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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	Other Motions/Papers
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Signature	/s/ Bryan D. Hull
Date	06/23/2016
Attachments	Mo- tion_for_leave_to_file_motion_for_issuance_of_letters_of_request.PDF(82902 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.**

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**MOTION FOR LEAVE TO FILE 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**

Applicant, United Yacht Transport LLC (“**Applicant**” or “**United**”), filed a notice of taking the deposition upon written questions of André Goedée. (Doc. 30). Shortly after filing the notice, an order was entered suspending these proceedings. (Doc. 31).

Mr. Goedée is a resident of the Netherlands, and his deposition must be taken pursuant to the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters. Accordingly, United prepared a motion for issuance of letters of request for international judicial assistance pursuant to the Hague Convention related to (1) the deposition of Mr. Goedée, and (2) requests for the production of documents from Dockwise Ltd., a non-party which is also located in the Netherlands.

Although the order suspends the proceedings until the completion of the deposition, the deposition cannot be completed unless the Letter of Request is issued to the Netherlands courts. Accordingly, notwithstanding that the proceedings have been suspended, Applicant respectfully requests leave to file its motion for issuance of letters of request with the Board. Because the letter of request must contain all written questions to be asked of Mr. Goedée at his deposition,

Applicant requests that it be permitted to file its motion after all cross-examination and redirect deposition questions have been served by the parties. For purposes of judicial efficiency before this Board and the Netherlands courts, Applicant further requests that it be permitted to include both the Goedée deposition and the Dockwise documentary discovery with its motion for issuance of letters of request.

WHEREFORE, Applicant respectfully requests entry of an order permitting it to file its motion for issuance of letters of request for international judicial assistance pursuant to the Hague Convention, notwithstanding the suspension of these proceedings.

Respectfully submitted,

BUSH ROSS, P.A.

Dated: June 23, 2015

By: /s/ Bryan D. Hull

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**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 23, 2016 by email to: [jpennekamp@fowler-white.com](mailto:jpennekamp@fowler-white.com) and [start@fowler-white.com](mailto: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 23, 2016