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Filing date: **08/27/2014**

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

Proceeding	91205753
Party	Plaintiff Bridgestone Corporation and Bridgestone Americas Tire Operations, LLC
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Submission	Motion to Suspend for Settlement Discussions
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Signature	/Danny M. Awdeh/
Date	08/27/2014
Attachments	8-27-14 Motion for Suspension for Settlement with Consent.pdf(176335 bytes)

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

<p>BRIDGESTONE CORPORATION, and BRIDGESTONE AMERICAS TIRE OPERATIONS, LLC,</p> <p style="text-align:right">Opposers</p> <p style="text-align:center">v.</p> <p>MICHEL MANZ,</p> <p style="text-align:right">Applicant.</p>	<p>Opposition No.: 91205753</p> <p>Mark: ONZA Serial No.: 79102854 Filed: April 21, 2011</p>
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MOTION FOR SUSPENSION FOR SETTLEMENT WITH CONSENT

On August 11, 2014, Opposers Bridgestone Corporation and Bridgestone Americas Tire Operations, LLC (individually and collectively “Bridgestone”) filed a Motion for Suspension for Settlement with Consent. Bridgestone inadvertently did not include a report on the progress of the parties’ settlement negotiations, as requested in the Board’s December 9, 2013 Order. As a result, the Board denied Bridgestone’s motion.

Bridgestone provides the following status report on the parties’ progress towards settlement. The parties have now reached an agreement on core settlement terms, which has been the result of ongoing negotiations and settlement efforts dating back to the Fall of 2012. Bridgestone prepared a full written draft settlement agreement encompassing these core terms, which it sent to Applicant on April 11, 2014.

On April 23, 2014; June 9, 2014; June 10, 2014; June 19, 2014; June 20, 2014; and June 30, 2014, Bridgestone and Applicant exchanged proposed revisions to the settlement

agreement, comments to the settlement agreement, and/or correspondence related to the possible resolution of this matter. These efforts narrowed the number of open issues to just a handful.

Bridgestone and Applicant have continued to correspond with each other to resolve the remaining open issues and finalize the settlement agreement. Bridgestone is considering Applicant's latest proposed changes. Given the nature of the changes, Bridgestone is optimistic that a settlement should be finalized soon.

Because Bridgestone Corporation and Michel Manz are located abroad (Japan and Switzerland respectively), the settlement process has understandably taken longer than might be expected for U.S. litigants.

The parties believe that it will benefit both the parties and the TTAB to suspend this proceeding for 90 days. In particular, a suspension of this matter will allow time to resolve the few remaining open settlement items and to finalize a settlement agreement. If a final settlement is reached, it will save the time and resources of both the parties and the Board. Accordingly, the parties submit that good cause has been shown to grant the suspension.

Accordingly, subject to the Board's approval, Bridgestone requests that this proceeding be suspend for a period of 90 days (as outlined in Bridgestone's original request and as detailed below) to allow the parties to continue their settlement efforts.

Time to Answer:	CLOSED
Deadline for Discovery Conference:	CLOSED
Discovery Opens:	CLOSED
Initial Disclosures Due:	CLOSED
Expert Disclosure Due:	10/08/2014
Discovery Closes:	11/07/2014
Plaintiff's Pretrial Disclosures:	12/22/2014
Plaintiff's 30-day Trial Period Ends:	02/05/2015
Defendant's Pretrial Disclosures:	02/20/2015
Defendant's 30-day Trial Period Ends:	04/06/2015
Plaintiff's Rebuttal Disclosures:	04/21/2015
Plaintiff's 15-day Rebuttal Period Ends:	05/21/2015

Applicant, through his agent Daniel J. Maier, consented to this suspension request via email on August 9, 2014.

Respectfully Submitted,

Dated: August 27, 2014

By: /Danny M. Awdeh/
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Attorneys for Opposers
Bridgestone Corporation
Bridgestone Americas Tire Operations, LLC

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing MOTION FOR SUSPENSION FOR SETTLEMENT WITH CONSENT was served by first class mail, postage prepaid, on this 27th day of August 2014 on Applicant's counsel at the following address of record :

EUROMAIER LLC
707 SKOKIE BLVD SUITE 600
NORTHBROOK, IL 60062
UNITED STATES


