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Filing date: **10/12/2011**

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

Proceeding	91198881
Party	Plaintiff Sazerac North America, Inc.
Correspondence Address	KATHRYN ROBINSON COOLEY LLP 777 6TH STREET NW, SUITE 1100 WASHINGTON, DC 20001-2421 UNITED STATES krobinson@cooley.com , trademarks@cooley.com
Submission	Motion to Suspend for Settlement Discussions
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Signature	/KDD/
Date	10/12/2011
Attachments	Consent Motion for Suspension re NAKED TURTLE_10_12_2011.pdf (3 pages) (66324 bytes)

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

In the matter of application Serial No. 85/183,733
For the Trademark NAKED TURTLE
Published in the Official Gazette on February 22, 2011

SAZERAC NORTH AMERICA,)	
INC.)	
)	
Opposer,)	
)	Opposition No. 91198881
v.)	
)	
DIAGEO NORTH AMERICA, INC.)	
)	
Applicant.)	
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CONSENTED MOTION FOR FURTHER SUSPENSION OF OPPOSITION

Opposer Sazerac North America, Inc. (“Sazerac”), through its counsel, hereby files and serves this Consented Motion for Further Suspension of Opposition regarding Opposition Proceeding No. 91198881.

The parties have previously filed, and were granted, four 30-day suspension consent motions. The parties are in the process of finalizing a settlement agreement. Under TBMP § 510.03, the parties respectfully request that the Trademark Trial and Appeal Board suspend all action for Opposition Proceeding No. 91198881 for a further thirty (30) days for good cause while the parties finalize settlement. Counsel for Applicant, Evan Gourvitz of Diageo North America, Inc., consented to this suspension by email on October 12th, 2011.

The requested thirty (30) day suspension would result in the following revised deadlines:

Initial Disclosures Due	November 18, 2011
Expert Disclosures Due	March 14, 2012
Discovery Period to Close	April 15, 2012
Plaintiff Pretrial Disclosures	May 28, 2012
Plaintiff's 30-day Trial Period Ends	July 11, 2012
Defendant's Pretrial Disclosures	July 26, 2012
Defendant's 30-Day Trial Period Ends	September 11, 2012
Plaintiff's Rebuttal Disclosures	September 26, 2012
Plaintiff's 15-Day Rebuttal Period Ends	October 26, 2012

If there are any deadlines not represented in the above list, the parties respectfully request that those deadlines also be suspended for the same thirty (30) day period.

COOLEY LLP

Date: October 12, 2011

By: Kathryn Duvall
Kathryn Duvall Esq.
Todd S. Bontemps, Esq.
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CERTIFICATE OF SERVICE

I hereby certify that on October 12, 2011, pursuant to the parties stipulation, I e-mailed the foregoing CONSENTED MOTION FOR SUSPENSION OF OPPOSITION regarding Sazerac North America, Inc. v. Diageo North America, Inc. to Counsel for Applicant at the following email address:

Evan.Gourvitz@diageo.com

Date: October 12, 2011


Kathryn Duvall
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