

ESTTA Tracking number: **ESTTA885932**

Filing date: **03/27/2018**

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

Proceeding	91239531
Party	Defendant Natural Cosmeceuticals of America Inc.
Correspondence Address	JAMES C WRAY LAW OFFICES OF JAMES C WRAY 1497 CHAIN BRIDGE ROAD, SUITE 204 MCLEAN, VA 22101 UNITED STATES Email: jameswray@jcwray.com
Submission	Other Motions/Papers
Filer's Name	James C. Wray
Filer's email	jameswray@jcwray.com
Signature	/James C. Wray/
Date	03/27/2018
Attachments	Motion to Suspend 3-27-18.pdf(31632 bytes )

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

=====

Bonobos, Inc.	)	
	)	Opposition Nos. 91238164 and 91239531
	)	
Opposer	)	Serial Nos. 87/411,797 and 87/266,841
	)	
v.	)	
	)	
Natural Cosmeceuticals of America Inc.	)	
	)	
Applicant.	)	
	)	

=====

**MOTION TO SUSPEND**

On January 26, 2018 Opposer filed a Motion to Consolidate in the ‘164 Opposition.

To date there has been no TTAB response to that Motion to Consolidate. That information was confirmed by a TTAB clerk in a telephone call on March 27, 2018 (Receipt No. 1-582-854-458).

A telephone call to TTAB Clerk Joy Wilson was made on March 27, 2018 at 11:45 a.m.

## CONCLUSION

This Motion requests suspension of both oppositions until a TTAB response is made to Opposer's January 26, 2018 Motion to Consolidate.

Respectfully submitted,

Natural Cosmeceuticals of America Inc.

By: /s/ James C. Wray

James C. Wray  
Law Offices of James C. Wray  
1497 Chain Bridge Road  
Suite 204  
McLean, VA 22101  
(703) 442-4800  
(703) 448-7397  
jameswray@jcwray.com

Date: March 27, 2018

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion to Suspend was served on Applicant at the following address on this 27th day of March, 2018:

David Donahue  
Leo Kittay  
Fross Zelnick Lehrman & Zissu, P.C.  
4 Times Square, 17<sup>th</sup> Floor  
New York, NY 10036

/s/ Julie H. Gamotis

Julie H. Gamotis  
The Law Offices of James C. Wray  
1493 Chain Bridge Road, Suite 300  
McLean, Virginia 22101  
Tel: (703) 442-4800  
Fax: (703) 448-7397

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

=====

Bonobos, Inc.	)	
	)	Opposition Nos. 91238164 and 91239531
	)	
Opposer	)	Serial Nos. 87/411,797 and 87/266,841
	)	
v.	)	
	)	
Natural Cosmeceuticals of America Inc.	)	
	)	
Applicant.	)	
	)	

=====

**MOTION TO SUSPEND**

On January 26, 2018 Opposer filed a Motion to Consolidate in the ‘164 Opposition.

To date there has been no TTAB response to that Motion to Consolidate. That information was confirmed by a TTAB clerk in a telephone call on March 27, 2018 (Receipt No. 1-582-854-458).

A telephone call to TTAB Clerk Joy Wilson was made on March 27, 2018 at 11:45 a.m.

## CONCLUSION

This Motion requests suspension of both oppositions until a TTAB response is made to Opposer's January 26, 2018 Motion to Consolidate.

Respectfully submitted,

Natural Cosmeceuticals of America Inc.

By: /s/ James C. Wray

James C. Wray  
Law Offices of James C. Wray  
1497 Chain Bridge Road  
Suite 204  
McLean, VA 22101  
(703) 442-4800  
(703) 448-7397  
jameswray@jcwray.com

Date: March 27, 2018

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion to Suspend was served on Applicant at the following address on this 27th day of March, 2018:

David Donahue  
Leo Kittay  
Fross Zelnick Lehrman & Zissu, P.C.  
4 Times Square, 17<sup>th</sup> Floor  
New York, NY 10036

/s/ Julie H. Gamotis

Julie H. Gamotis  
The Law Offices of James C. Wray  
1493 Chain Bridge Road, Suite 300  
McLean, Virginia 22101  
Tel: (703) 442-4800  
Fax: (703) 448-7397