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

Proceeding	91161557
Party	Plaintiff Red Bull GmbH
Correspondence Address	Martin R. Greenstein TechMark a Law Corporation 4820 Harwood Road, Suite 200 San Jose, CA 95124-5273 UNITED STATES MRG@TechMark.com, MPV@TechMark.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Martin R. Greenstein
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Signature	/Martin R Greenstein/
Date	03/12/2008
Attachments	ToroOsborne-91161557-AgreedSuspRequest-March2008.pdf (3 pages)(11017 bytes)

TRADEMARK

CERTIFICATE OF MAILING

I hereby certify that this correspondence is filed electronically via ESSTA on March 12, 2008.

/Martin R Greenstein/
Martin R. Greenstein

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

RED BULL GMBH

Opposer

v.

Osborne Distribuidora, S.A.

Applicant.

Opposition No. 91-161,557

Trademark:
TORO OSBORNE & Black
Bull Design

Serial No.: 76/320,629

STIPULATED MOTION TO SUSPEND PROCEEDING

Opposer, with the consent of Applicant, hereby moves the Trademark Trial and Appeal Board to suspend the above-identified proceeding for a period of six (6) months, without prejudice to the rights of either party, and to reset all Trial Dates as follows:

Answer to the counterclaim
due: October 4, 2008

Discovery period to close: November 27, 2008

30-day testimony period for party
in position of plaintiff in the
opposition to close: February 25, 2009

30-day testimony period for party
in position of defendant in the
opposition and plaintiff in the
counterclaim to close: April 24, 2009

30-day rebuttal testimony period for plaintiff in the opposition and defendant in the counterclaim to close:	June 23, 2009
15-day rebuttal testimony period for plaintiff in the counterclaim to close:	August 6, 2009
Brief for plaintiff in the opposition shall be due:	October 7, 2009
Brief for defendant in the opposition and plaintiff in the counterclaim shall be due:	November 7, 2009
Brief for defendant in the counterclaim and reply brief, if any, for plaintiff in the opposition shall be due:	December 6, 2009
Reply brief, if any, for plaintiff in the counterclaim shall be due:	December 21, 2009

The parties are attempting to resolve the U.S. dispute in conjunction and coordination with similar disputes in other foreign jurisdictions, including Europe, Latin America and Asia and have discussed what additional marks can or should be included in the settlement agreement to prevent and resolve additional oppositions that might otherwise be filed. To that end, the parties have conducted several rounds of discussions in Europe to work on the possible global settlement terms. This Motion To Suspend is being respectfully filed in order to allow the parties the possibility to continue their settlement discussions.

This stipulated motion was agreed to by Applicant's counsel Deborah Tellerman Berkowitz, Ruden, McClosky, Smith, Schuster & Russell, P.A. in a telephone conversation. In jointly requesting suspension of the proceedings the parties are not being motivated by any desire to delay these proceedings.

It is submitted that in view of the foregoing, good cause has been shown for this Request, and it is respectfully requested that the motion be granted.

Dated: March 12, 2008

Respectfully Submitted,
RED BULL GMBH
By /Martin R Greenstein/
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing STIPULATED MOTION TO SUSPEND PROCEEDING is being served electronically on March 12, 2008, on Applicant's Attorney of Record at her e-mail below by express agreement:

Deborah Tellerman Berkowitz, Esq.
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/Martin R Greenstein/
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