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

Proceeding	92074303
Party	Plaintiff Travel Nurse Across America, LLC d/b/a/ SimpliFi
Correspondence Address	CHARLES C KINNE KINNE IP GROUP 1717 N NAPER BLVD STE 200 NAPERVILLE, IL 60563 UNITED STATES Primary Email: ckinne@kinnelaw.com Secondary Email(s): cckinne@gmail.com 630-904-0940
Submission	Other Motions/Papers
Filer's Name	Charles C Kinne
Filer's email	ckinne@kinnelaw.com
Signature	/Charles C Kinne/
Date	08/20/2020
Attachments	2020 08 20 Stipulated Dismissal of Claims and Counterclaims Without Prejudice.pdf(98413 bytes)

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

In the matter of U.S. Trademark Reg. No. 5,354,765
For the Trademark SimplifyVMS
Date Registered December 12, 2017
(Principal Register)

TRAVEL NURSE ACROSS AMERICA, LLC
D/B/A/ SIMPLIFI

Petitioner,

v.

SIMPLIFY WORKFORCE, INC.,

Registrant.

Cancellation Proceeding
No. 92/074,303

**STIPULATED DISMISSAL OF CLAIMS AND COUNTERCLAIMS
WITHOUT PREJUDICE**

Petitioner-Counterclaim Respondent, Travel Nurse Across America, LLC d/b/a SimpliFi (“SimpliFi”), and Registrant-Counterclaimant, Simplify Workforce, Inc. (“Workforce”), stipulate as follows:

1. Petitioner-Counterclaim Respondent’s claims presented in this proceeding are hereby dismissed without prejudice.
2. Registrant-Counterclaimant’s claims presented in this proceeding are hereby dismissed without prejudice.

Accordingly, pursuant to Rule 41(a)(1)(A)(ii) and 41(c), FED. R. CIV. P., this entire proceeding, including claims and counterclaims, is dismissed without prejudice.

Respectfully submitted,

TRAVEL NURSE ACROSS AMERICA,
LLC D/B/A/ SIMPLIFI

Date: August 19, 2020

/Charles C Kinne/
Charles C. Kinne
Attorney for Petitioner-Counterclaim
Respondent
KINNE IP GROUP
1717 N. Naper Blvd.
Suite 200
Naperville, Illinois 60563
Phone: (630) 904-0940
Fax: (888) 887-7158
Email: ckinne@kinnelaw.com

/Daniel J. Schlue/
Daniel J. Schlue, Esq.
BLACK MCCUSKEY SOUERS &
ARBAUGH
220 Market Avenue South
Canton, OH 44702
Phone: (330) 903-2289
Fax: (330) 456-5756
dschlue@bmsa.com
robertjbasil@rjbasil.com
Attorneys for Registrant-
Counterclaimant

CERTIFICATE OF SERVICE ON REGISTRANT-COUNTERCLAIMANT

As an attorney for Petitioner and Registrant and Counterclaim-Respondent, I hereby certify that on August 20, 2020, I served, by email, a complete copy of the attached STIPULATED DISMISSAL OF CLAIMS AND COUNTERCLAIMS to the following attorneys of record for Registrant-Counterclaimant, Simplify Workforce, Inc.:

Daniel J. Schlue, Esq.
BLACK MCCUSKEY SOUERS & ARBAUGH
220 Market Avenue South
Canton, OH 44702
Phone: (330) 903-2289
Fax: (330) 456-5756
dschlue@bmsa.com
robertjbasil@rjbasil.com
Attorneys for Registrant and Counterclaimant

with a courtesy copy to:

Robert J. Basil
THE BASIL LAW GROUP, P.C.
32 East 31st Street, 9th Floor
New York, NY 10016
917-994-9973
831-536-1075 (fax)
917-512-3066 (text)
robertjbasil@rjbasil.com



/Charles C. Kinne/
Charles C. Kinne