his client;

however, due to counsel's schedule, this cannot be accomplished prior to December. Both

counsel continue to believe the matter can be resolved. Said proposal, if accepted, would resolve

the issues in this opposition proceeding.

In view of the foregoing, the parties respectfully request that the Board grant this

request to suspend the proceedings for an additional sixty (60) days so that the parties may

attempt to resolve the matter. The parties are not requesting an additional suspension to delay

the proceedings but are requesting same so that good faith negotiations may continue.

Counsel for Opposer Wrangler Apparel Corp. secured the express consent of

Applicant Hudson Clothing, LLC for the suspension requested herein on November 7, 2012.

Applicant's counsel has agreed to service of the Consent Motion by electronic mail and U.S.

First Class Mail.

Respectfully submitted,

Dated: November 9, 2012

Paul J. Kennedy

PEPPER HAMILTON LLB

3000 Two Logan Square

Eighteenth and Arch Streets

Philadelphia, PA 19103-2799

(215) 981-4194

Email: kennedyp@pepperlaw.com

Attorneys for Opposer,

Wrangler Apparel Corp.

## **CERTIFICATE OF SERVICE**

I, Paul J. Kennedy, hereby certify that on November 9, 2012, a true and correct copy of the foregoing Consent Motion to Suspend Proceedings was served via email (by agreement of counsel) and U.S. First Class Mail upon the following:

John J. Dabney, Esquire McDermott Will & Emery LLP 500 North Capitol Street, N.W. Washington, D.C. 20001 Email: jdabney@mwe.com

Attorneys for Applicant

Paul J. Kennedy