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Filing date: **10/29/2015**

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

Proceeding	91215566
Party	Defendant Springbot, LLC
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Date	10/29/2015
Attachments	SPRINGBOT Opp. No. 91215566 -- Consent Motion for 90-Day Suspension.pdf(121881 bytes)

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

In the matter of Service Mark
Application Serial No. 85/871,678
Mark: SPRINGBOT
Filed: March 8, 2013
Published: September 24, 2013

BOTTLE ROCKET CORP.,)	
)	
Opposer,)	
)	
v.)	Opposition No. 91215566
)	
SPRINGBOT, LLC)	
)	
Applicant.)	
)	

CONSENTED MOTION FOR A NINETY-DAY SUSPENSION

Commissioner for Trademarks
Post Office Box 1451
Alexandria, Virginia 22313-1451

Springbot, LLC (“Applicant”), by and through the undersigned counsel, together with Opposer Bottle Rocket Corp. (“Opposer”), submit this Consented Motion for a Ninety-Day Suspension with the Trademark Trial and Appeal Board (“Board”), respectfully requesting that the Board grant the suspension for the purpose of settlement negotiations, and that all subsequent case deadlines be re-set by ninety days, pursuant to TBMP §§ 510.03(a) & 605.02.

The new case deadlines following resumption of proceedings would be as follows:

Discovery Period to Close:	February 22, 2016
Plaintiff Pretrial Disclosures:	April 7, 2016
Plaintiff’s 30-Day Trial Period Ends:	May 22, 2016
Defendant’s Pretrial Disclosures:	June 6, 2016

Defendant's 30-Day Trial Period Ends: September 21, 2016

Plaintiff's Rebuttal Disclosures: August 5, 2016

Plaintiff's 15-Day Rebuttal Period Ends: September 4, 2016

The Parties are engaged in settlement negotiations. The next deadline is currently the close of the Discovery Period on November 24, 2015. On October 28, 2015, Applicant secured the express consent of Opposer, as confirmed by its attorney Linda S. McAleer, to this Consented Motion and for the extension requested herein.

The Parties respectfully submit that this Consented Motion is not made for the purpose of unduly delaying proceedings before the Board.

WHEREFORE, in light of the foregoing, the Parties have shown good cause as to why the instant Consented Motion should be granted. As such, the Parties request that further appropriate action be taken in these proceedings, including the granting of a suspension for ninety days, and that all subsequent case deadlines be re-set by ninety days accordingly.

Respectfully submitted,

Dated: October 29, 2015

By: /s/ John M. Nading
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Attorneys for Applicant Springbot, LLC

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing **CONSENTED MOTION FOR A NINETY-DAY SUSPENSION** was served via electronic mail, as agreed to by the Parties, to Opposer's counsel of record:

Linda S. McAleer
The Law Offices of Linda S. McAleer
1434 5th Avenue
San Diego, California 92101
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this 29th day of October, 2015.

/s/ John M. Nading

John M. Nading

Attorney for Applicant