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Filing date: **12/09/2015**

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

Proceeding	91220488
Party	Defendant Two Hands Wines Pty Ltd
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Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Keith R. Obert
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Date	12/09/2015
Attachments	MotionforSuspensionDect2015.pdf(19846 bytes )

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
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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 March 9, 2016. It is further requested that the conferencing, disclosure, discovery and trial dates be reset as follows:

<b>Time to Answer :</b>	CLOSED
<b>Deadline for Discovery Conference :</b>	CLOSED
<b>Discovery Opens :</b>	CLOSED
<b>Initial Disclosures Due :</b>	03/10/2016
<b>Expert Disclosure Due :</b>	07/08/2016
<b>Discovery Closes :</b>	08/07/2016
<b>Plaintiff's Pretrial Disclosures :</b>	09/21/2016
<b>Plaintiff's 30-day Trial Period Ends :</b>	11/05/2016
<b>Defendant's Pretrial Disclosures :</b>	11/20/2016
<b>Defendant's 30-day Trial Period Ends :</b>	01/04/2017
<b>Plaintiff's Rebuttal Disclosures :</b>	01/19/2017
<b>Plaintiff's 15-day Rebuttal Period Ends :</b>	02/18/2017

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: December 9, 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 9<sup>th</sup> day of December 2015, on Opposer's counsel, Matthew A. Becker, by emailing said copy to the following email address:

[matt@beckerlawfirm.com](mailto:matt@beckerlawfirm.com)

By:           /Keith R. Obert/          

Keith R. Obert