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Filing date: **10/06/2016**

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

Proceeding	91222272
Party	Defendant Bugatti International S.A.
Correspondence Address	SUSAN B FLOHR BLANK ROME LLP 600 NEW HAMPSHIRE AVE NW WASHINGTON, DC 20037-2403 UNITED STATES trademarks@blankrome.com, DocketingAllOfficeExcept-NewYork@BlankRome.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Susan B. Flohr
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Signature	/sbf/
Date	10/06/2016
Attachments	Bugatti Motion for Suspension 91222272.pdf(139217 bytes)

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

In the Matter of Application Serial Nos. 86162642 and 86162637
 Applicant: Bugatti International S.A.
 Marks: BUGATTI and EB BUGATTI
 Date of Publication: December 16, 2014 and December 9, 2014

Bugatchi Uomo Apparel, Inc.	:	
	:	
Opposer,	:	
	:	
v.	:	Opposition No.: 91222272
	:	
Bugatti International S.A.	:	
	:	
Applicant.	:	

MOTION ON CONSENT FOR SUSPENSION TO COMPLETE SETTLEMENT

Applicant, Bugatti International S.A., (hereinafter, “Applicant Bugatti”), with the consent of Opposer, Bugatchi Uomo Apparel, Inc., (hereinafter “Opposer Bugatchi”), herewith moves to suspend the proceeding for an additional sixty (60) days and reset discovery and trial dates as set forth below.

Deadline to Answer	January 9, 2017
Initial Disclosures Due	March 10, 2017
Expert Disclosure Due	July 8, 2017
Discovery Closes	August 7, 2017
Plaintiff’s Pretrial Disclosures	September 21, 2017
Plaintiff’s 30-day Trial Period Ends	November 5, 2017
Defendant’s Pretrial Disclosures	November 20, 2017
Defendant’s 30-day Trial Period Ends	January 4, 2018
Plaintiff’s Rebuttal Disclosures	January 19, 2018
Plaintiff’s 15-day Rebuttal Period Ends	February 18, 2018

Pursuant to the Board’s August 15, 2016 Order, Applicant submits the following information requested by the Board in support of its motion:

- (1) the dates on which the parties have communicated since the last motion
 - the parties last communicated on October 4, 5 and 6, 2016.
- (2) the method of each communication (e.g., telephone, email, in-person, etc.),
 - the above communications were via email and the parties discussed this matter by telephone today, October 6, 2016.
- (3) the general nature of each communication
 - The communications related to the status of the settlement negotiations between the parties.
- (4) a list of issues that have been resolved
 - The confidentiality provisions of the parties' settlement agreement prohibit disclosure of the proposed specific settlement terms discussed, or the issues that have been resolved regarding settlement. However, counsel for Opposer (Stephanie Bald) and counsel for Applicant (Susan Flohr) are willing to participate in a teleconference with the Interlocutory Attorney assigned to this case to discuss generally the status of settlement negotiations, including the efforts being made to try to expedite a resolution.
- (5) a list of issues that remain to be resolved or remain for trial
 - The confidentiality provisions of the parties' settlement agreement prohibit disclosure of the issues that remain to be resolved regarding settlement. However, as mentioned above, the parties' counsel are willing to participate in a teleconference with the Interlocutory Attorney assigned to this case to discuss generally the status of settlement negotiations.
- (6) a proposed timetable for resolution of the unresolved issues
 - The resolution of this opposition involves complex trademark issues, including the potential involvement of third parties. The parties are diligently working towards a resolution and are hopeful that meaningful progress can be made on the unresolved issues within the next 60 days.

The parties submit that good cause is shown for an additional suspension and the motion has not been filed for purposes of delay.

BLANK ROME LLP

Date: October 6, 2016

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Attorneys for Opposer Bugatti
Bugatti International S.A.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing MOTION ON CONSENT FOR SUSPENSION TO COMPLETE SETTLEMENT was forwarded on this 6th day of October, 2016 by email to Stephanie H. Bald, Kelly IP, LLP at Stephanie.Bald@kelly-ip.com

/sbf/

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