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

Proceeding	92045378
Party	Defendant GLOBE UNION INDUSTRIAL CORP. GLOBE UNION INDUSTRIAL CORP. No.22, Chien-Kuo Road Taichung Export Processing Zone TWX Taichung,
Correspondence Address	Linda K. McLeod Finnegan Henderson Farabow Garrett & Dunner, L.L.P. 901 New York Avenue, NW Washington, DC 20001-4413 UNITED STATES docketing@finnegan.com, judy.valusek@finnegan.com, linda.mcleod@finnegan.com
Submission	Other Motions/Papers
Filer's Name	Linda K. McLeod
Filer's e-mail	docketing@finnegan.com, linda.mcleod@finnegan.com, judy.valusek@finnegan.com
Signature	/Linda K. McLeod/
Date	10/11/2006
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

<p>TOTO USA, INC.,</p> <p style="text-align: center;">Petitioner,</p> <p style="text-align: center;">v.</p> <p>GLOBE UNION INDUSTRIAL CORP.,</p> <p style="text-align: center;">Registrant/Respondent.</p>	<p>Cancellation No. 92045378</p> <p>Registration No. 2,896,116</p> <p>Mark: PLYMOUTH</p>
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**STIPULATION TO SUSPEND PROCEEDINGS**

Subject to the approval of the Board, the parties, by their respective counsel, stipulate that proceedings be suspended for a period of three months from the date of the Board's suspension order, subject to the right of either party to request resumption of proceedings at any time. Trademark Rule 2.117(c).

This request is not filed for purposes of delay. The parties request a suspension of proceedings because they are finalizing the terms of a settlement agreement.

Upon resumption of proceedings, if any, the parties respectfully request that the Board reset discovery and trial dates, including Petitioner's time to serve responses and objections to Respondent's discovery requests.

Counsel for Petitioner, Caroline L. Keller, Esq. has consented to and joins in this request.

Respectfully submitted,

GLOBE UNION INDUSTRIAL CORP.,

Dated: October 11, 2006

By: 

David M. Kelly  
Linda K. McLeod  
FINNEGAN, HENDERSON, FARABOW,  
GARRETT & DUNNER L.L.P.  
901 New York Avenue, N.W.  
Washington, D.C. 20001-4413  
(202) 408-4000

Attorneys for Respondent

**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing Stipulation To Suspend Proceedings was served, via prepaid First Class Mail, on October 11, 2006, upon counsel for Petitioner at the following address:

Caroline L. Keller, Esq.  
Pillsbury Winthrop Shaw Pittman LLP  
725 S. Figueroa St.  
Suite 2800  
Los Angeles, CA 90017-5406

  
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