

ESTTA Tracking number: **ESTTA1322532**

Filing date: **11/15/2023**

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

Proceeding no.	91270401
Party	Plaintiff Valeo Service
Correspondence address	BRYCE J. MAYNARD BUCHANAN INGERSOLL & ROONEY, PC 1737 KING STREET, SUITE 500 ALEXANDRIA, VA 22314 UNITED STATES Primary email: bryce.maynard@bipc.com No phone number provided
Submission	Stipulated/Consent Motion to Extend
Filer's name	Bryce J. Maynard
Filer's email	bryce.maynard@bipc.com
Signature	/Bryce J. Maynard/
Date	11/15/2023
Attachments	Consented Motion to Suspend Opposition.pdf(75037 bytes)

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

Valeo Service.	:	
	:	
Opposer	:	
	:	
v.	:	
	:	Opposition No. 91270401
Trico Products Corporation	:	
	:	
Applicant	:	

CONSENTED MOTION FOR SUSPENSION

Opposer Valeo Service (“Opposer”), with the consent of Applicant Trico Products Corporation (“Applicant”), hereby requests that this proceeding be suspended for an additional sixty (60) days to allow the parties sufficient time to continue and finalize settlement as outlined below.

The Board stated in its September 13, 2023 Order granting the parties’ consented motion for suspension that any further requests for suspension must include a status report setting forth the efforts that the parties have made towards settlement during the prior suspension.

The parties hereby advise the Board that they have exchanged several drafts of a proposed settlement agreement. Applicant's counsel sent the most recent version, with Applicant's revisions, to Opposer's counsel via e-mail on November 13, 2023. Opposer is currently reviewing the current draft and expects to respond to Applicant's counsel shortly. The parties have agreed on several issues, including that Applicant will amend the identification of goods and services in its pending applications to exclude windshield wipers, and that Opposer will agree not to oppose the amended applications or challenge Applicant’s use of the mark. The parties are still negotiating several other issues, namely the extent to which Applicant will be required to use Applicant's Mark in combination with other brands or marks as well as consent to applications of future marks. The parties are continuing to negotiate in good faith and hope

to be able to reach a final agreement before the expiration of the suspension requested by this motion.

In light of the above, the parties respectfully request that the trial schedule be amended as follows:

Initial Disclosures Due	1/14/24
Expert Disclosures Due	5/13/2024
Discovery Closes	6/12/2024
Plaintiff's Pretrial Disclosures Due	7/27/2024
Plaintiff's 30-day Trial Period Ends	9/10/2024
Defendant's Pretrial Disclosures Due	9/25/2024
Defendant's 30-day Trial Period Ends	11/9/2024
Plaintiff's Rebuttal Disclosures Due	11/24/2024
Plaintiff's 15-day Rebuttal Period Ends	12/24/2024
Plaintiff's Opening Brief Due	2/22/2025
Defendant's Brief Due	3/24/2025
Plaintiff's Reply Brief Due	4/8/2025
Request for Oral Hearing (optional) Due	4/18/2025

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY
PC

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Dated: November 15, 2023

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Attorneys for Opposer

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing **CONSENTED MOTION TO SUSPEND** was served this 15th day of November, 2023 via e-mail upon:

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/Bryce J. Maynard/
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