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Filing date: **05/25/2016**

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

Proceeding	91224029
Party	Plaintiff Bliss Canyon Winery Inc.
Correspondence Address	RONALD WARGO FRIEDEMANN GOLDBERG LLP 420 AVIATION BLVD, SUITE 201 SANTA ROSA, CA 95403 UNITED STATES rwargo@frigolaw.com
Submission	Motion to Suspend for Settlement Discussions
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Date	05/25/2016
Attachments	Tolay Stipulation.PDF(81331 bytes)

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

In the Matter of Application No.: 86548909
For the Mark TOLAY CREEK
Applicant: Ram's Gate Winery, LLC
Published in the Official Gazette on: July 28, 2015
Opposition No. 91224029

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Bliss Canyon Winery, Inc.	:
	:
Opposer,	:
	:
v.	:
	:
Ram's Gate Winery, LLC	:
	:
Applicant,	:
-----X	:

**STIPULATED REQUEST TO SUSPEND OPPOSITION
FOR SETTLEMENT NEGOTIATIONS**

Pursuant to an agreement between Ram's Gate Winery, LLC ("Applicant") and Bliss Canyon Winery, Inc. ("Opposer," together with Applicant the "Parties") and TBMP Rule 605.02, the Parties hereby request that the Board suspend Opposition No. 91224029 for six (6) months.

On May 18, 2016, the Parties reached a Memo of Understanding ("MOU") to document the general terms they have agreed upon as they move toward the resolution of the Opposition. Under the terms of the MOU, the Parties will draft a Consent Agreement to submit to the trademark examining attorney in connection with Opposer's pending application (Application No. 86705542). The Parties wish to defer further litigation of the case pending the conclusion of their negotiations under the terms of the MOU and the outcome of Opposer's pending application.

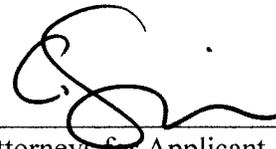
Respectfully submitted this 23rd day of May, 2016 by:

BLISS CANYON WINERY, INC.

By: 

Attorneys for Opposer
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RAM'S GATE WINERY, INC.

By: 

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CERTIFICATE OF SERVICE

STATE OF CALIFORNIA, COUNTY OF SONOMA

I am employed in the County of Sonoma, State of California. I am over the age of eighteen (18) and not a party to the within action. My business address is 420 Aviation Boulevard, Suite 201, Santa Rosa, California 95403.

On May 23, 2016, I served the foregoing document(s) described as:

**STIPULATED REQUEST TO SUSPEND OPPOSITION
FOR SETTLEMENT NEGOTIATIONS**

on the interested parties in this action as follows:

Charmaine Stainbrook
Stainbrook & Stainbrook, LLP
412 Aviation Blvd., Suite H
Santa Rosa, CA 95403
**Counsel for Applicant
Ram's Gate Winery, LLC**

[XX] BY UNITED STATES MAIL

I enclosed the document(s) listed above in an envelope or package addressed to the person(s) at the address(es) listed above and placed the envelope or package for collection and mailing following this firm's ordinary business practices. I am readily familiar with this firm's practice of collecting and processing correspondence for mailing. Under that practice, on the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service with postage thereon fully prepaid at Santa Rosa, California. I am aware that, on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing.

[XX] (FEDERAL) I declare that I am employed in the office of a member of the Bar of this Court, at whose direction the service was made.

Executed on May 23, 2016, at Santa Rosa, California.


David Wohlschlaeger