

ESTTA Tracking number: **ESTTA651891**

Filing date: **01/23/2015**

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

Proceeding	92060050
Party	Plaintiff Cellco Partnership d/b/a Verizon Wireless
Correspondence Address	PAUL J REILLY BAKER BOTTS LLP 30 ROCKEFELLER PLAZA, 44TH FLOOR NEW YORK, NY 10112-4498 UNITED STATES paul.reilly@bakerbotts.com, lauren.emerson@bakerbotts.com, julie.albert@bakerbotts.com, nytmdpt@bakerbotts.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Lauren Beth Emerson
Filer's e-mail	nytmdpt@bakerbotts.com, lauren.emerson@bakerbotts.com, paul.reilly@bakerbotts.com
Signature	/lbe/
Date	01/23/2015
Attachments	Cellco v Symons Motion to Suspend.pdf(21715 bytes)

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

In the Matter of Trademark Reg. No. 3,023,143
Mark : WORLD CUP STREET LUGE
Registrant : Ross Symons
Issued : December 6, 2005

In the Matter of Trademark Reg. No. 3,026,975
Mark : STREET LUGE
Registrant : Ross Gordon Symons
Issued : December 13, 2005

-----X
CELLCO PARTNERSHIP d/b/a VERIZON :
WIRELESS, :
Petitioner, : Cancellation No. 92060050
v. :
ROSS SYMONS :
Respondent. :
-----X

MOTION ON CONSENT TO SUSPEND PROCEEDINGS

Opposer, Cellco Partnership d/b/a Verizon Wireless (“Opposer”), by its undersigned counsel, hereby respectfully moves to suspend all discovery and trial dates in the above-referenced proceeding for sixty (60) days. Applicant consented to this suspension by email dated January 23, 2015.

This motion is made in good faith and without any intention of causing a delay in this proceeding. Settlement discussions are ongoing between the parties. While the parties remain committed to trying to resolve this matter, if settlement cannot be achieved, additional time will also be required to pursue discovery and prepare for trial.

Wherefore, for the reasons stated and the good cause shown herein, Opposer, by its counsel, respectfully requests that all dates in the proceeding be suspended by sixty (60) days and proceed in accordance with the following schedule following the expiration of the suspension period:

Time to Answer : CLOSED
Deadline for Discovery Conference : CLOSED
Discovery Opens : CLOSED
Initial Disclosures Due : 03/26/2015
Expert Disclosures Due : 07/24/2015
Discovery Period to Close : 08/23/2015
Plaintiff Pretrial Disclosures : 10/07/2015
Plaintiff's 30-day Trial Period Ends : 11/21/2015
Defendant's Pretrial Disclosures : 12/06/2015
Defendant's 30-day Trial Period ends : 01/20/2016
Plaintiff's Rebuttal Disclosures : 02/04/2016
Plaintiff's 15-day Rebuttal Period Ends : 03/05/2016

Respectfully submitted,

BAKER BOTTS, L.L.P.

Date: January 23, 2015

By: 

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Lauren Beth Emerson
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New York, NY 10112-4498
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Attorneys for Opposer
Cellco Partnership d/b/a Verizon Wireless

CERTIFICATE OF SERVICE

I hereby certify that on the date set forth below a true and correct copy of the
aforementioned document, “**MOTION ON CONSENT TO SUSPEND PROCEEDINGS,**”
was served on Applicant by first class mail at its address of record and by email as follows:

ROSS SYMONS
BIG ANT STUDIO
71-75 CITY ROAD
SOUTHBANK VICTORIA, 3006
AUSTRALIA

Ross.Symons@bigant.com

Date: January 23, 2015

By: 

Lauren Beth Emerson