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

Proceeding	91226899
Party	Defendant Shakespeare and Company
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Date	08/25/2016
Attachments	Motion on Consent to Suspend Opposition and For New CMS.pdf(11857 bytes)

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

**ESPRESSO BOOKSTORE AND CAFÉ
HOLDINGS, LLC,**

Opposer,

vs.

SHAKESPEARE AND COMPANY,

Applicant.

Opposition Nos. 91226899

Serial No. 79156675

Mark: SHAKESPEARE AND CO.

**MOTION ON CONSENT TO SUSPEND OPPOSITION PROCEEDINGS AND FOR
NEW CASE MANAGEMENT SCHEDULE**

Go Espresso Bookstore And Café Holdings, LLC (“Opposer”) and Shakespeare And Company (“Applicant”) (“Opposer and Applicant collectively, the “Parties”) jointly and respectfully move the Trademark Trial and Appeal Board to suspend the above-captioned opposition proceeding for an additional thirty (30) days, as the Parties continue to finalize the resolution of this opposition.

The Parties also jointly move for a revised case management schedule to go into effect at the end of that 30-day suspension period, as follows:

Time to Answer	9/25/2016
Deadline for Discovery Conference	10/23/2016
Discovery Opens	10/23/2016
Initial Disclosures Due	11/23/2016
Expert Disclosure Due	03/20/2017
Discovery Closes	04/22/2017
Plaintiff’s Pretrial Disclosures	06/06/2017
Plaintiff’s 30-day Trial Period Ends	07/20/2017
Defendant’s Pretrial Disclosures	08/05/2017
Defendant’s 30-day Trial Period Ends	09/19/2017
Plaintiff’s Rebuttal Disclosures	10/03/2017
Plaintiff’s 15-day Rebuttal Period Ends	11/03/2017

For all the foregoing reasons, the Parties' joint motion should be granted.

Dated: August 25, 2016

Respectfully submitted,

/s/: Philip R. Bautista

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Attorney for Opposer

CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2016, I served a true and accurate copy of the foregoing by e-mail and first class mail upon the following party:

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Attorney for Opposer

/s/ Philip R. Bautista
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