

ESTTA Tracking number: **ESTTA751245**

Filing date: **06/08/2016**

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

|                        |  |
|------------------------|--|
| Proceeding             | 91206284   |
| Party                  | Defendant<br>Haze Tobacco, LLC   |
| Correspondence Address | BOBBY A GHAJAR<br>PILLSBURY WINTHROP SHAW PITTMAN LLP<br>725 SOUTH FIGUEROA STREET SUITE 2800<br>LOS ANGELES, CA 90017-5406<br>UNITED STATES<br>Bobby.Ghajar@pillsburylaw.com, marcus.peterson@pillsburylaw.com, Docket_IP@pillsburylaw.com, la-tmdocketing@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                   | 06/08/2016   |
| Attachments            | 6-8-16 Consent Motion to Suspend.pdf(888927 bytes )  |

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
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|                        |   |                         |
|------------------------|---|-------------------------|
| 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 THIRTY DAYS**

The Parties, through their undersigned counsel, respectfully request that the Board suspend the proceedings for 30 days and then reset all deadlines accordingly. The new deadlines would be as follows:

|  |            |
|--|------------|
| <b>Time to Answer</b>                          | 07/08/2016 |
| <b>Deadline for Discovery Conference</b>       | 08/07/2016 |
| <b>Discovery Opens</b>                         | 08/07/2016 |
| <b>Initial Disclosures Due</b>                 | 09/06/2016 |
| <b>Expert Disclosure Due</b>                   | 01/04/2017 |
| <b>Discovery Closes</b>                        | 02/03/2017 |
| <b>Plaintiff's Pretrial Disclosures</b>        | 03/20/2017 |
| <b>Plaintiff's 30-day Trial Period Ends</b>    | 05/04/2017 |
| <b>Defendant's Pretrial Disclosures</b>        | 05/19/2017 |
| <b>Defendant's 30-day Trial Period Ends</b>    | 07/03/2017 |
| <b>Plaintiff's Rebuttal Disclosures Due</b>    | 07/18/2017 |
| <b>Plaintiff's 15-day Rebuttal Period Ends</b> | 08/17/2017 |

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. The talks have entailed a series of conversations and meetings between the principals for the parties, though there are still issues remaining that need to be addressed. Because of the complexity of the proposed global resolution, the talks remain ongoing. Because the settlement discussions between the parties are confidential, specific issues on which they have agreed cannot be disclosed. The parties continue to expect to settle the matter, and are attempting to do so as quickly as possible.

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: June 8, 2016

By: /s/ Bobby A. Ghajar  
Bobby A. Ghajar  
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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 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](mailto:NPatel@thePatelLawFirm.com) on this 8th day of June, 2016.

/s/ Marcus Peterson

Marcus Peterson