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

Proceeding	91158951
Party	Plaintiff Precision Trading Corp.
Correspondence Address	MICHAEL B. CHESAL KLUGER, PERETZ, KAPLAN & BERLIN 201 S. BISCAYNE BLVD., 17TH FLOOR MIAMI, FL 33131 UNITED STATES trademarks@kpkb.com
Submission	Other Motions/Papers
Filer's Name	Michael E. Tschupp
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Date	03/27/2008
Attachments	Response to Board's Order- Amended Stip for Suspension (M0532024).PDF (3 pages)(31127 bytes) Proposed order granting suspension and resetting trial dates (M0532025).PDF (2 pages)(18656 bytes)

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

In the Matter of:

Application Serial No.: 78/170,563
Filed: October 3, 2002
Trademark: PREMIUM PRESTIGE
Applicant: BSH Home Appliances Corporation
Published in the
Official Gazette on: November 11, 2003

Precision Trading Corporation,

Opposer,

Opposition No. 91158951

v.

BSH Home Appliances Corporation

Applicant.

**CONSENTED RESPONSE TO BOARD'S ORDER AND
AMENDED STIPULATION TO SUSPEND PENDING SETTLEMENT NEGOTIATIONS**

Opposer, Precision Trading Corporation ("Opposer"), by and through undersigned counsel, hereby responds to the Board's Order of February 27, 2008, and states as follows:

1. In response to the Stipulation to Suspend Pending Settlement Negotiations filed by Opposer on February 19, 2008 (the "Stipulation"), the Board issued an Order on February 27, 2008 (the "Order").

2. The Order denied the request for without prejudice and identified certain deficiencies in the Stipulation. The Order gives the parties thirty days to address these deficiencies by: (1) setting forth all of the dates for which extension is requested in the form of a

trial order including all dates; (2) showing good cause for the requested suspension by providing a report on the status of the ongoing settlement discussions that form the grounds for the requested suspension.

3. A proposed order of the Board extending all trial dates, including those for the counterclaim, is attached hereto as Exhibit A.

4. Good cause exists for granting the requested suspension because the parties have now agreed to most terms of a settlement, and require the requested suspension and extension to focus their efforts on resolving the final settlement points and to provide sufficient time to complete the ongoing process of reducing these terms to a formal writing. Counsel notes that one of the reasons for the delay is that the parties' initial settlement discussions only covered one mark. The current draft agreement involves another mark that is the subject of a later-filed Opposition.

5. Undersigned counsel has conferred with counsel for Applicant regarding the foregoing. Accordingly, Counsel for Applicant has authorized undersigned counsel to communicate their concurrence with the foregoing.

Respectfully submitted,

KLUGER, PERETZ, KAPLAN & BERLIN, P.L.

Attorneys for Opposer

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By: /Michael E. Tschupp/

Michael B. Chesal

Michael E. Tschupp (Reg. No. 55,895)

CERTIFICATE OF SERVICE

We hereby certify that a true and correct copy of the foregoing is being sent by First Class Mail on the 27th day of March, 2008, to the attorney of record for the Applicant at the following address:

Bradley L. Cohn, Esq.
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Chicago, IL 60606
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By: /Michael E. Tschupp/
Michael E. Tschupp (Reg. No. 55,895)

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ORDER SUSPENDING PROCEEDINGS AND EXTENDING TRIAL DEADLINES

_____, (Attorney, Trademark Trial and Appeal Board/Paralegal
Specialist):

Opposer's stipulated motion filed February 19, 2008, as supplemented by its response to this Board's Order and amended stipulation dated March 27, 2008 is granted.

Because the parties are negotiating for possible settlement of this case, proceedings herein are suspended for ninety days, subject to the right of either party to request resumption at any time. *See* Trademark Rule 2.117(c).

In the event that there is no word from either party concerning the progress of their negotiations within the next ninety days, the Board will issue an order resuming proceedings.

Trial dates, including dates for the counterclaim, are reset as indicated below (Trademark

Rule 2.127(a)):

Proceedings resume:	June 28, 2008
THE PERIOD FOR DISCOVERY TO CLOSE:	September 25, 2008
30-day testimony period for party in position of plaintiff in the opposition to close:	January 23, 2009
30-day testimony period for party in position of Defendant in the opposition and plaintiff in the Counterclaim to close:	March 23, 2009
30-day rebuttal testimony period for plaintiff in the opposition and defendant in the counterclaim to close:	May 25, 2009
15-day rebuttal testimony period for plaintiff in the counterclaim to close:	July 7, 2009
Briefs shall be due as follows: [See Trademark Rule 2.128(a) (2)].	
Brief for plaintiff the opposition shall be due:	September 8, 2009
Brief for the defendant in the opposition and plaintiff in the counterclaim shall be due:	October 5, 2009
Brief for the defendant in the counterclaim and reply brief, if any, for plaintiff in the opposition shall be due:	November 4, 2009
Reply brief, if any, for plaintiff in the Counterclaim shall be due:	November 23, 2009