

ESTTA Tracking number: **ESTTA672763**

Filing date: **05/18/2015**

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

Proceeding	91220150
Party	Plaintiff HQ Network Systems, LLC
Correspondence Address	STACEY R HALPERN KNOBBE MARTENS OLSON & BEAR LLP 2040 MAIN STREET, 14TH FLOOR IRVINE, CA 92614 UNITED STATES efiling@knobbe.com, stacey.halpern@knobbe.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Stacey R. Halpern
Filer's e-mail	efiling@knobbe.com, stacey.halpern@knobbe.com
Signature	/Stacey R. Halpern/
Date	05/18/2015
Attachments	kemp1.pdf(17650 bytes)

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

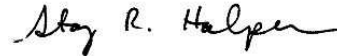
HQ Network Systems, Inc.,)
)
Opposer,)
)
v.)
)
Hire Quest LLC,)
)
Applicant.)
_____)

Opposition No. 91220150

I hereby certify that this correspondence and all marked attachments are being electronically filed with the Trademark Trial and Appeal Board through their web site located at <http://esta.uspto.gov> on:

May 18, 2015

(Date)



Stacey R. Halpern

**AMENDED STIPULATED MOTION TO CONTINUE SUSPENSION
OF OPPOSITION PROCEEDING**

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

Dear Sir or Madam:

On May 14, 2015, Opposer, HQ Network Systems, Inc. (“HQ”) filed a Motion to Continue the Suspension of the above-referenced Opposition proceeding with the Trademark Trial and Appeal Board (the “Board”). Due to a typographical error, several of the dates requested on the Motion were incorrect. Accordingly, an Amended Motion with the correct dates is attached. HQ reiterates its request that the Board continue the suspension of the above-referenced opposition proceeding for one-hundred eighty (180) days so that the parties can continue with their settlement discussions. HQ notes that the parties have agreed on basic term for settlement and need additional time to prepare and negotiate an agreement.

Specifically, if HQ’s Motion is granted, the deadlines will be as follows:

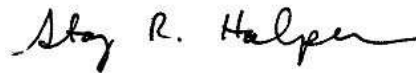
Discovery Opens: 11/19/2015
Initial Disclosures: 12/19/2015

Expert Disclosures:	04/17/2016
Discovery Closes:	05/17/2016
Plaintiff's Pretrial Disclosures:	07/01/2016
Plaintiff's 30-day Trial Period Ends:	08/15/2016
Defendant's Pretrial Disclosures:	08/30/2016
Defendant's 30-day Trial Period Ends:	10/14/2016
Plaintiff's Rebuttal Disclosures:	10/29/2016
Plaintiff's 15-day Rebuttal Period Ends:	11/28/2016

Continuing the suspension of this matter will allow the parties to move forward with their settlement discussions. As an amicable resolution of the Opposition proceeding would save the resources of the Board and the parties, HQ submits that good cause exists for granting the suspension. The parties conducted the settlement/discovery conference and Applicant's counsel provided consent to this suspension on May 14, 2015 via electronic mail.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP



Dated: May 18, 2015

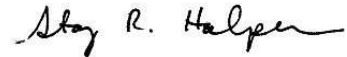
By: _____

Stacey R. Halpern
2040 Main Street, 14th Floor
Irvine, CA 92614
Attorney for Opposer,
HQ Network Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing **AMENDED STIPULATED MOTION TO CONTINUE SUSPENSION OF OPPOSITION PROCEEDING** upon Applicant's counsel by depositing one copy thereof in the United States Mail, first-class postage prepaid on May 18, 2015, addressed as follows:

STEPHEN G. JANOSKI
RICHARD A. FLYNT
ROYLANCE, ABRAMS, BERDO & GOODMAN, L.L.P
STE 600 1300 19TH ST NW
WASHINGTON, DC 20036



Stacey R. Halpern

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