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Filing date: **09/08/2015**

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	09/08/2015
Attachments	2015-09-08 Motion to Suspend.pdf(29049 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.	Opposition No. 91213849
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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 sixty (60) days. Applicant notes that on March 11, 2015, counsel for Opposer Ole Henriksen of Denmark, Inc. (“Opposer”) provided Applicant’s counsel with a revised draft agreement. On March 24, 2015, Applicant’s counsel notified Opposer’s counsel that Applicant agreed to the terms of the agreement and Opposer’s counsel provided Applicant’s counsel with a partially-executed agreement. On September 8, 2015, Applicant’s counsel advised Opposer’s counsel that she is awaiting final sign-off of the agreement from Applicant, and will forward the executed agreement shortly. The parties expect to finalize the agreement in the near future.

Specifically, the parties jointly request that the current suspension be extended for an additional fourteen (14) days so that the following deadlines would apply:

Time to Answer	9/21/2015
Deadline for Discovery Conference	10/21/2015
Discovery Opens	10/21/2015
Initial Disclosures Due	11/20/2015
Expert Disclosures Due	3/19/2016
Discovery Closes	4/18/2016
Plaintiff's Pretrial Disclosures	6/2/2016
Plaintiff's 30-day Trial Period Ends	7/17/2016
Defendant's Pretrial Disclosures	8/1/2016
Defendant's 30-day Trial Period Ends	8/15/2016
Plaintiff's Rebuttal Disclosures	10/30/2016
Plaintiff's 15-day Rebuttal Period Ends	10/30/2016

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 September 8, 2015.

Dated: September 8, 2015

Respectfully submitted,

/s/ Olivia Harris
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Attorneys for Applicant

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 September 8, 2015.

/s/ Alberto Garcia
Alberto Garcia

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of July, 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
100 Corson Street, 3rd Floor
Pasadena, California 91103
dmorseburg@leechtishman.com

Dated: September 8, 2015

s/ Alberto Garcia
Alberto Garcia