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

Proceeding	91220077
Party	Plaintiff The Chamberlain Group, Inc.
Correspondence Address	JOSEPH T NABOR FITCH EVEN TABIN & FLANNERY LLP 120 S LASALLE STREET, SUITE 1600 Chicago, IL 60603-3406 UNITED STATES trademark@fitcheven.com, jtnabo@fitcheven.com
Submission	Motion to Suspend for Settlement Discussions
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Signature	/Edward E. Clair/
Date	04/07/2017
Attachments	MYLINK Consented Mtn to Suspend.pdf(96155 bytes)

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

The Chamberlain Group, Inc.
Opposer,

v.

Somfy SAS,
Applicant.

Opposition No. 91220077

Application No. 86266056
For MYLINK

Commissioner for Trademarks
P.O. Box 1451
Alexandria, VA 22313-1451

**Consented Motion to Extend
Proceeding Deadlines for Sixty Days for Settlement**

Opposer The Chamberlain Group, Inc. and Applicant Somfy SAS are working to settle this opposition. With the consent of Somfy SAS and on behalf of the parties, Opposer respectfully requests that the proceeding deadlines in this case be extended by sixty days (as set out below) to afford the parties the opportunity to continue settlement efforts and negotiations.

Per the February 6, 2017, Order, the parties report on the progress of the parties' settlement efforts with these updates. The parties are currently engaged in settlement negotiations. On March 15, 2017, the parties discussed Opposer's updated settlement proposal by email. Applicant is currently reviewing and considering this updated proposal. Counsel for the parties believe that the parties are closer to reaching a final agreement in settlement of this case.

During further discussion between counsel on March 31, 2017, counsel for the parties provided their approval and consent of to the filing of this motion and the extension of the deadlines sought by the parties.

Because the parties are working on executing a written settlement agreement, good cause exists for the Board to grant the requested extension of the proceeding deadlines. The parties therefore respectfully request that the Board extend by sixty days and reset the proceeding deadlines as follows:

Answer due:	Closed
Deadline for Discovery Conference:	Closed
Discovery opens:	Closed
Initial Disclosures due:	Closed
Expert Disclosures due:	06/06/2017
Discovery closes:	07/06/2017
Plaintiff's Pretrial Disclosures:	08/20/2017
Plaintiff's 30-day Trial Period Ends:	10/04/2017
Defendant's Pretrial Disclosures:	10/19/2017
Defendant's 30-day Trial Period Ends:	12/03/2017
Plaintiff's Rebuttal Disclosures:	12/18/2017
Plaintiff's 15-day Rebuttal Period Ends:	01/17/2018

As shown above, this suspension and extension request is not filed for the purposes of delay. The parties are working on a written settlement agreement and submit that extending the deadlines in the proceeding will save resources for the Board and for the parties. With this motion, counsel for Opposer provides email addresses of record for the parties so that any order on this motion may be issued electronically.

Dated: April 7, 2017

Respectfully submitted,

The Chamberlain Group, Inc.



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Certificate of Service

The undersigned hereby certifies that a copy of the foregoing **Consented Motion to Extend Proceeding Deadlines for Sixty Days for Settlement** has been served upon all parties, at their address of record by email set forth below on this date:

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Dated this 7th day of April, 2017.



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