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Filing date: **01/22/2018**

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

Proceeding	91228027
Party	Plaintiff Ridgid, Inc.
Correspondence Address	MICHAEL P BRENNAN & LISA M DUROSS HARNESS DICKEY & PIERCE PLC 5445 CORPORATE DR STE 200 TROY, MI 48098 UNITED STATES Email: troymailroom@hdp.com, lmduross@hdp.com, agrant@hdp.com, bmarkham@hdp.com, lgolusin@hdp.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Lisa M. DuRoss
Filer's email	duross@hdp.com, tjcomparoni@hdp.com, troymailroom@hdp.com
Signature	/Lisa M. DuRoss/
Date	01/22/2018
Attachments	91228027 - RIDGEWING - RIDGID Inc. Motion to Suspend 012218.pdf(81752 bytes)

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

RIDGID, Inc. Opposer, v. Timothy P. White Applicant.	)	Opposition No. 91228027 Serial No. 86/283265 Mark: RIDGEWING

CONSENTED MOTION TO SUSPEND

Opposer, RIDGID, Inc., respectfully requests that these proceedings be further suspended for a period of ninety (90) days in order to allow the parties additional time to pursue settlement in this matter, subject to the right of either party to request resumption at any time. Neal Friedman (nfriedman@davisandbujold.com), counsel for Applicant, consented to this Motion to Suspend by email on January 22, 2018.

In light of the Board's August 22, 2017 request that a progress report establishing good cause accompany any further requests for extension or suspension, the parties respond as follows:

The parties have had a series of substantive settlement discussions that began prior to the instant proceeding. The discussions led to the drafting of a proposed settlement document, which prompted further negotiations. Since the filing of the last Consented Motion to Suspend, Opposer has responded to Applicant's latest draft proposal. Currently, Applicant requires additional time to review and respond substantively to Opposer's latest draft.

Recitation of Issues Resolved

As noted above, the parties have exchanged drafts of an agreement and are amenable in principle to limitations on the use and registration of Applicant's mark.

Recitation of Issues that Remain to be Resolved

While the parties are amenable in principle to limitations on the use and registration of the mark, they require additional time to negotiate remaining issues relating to the nature and use of Applicant's mark, including channels of trade and the scope of use and registration.

Timetable for Final Resolution

The parties are reasonably hopeful the remaining issues will be resolved within the sought suspension period.

Every other party to these proceedings has agreed to the filing of this motion and has agreed to the dates set forth below. As this request is made for good cause and not made simply for purposes of delay, the parties respectfully request that the suspension be granted and discovery and trial dates be reset as indicated below:

Time to Answer 04/23/18

Deadline for Discovery Conference 05/23/18

Discovery Opens 05/23/18

Initial Disclosures Due 06/22/18

Expert Disclosures Due 10/20/18

Discovery Closes 11/19/18

Plaintiff's Pretrial Disclosures..... 01/03/19

Plaintiff's 30-Day Trial Period Ends 02/17/19

Defendant’s Pretrial Disclosures..... 03/04/19

Defendant’s 30-Day Trial Period Ends..... 04/18/19

Plaintiff’s Rebuttal Disclosures..... 05/03/19

Plaintiff’s 15-Day Rebuttal Period Ends 06/02/19

Plaintiff's Brief Due..... 08/01/19

Defendant's Brief Due..... 08/31/19

Plaintiff's Reply Brief Due 09/15/19

Request for Oral Hearing (optional) Due... 09/25/19

Respectfully submitted,

Dated January 22, 2018

By:/Lisa M. DuRoss/

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
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CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Consented Motion to Suspend has been served on counsel for Applicant, Neal E. Friedman by forwarding said copy on January 22, 2018, via email to:

Neal E. Friedman
Davis & Bujold PLLC
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/Timothy J. Comparoni/
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