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Filing date: **06/16/2023**

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

Proceeding no.	91273945
Party	Plaintiff Beeline GmbH
Correspondence address	ANNE W. GLAZER STOEL RIVES LLP 760 SW NINTH AVENUE, SUITE 3000 PORTLAND, OR 97205 UNITED STATES Primary email: docketclerk@stoel.com Secondary email(s): anne.glazer@stoel.com, elliot.williams@stoel.com, patrick.hartigan@stoel.com, kevin.crosman@stoel.com 503-224-3380
Submission	Withdrawal of Opposition
Filer's name	Elliott Williams
Filer's email	elliott.williams@stoel.com, tm-pdx@stoel.com, anne.glazer@stoel.com, patrick.hartigan@stoel.com
Signature	/Elliott Williams/
Date	06/16/2023
Attachments	Withdrawal of Opposition with Exhibit A.pdf(881591 bytes)

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

Serial No. 90/320,930
For the Mark: IAM (and Design)
Filed: November 16, 2020
Published in the Official Gazette on: September 14, 2021

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Beeline GMBH,)	
)	
Opposer,)	Opposition No: 91273945
)	
v.)	
)	
Nanci Cestone)	
Michael G. Cestone)	
Michael J. Cestone)	
Frank Cestone)	
Gianna Cestone)	
)	
Applicants.)	
<hr/>)	

CONSENTED WITHDRAWAL OF OPPOSITION WITHOUT PREJUDICE

Beeling GmbH hereby withdraws its opposition to the application Ser. No. 90/320,930. without prejudice. On June 12, 2023, Mr. Cestone consented via email to the undersigned counsel to withdrawal of the opposition proceeding without prejudice. A true and correct copy of the parties' email exchange regarding withdrawal without prejudice is enclosed with this submission as Exhibit A.

Dated: June 16, 2023.

STOEL RIVES LLP

/s Elliott J. Williams/ _____

ELLIOTT J. WILLIAMS
elliott.williams@stoel.com
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ANNE W. GLAZER
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Telephone: 503-294-3380
760 SW Ninth Avenue, Suite 3000
Portland, Oregon 97205

Attorneys for Opposer

Williams, Elliott J.

From: Williams, Elliott J.
Sent: Tuesday, June 13, 2023 12:05 PM
To: M Cestone3
Cc: Glazer, Anne
Subject: RE: Update Regarding Proceeding No. 91273945 [SR-ACTIVE.FID5199188]

Dear Mr. Cestone,

Thank you for your prompt response. Based on your agreement, we will prepare and file the paperwork to dismiss the opposition without prejudice.

My client has simply decided not to pursue the opposition at this time if you were willing to consent to such withdrawal without prejudice. You are free to consult your own counsel in this matter (and please forward this message to your counsel if you have counsel), but that is all the explanation that I can offer regarding the decision.

Feel free to give me a call if you have any questions or would like to discuss this matter further.

Best regards,
Elliott

Elliott Williams | Attorney
Direct: (503) 294-9571 | Mobile: (907) 854-4880

From: M Cestone3 <mjcestone3@cestonegolf.com>
Sent: Monday, June 12, 2023 9:43 AM
To: Williams, Elliott J. <elliott.williams@stoel.com>
Cc: Glazer, Anne <anne.glazer@stoel.com>
Subject: Re: Update Regarding Proceeding No. 91273945 [SR-ACTIVE.FID5199188]

Dear Mr. Elliot Williams and Beeline GmbH Delegates,

I (Michael Cestone) hereby accept Beeline's decision to withdraw the Opposition No. 91273945 and dismiss it.

If there is any further action I am to take, feel free to reach out. Thank You for communicating with Me on this matter.

Also, the providing of the reasoning for reaching this ultimate decision would be greatly appreciated.

Best,

Michael Cestone

From: Williams, Elliott J. <elliott.williams@stoel.com>
Sent: Friday, June 9, 2023 1:53 PM
To: M Cestone3 <mjcestone3@cestonegolf.com>

Cc: Glazer, Anne <anne.glazer@stoel.com>

Subject: RE: Update Regarding Proceeding No. 91273945 [SR-ACTIVE.FID5199188]

Dear Mr. Cestone,

I am following up on this trademark Proceeding No. 91273945. Our client Beeline GmbH is willing to withdraw the opposition and dismiss the proceeding if you (on behalf of defendant/applicant) will consent to such withdrawal without prejudice. Please let me know if you are willing to proceed in this way.

If you are represented by counsel in this matter, please forward this message to your counsel.

Thank you, and best regards,

Elliott Williams | Attorney

Direct: (503) 294-9571 | Mobile: (907) 854-4880

From: M Cestone3 <mjcestone3@cestonegolf.com>

Sent: Thursday, July 28, 2022 11:56 AM

To: Glazer, Anne <anne.glazer@stoel.com>

Subject: Re: Update Regarding Proceeding No. 91273945 [SR-ACTIVE.FID5199188]

Ok, thank You for the update.

Best,

Michael Cestone

From: Glazer, Anne <anne.glazer@stoel.com>
Sent: Thursday, July 28, 2022 2:27:59 PM
To: M Cestone3 <mjcestone3@cestonegolf.com>
Subject: RE: Update Regarding Proceeding No. 91273945 [SR-ACTIVE.FID5199188]

Dear Mr. Cestone – I still need to discuss this with my client. You will hear from us.

Best regards,

Anne

Anne W. Glazer | Partner
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From: M Cestone3 <mjcestone3@cestonegolf.com>
Sent: Wednesday, July 27, 2022 5:52 AM
To: Glazer, Anne <anne.glazer@stoel.com>
Subject: Update Regarding Proceeding No. 91273945

Good morning Ms. Glazer,

I am communicating this message regarding Our answer to uphold classes 014 and 025 respectively. I had sent an email to You on 07/18/22 regarding this subject matter, however, I have not yet received a response. Consider this email as further communication regarding this proceeding.

Thank You.

Best,

Michael J. Cestone