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Filing date: **10/15/2021**

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

Proceeding	91245553
Party	Plaintiff Entegris, Inc.
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Submission	Motion to Suspend for Settlement Discussions
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Date	10/15/2021
Attachments	Motion on Consent to Suspend for Settlement - 10.15.2021.pdf(101308 bytes)

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

In the matter of Application Serial No. 87/742,561
For the Mark SIMSII [Interlocking Rings Design]
Published in the Official Gazette on September 4, 2018

ENTEGRIS, INC.,

Opposer,

v.

SIMSII, INC.,

Applicant.

Opposition No. 91245553

MOTION ON CONSENT TO SUSPEND FOR SETTLEMENT

Opposer Entegris, Inc. (“Opposer”), through its undersigned attorneys, hereby moves for an order suspending the discovery and trial deadlines by sixty (60) days in the above captioned proceeding. Applicant Simsii, Inc. (“Applicant”) consents to the requested suspension. The parties agree to the timeline, which would be reset as follows:

Event	Date
Plaintiff's Pretrial Disclosures Due	12/16/2021
Plaintiff's 30-day Trial Period Ends	01/30/2022
Defendant's Pretrial Disclosures Due	2/14/2022
Defendant's 30-day Trial Period Ends	03/31/2022
Plaintiff's Rebuttal Disclosures Due	04/15/2022
Plaintiff's 15-day Rebuttal Period Ends	05/15/2022
Plaintiff's Opening Brief Due	07/14/2022
Defendant's Brief Due	08/13/2022
Plaintiff's Reply Brief Due	08/28/2022
Request for Oral Hearing (optional) Due	09/07/2022

This motion is not brought for purposes of delay. Opposer respectfully submits that there is good cause for suspension and makes this request to allow the parties to continue negotiating the terms of settlement.

Throughout the course of this proceeding, the parties have exchanged a series of settlement proposals and counter-proposals via email and telephone. The parties appear to be close to reaching agreement on the proposed terms of settlement, but need additional time in order to finalize the agreement on the terms of settlement. Since the last Consent Motion for Suspension for Settlement filed on July 7, 2021 (which the Board granted on July 9, 2021), the parties have continued their good faith efforts to attempt to amicably resolve this matter. On October 11, 2021, the parties agreed on filing a stipulated request for a further suspension of the opposition to afford sufficient time to attempt to finalize the terms of an amicable resolution to this matter, the terms of which are confidential.

The Board has requested a proposed timetable for final resolution. The parties are hopeful they will be able to reach an amicable resolution in this matter within the coming weeks, though it is difficult to predict an exact timeframe for final resolution.

Opposer respectfully requests that the Board grant this consent motion and suspend the opposition for 60 days.

Respectfully submitted,
ENTEGRIS, INC.

By its Attorneys,

Date: October 15, 2021

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