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

Proceeding	91215843
Party	Plaintiff Minto Sabal Bay, LLC
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Date	12/08/2014
Attachments	Minto's Response to CRCC's Motion for Ext. of Time.pdf(106359 bytes)

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

In the Matter of U.S. Application Serial No.: 85/848,672
For the Mark: COLLIER'S RESERVE
Published in the *Official Gazette*: February 11, 2014

MINTO SABAL BAY, LLC,

Opposer,

v.

COLLIER'S RESERVE COUNTRY CLUB,
INC.,

Applicant.

Opposition No. 91215843

**OPPOSER'S RESPONSE TO
APPLICANT'S MOTION FOR EXTENSION OF TIME TO ANSWER**

Opposer, Minto Sabal Bay, LLC ("Minto"), is in receipt of Applicant's Motion for Extension of Time to Answer and hereby responds to the same. For the reasons set forth below, Minto does not oppose an extension, but submits that a 60-day extension would be more appropriate (i.e., that Applicant's Answer be due on January 16, 2015) and requests that the schedule be reset accordingly.

Minto's Notice of Opposition was filed on April 9, 2014, and the parties have already twice stipulated to suspend the proceedings for settlement purposes. The suspensions extended the time for Applicant's Answer from May 19, 2014, to November 17, 2014. During that time, the parties engaged in negotiations concerning settlement, and Minto did, in fact, provide Applicant with a settlement proposal. However, Applicant has already had several months to consider the proposal and, until filing its extension request, had ceased all communications with

Minto. Indeed, Applicant did not even confer with Minto about its extension request before filing its pending motion with the Board.

Notwithstanding, Applicant has requested an extension of the time to file its Answer and a resetting of all pending deadlines in the case by 90 days, stating that it is reviewing Minto's settlement proposal and that certain upcoming confidential events within the requested extension period may influence the feasibility of settlement. Because Minto does not wish to derail the parties' efforts at settlement to date, Minto does not oppose an extension. However, Minto does not agree with the amount of time requested by Applicant, particularly in view of the fact that it has come directly on the heels of two consecutive suspensions for settlement and, from Minto's perspective, follows a lengthy period that lacked progress with respect to the parties' settlement discussions. Thus, Minto respectfully submits that a 60-day extension of Applicant's Answer deadline and the remaining case schedule would be more appropriate and, unless otherwise stipulated, opposes any further extension of the Answer deadline as unnecessary and unjustified.

Dated: December 8, 2014

Respectfully submitted,

/Angela R. Gott/

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*Attorneys for Opposer
Minto Sabal Bay, LLC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing
OPPOSER'S RESPONSE TO APPLICANT'S MOTION FOR EXTENSION OF TIME TO
ANSWER was served on this 8th day of December, 2014, via First Class U.S. Mail, postage
prepaid, upon:

Jennifer L. Whitelaw, Esq.
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Collier's Reserve Country Club, Inc.

/Angela R. Gott/
One of the Attorneys for Opposer