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Filing date: **08/12/2016**

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

Proceeding	91228245
Party	Defendant Tobias Lubin
Correspondence Address	RISHI NAIR KEENER AND ASSOCIATES PC 161 N CLARK STREET #4700 CHICAGO, IL 60601 UNITED STATES rishi.nair@keenerlegal.com, kevin.keener@keenerlegal.com, trademark@keenerlegal.com
Submission	Motion to Suspend for Settlement Discussions
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Signature	/Rishi Nair/
Date	08/12/2016
Attachments	Beyond Stitch Consented Suspension for Settlement Filing.pdf(124733 bytes)

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

In the Matter of
Trademark Serial No. 86831780
For the Mark BEYOND THE STITCH
Filed on: May 23, 2016
Published for Opposition on: April 26, 2016

5.11, Inc.,

Opposer,

v.

Tobias Lubin,

Applicant.

Opposition No. 91228245

**APPLICANT'S CONSENTED MOTION FOR SUSPENSION OF PROCEEDINGS FOR
SETTLEMENT**

Applicant, Tobias Lubin, and Opposer 5.11, Inc., hereby move the Board to enter an order suspending the above-referenced opposition proceeding for 90 days to allow the parties to continue their settlement efforts. The parties are actively engaged in negotiations for the settlement of this matter and, accordingly, request that this proceeding be suspended for 90 days to allow the parties to continue their settlement efforts and for the trial calendar to be reset as set forth below:

Deadline for Discovery Conference 11/11/2016

Discovery Opens: 11/11/2016

Initial Disclosures Due 12/10/2016

Expert Disclosures Due 4/8/2017

Discovery Closes 5/7/2017

Plaintiff's Pretrial Disclosures 6/24/2017

Plaintiff's 30-day Trial Period Ends 8/8/2017

Defendant's Pretrial Disclosures 8/23/2017

Defendant's 30-day Trial Period Ends 10/7/2017

Plaintiff's Rebuttal Disclosures 10/22/2017

Plaintiff's 15-day Rebuttal Period Ends 11/21/2017

Tobias Lubin has secured the express consent of all other parties to this proceeding for the suspension and resetting of dates requested herein.

DATED: August 12, 2016

Respectfully Submitted,

/Rishi Nair/

One of Applicant's Attorneys,

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CERTIFICATE OF SERVICE AND FILING

I, Rishi Nair, hereby certify that on August 12, 2016 this Motion for Suspension for Settlement with Consent is being filed through the electronic system for the Trademark Trial and Appeal Board of the United States Patent and Trademark Office, and that a copy is being served via electronic mail on Applicant's attorney of record at the following address:

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