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Filing date: **07/30/2014**

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

Proceeding	91209486
Party	Plaintiff Razor USA LLC
Correspondence Address	STACEY R HALPERN KNOBBE MARTENS OLSON & BEAR LLP 2040 MAIN STREET, 14TH FLOOR IRVINE, CA 92614 UNITED STATES efiling@Knobbe.com, stacey.halpern@Knobbe.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Stacey R. Halpern
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Signature	/Stacey R. Halpern/
Date	07/30/2014
Attachments	razor.802.pdf(18793 bytes)

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

Razor USA LLC,

Opposer,

v.

Koei Tecmo Games Co., Ltd, fka
Tecmo Koei Games Co., Ltd.

Applicant.

) Opposition No. 91,209,486

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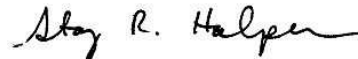
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I hereby certify that this correspondence and all marked attachments are being electronically filed with the Trademark Trial and Appeal Board through their web site located at <http://estta.uspto.gov> on:

July 30, 2014

(Date)



Stacey R. Halpern

STIPULATED MOTION FOR SUSPENSION OF OPPOSITION PROCEEDING

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

Dear Sir or Madam:

Opposer, Razor USA LLC (“Razor”) requests that the Trademark Trial and Appeal Board (the “Board”) suspend the above-referenced opposition proceeding for 30 days. Razor note that on May 29, 2014 Razor’s counsel provided counsel for Applicant, Tecmo Koei Games Co., Ltd. with a draft settlement agreement. Subsequently, Tecmo Koei Games Co., Ltd. changed its name to Koei Tecmo Games Co., Ltd. (“Applicant”). Thereafter, on July 29, 2014, Applicant’s counsel provided Razor’s counsel with proposed revisions to the draft agreement. Razor is currently reviewing the proposed revisions.

Razor notes that the parties are attempting to resolve the matter on a worldwide basis. Moreover, Applicant is a foreign company. Thus, settlement of this matter has taken considerable amounts of time. Accordingly, the parties request that the current deadlines be suspended for an additional 30 days so that the following deadlines would apply:

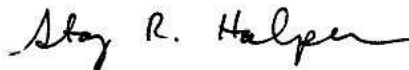
Answer	09/29/2014
Deadline for Discovery Conference:	10/29/2014
Discovery Opens :	10/29/2014

Initial Disclosures Due :	11/28/2014
Expert Disclosures Due :	03/28/2015
Discovery Period to Close :	04/27/2015
Plaintiff Pretrial Disclosures :	06/11/2015
Plaintiff's 30-day Trial Period Ends :	07/26/2015
Defendant's Pretrial Disclosures :	08/10/2015
Defendant's 30-day Trial Period ends :	09/24/2015
Plaintiff's Rebuttal Disclosures :	10/09/2015
Plaintiff's 15-day Rebuttal Period Ends :	11/08/2015

In light of the foregoing, Razor submits that this motion is made in good faith and not for the purpose of delay, as a further suspension may save the Board's time and resources. Razor notes that Applicant's counsel provided her consent to this suspension via electronic mail on July 30, 2014.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP



Dated: July 30, 2014

By: _____

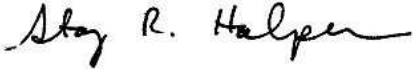
Stacey R. Halpern
2040 Main Street, 14th Floor
Irvine, CA 92614
Attorney for Opposer

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing **STIPULATED MOTION FOR SUSPENSION OF OPPOSITION PROCEEDING** upon Applicant's counsel by depositing one copy thereof in the United States Mail, first-class postage prepaid, on July 30, 2014 addressed as follows:

Jason Vogel
Kilpatrick Townsend & Stockton LP
1114 Avenue of the Americas
New York, NY 10036-7703

Tracie Siddiqui
Kilpatrick Townsend & Stockton LLP
607 14th Street, NW, Suite 900
Washington, DC 20005-2018

By: 
Stacey R. Halpern

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