

ESTTA Tracking number: **ESTTA704466**

Filing date: **10/26/2015**

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

Proceeding	91215896
Party	Plaintiff Bells Brewery, Inc.
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Date	10/26/2015
Attachments	INNOVATION BREWING Reply Motion to Suspend.pdf(13351 bytes)

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

Bell's Brewery, Inc.,)	
)	
)	Opposition No. 91215896
v.)	
)	
Innovation Brewing,)	
)	
Applicant.)	
)	

OPPOSER'S REPLY IN SUPPORT OF ITS MOTION TO SUSPEND

Applicant's opposition to Opposer's motion to suspend the instant proceeding sets forth no meritorious reason why the motion should not be granted. In fact, Applicant admits that a suspension could conserve the Board's resources. *See* Applicant's Br. at 1. In making such an admission, Applicant effectively concedes that judicial economy favors the suspension. On this basis alone, good cause exists for the suspension of this proceeding.

Applicant's only justification for opposing Opposer's requested suspension is its own inconvenience in having to wait for the present opposition to be resolved. *Id.* Contrary to Applicant's assertion, judicial economy will not suffer from a suspension of the proceedings under any circumstances. Judicial economy concerns the time and resources of the Board, not the parties. Any alleged inconvenience that Applicant may encounter has no bearing on judicial economy. Furthermore, the burden that will be placed on the Board and on both parties from the conduct of an entirely separate trial on the issue of descriptiveness if Opposer's Petition is granted, in the absence of a suspension, far outweighs any alleged inconvenience that Applicant may suffer as a result of the suspension.

CONCLUSION

For these reasons, and for the reasons set forth in Opposer's motion, Opposer submits that it has shown good cause for the requested suspension and requests that its motion be granted.

Respectfully Submitted,

DORSEY & WHITNEY LLP

Dated: October 26, 2015

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CERTIFICATE OF SERVICE

I hereby certify that on this 26th Day of October 2015, a copy of the foregoing
OPPOSER'S REPLY IN SUPPORT OF ITS MOTION TO SUSPEND was served on Applicant
via first class mail, postage prepaid to:

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