

ESTTA Tracking number: **ESTTA733628**

Filing date: **03/15/2016**

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

Proceeding	91220843
Party	Plaintiff John Edward Guzman DBA Club Ed Surf School and Camp
Correspondence Address	BARBARA BURNS PRAXIS LEGAL SOLUTIONS LLC 4 OCEAN AVE APT 13 OCEAN GROVE, NJ 07756-1693 UNITED STATES bburns@praxislegalsolutions.com
Submission	Stipulated/Consent Motion to Reopen
Filer's Name	Barbara Burns
Filer's e-mail	bburns@praxislegalsolutions.com
Signature	/Barbara Burns/
Date	03/15/2016
Attachments	consent_reopen_signed.pdf(883687 bytes)

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

John Edward Guzman)	
)	
Opposer,)	Opposition No.: 91220843
)	
v.)	Serial No.: 86266634
)	
The New Santa Cruz Surf School, LLC)	Mark: Santa Cruz Surf School
)	
Applicant)	
)	
)	

OPPOSER'S NOTICE OF NON-OPPOSITION TO APPLICANT'S REQUEST
TO RE-OPEN DISCOVERY

On September 11, 2015, Opposer filed a Motion for Leave to File an Amended Notice of Opposition.

On February 5, 2016, Applicant filed its consent to Opposer's Motion for Leave to File an Amended Notice of Opposition.

On February 26, 2016, Applicant filed its Answer to Opposer's Amended Notice of Opposition ("Answer").

In its Answer, at page 5, Applicant states that:

"Applicant relies upon Opposer consenting to a continuation of the Discovery phase of the proceeding, so that Applicant and Opposer may have sufficient time [to] enter new and relevant facts and information into evidence for consideration in the Opposition proceeding".

Opposer will consent to Applicant's request to re-open discovery; provided, that Opposer is allowed additional time for discovery equal to the time allowed to Applicant.

Opposer respectfully requests that discovery in this matter be reopened for a period not to exceed 30 days.

Respectfully submitted,



Barbara Burns
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Attorney for Opposer John Edward Guzman

Dated: March 15, 2016

Certificate of Service

The undersigned hereby certifies that a true and correct copy of the foregoing Notice of Non-Opposition to Applicant's Request to Re-Open Discovery was served on Applicant's Attorney by mailing a true copy thereof to its attorney of record by USPS first class mail, postage prepaid, this 15th day of March, 2016, addressed as follows:

Patrick T. Reilly, Esq.
101 Cooper Street
Santa Cruz, California 95060



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