ESTTA Tracking number: **ESTTA753991**

Filing date: **06/22/2016**

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

Proceeding	91225396
Party	Plaintiff The Keith Haring Foundation Inc.
Correspondence Address	DENNIS PRAHL LADAS & PARRY LLP 1080 AVENUE OF THE AMERICAS NEW YORK, NY 10018 UNITED STATES dprahl@ladas.com, anlam@ladas.com, RCathcart@ladas.com, RRoa@ladas.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Dennis S. Prahl
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Signature	/Dennis S. Prahl/
Date	06/22/2016
Attachments	Motion for Suspension of Proceedings with Consent - National Entertainment.pdf(489545 bytes)

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

THE KEITH HARING FOUNDATION INC. Opposer, v. NATIONAL ENTERTAINMENT COLLECTIBLES ASSOCIATION, INC. DBA NECA, Applicant.	:	Opposition No. 91225396 Serial No. 86/582,401

MOTION FOR SUSPENSION OF PROCEEDINGS WITH CONSENT

Opposer The Keith Haring Foundation Inc., by its counsel, hereby respectfully requests, with Applicant National Entertainment Collectibles Association, Inc. DBA NECA's consent, a thirty (30) day suspension of proceedings, with each party reserving the right at any time during the suspension to request a resumption of the proceedings.

The parties are actively engaged in settlement negotiations.

Currently, Initial Disclosures are due on June 23, 2016. In the event there is no word from either party upon conclusion of the suspension period, the parties request that proceedings automatically resume on the schedule set out below:

Time to Answer:	CLOSED
Deadline for Discovery Conference:	CLOSED
Discovery Opens:	CLOSED
Initial Disclosures Due:	07/23/2016
Expert Disclosures Due:	11/20/2016
Discovery Closes:	12/20/2016
Plaintiff's Pretrial Disclosures:	02/3/2017

Plaintiff's 30-day Trial Period Ends:	03/20/2017
Defendant's Pretrial Disclosures:	04/04/2017
Defendant's 30-day Trial Period Ends:	05/19/2017
Plaintiff's Rebuttal Disclosures:	06/03/2017
Plaintiff's 15-day Rebuttal Period Ends:	07/03/2017

Opposer has secured the express consent of Applicant's counsel for the suspension and resetting of dates requested herein.

Respectfully submitted,

LADAS & PARRY LLP
Attorneys for Opposer

Dated: June 22, 2016

By: _____

Dennis S. Prahl
1040 Avenue of the Americas
New York, New York 10018
Tel: (212) 708-1817
(Our Ref.: C15672381)

CERTIFICATE OF TRANSMISSION

I, Reinaldo M. Roa, hereby certify that a copy of the foregoing **MOTION FOR SUSPENSION OF PROCEEDINGS WITH CONSENT** has been electronically transmitted to the United States Patent and Trademark Office on the date indicated:

Dated: June 22, 2016

Reinaldo M. Roa

CERTIFICATE OF SERVICE

I, Reinaldo M. Roa, hereby certify that a copy of the foregoing **MOTION FOR SUSPENSION OF PROCEEDINGS WITH CONSENT** was served via First-Class Mail, postage prepaid, on the date indicated below, to the following:

Michael Friscia, Esq.
McCarter & English, LLP
Four Gateway Center
100 Mulberry Street
Newark, New Jersey 07102

Dated: June 22, 2016

Reinaldo M. Roa