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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	WILLIAM J SAPONE WARE FRESSOLA MAGUIRE & BARBER LLP 755 MAIN STREET, SUITE 5 MONROE, CT 06468-2830 UNITED STATES wsapone@wfm-b-iplaw.com, wjs@warefressola.com
Submission	Stipulated/Consent Motion to Extend
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Date	04/16/2015
Attachments	MotionforSuspensionApril2015.pdf(20925 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. 85/191,378
	)	
	)	
Applicant.	)	

**MOTION FOR SUSPENSION WITH CONSENT**

In view of the sudden and untimely passing of attorney for Applicant, William J. Sapone, on April 14, 2015 the parties jointly request that the above captioned opposition proceeding be suspended for sixty (60) days and that the conferencing, disclosure, discovery and trial dates be reset as follows:

<b>Time to Answer :</b>	CLOSED
<b>Deadline for Discovery Conference :</b>	06/14/2015
<b>Discovery Opens :</b>	06/14/2015
<b>Initial Disclosures Due :</b>	07/14/2015
<b>Expert Disclosure Due :</b>	11/11/2015
<b>Discovery Closes :</b>	12/11/2015
<b>Plaintiff's Pretrial Disclosures :</b>	01/25/2016
<b>Plaintiff's 30-day Trial Period Ends :</b>	03/10/2016
<b>Defendant's Pretrial Disclosures :</b>	03/25/2016
<b>Defendant's 30-day Trial Period Ends :</b>	05/09/2016
<b>Plaintiff's Rebuttal Disclosures :</b>	05/24/2016
<b>Plaintiff's 15-day Rebuttal Period Ends :</b>	06/23/2016

The original deadline for the parties to hold their discovery conference was April 15, 2015, but due to the passing of Applicant's attorney, the parties were unable to hold a discovery

conference on such date, and have not yet held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2).

Suspension is believed to be warranted in order to allow Applicant's new attorney or attorneys opportunity to apprise him/herself or themselves of the current proceeding to allow for effective and efficient resolution of this matter.

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.

Therefore, it is respectfully submitted that the proceedings of this opposition should be suspended for sixty (60) days subject to the right of either party to request resumption at any time.

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: April 16, 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 MOTION FOR  
SUSPENSION WITH CONSENT was served on this 16<sup>th</sup> day of April 2015, by first class  
United States mail, to the following counsel of record:

Matthew A. Becker  
The Law Office of Matthew A. Becker  
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By:           /Keith R. Obert/          

Keith R. Obert