

ESTTA Tracking number: **ESTTA688383**

Filing date: **08/07/2015**

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

Proceeding	91206284
Party	Defendant Haze Tobacco, LLC
Correspondence Address	BOBBY A GHAJAR PILLSBURY WINTHROP SHAW PITTMAN LLP 725 SOUTH FIGUEROA STREET, SUITE 2800 LOS ANGELES, CA 90017-5406 UNITED STATES Bobby.Ghajar@pillsburylaw.com, marcus.peterson@pillsburylaw.com, Docket_IP@pillsburylaw.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Marcus Peterson
Filer's e-mail	bobby.ghajar@pillsburylaw.com, marcus.peterson@pillsburylaw.com, docket_ip@pillsburylaw.com, la-tmdocketing@pillsburylaw.com
Signature	/Marcus Peterson/
Date	08/07/2015
Attachments	8-7-15 Consent Motion to Suspend.pdf(498342 bytes)

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

Starbuzz Tobacco, Inc.	§	
	§	
Opposer,	§	Opposition No. 91206284
	§	
Haze Tobacco, LLC	§	Serial No. 85303577
	§	
Applicant	§	Mark: HAZE TOBACCO

Commissioner for Trademarks
P.O. Box 1451
Alexandria, VA 22313-1451

CONSENTED MOTION TO SUSPEND PROCEEDINGS FOR SIXTY DAYS

The Parties, through their undersigned counsel, respectfully request that the Board suspend the proceedings for 60 days and then reset all deadlines accordingly. The new deadlines would be as follows:

Time to Answer	10/10/2015
Deadline for Discovery Conference	11/09/2015
Discovery Opens	11/09/2015
Initial Disclosures Due	12/09/2015
Expert Disclosure Due	04/07/2016
Discovery Closes	05/07/2016
Plaintiff's Pretrial Disclosures	06/21/2016
Plaintiff's 30-day Trial Period Ends	08/05/2016
Defendant's Pretrial Disclosures	08/20/2016
Defendant's 30-day Trial Period Ends	10/04/2016
Plaintiff's Rebuttal Disclosures Due	10/19/2016
Plaintiff's 15-day Rebuttal Period Ends	11/18/2016

This request is not filed for purposes of delay. The parties continue to be engaged in bilateral settlement discussions and the principals of the parties have reached agreement as to the basic framework for settlement. Opposer has prepared a draft settlement agreement, which

Applicant has proposed edits to. The parties are continuing to discuss finalizing the agreement. The settlement negotiations are proceeding and the parties believe that, given further time, they should be able to resolve this matter.

Accordingly, the Parties respectfully request that the Board reset the dates as set forth above.

Respectfully Submitted,

DATED: August 7, 2015

By: /s/ Bobby A. Ghajar
Bobby A. Ghajar
Marcus D. Peterson
Pillsbury Winthrop Shaw Pittman LLP
725 S. Figueroa Street, Suite 2800
Los Angeles, CA 90017-5406
(213) 488-7100

Attorneys for Applicant
Haze Tobacco, LLC

By: /s/ Natu J. Patel
Natu J. Patel
The Patel Law Firm PC
22952 Mill Creek Drive
Laguna Hills, CA 92653

Opposer
Starbuzz Tobacco, Inc.

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing CONSENTED MOTION TO SUSPEND PROCEEDINGS FOR SIXTY DAYS was sent to counsel for Opposer, Natu J. Patel, The Patel Law Firm PC, 22952 Mill Creek Drive, Laguna Hills, CA 92653 via email to NPatel@thePatelLawFirm.com, JChuan@thePatelLawFirm.com, and MUy@thePatelLawFirm.com on this 7th day of August, 2015.

/s/ Marcus Peterson

Marcus Peterson