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

Proceeding	91217321
Party	Defendant Fugro N.V.
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Submission	Motion to Suspend for Settlement Discussions
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Signature	/Brittany D. Parling/
Date	04/01/2015
Attachments	Motion to Suspend.pdf(11506 bytes)

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

Marine Acquisition Corp., : Opposition No. 91217321
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 Opposer, : Application No. 79/115255
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 vs. : Mark: SEASTAR
 :
 Fugro N.V., :
 :
 Applicant. :
 :
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CONSENT MOTION TO SUSPEND FOR SETTLEMENT DISCUSSIONS

Applicant Fugro N.V., through its attorneys Honigman Miller Schwartz and Cohn LLP, respectfully moves for a 90-day suspension of this proceeding for the parties to conduct settlement discussions. In support of this consent motion, Applicant states as follows:

1. Opposer filed its Notice of Opposition on July 2, 2014. (Doc. No. 1.) The proceeding was suspended pending settlement negotiations until February 16, 2015. (Doc. Nos. 5, 7.) Applicant filed its Answer on February 15, 2015. (Doc. No. 8.)

2. On March 11, 2015, Applicant filed a Motion for Suspension for Settlement with Consent, requesting a 90-day suspension of the proceedings to allow the parties to continue their settlement efforts. (Doc. No. 11.) Applicant filed its motion prior to the March 18, 2015 deadline to conduct the required discovery conference.

3. Because Applicant's Motion for Suspension for Settlement was still pending before the deadline to conduct the discovery conference, the parties held the discovery conference on March 17, 2015.

4. On March 24, 2015, the Board denied Applicant’s Motion for Suspension for Settlement on the grounds that the motion “was filed after the answer, but prior to the parties’ discovery conference deadline.” (Doc. No. 12.) The Board directed the parties to proceed with the required discovery conference and ordered that disclosure, discovery, and trial dates would remain as previously set. (*Id.*)

5. As discussed above, the parties have conducted the required discovery conference. The parties continue to be actively engaged in negotiations for the settlement of this matter.

6. Accordingly, Applicant respectfully requests that this proceeding be suspended for 90 days to allow the parties to continue their settlement efforts, as detailed below:

Initial Disclosures Due:	7/16/2015
Expert Disclosures Due:	11/13/2015
Discovery Closes:	12/13/2015
Plaintiff’s Pretrial Disclosures:	1/27/2016
Plaintiff’s 30-day Trial Period Ends:	3/12/2016
Defendant’s Pretrial Disclosures:	3/27/2016
Defendant’s 30-day Trial Period Ends:	5/11/2016
Plaintiff’s Rebuttal Disclosures:	5/26/2016
Plaintiff’s 15-day Rebuttal Period Ends:	6/25/2016

7. Applicant has secured the express consent and agreement of all other parties to this proceeding for the suspension and re-setting of dates requested in this motion.

Dated: April 1, 2015

Honigman Miller Schwartz and Cohn LLP

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing CONSENT MOTION TO SUSPEND FOR SETTLEMENT DISCUSSIONS was served on Counsel for Opposer as identified by the records of the U.S. Patent and Trademark Office, this 1st day of April, 2015, by sending same via First Class mail, postage prepaid, to:

Joseph W. Berenato, III
Berenato & White, LLC
6550 Rock Spring Drive, Suite 240
Bethesda, MD 20817

/Brittany D. Parling/
Brittany D. Parling

CERTIFICATE OF FILING

I, Brittany D. Parling, do certify that on April 1, 2015, I filed via electronic means (ESTTA) this CONSENT MOTION TO SUSPEND FOR SETTLEMENT DISCUSSIONS with the:

U.S. Patent and Trademark Office
Trademark Trial and Appeal Board

By: /Brittany D. Parling/