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Filing date: **06/26/2014**

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

Proceeding	91215926
Party	Defendant Nasza Scinana LLC
Correspondence Address	PAUL T SABAJ SABAJ LAW PC 26 COURT ST, SUITE 2003 BROOKLYN, NY 11242 UNITED STATES
Submission	Motion to Suspend for Civil Action
Filer's Name	Paul T. Sabaj, Esq
Filer's e-mail	psabaj@sabajlaw.com
Signature	/Paul T. Sabaj/
Date	06/26/2014
Attachments	Nasza Sciana LLC - USPTO Motion to Suspend for Civil Action.pdf(139584 bytes ) Complaint Nasza Sciana LLC vs Adamski, Galik, Radio Rampa - docketed.pdf(2457759 bytes )

UNITED STATES PATENT AND TRADEMARK OFFICE  
TRADEMARK TRIAL AND APPEAL BOARD

IN Re Application of Nasza Sciana LLC

Serial No.: 85750,919

Mark: Radio Rampa

Filed: October 10, 2012

RADIO RAMPA, LLC		
	Opposer	MOTION TO SUSPEND FOR CIVIL ACTION
-against-		No. 91215926
NASZA SCIANA, LLC		
	Applicant.	

SIRS, PLEASE TAKE NOTICE THAT:

Upon the annexed Declaration of Paul T. Sabaj, Esq attorney for Nasza Sciana LLC, sworn to on June 26, 2014, and the exhibits attached thereto,

Moves this Board, pursuant to paragraph 2.116 of the US Trademark Law, without oral argument requested, to issue a decision on July 20, 2014, or as soon as Board can decide so,

For an order:

1. Suspending the proceedings pursuant to 2.117, pending outcome of the civil case **CV-13-2752**, filed in USDC EDNY.
2. For extension of time to file an answer, should this motion not be entertained.
3. For such other and further relief, that this Board may deem just and proper.

Dated: June 26, 2014  
New York, New York

Respectfully submitted,  
By: /s/ Paul T. Sabaj  
Paul T. Sabaj, Esq.  
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UNITED STATES PATENT AND TRADEMARK OFFICE  
TRADEMARK TRIAL AND APPEAL BOARD

IN Re Application of Nasza Sciana LLC

Serial No.: 85750,919

Mark: Radio Rampa

Filed: October 10, 2012

RADIO RAMP, LLC		
	Opposer	<b>Affirmation of Paul T. Sabaj in Support</b>
-against-		No. 91215926
NASZA SCIANA, LLC		
	Applicant.	

Nasza Sciana LLC, by and through their undersigned attorney, upon information and belief hereby alleges as follows:

1. The undersigned represents Nasza Sciana, LLC.
2. Before interposing an answer in the instant proceedings, Nasza Sciana LLC makes this motion, for suspension of proceedings pending civil action.
3. On the 8<sup>th</sup> day of May 2103, Nasza Sciana, LLC instituted a civil action in United States District Court, for the Eastern District of New York, bearing index number **CV-13-2752**.
4. Said action is a “complaint for trademark infringement”, among other causes of action.
5. Nasza Sciana, LLC - plaintiff to said civil action, in causes of action alleges, that opposer to the instant proceedings - Radio Rampa, LLC creates dilution in commerce.

6. Moreover, Nasza Sciana, LLC has submitted a trademark Radio Rampa for determination and adjudication of abovementioned federal court. **See Exhibit A attached hereto – Complaint with Exhibits.**
7. Said civil action is pending for over a year, and has been in discovery stage for substantial time, which has a bearing on complexity of the instant proceedings.
8. For the sake of saving this Board’s time and resources Nasza Sciana, LLC is not going to reiterate lengthy allegations contained in the complaint to the civil action.
9. Mark Radio Rampa was invented and created by Nasza Sciana LLC and its principal, also utilizing resources for hire.
10. Nasza Sciana, LLC was using the mark Radio Rampa in business, and in fact had said domain registered in its name, until a dispute between the individuals, who are the parties to the civil action, arose.
11. For the reasons set forth below, and on the basis of paragraph 2.117 of US Trademark Law, Nasza Sciana, LLC asks for stay and suspension of the proceedings, pending outcome of the civil action, before interposing its answer to the instant proceedings.
12. Should this Board not entertain this motion, Nasza Sciana, LLC asks for extension of time to file an answer.
13. **Wherefore, it is requested as in the petition of this motion, for the instant action to be suspended for civil action.**

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