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Filing date: **04/13/2022**

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

Proceeding no.	91266269
Party	Defendant Tara Brands, LLC
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Submission	Motion to Suspend for Settlement Discussions
Filer's name	Brian P. Kinder
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Signature	/BPK/
Date	04/13/2022
Attachments	2022.04.13 - Stipulated Motion to Suspend - FAI.pdf(134176 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) and March 21, 2022 Order (Dkt. 20), the Parties report that the matter continues to near resolution with the Parties, through counsel, exchanging final drafts of a Consent and Co-Existence Agreement that the parties believe will resolve all issues in the case. Counsel for Applicant provided a final redline draft of the agreement to counsel for Opposer last month. Counsel for Opposer is located here in the United States, but had to coordinate further with his counterparts for Europe-based Opposer with regard to evaluation of the final version of the document. Opposer has now returned the document with additional revisions that are under evaluation by Applicant. Assuming the parties are able to work through the final revisions, the parties anticipate resolution within the

next thirty (30) days and request sixty (60) days suspension to provide for timelines set forth in the terms of the proposed agreement.

In light of the foregoing, the Parties ask that the above proceeding be suspended pending final resolution according to the following schedule:

Event	Current	Proposed
Time to Answer	04/13/2022	06/13/2022
Deadline for Discovery Conference	05/13/2022	07/13/2022
Discovery Opens	05/13/2022	07/13/2022
Initial Disclosures Due	06/12/2022	08/12/2022
Expert Disclosures Due	10/10/2022	12/10/2022
Discovery Closes	11/09/2022	01/09/2023
Plaintiff's Pretrial Disclosures Due	12/24/2022	02/23/2023
Plaintiff's 30-day Trial Period Ends	02/07/2023	04/09/2023
Defendant's Pretrial Disclosures Due	02/22/2023	04/24/2023
Defendant's 30-day Trial Period Ends	04/08/2023	06/08/2023
Plaintiff's Rebuttal Disclosures Due	04/23/2023	06/23/2023
Plaintiff's 15-day Rebuttal Period Ends	05/23/2023	07/23/2023
Plaintiff's Opening Brief Due	07/22/2023	09/21/2023
Defendant's Brief Due	08/21/2023	10/21/2023
Plaintiff's Reply Brief Due	09/05/2023	11/05/2023
Request for Oral Hearing (optional) Due	09/15/2023	11/15/2023

Respectfully submitted,

Dated: April 13, 2022

THE KINDER LAW GROUP, APC



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CERTIFICATE OF TRANSMISSION AND SERVICE

I certify that on April 13, 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 April 13, 2022, in Irvine, California.



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