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

Proceeding	91245677
Party	Defendant ZF Friedrichshafen AG
Correspondence Address	BREWSTER TAYLOR STITES & HARBISON PLLC 1800 DIAGONAL ROAD SUITE 325 ALEXANDRIA, VA 22314 UNITED STATES btaylor@stites.com 703-739-4900
Submission	Other Motions/Papers
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Date	10/28/2019
Attachments	CONSENT_MOTION.pdf(142082 bytes)

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

VISION WHEEL, INC.)	
)	
Opposer,)	
v.)	
)	Opposition No. 91245677
)	Serial No. 79/223701
ZF FRIEDRICHSHAFEN AG)	
)	
Applicant.)	

**CONSENT MOTION TO AMEND AND TO SUSPEND
PROCEEDINGS PENDING AMENDMENT**

Pursuant to 37 CFR §§ 2.133 and 2.117 and TMEP 514 and 510, pursuant to a Settlement Agreement between the parties in which the parties have agreed that (1) **ZF FRIEDRICHSHAFEN AG** (hereinafter “Applicant”) would amend its application (2) that proceedings would be suspended pending amendment and (3) that following receipt of notification of the amendment **VISION WHEEL, INC.** (hereinafter “Opposer”), would terminate the Opposition proceeding with prejudice, Applicant, with the consent of Opposer, hereby moves the Board to amend the identification of services in U.S. application Serial No. 79/223, 701 (“0 VISION 0” stylized) as follows (with the amendments highlighted in bold):

- IC 035. US 100 101 102. G & S: Advertising services; business management; business administration for others; providing office functions; systemization and compilation of data into computer databases, in particular parts lists, material masters, documents, image data, order lists, spare parts catalogues and customer service information, **with the exception of rims, wheels, and tires, and related structural parts, namely, lug nuts, lock nuts, valve stems, and wheel spacers**

- IC 037. US 100 103 106. G & S: Building construction; maintenance, servicing and repair of vehicles and parts therefor, **with the exception of maintenance, servicing, and repair of rims, wheels, and tires, and related structural parts, namely, lug nuts, lock nuts, valve stems, and wheel spacers**

- IC 041. US 100 101 107. G & S: Educational services, namely, conducting seminars and workshops in the field of automobile technology; providing of training in the use and operation of vehicles and in the mounting of vehicles spare parts **with the exception of rims, wheels, and tires, and related structural parts, namely, lug nuts, lock nuts, valve stems, and wheel spacers**; entertainment, namely, organizing community sporting and cultural events; online publication of electronic periodicals for drive and suspension technology.
- IC 042. US 100 101. G & S: Scientific and technological services and research and design relating thereto, namely, scientific research, design and implementation of vehicle technologies for others; motor vehicle parts design services, namely, design and development of vehicle parts and vehicle components **with the exception of rims, wheels, and tires, and related structural parts, namely, lug nuts, lock nuts, valve stems, and wheel spacers**; design and development of computer hardware and software; design and development of computer hardware and computer software for vehicles and parts therefor **with the exception of rims, wheels, and tires, and related structural parts, namely, lug nuts, lock nuts, valve stems, and wheel spacers**

Applicant further moves, with the consent of Opposer, for the suspension of these proceedings pending amendment.

In view of the foregoing, it is respectfully requested that the Trademark Trial and Appeal Board grant this consent motion for amendment and suspension of proceedings pending amendment

Respectfully Submitted,

STITES & HARBISON, PLLC

/BT/

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October 28, 2019

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Applicant's Consent Motion to Amend and for Suspension of Proceedings Pending Amendment was sent via e-mail to counsel for Opposer, Rudy Hill, at rhill@bradley.com on this the 28th day of October, 2019.

/BT/

Brewster Taylor