

ESTTA Tracking number: **ESTTA695463**

Filing date: **09/11/2015**

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

Proceeding	91220488
Party	Defendant Two Hands Wines Pty Ltd
Correspondence Address	KEITH R OBERT WARE FRESSOLA MAGUIRE & BARBER LLP BRADFORD GREEN BUILDING 5 , 755 MAIN STREET PO BOX 224 MONROE, CT 06468 UNITED STATES kro@warefressola.com, mail@warefressola.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Keith R. Obert
Filer's e-mail	kro@warefressola.com, mail@warefressola.com
Signature	/Keith R. Obert/
Date	09/11/2015
Attachments	MotionforSuspensionSept2015.pdf(19841 bytes)

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

FITA PRETA VINHOS, LDA LLC,)	
)	
Opposer,)	
)	
v.)	Opposition No. 91220488
)	
TWO HANDS WINES PTY LTD,)	Application Serial No. 86/191,378
)	
)	
Applicant.)	

STIPULATED MOTION FOR SUSPENSION FOR SETTLEMENT WITH CONSENT

The parties are actively engaged in activities related to the settlement of this matter, and the parties jointly request that the above captioned opposition proceeding be suspended for ninety (90) days until December 10, 2015. It is further requested that the conferencing, disclosure, discovery and trial dates be reset as follows:

Time to Answer :	CLOSED
Deadline for Discovery Conference :	CLOSED
Discovery Opens :	CLOSED
Initial Disclosures Due :	12/11/2015
Expert Disclosure Due :	04/09/2016
Discovery Closes :	05/09/2016
Plaintiff's Pretrial Disclosures :	06/23/2016
Plaintiff's 30-day Trial Period Ends :	08/07/2016
Defendant's Pretrial Disclosures :	08/22/2016
Defendant's 30-day Trial Period Ends :	10/06/2016
Plaintiff's Rebuttal Disclosures :	10/21/2016
Plaintiff's 15-day Rebuttal Period Ends :	11/20/2016

The parties have held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2).

The grounds for this suspension request are that the parties are engaged in settlement discussions.

It is submitted that the foregoing constitute a proper showing of good cause for the suspension as requested, and it is not interposed for purposes of delay.

Applicant, Two Hands Wines Pty Ltd., has secured the express consent of all other parties to this proceeding for the suspension and resetting of dates requested herein.

Applicant, Two Hands Wines Pty Ltd., has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

Respectively submitted,
Two Hands Wines Pty Ltd.

Dated: September 11, 2015

By: /Keith R. Obert/
Keith R. Obert
Attorney for Applicant

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CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing STIPULATED MOTION FOR SUSPENSION FOR SETTLEMENT WITH CONSENT was served on this 11th day of September 2015, on Opposer's counsel, Matthew A. Becker, by emailing said copy to the following email address:

matt@beckerlawfirm.com

By: /Keith R. Obert/

Keith R. Obert