ESTTA Tracking number:

ESTTA656380 02/17/2015

Filing date:

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

| Proceeding | 91203267 |
|---------------------------|--|
| Party | Defendant Datcard Systems, Inc. |
| Correspondence Address | STACEY R HALPERN KNOBBE MARTENS OLSON & BEAR LLP 2040 MAIN STREET, 14TH FLOOR IRVINE, CA 92614 UNITED STATES efiling@kmob.com, stacey.halpern@kmob.com |
| Submission | Motion to Suspend for Settlement Discussions |
| Filer's Name | Stacey R. Halpern |
| Filer's e-mail | efiling@knobbe.com, stacey.halpern@knobbe.com |
| Signature | /Stacey R. Halpern/ |
| Date | 02/17/2015 |
| Attachments | opp.pdf(17660 bytes) |

DATCAR.078M TTAB

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

|) U.S. Opposition No.: 91203267 |
|--|
|) I hereby certify that this correspondence and all marked attachments are being electronically filed with the Trademark Trial and Appeal Board of the U.S. Patent and |
| Trademark Office through their website located at http://estta.uspto.gov on: |
| February 17, 2015 |
| Stacey R. Halpen |
| |

STIPULATED MOTION TO SUSPEND DEADLINE TO SERVE DISOVERY RESPONSES AND ALL OTHER DEADLINES

Commissioner for Trademarks P.O. Box 1451 Alexandria, VA 22313-1451

Suspended Ends:

Defendant's 30-day Trial Period Ends:

Dear Sir or Madam:

Datcard Systems, Inc. ("Applicant") hereby requests that the Trademark Trial and Appeal Board (the "Board") extend all deadlines in the above-referenced opposition proceeding, including but not limited to, the deadline for the parties to responding to the other party's discovery requests by thirty (30) days. Specifically, if this matter is not resolved or deadlines are not further extended or suspended, the following deadlines would apply:

March 19, 2015

August 16, 2015

Discovery Closes:

Deadline for Applicant
to respond to Opposer's Discovery

Deadline for Opposer
to respond to Applicant's Discovery

April 5, 2015

Plaintiff's Pretrial Disclosures:

Plaintiff's 30-day Trial Period Ends:

Defendant's Pretrial Disclosures:

June 17, 2015

Defendant's Pretrial Disclosures:

July 2, 2015

Plaintiff's Rebuttal Disclosures: Plaintiff's 15-day Rebuttal Period Ends:

Dated: February 17, 2015

September 15, 2015 September 30, 2015

Applicant makes this request so that the parties can continue with their settlement discussions. Applicant notes that several draft settlement agreements have been exchange. Moreover, both parties have served discovery requests. Further, Applicant notes that Opposer obtained new counsel during the course of the settlement discussions. Accordingly, the parties need additional time to determine if an amicable resolution can be reached and if not, complete discovery. As settlement of this matter will save the time and resources of the Board, Applicant makes this request for good cause. Applicant notes that the Settlement/Discovery Conference has been conducted. Applicant also noted that Opposer's counsel provided her consent to this extension via electronic mail on February 13, 2015.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Stay R. Halpen

By: _

Stacey R. Halpern 2040 Main Street, 14th Floor Irvine, CA 92614 (949) 760-0404 efiling@kmob.com Attorneys for Applicant

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing **STIPULATED MOTION TO SUSPEND DEADLINE TO RESPOND TO DISCOVERY REQUEST AND ALL OTHER DEADLINES** upon Opposer's counsel by depositing one copy thereof in the United States Mail,

first-class postage prepaid on addressed as follows:

Barbara Grahn
OPPENHEIMER WOLFE DONNELLY LLP
Campbell Mithun Tower – Suite 2000
222 South Ninth Street
Minneapolis, MN 55402-3338

Stacey R. Halpern

Stay R. Halpen

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