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Filing date: **08/17/2018**

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

Proceeding	91229249
Party	Plaintiff Certina A.G. (Certina S.A.) (Certina Ltd.)
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Submission	Motion to Suspend for Settlement Discussions
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Date	08/17/2018
Attachments	Motion to Suspend for Settlement - Opposition No. 91229249.pdf(83098 bytes )

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

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CERTINA A.G. (CERTINA S.A.)	:	
(CERTINA LTD.),	:	
	:	
Opposer,	:	Serial No. 79/169,426
	:	
v.	:	
	:	Opposition No.: 91229249
T.R.B. INTERNATIONAL SA,	:	
	:	
Applicant.	:	

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**MOTION FOR SUSPENSION FOR SETTLEMENT WITH CONSENT**

Pursuant to 37 C.F.R. § 2.117, Certina A.G. (Certina S.A.) (Certina Ltd.) ("Opposer"), through its undersigned counsel, requests that this proceeding be suspended for 180 days to allow the parties to continue their settlement efforts and that all discovery and trial periods be reset accordingly, as follows:

Time to Answer:	CLOSED
Deadline for Discovery Conference:	CLOSED
Discovery Opens:	CLOSED
Initial Disclosures Due:	CLOSED
Expert Disclosures Due:	05/24/2019
Discovery Period to Close:	06/23/2019
Plaintiff's Pretrial Disclosures:	08/07/2019
Plaintiff's 30-day Trial Period Ends:	09/21/2019
Defendant's Pretrial Disclosures:	10/06/2019
Defendant's 30-day Trial Period ends:	11/20/2019
Plaintiff's Rebuttal Disclosures:	12/05/2019
Plaintiff's 15-day Rebuttal Period Ends:	01/04/2020

Opposer submits there is good cause for granting the requested suspension, as the parties are actively engaged in negotiations for the settlement of this matter. The parties have been actively negotiating the potential for settlement across multiple jurisdictions, primarily through in-house counsel for the parties. Since the last suspension request, the parties have amicably negotiated specific terms of a potential settlement, thus pushing the discussions toward a potential resolution. At this time, the parties require additional time to continue working toward a potential final resolution of this dispute.

This motion is therefore filed in good faith and not for purposes of delay. Accordingly, Opposer submits that good cause has been shown to grant the requested suspension. Opposer has secured the express consent of all other parties to this proceeding for the suspension and resetting of dates requested herein.

Opposer has provided an email address herewith for itself and for Applicant T.R.B. International SA so that any order on this motion may be issued electronically by the Board.

WHEREFORE, Opposer respectfully requests that the Board grant the subject motion, suspend the proceeding, and reset the discovery and trial periods as set forth herein to allow the parties to continue their settlement efforts.

Respectfully submitted,

CERTINA A.G. (CERTINA S.A.)  
(CERTINA LTD.)

Date: August 17, 2018

By: /Timothy D. Pecsénye/  
Timothy D. Pecsénye  
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CERTIFICATE OF ELECTRONIC FILING

I hereby certify that this correspondence is addressed to the Trademark Trial and Appeal Board, Hon. Commissioner for Trademarks, P.O. Box 1451, Alexandria, Virginia 22313-1451, and is being deposited via the Electronic System for Trademark Trials and Appeals (ESTTA) on August 17, 2018.

/Samar Aryani-Sabet/  
Samar Aryani-Sabet

**CERTIFICATE OF SERVICE**

I, Samar Aryani-Sabet, do hereby certify that I have on this 17th day of August 2018 served via electronic mail the foregoing MOTION FOR SUSPENSION FOR SETTLEMENT WITH CONSENT to the following:

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T.R.B. International SA

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