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Filing date: **09/24/2014**

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 Halpern
Filer's e-mail	efiling@knobbe.com, stacey.halpern@knobbe.com
Signature	/SRH/
Date	09/24/2014
Attachments	razor802.pdf(18883 bytes)

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

Razor USA LLC,

Opposer,

v.

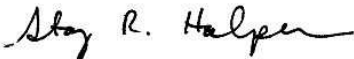
Koei Tecmo Games Co., Ltd, fka
Tecmo Koei Games Co., Ltd.

Applicant.

) Opposition No. 91209486
)
)

) 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:

) September 24, 2014
) (Date)

) 
) Stacey R. Halpern
) 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 sixty (60) days. Razor notes that on May 29, 2014 Razor’s counsel provided counsel for Koei Tecmo Games Co., Ltd. (“Applicant”) with a draft agreement. On July 29, 2014, Applicant’s counsel provided Razor’s counsel with proposed revisions to the draft agreement. Razor and Razor’s counsel have now reviewed the proposed revisions and on September 18, 2014, Razor’s counsel provided Applicant’s counsel with Razor’s comments and a revised draft agreement. Applicant and Applicant’s counsel are currently reviewing the proposed changes. Thus, the parties are requesting an additional suspension of 60 days.

Specifically, the parties request that the current deadlines be suspended so that the following deadlines would apply:

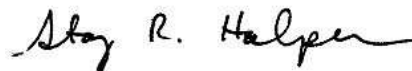
Answer:	11/28/2014
Deadline for Discovery Conference:	12/28/2014
Discovery Opens :	12/28/2014

Initial Disclosures Due :	01/27/2015
Expert Disclosures Due :	05/27/2015
Discovery Period to Close :	06/26/2015
Plaintiff Pretrial Disclosures :	08/10/2015
Plaintiff's 30-day Trial Period Ends :	09/24/2015
Defendant's Pretrial Disclosures :	10/09/2015
Defendant's 30-day Trial Period Ends :	11/23/2015
Plaintiff's Rebuttal Disclosures :	12/08/2015
Plaintiff's 15-day Rebuttal Period Ends :	01/07/2016

As the parties are attempting to resolve the matter on a worldwide basis, and as several drafts of the agreement have been exchanged, Razor submits that this motion is made in good faith and not for the purpose of delay. Specifically, this suspension will provide the parties with additional time to review the revised draft agreement. Moreover, if the parties are able to resolve this matter amicably, this further suspension will save the Board's time and resources. Applicant's counsel provided consent to this motion via electronic mail on September 23, 2014.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP



Dated: September 24, 2014

By:

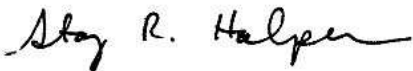
Stacey R. Halpern
2040 Main Street, 14th Floor
Irvine, CA 92614
Attorney for Opposer

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 September 24, 2014 addressed as follows:

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

Tracie Siddiqui
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By: 
Stacey R. Halpern

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