

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

3M COMPANY

Plaintiff,

CASE NO. 8:20-cv-1003-T-35CPT

v.

TAC2 GLOBAL LLC

Defendant.

**JOINT MOTION TO CONTINUE HEARING ON PLAINTIFF'S
MOTION FOR PRELIMINARY INJUNCTION**

Defendant, TAC2 GLOBAL, LLC ("TAC2" or "Defendant") and Plaintiff, 3M COMPANY ("3M" or "Plaintiff"), (collectively, "The Parties"), pursuant to M.D. Fla. Local Rule 3.09, by and through their undersigned counsel, hereby move to continue the hearing on Plaintiff's Motion for Preliminary Injunction for a minimum of fourteen (14) days and in support thereof, state as follows:

1. This action consists of an eight-count Complaint asserting various causes of action related to trademark infringement under federal and state law.
2. Plaintiff served its Motion for Temporary Restraining Order and Preliminary Injunction and Supporting Memorandum of Law on May 8, 2020.
3. A hearing on Plaintiff's Motion for Temporary Restraining Order was held on May 12, 2020. [D.E. 15].
4. The Court entered an order on Plaintiff's Motion for Temporary Restraining Order ("TRO") that was to remain in effect until June 3, 2020, on which date the Court will hear Plaintiff's Motion for Preliminary Injunction. [D.E. 25].
5. The Parties are engaged in meaningful settlement negotiations to either resolve the entire Complaint or, alternatively, to resolve the preliminary injunction motion without the

expense of a hearing. The parties agree that it is in their best interest to continue the hearing on Plaintiff's Motion for Preliminary Injunction scheduled for June 3, 2020 for at least fourteen (14) days while the parties attempt to come to a resolution.

6. Thus, The Parties request that the hearing on Plaintiff's Motion for Preliminary Injunction be heard on June 17, 2020, or as soon thereafter as the Court is available.

7. The Parties stipulate that the TRO will be extended until and through the new hearing date.

MEMORANDUM OF LAW

M.D. Fla. Local Rule 3.09 provides that the Court may continue a hearing for good cause. As stated above, The Parties have provided good cause to continue the hearing on Plaintiff's Motion for Preliminary Injunction due to the ongoing settlement negotiations between The Parties. There will be no prejudice to the Court or The Parties if the Joint Motion to granted.

WHEREFORE, The Parties' counsel respectfully request that this Court grant this Joint Motion to Continue Hearing on Plaintiff's Motion for Preliminary Injunction until June 17, 2020, or as soon thereafter as the Court will allow and extend the TRO until and through the new hearing date, and for any other relief the Court deems appropriate.

Dated this 1st day of June, 2020.

/s/ Amy E. Stoll

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