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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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Date	10/06/2015
Attachments	2015-10-6 Consent Motion to Suspend.pdf(10217 bytes)

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

Marine Acquisition Corp., : Opposition No. 91217321
Opposer, : Application No. 79/115255
vs. : Mark: SEASTAR
Fugro N.V., :
Applicant. :
_____ /

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 April 8, 2015, the proceeding was suspended for 90 days to allow the parties to negotiate a possible settlement. (Doc. No. 14.) On July 17, 2015, the proceeding was suspended for an additional 90 days. (Doc. No. 17.)
3. The parties continue to be actively engaged in negotiations for the settlement of this matter.
4. 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: 1/13/2015

Expert Disclosures Due:	5/13/2016
Discovery Closes:	6/13/2016
Plaintiff's Pretrial Disclosures:	7/27/2016
Plaintiff's 30-day Trial Period Ends:	9/12/2016
Defendant's Pretrial Disclosures:	9/26/2016
Defendant's 30-day Trial Period Ends:	11/9/2016
Plaintiff's Rebuttal Disclosures:	11/24/2016
Plaintiff's 15-day Rebuttal Period Ends:	12/26/2016

5. 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: October 6, 2015

Honigman Miller Schwartz and Cohn LLP

/Brittany D. Parling/
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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 6th day of October, 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 October 6, 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/