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

Proceeding	91220529
Party	Plaintiff Antonio Puig, S.A.
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Date	04/21/2015
Attachments	HENO DE ESPANA Stipulated Motion to Suspend Proceedings by 120 days.pdf(104352 bytes)

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

ANTONIO PUIG, S.A.,			
	Opposer,	:	Opposition No.: 91220529
		:	Application No.: 86042404
v.		:	Mark: HENO DE ESPAÑA
		:	Date of Publication: August 12, 2014
J. PINON ENTERPRISES OF		:	
TAMPA, INC.,		:	
	Applicant.	:	
		:	
		:	
		:	

STIPULATED MOTION TO SUSPEND PROCEEDINGS BY 120 DAYS

The parties having held their Discovery Conference as required under Trademark Rules 2.120(a)(1) and (a)(2), hereby respectfully request that the Board suspend proceedings for 120 days so the parties can continue to discuss settlement.

Since their Discovery Conference the parties have continued settlement discussions, and would like to suspend proceedings to explore settlement options without simultaneously engaging in the opposition litigation schedule. This request for suspension of proceedings includes a corresponding extension on producing Initial Disclosures so the parties may focus on settlement discussions and any possibly resulting settlement agreement.

For the foregoing reasons, it is respectfully requested that the Board suspend proceedings by 120 days until August 28, 2015. If the matter is resumed, the proposed new schedule would be as follows:

Time to Answer	Closed
Deadline for Discovery Conference	Closed
Discovery Opens	Closed
Initial Disclosures due	9/17/2015
Expert Disclosures due	1/15/2016
Discovery Closes	2/13/2016
Plaintiff's Pretrial Disclosures	3/29/2016
Plaintiff's 30-day Trial Period Ends	5/14/2016
Defendant's Pretrial Disclosures	5/29/2016
Defendant's 30-day Trial Period Ends	7/13/2016
Plaintiff's Rebuttal Disclosures	7/28/2016
Plaintiff's 15-day Rebuttal Period Ends	8/27/2016

Counsel for Applicant and Opposer have consented to this request as confirmed with their signatures set forth below. Accordingly, favorable action to this Motion is respectfully requested.

Respectfully submitted:

ANTONIO PUIG, S.A.

**J. PINON ENTERPRISES OF
TAMPA, INC.**

By: /Brooks R. Bruneau/
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By: /Francisco J. Ferreiro/
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Date: April 21, 2015

Date: April 21, 2015

CERTIFICATE OF ELECTRONIC FILING

I hereby certify that this Stipulated Motion to Suspend Proceedings by 120 Days was electronically filed with the Trademark Trial and Appeal Board this 21st day of April, 2015.

/Brooks R. Bruneau/
(Signature)
April 21, 2015
(Date of Signature)

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within Stipulated Motion to Suspend Proceedings by 120 Days was served upon Applicant's counsel, via Email (by agreement), on this 21st day of April, 2015, addressed as follows:

Francisco J. Ferreiro, Esq.
Malloy & Malloy, P.L.
FFerreiro@malloylaw.com

ANTONIO PUIG, S.A.

Date: April 21, 2015

By: /Brooks R. Bruneau/
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