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Filing date: **11/16/2020**

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

Proceeding	91247990
Party	Plaintiff Pirelli Tyre S.p.A.
Correspondence Address	STEVEN B. POWELL VENABLE LLP P.O. BOX 34385 WASHINGTON, DC 20043-9998 UNITED STATES Primary Email: adprice@venable.com Secondary Email(s): trademarkdocket@venable.com, sbpowell@venable.com, pjwyles@venable.com 2023444536
Submission	Motion to Suspend for Settlement Discussions
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Signature	/StevenBPowell/
Date	11/16/2020
Attachments	Motion to Suspend - STRADA - TTAB Opposition - Nov 16 2020.pdf(77075 bytes)

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

Pirelli Tyre S.p.A.,)	
)	
Opposer,)	
v.)	Opposition No. 91247990
)	Appl. Serial No. 87/536,
Pacific Import Manufacturing, Inc.,)	
)	
Applicant)	
Venable Ref.: 140232.502620)	

MOTION WITH CONSENT TO SUSPEND FOR SETTLEMENT

Opposer, with Applicant’s consent (Opposer and Applicant collectively, “Parties”), requests that the Board suspend the proceedings an additional thirty (30) days in the above opposition proceeding so the Parties can continue settlement negotiations. Counsel for Applicant consented to this motion by email on November 16, 2020. This request is made for good cause and is not made simply for purposes of delay.

To be clear, the requested suspension would reset the trial schedule such that the scheduled close of discovery would be **January 16, 2021**, with all subsequent dates in the trial schedule reset as indicated in the Proposed Trial Schedule herein.

This request is made consistent with the Parties’ desired outcome of the two most recently filed consented suspension requests, on which the Board has not ruled yet. The still-pending consented suspension requests were filed on September 10, 2020 (to request the entire trial schedule be reset and moved 30 days forward, such that the close of discovery would have been November 17, 2020) and October 14, 2020 (to request the entire trial schedule be reset and

moved 30 days forward from the end of the previously requested suspension, such that the close of discovery would have been December 17, 2020).

It is respectfully requested that trial dates be reset as indicated below.

Proposed Trial Schedule

Discovery Closes	1/16/2021
Plaintiff's Pretrial Disclosures Due	3/2/2021
Plaintiff's 30-day Trial Period Ends	4/16/2021
Defendant's Pretrial Disclosures Due	5/1/2021
Defendant's 30-day Trial Period Ends	6/15/2021
Plaintiff's Rebuttal Disclosures Due	6/30/2021
Plaintiff's 15-day Rebuttal Period Ends	7/30/2021
Plaintiff's Opening Brief Due	9/28/2021
Defendant's Brief Due	10/28/2021
Plaintiff's Reply Brief Due	11/12/2021
Request for Oral Hearing (optional) Due	11/22/2021

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Respectfully submitted,



Dated: November 16, 2020

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CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing MOTION WITH CONSENT TO SUSPEND FOR SETTLEMENT was served on counsel for Applicant, this 16th day of November 2020, by sending the same via email to Aaron Bradford, attorney of record for Applicant, at trademarks@apb-law.com; aaron@apb-law.com and nina@apb-law.com.



Steven B. Powell