ESTTA Tracking number: **ESTTA725035**

Filing date: **02/04/2016**

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

Proceeding	91196955
Party	Defendant Alcatel-Lucent USA Inc.
Correspondence Address	KEITH R OBERT WARE FRESSOLA MAGUIRE & BARBER LLP 755 MAIN STREET, PO BOX 224 MONROE, CT 06468 UNITED STATES kro@warefressola.com, mail@warefressola.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Keith R. Obert
Filer's e-mail	kro@warefressola.com, mail@warefressola.com
Signature	/Keith R. Obert/
Date	02/04/2016
Attachments	MotionforSuspensionFeb2016.pdf(21333 bytes)

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

WESTERN ELECTRIC EXPORT CORPORATION, Opposer,	)	
v.	)	Opposition No. 91196955
ALCATEL-LUCENT USA INC, Applicant.	)	Application Serial No. 77/709,427

STIPULATED MOTION FOR REOPENING AND SUSPENSION FOR SETTLEMENT WITH CONSENT

The parties are actively engaged in activities related to the settlement of this matter, and the parties jointly request that the above captioned opposition proceeding be suspended for a further ninety (90) days until March 5, 2016. It is further requested that the conferencing, disclosure, discovery and trial dates be reopened and/or reset as follows:

Time to Answer :	CLOSED
Deadline for Discovery Conference :	CLOSED
Discovery Opens :	CLOSED
Initial Disclosures Due :	CLOSED
Expert Disclosure Due :	CLOSED
Discovery Closes :	CLOSED
Plaintiff's Pretrial Disclosures :	03/05/2016
Plaintiff's 30-day Trial Period Ends :	04/19/2016
Defendant's Pretrial Disclosures :	05/04/2016
Defendant's 30-day Trial Period Ends :	06/18/2016
Plaintiff's Rebuttal Disclosures :	07/03/2016
Plaintiff's 15-day Rebuttal Period Ends :	08/02/2016

In support of this Motion, the parties report on the progress of this matter as follows:

It is confirmed that the parties have reached agreement on settling this matter, however additional time is required to prepare and review the documents required to implement the settlement. Although significant progress has been made in settling this matter, it will take additional time to complete the settlement. Further details of the settlement remain confidential.

It is expected that the settlement can be completed in the relatively near future.

It is submitted that the foregoing and the parties' continued settlement efforts and progress towards resolution of this matter constitute a proper showing of good cause for the suspension as requested and it is not interposed for purposes of delay.

Applicant, Alcatel-Lucent USA Inc., has secured the express consent of all other parties to this proceeding for the suspension and resetting of dates requested herein.

Therefore, it is respectfully submitted that the proceedings of this opposition should be suspended for ninety (90) days subject to the right of either party to request resumption at any time.

Applicant, Alcatel-Lucent USA Inc., has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

Respectively submitted,
ALCATEL-LUCENT USA INC.

Dated: February 4, 2016

By: /Keith R. Obert/
Keith R. Obert
Attorney for Applicant

WARE, FRESSOLA, MAGUIRE & BARBER, LLP
Bradford Green, Building 5
755 Main Street, P.O. Box 224
Monroe, Connecticut 06468
Telephone: (203) 261-1234
Facsimile: (203) 261-5676
kro@warefressola.com

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing STIPULATED MOTION FOR REOPENING AND SUSPENSION FOR SETTLEMENT WITH CONSENT has been served on Opposer, WESTERN ELECTRIC EXPORT CORPORATION, by emailing said copy on the date indicated below to Charles Whitener at the following email address:

cgw@westernelectric.com

Dated: February 4, 2016

By: /Keith R. Obert/

Keith R. Obert