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

Proceeding	91209183
Party	Plaintiff Sequel Naturals ULC
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Submission	Motion to Suspend for Settlement Discussions
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Date	09/21/2016
Attachments	2016.09.21 - Consent Motion to Suspend.pdf(15610 bytes )

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

Sequel Naturals ULC,  Opposer,  v.  Vega Produce LLC,  Applicant.	Opposition No. 91209183  Mark: VEGA  Serial No.: 85/663,788
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**MOTION FOR SUSPENSION FOR SETTLEMENT WITH CONSENT**

Opposer, by and through its undersigned counsel, hereby moves upon consent for an Order suspending this proceeding for thirty (30) days from September 9, 2016. Opposer filed a previous Consent Motion requesting a 30 day suspension on September 9, 2016. The Board denied that motion without prejudice on September 21, 2016, because the parties did not provide a detailed report on the progress of the parties' settlement. By this Motion, the parties provide the requested information. Applicant, by its counsel, has consented to, and joins in, this request.

The parties are currently engaged in settlement negotiations. Specifically, the parties have negotiated settlement terms and exchanged several iterations of a draft settlement agreement. On September 6, 2016, Applicant's counsel indicated Applicant's agreement to the terms of the latest draft of the agreement. This version of the agreement is currently under review by Opposer and Opposer's counsel expects to convey Opposer's substantive response within one week. Accordingly, the parties' request for an extension of all deadlines is not for the purpose of delay, but for good cause to continue settlement negotiations.

The parties propose the following new deadlines in this proceeding:

<b>Time to Answer :</b>	CLOSED
<b>Deadline for Discovery Conference :</b>	CLOSED
<b>Discovery Opens :</b>	CLOSED
<b>Initial Disclosures Due :</b>	CLOSED
<b>Expert Disclosures Due :</b>	CLOSED
<b>Discovery Period to Close :</b>	CLOSED
<b>Plaintiff Pretrial Disclosures :</b>	10/09/2016
<b>Plaintiff's 30-day Trial Period Ends :</b>	11/23/2016
<b>Defendant's Pretrial Disclosures :</b>	12/08/2016
<b>Defendant's 30-day Trial Period ends :</b>	01/22/2017
<b>Plaintiff's Rebuttal Disclosures :</b>	02/06/2017
<b>Plaintiff's 15-day Rebuttal Period Ends :</b>	03/08/2017

As this request is made for good cause and is not made merely for purposes of delay, the parties respectfully request that the Board grant the consented motion.

September 21, 2016

HOLLAND & HART LLP

/Beth E. Cooperstein/

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*Attorneys for Opposer Sequel Naturals ULC*

**CERTIFICATE OF SERVICE**

I certify that September 21, 2016, I served a copy of the above MOTION FOR SUSPENSION FOR SETTLEMENT WITH CONSENT to the following by:

- U.S. Mail, postage prepaid
- Hand Delivery
- Email

David K. Friedland, by email to [dkf@friedlandvining.com](mailto:dkf@friedlandvining.com)

FRIEDLAND VINING, P.A.

/s/ Beth E. Cooperstein  
For Holland & Hart LLP