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

Proceeding	91219179
Party	Defendant United Yacht Transport LLC dba United Yacht Transport
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Submission	Stipulated/Consent Motion to Extend
Filer's Name	Bryan D. Hull
Filer's e-mail	bhull@bushross.com, lhoman@bushross.com
Signature	/s/ Bryan D. Hull
Date	06/15/2016
Attachments	Motion_to_extend_and_suspend_pdf.pdf(88923 bytes)

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

SPLIETHOFF'S BEVRACHTINGSKANTOOR B.V.,

Opposer,

vs.

**Opposition No. 91219179
Serial No. 86031633**

UNITED YACHT TRANSPORT LLC,

Applicant.

**CONSENT MOTION TO EXTEND DISCOVERY PERIOD, OR IN THE
ALTERNATIVE, OPPOSED MOTION TO SUSPEND PROCEEDINGS**

Applicant, United Yacht Transport LLC (“**Applicant**” or “**United**”), respectfully requests that the Court extend the discovery period and other pretrial deadlines by 90 days (to which the Opposer, Spliethoff's Bevrachtingskantoor B.V. (“**Spliethoff**”) consents), or in the alternative, that the proceedings be suspended (which Spliethoff opposes), and states:

1. The parties have agreed to an extension of the discovery period and other pretrial deadlines by 90 days to permit the completion of certain discovery, including international discovery of documents from Dockwise, Ltd., and the deposition upon written questions of its former CEO, André Goedée. *See* 37 C.F.R. § 2.120(a)(2) (“The discovery period may be extended upon stipulation of the parties approved by the Board, or upon motion granted by the Board, or by order of the Board.”).

2. Because the length of time for international discovery may be uncertain, United requests that these proceedings be suspended during the deposition upon written questions process and until the international discovery is returned. *See* 37 C.F.R. § 2.124(d)(2) (“Upon receipt of written notice that one or more testimonial depositions are to be taken upon written questions, the Trademark Trial and Appeal Board shall suspend or reschedule other proceedings

in the matter to allow for the orderly completion of the depositions upon written questions.”); T.B.M.P. § 404.03(c)(2) (noting, “During the interim, proceedings in the case before the Board most likely will be suspended pending the execution and return to the Board of the letter rogatory.”).

3. Concurrent with this motion, United is filing a notice of deposition on written questions with the Board and serving a copy of the notice and questions to Spliethoff.

4. United is also filing a Motion for Issuance of Letters of Request for International Judicial Assistance Pursuant to the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters related to the requests for international discovery from Dockwise Ltd. and Mr. Goedée.

Certificate of Good Faith Conference

The undersigned conferred with Spliethoff’s counsel who consents to the request to extend the discovery period and other pretrial deadlines by 90 days, but opposes the request to suspend the proceedings.

Respectfully submitted,

BUSH ROSS, P.A.

Dated: June 15, 2015

By: /s/ Bryan D. Hull

Bryan D. Hull

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Attorneys for United Yacht Transport, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on J. Michael Pennekamp and Sandra I. Tart on June 15, 2016 by email to: jpennekamp@fowler-white.com and start@fowler-white.com, and by First Class Mail, postage prepaid to: J. Michael Pennekamp and Sandra I. Tart, FOWLER WHITE BURNETT, P.A., Espirito Santo Plaza, Fourteenth Floor, 1395 Brickell Avenue, Miami, Florida 33131.

Signature: /s/ Bryan D. Hull
Date: June 15, 2016