

ESTTA Tracking number: **ESTTA696051**

Filing date: **09/15/2015**

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	WINSTON FOLMAR 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, jbel-lanca@hertzschram.com
Signature	/W. Folmar/
Date	09/15/2015
Attachments	Motion for 14-day Suspension - 9-15-2015.pdf(94465 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

**MOTION FOR 14-DAY SUSPENSION OF UPCOMING DEADLINES  
TO ALLOW PARTIES TIME TO FINALIZE SETTLEMENT PROCESS**

Opposer, Washington Story Tellers Theatre dba SpeakeasyDC (“Opposer”), through its undersigned counsel, hereby requests an additional 14-day suspension of all upcoming deadlines (including the September 15, 2015, deadline for the close of discovery) in order to finalize the parties' settlement process.

The parties reached agreement last week on the text of a written settlement agreement that, among other things, would entirely resolve this Opposition proceeding. Opposer has signed the settlement agreement, and is awaiting Applicant's counter-signed copy of the agreement; after which this Opposition proceeding would be ripe for dismissal. Accordingly, the grant of this motion will allow the parties and their counsel to focus their efforts on the settlement of their dispute.

For the foregoing reasons, Opposer respectfully requests that the Board grant the parties a 14-day suspension of all upcoming deadlines, including the September 15, 2015 deadline for the close of discovery, to allow the parties time to finalize the settlement process

Finally, on September 15, 2015, Opposer's counsel sought to meet and confer by telephone with Applicant's counsel about the parties' execution of the settlement agreement and this Motion, but was told that Applicant's counsel was in a meeting and unavailable. As a result, Opposer was unable to confirm whether Applicant is joining in this Motion.

This 15<sup>th</sup> day of September, 2015

Respectfully submitted,

**BALLARD SPAHR, LLP**  
Attorneys for Opposer  
Washington Storytellers Theatre

By:     /W. Folmar/      
John L. Cuddihy  
Winston Folmar  
1909 K Street, NW, 12<sup>th</sup> Floor  
Washington, DC 20006-1157  
Tel.: 202.661.2200  
E-mail:cuddihyj@ballardspahr.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 **MOTION FOR 14-DAY SUSPENSION OF UPCOMING DEADLINES TO ALLOW PARTIES TIME TO FINALIZE SETTLEMENT PROCESS** 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 Bloomfield Hills, MI 48302-0183 Tel: 248.335.5000 E-mail: <a href="mailto:jbellanca@hertzschram.com">jbellanca@hertzschram.com</a>
<input type="checkbox"/>	By Facsimile	
<input checked="" type="checkbox"/>	By US Postal Service (1 <sup>st</sup> Class)	
<input type="checkbox"/>	By Overnight Delivery	
<input checked="" type="checkbox"/>	By Email	

This 15<sup>th</sup> day of September, 2015

**/W. Folmar/**

Winston Folmar