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Filing date: **03/14/2022**

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

| | |
|------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Proceeding no. | 91266269 |
| Party | Defendant Tara Brands, LLC |
| Correspondence address | BRIAN P. KINDER THE KINDER LAW GROUP, APC 19200 VON KARMAN AVENUE FOURTH FLOOR IRVINE, CA 92612 UNITED STATES Primary email: bkinder@tklglaw.com 949-216-3070 |
| Submission | Motion to Suspend for Settlement Discussions |
| Filer's name | Brian Kinder |
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| Signature | /BPK/ |
| Date | 03/14/2022 |
| Attachments | 2022.03.14 - Stipulated Motion to Suspend - FAI.pdf(142940 bytes) |

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

In the Matter of:
Trademark Serial No. 88/666,964
For the Mark: FAI
Published: August 4, 2020

PAI SKINCARE LIMITED,

Opposer,

v.

TARA BRANDS, LLC,

Applicant.

Opposition No. 91266269

STIPULATED MOTION TO SUSPEND

Opposer Pai Skincare Limited (“Opposer”) and Applicant Tara Brands, LLC (“Applicant”) hereby move the Honorable Board to suspend the above proceedings for good cause.

Pursuant to the Board’s Feb. 17, 2022 Order (Dkt. 18), the Parties report that the matter is nearing resolution with the Parties, through counsel, exchanging what is believed to be the final draft of a Consent and Co-Existence Agreement that will resolve all issues in the case. Counsel for Applicant provided to counsel for Opposer today – March 14, 2022 – a final redline draft of the agreement together with a *signed* version of the document. Counsel for Opposer here in the United States will now be coordinating with Europe-based Opposer with regard to evaluation of the final version of the document. Assuming Opposer accepts the final version, the Parties anticipate resolution within the next thirty (30) days

In light of the foregoing, the Parties ask that the above proceeding be suspended pending final resolution.

Respectfully submitted,

Dated: March 14, 2022

THE KINDER LAW GROUP, APC



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CERTIFICATE OF TRANSMISSION AND SERVICE

I certify that on March 14, 2022, the foregoing STIPULATED MOTION TO SUSPEND is being electronically filed via the Trademark Trial and Appeal Board's Electronic System for Trademark Trials and Appeals ("ESTTA") and is being served by emailing a copy thereof to counsel of record for Opposer as follows:

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Executed on March 14, 2022, in Irvine, California.



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