

ESTTA Tracking number: **ESTTA679721**

Filing date: **06/23/2015**

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

Proceeding	91217521
Party	Plaintiff Washington Storytellers Theatre dba SpeakEasyDC
Correspondence Address	JOHN L CUDDIHY BALLARD SPAHR LLP 1909 K ST NW, 12TH FLOOR WASHINGTON, DC 20006-1157 UNITED STATES tmdocketing@ballardspahr.com, folmarw@ballardspahr.com, cuddihyj@ballardspahr.com, faxiot@ballardspahr.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Winston Folmar
Filer's e-mail	folmarw@ballardspahr.com, cuddihyj@ballardspahr.com, faxiot@ballardspahr.com, jbellanca@hertzschram.com, tmdocketing@ballardspahr.com
Signature	/W. Folmar/
Date	06/23/2015
Attachments	Motion for 30-day Suspension_June23-2015.pdf(96703 bytes)

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

IN THE MATTER OF APPLICATION SERIAL NO. 86/096,208

**WASHINGTON STORYTELLERS THEATRE DBA
SPEAKEASYDC,**

Opposer,

v.

**SPEAKEASY COMMUNICATIONS CONSULTING
LLC,**

Applicant.

Opposition No.

91217521

JOINT MOTION FOR 30-DAY SUSPENSION OF UPCOMING DEADLINES

Opposer, Washington Story Tellers Theatre dba SpeakeasyDC (“Opposer”) and Applicant, Speakeasy Communications Consulting, LLC (“Applicant”), through their respective undersigned counsel, hereby jointly request a thirty (30) day suspension of all upcoming deadlines (including the June 29, 2015 deadline for the close of discovery) in order to facilitate ongoing settlement negotiations. In recent weeks, the parties have exchanged numerous drafts of a written settlement agreement, and are hopeful that they will resolve their remaining areas of disagreement on settlement within the next two weeks. The grant of this joint motion will allow the parties and their counsel to focus their efforts in the coming weeks on settlement, rather than litigation, of this dispute.

Accordingly, Opposer and Applicant respectfully and jointly request that the Board grant the parties a 30-day suspension of all upcoming deadlines, including the June 29, 2015 deadline for the close of discovery, to allow the parties to negotiate (and hopefully finalize) settlement terms without the distraction of litigation.

This 23rd day of June, 2015

Respectfully submitted,

BALLARD SPAHR, LLP
Attorneys for Opposer
Washington Storytellers Theatre

By: /W. Folmar/
John L. Cuddihy
Winston Folmar
1909 K Street, NW, 12th Floor
Washington, DC 20006-1157
Tel.: 202.661.2200
Fax: 202.661.2299
E-mail: cuddihyj@ballardspahr.com

HERTZ SCRHAM PC
Attorneys for Applicant
Speakeasy communications Consulting, LLC

By: /Joseph Bellanca/
Joseph A. Bellanca
1760 S. Telegraph Road, Suite 300
Bloomfield Hills, MI 48302-0183
Tel.: 248.335.5000
E-mail: jbellanca@hertzschram.com

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

IN THE MATTER OF APPLICATION SERIAL NO. 86/096,208

**WASHINGTON STORYTELLERS THEATRE DBA
SPEAKEASYDC,**

Opposer,

v.

**SPEAKEASY COMMUNICATIONS CONSULTING
LLC,**

Applicant.

Opposition No.

91217521

CERTIFICATE OF SERVICE

I hereby certify that a copy of the **JOINT MOTION FOR 30-DAY SUSPENSION OF UPCOMING DEADLINES** has been served upon Applicant, by causing a true and correct copy thereof to be delivered in the manner indicated below and properly addressed to the following counsel of record:

<input type="checkbox"/>	By Hand	Joseph A. Bellanca, Esq. Hertz Schram, PC 1760 S. Telegraph Rd., Suite 300 Bloomfied Hills, MI 48302-0183 Tel: 248.335.5000 E-mail: jbellanca@hertzschram.com
<input type="checkbox"/>	By Facsimile	
<input type="checkbox"/>	By US Postal Service (1 st Class)	
<input type="checkbox"/>	By Overnight Delivery	
<input checked="" type="checkbox"/>	By Email	

This 23RD day of June, 2015

/W. Folmar/
Winston Folmar