

ESTTA Tracking number: **ESTTA1215222**

Filing date: **06/13/2022**

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

Proceeding no.	91266269
Party	Defendant Tara Brands, LLC
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 P. Kinder
Filer's email	BKINDER@TKLGLAW.COM
Signature	/BPK/
Date	06/13/2022
Attachments	2022.06.13 - Stipulated Motion to Suspend - FAI.pdf(133060 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 April 19, 2022 Order (Dkt. 22), the Parties report that the matter continues to near resolution with the Parties, through counsel, continuing to negotiate a final draft of a Consent and Co-Existence Agreement that the parties believe will resolve all issues in the case. Counsel for Applicant is continuing to evaluate a final redline draft of the agreement. Assuming the parties are able to work through the final revisions, the parties anticipate resolution within the next sixty (60) days and request 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	06/13/2022	08/13/2022
Deadline for Discovery Conference	07/13/2022	09/12/2022
Discovery Opens	07/13/2022	09/12/2022
Initial Disclosures Due	08/12/2022	10/12/2022
Expert Disclosures Due	12/10/2022	02/09/2023
Discovery Closes	01/09/2023	03/11/2023
Plaintiff's Pretrial Disclosures Due	02/23/2023	04/25/2023
Plaintiff's 30-day Trial Period Ends	04/09/2023	06/09/2023
Defendant's Pretrial Disclosures Due	04/24/2023	06/24/2023
Defendant's 30-day Trial Period Ends	06/08/2023	08/08/2023
Plaintiff's Rebuttal Disclosures Due	06/23/2023	08/23/2023
Plaintiff's 15-day Rebuttal Period Ends	07/23/2023	09/22/2023
Plaintiff's Opening Brief Due	09/21/2023	11/21/2023
Defendant's Brief Due	10/21/2023	12/21/2023
Plaintiff's Reply Brief Due	11/05/2023	01/05/2024
Request for Oral Hearing (optional) Due	11/15/2023	01/15/2024

Respectfully submitted,

Dated: June 13, 2022

THE KINDER LAW GROUP, APC



Brian P. Kinder, Esq.  
 19200 Von Karman Ave., Fourth Floor  
 Irvine, California 92612  
 T: (949) 216-3070  
 F: (949) 216-3074  
 E: bkinder@tklglaw.com  
 Attorneys for Applicant

**CERTIFICATE OF TRANSMISSION AND SERVICE**

I certify that on June 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:

Erik J. Osterrieder  
Rao DeBoer Osterrieder, PLLC  
1334 Brittmoore Road, Suite 2401  
Houston, TX 77043  
erik@rdoip.com

Executed on June 13, 2022, in Irvine, California.



---

Brian P. Kinder, Esq.  
The Kinder Law Group, APC  
19200 Von Karman Ave., Fourth Floor  
Irvine, California 92612  
T: (949) 216-3070  
F: (949) 216-3074  
E: bkinder@tklglaw.com  
Attorneys for Applicant