

ESTTA Tracking number: **ESTTA650998**

Filing date: **01/20/2015**

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

Proceeding	92060421
Party	Plaintiff Happy Trails, LLC and The Children's Trust U/A Roy Rogers and Dale Evans Rogers Trust
Correspondence Address	REBECCA A FINKENBINDER MCNEES WALLACE & NURICK LLC 100 PINE STREET PO BOX 1166 HARRISBURG, PA 17108-1166 UNITED STATES trademarks@mwn.com
Submission	Other Motions/Papers
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Date	01/20/2015
Attachments	A4307051.PDF(22027 bytes )

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

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ROY "DUSTY" ROGERS, JR., AS TRUSTEE OF :  
THE CHILDREN'S TRUST U/A ROY ROGERS :  
AND DALE EVANS ROGERS TRUST, :

and :  
HAPPY TRAILS, LLC, :  
Petitioners, :

v. :

MANIFATTURE 7 BELL S.P.A., :  
Registrant/Respondent. :

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Cancellation No. 92060421

Registration No. 3,636,761  
Mark: ROY ROGER'S and Design

Registration No. 3,476,723  
Mark: ROY ROGER'S and Design

**PETITIONERS' RESPONSE TO RESPONDENT'S**  
**MOTION TO SUSPEND CANCELLATION PROCEEDINGS**

Pursuant to 37 C.F.R. 2.127, Petitioners Roy "Dusty" Rogers, Jr., as Trustee of the Children's Trust U/A Roy Rogers and Dale Evans Rogers Trust, and Happy Trails, LLC ("Petitioners") submit this response to the Motion to Suspend Cancellation Proceedings (the "Motion to Suspend") filed in this cancellation by Respondent Manifatture 7 Bell S.p.A. ("Respondent").

On November 19, 2014, Petitioners filed a Consolidated Petition for Cancellation against Registration Nos. 3,636,761 and 3,476,723. On December 23, 2014, Respondent filed a Complaint for Declaratory Judgment against Petitioners in the United States District Court for the District of Delaware. On December 29, 2014, Respondent filed the Motion to Suspend with this Honorable Board.

Petitioners hereby consent to the Motion to Suspend and, accordingly, consent to the stay of the instant proceeding, as requested by Respondent. By granting such consent, Petitioners do

not in any manner concede that the United States District Court for the District of Delaware has jurisdiction over the referenced declaratory judgment action.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

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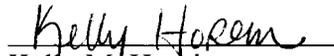
Attorneys for Petitioners  
Roy "Dusty" Rogers, Jr., as Trustee of The Children's  
Trust U/A Roy Rogers and Dale Evans Rogers Trust,  
and  
Happy Trails, LLC

Dated: January 20, 2015

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this date a true and correct copy of the **Petitioners' Response to Respondent's Motion to Suspend Cancellation Proceedings** was mailed via First Class Mail, postage prepaid to:

Leo M. Loughlin, Esquire  
Rothwell, Figg, Ernst & Manbeck, PC  
607 14th Street NW, Suite 800  
Washington, District of Columbia 20005

  
\_\_\_\_\_  
Kelly M. Horein

Of Counsel for Petitioners  
Roy "Dusty" Rogers, Jr., as Trustee of The Children's Trust,  
U/A Roy Rogers and Dale Evans Rogers Trust  
and  
Happy Trails, LLC

Dated: January 20, 2015