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

Proceeding	91213849
Party	Defendant Calvin Klein Trademark Trust Composed of the Wilmington Trust Company (Delaware Trust)
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Submission	Motion to Suspend for Settlement Discussions
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Signature	/Olivia Harris/
Date	03/11/2015
Attachments	2015-3-11 Motion for Suspension (Calvin Klein v Ole Henriksen).pdf(29204 bytes )

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

OLE HENRIKSEN OF DENMARK, INC.,  Opposer,  v.  CALVIN KLEIN TRADEMARK TRUST COMPOSED OF THE WILMINGTON TRUST COMPANY (DELAWARE TRUST),  Applicant.	<b>Opposition No. 91213849</b>
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**STIPULATED MOTION TO CONTINUE SUSPENSION OF OPPOSITION  
PROCEEDING**

Applicant Calvin Klein Trademark Trust Composed of the Wilmington Trust Company (Delaware Trust) (“Applicant”) requests that the Trademark Trial and Appeal Board (the Board”) continue the suspension of the above-referenced opposition proceeding for an additional thirty (30) days. Applicant notes that on November 13, 2014, Applicant’s counsel provided counsel for Opposer Ole Henriksen of Denmark, Inc. (“Opposer”) with a draft agreement. Applicant’s counsel and Opposer’s counsel subsequently corresponded concerning a few minor revisions to the draft agreement and, on March 10, 2015, Opposer’s counsel advised Applicant’s counsel that he is scheduled to discuss the draft agreement with his client on March 11, 2015. The parties hope to finalize the agreement in the near future.

Specifically, the parties jointly request that the current suspension be extended for an additional thirty (30) days so that the following deadlines would apply:

<b>Time to Answer</b>	<b>4/10/2015</b>
<b>Deadline for Discovery Conference</b>	<b>5/10/2015</b>
<b>Discovery Opens</b>	<b>5/10/2015</b>
<b>Initial Disclosures Due</b>	<b>6/09/2015</b>
<b>Expert Disclosures Due</b>	<b>10/07/2015</b>

<b>Discovery Closes</b>	<b>11/06/2015</b>
<b>Plaintiff's Pretrial Disclosures</b>	<b>12/21/2015</b>
<b>Plaintiff's 30-day Trial Period Ends</b>	<b>2/04/2016</b>
<b>Defendant's Pretrial Disclosures</b>	<b>2/19/2016</b>
<b>Defendant's 30-day Trial Period Ends</b>	<b>3/04/2016</b>
<b>Plaintiff's Rebuttal Disclosures</b>	<b>4/19/2016</b>
<b>Plaintiff's 15-day Rebuttal Period Ends</b>	<b>5/19/2016</b>

As the parties are attempting to resolve the matter amicably, Applicant 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 finalize and execute the agreement. Opposer's counsel provided consent to this motion via electronic mail on March 11, 2015.

Dated: March 11, 2015

Respectfully submitted,

/s/ Olivia Harris  
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**CERTIFICATE OF TRANSMISSION**

This is to certify that this Stipulated Motion to Continue Suspension of Opposition Proceeding was filed electronically with the Trademark Trial and Appeal Board via transmission through ESTTA on March 11, 2015.

/s/ Alberto Garcia  
Alberto Garcia

**CERTIFICATE OF SERVICE**

I hereby certify that on this 11<sup>th</sup> day of March, 2015 a true and complete copy of the foregoing Stipulated Motion to Continue Suspension of Opposition Proceeding has been served via electronic mail and First Class Mail, postage fully prepaid, upon counsel for Opposer, addressed as follows:

Douglas H Morseburg  
Leech Tishman  
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Dated: March 11, 2015

/s/ Alberto Garcia  
Alberto Garcia