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

Proceeding	92062378
Party	Defendant Hobsons, Inc.
Correspondence Address	FREDERICK H GRIBBELL FREDERICK H GRIBBELL LLC 5515 TIMBER WAY DRIVE CINCINNATI, OH 45238 UNITED STATES fred.gribbell@ieee.org, fhgribbe@fuse.net
Submission	Motion to Suspend for Civil Action
Filer's Name	Frederick H. Gribbell
Filer's e-mail	fred.gribbell@ieee.org, fhgribbe@fuse.net
Signature	/Fred Gribbell/
Date	11/10/2015
Attachments	cvi0363MotionToSuspend.pdf(31726 bytes) cvi0363ExhibitAcoversheet.pdf(8898 bytes) cvi0363ExhibitA.pdf(4163233 bytes) cvi0363ExhibitBcoversheet.pdf(8889 bytes) cvi0363ExhibitB.pdf(167532 bytes)

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

In the matter of Registration No.: 4796031
Date of Issue: August 18, 2015
Trademark: RADIUS

)	
RADIUS GLOBAL SOLUTIONS LLC)	
Petitioner,)	
)	
v.)	Cancellation No. 92062378
)	
HOBSONS, INC.)	
Registrant.)	
)	

MOTION TO SUSPEND FOR CIVIL ACTION

Pursuant to Section 2.117 of the Rules of Practice in Trademark Cases, Chapter 37 Code of Federal Regulations, Registrant Hobsons, Inc. (“Registrant”) respectfully requests suspension of this cancellation proceeding because the claims asserted by Petitioner are essentially duplicates of claims, defenses, and counterclaims in the pending federal litigation between these same parties regarding the same RADIUS trademark filed in Radius Global Solutions LLC v. Hobsons, Inc., Civil Action No. 2:15-cv-03871-BMS, which is currently pending in the U.S. District Court for the Eastern District of Pennsylvania.

Cancellation No. 92062378

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Attorney Docket: CVI0363

A copy of the Complaint that was filed by Petitioner (as the plaintiff) in the District Court (E.D. Pa.) is enclosed as *Exhibit A*. A copy of the Answer and Counterclaim that was filed by Registrant (as the defendant) in the District Court (E.D. Pa.) is enclosed as *Exhibit B*. These exhibits are evidence of the existing civil action that was noted above. That civil action is still pending at this time. The Petitioner listed this civil action in the “Related Proceedings” box of its Petition for Cancellation.

WHEREFORE, Registrant respectfully requests that this cancellation proceeding be suspended until termination of the above-referenced civil action.

Respectfully submitted,

HOBSONS, INC.

By: / Frederick H. Gribbell /

Frederick H. Gribbell

Attorney for Registrant

Registration No. 33,892

FREDERICK H. GRIBBELL, LLC

5515 Timber Way Drive

Cincinnati, Ohio 45238

(513) 891-2100

FAX: (513) 891-2100

e-mail: fred.gribbell@ieee.org

(submitted electronically, November 10, 2015)

CERTIFICATE OF TRANSMITTAL

I hereby certify that this MOTION TO SUSPEND FOR CIVIL ACTION is being filed electronically with the TTAB via ESTTA on November 10, 2015.

/ Frederick H. Gribbell /

Frederick H. Gribbell
Attorney for Registrant
Registration No. 33,892

FREDERICK H. GRIBBELL, LLC
5515 Timber Way Drive
Cincinnati, Ohio 45238
(513) 891-2100
FAX: (513) 891-2100
e-mail: fred.gribbell@ieee.org

CERTIFICATE OF SERVICE

This is to certify that the undersigned has served on this date a true and correct copy of the within and foregoing MOTION TO SUSPEND FOR CIVIL PROCEEDINGS, regarding the registered trademark RADIUS, Registration No. 4796031, upon counsel for the Petitioner, electronically and by United States First Class Mail, in a properly addressed envelope, with adequate postage affixed thereon, addressed as follows:

Timothy D. Pecsénye, Esq.
BLANK ROME LLP
One Logan Square, 130 N. 18th Street
Philadelphia, PA 19103

Respectfully submitted,

/s/ Frederick H. Gribbell
Frederick H. Gribbell
Attorney for Registrant
Registration No. 33,892

FREDERICK H. GRIBBELL, LLC
5515 Timber Way Drive
Cincinnati, Ohio 45238
(513) 891-2100
FAX: (513) 891-2100
e-mail: fred.gribbell@ieee.org

Dated: November 10, 2015

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