

ESTTA Tracking number: **ESTTA732781**

Filing date: **03/10/2016**

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, la-tmdocketing@pillsburylaw.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Marcus Peterson
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Signature	/Marcus Peterson/
Date	03/10/2016
Attachments	3-10-16 Consent Motion to Suspend.pdf(888395 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 NINETY DAYS

The Parties, through their undersigned counsel, respectfully request that the Board suspend the proceedings for 90 days and then reset all deadlines accordingly. The new deadlines would be as follows:

Time to Answer	06/08/2016
Deadline for Discovery Conference	07/08/2016
Discovery Opens	07/08/2016
Initial Disclosures Due	08/07/2016
Expert Disclosure Due	12/05/2016
Discovery Closes	01/04/2017
Plaintiff's Pretrial Disclosures	02/18/2017
Plaintiff's 30-day Trial Period Ends	04/04/2017
Defendant's Pretrial Disclosures	04/19/2017
Defendant's 30-day Trial Period Ends	06/03/2017
Plaintiff's Rebuttal Disclosures Due	06/18/2017
Plaintiff's 15-day Rebuttal Period Ends	07/18/2017

This request is not filed for purposes of delay. The parties continue to be engaged in bilateral settlement discussions to resolve not only this opposition, but also Opposition No. 91206746 for the mark HAZE COLADA along with global issues relating to the parties' uses of

their respective marks in the United States and abroad. Because the settlement discussions between the parties are confidential, specific issues on which they have agreed cannot be disclosed. Principals of the parties have met several times in the past three months and continue to exchange settlement propositions. They expect to resolve the remaining issues and finalize a settlement agreement within the next few weeks.

Accordingly, good cause exists to further suspend this proceeding and the Parties respectfully request that the Board reset the dates as set forth above.

Respectfully Submitted,

DATED: March 10, 2015

By: /s/ Bobby A. Ghajar
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By: /s/ Natu J. Patel
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Opposer
Starbuzz Tobacco, Inc.

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing CONSENTED MOTION TO SUSPEND PROCEEDINGS FOR NINETY 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 on this 10th day of March, 2016.

/s/ Marcus Peterson

Marcus Peterson