

ESTTA Tracking number: **ESTTA1190497**

Filing date: **02/11/2022**

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

Proceeding no.	91249565
Party	Plaintiff Villanova University
Correspondence address	W DREW KASTNER SCHNADER HARRISON 1600 MARKET STREET SUITE 3600 PHILADELPHIA, PA 19103 UNITED STATES Primary email: trademarks@schnader.com 215-751-2122
Submission	Stipulated/Consent Motion to Extend
Filer's name	Stephenie Yeung
Filer's email	trademarks@schnader.com
Signature	/Stephenie Yeung/
Date	02/11/2022
Attachments	2022-02-11 Stip Consent Motion to Suspend 91249565.pdf(8982 bytes) Exhibit A to Stipulated Consent Motion to Suspend 91249565.pdf(7191 bytes)

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

VILLANOVA UNIVERSITY IN THE)	
STATE OF PENNSYLVANIA,)	
)	
Opposer,)	Opposition No. 91249565
)	Mark: NOVA DISPENSARY & Design
)	
v.)	Serial No. 88/186,910
)	
NAZ HOLDINGS, LLC,)	
)	
Applicant.)	

STIPULATED CONSENT MOTION TO SUSPEND FOR SETTLEMENT

The parties, by and through their undersigned counsel, files this Stipulated Consent Motion for a 30-day suspension of the Opposition proceedings until March 16, 2022 to allow the parties to finalize settlement and aver as follows:

1. On July 17, 2019, Villanova University opposed Applicant NAZ Holdings, LLC's Application 88/186,910 for NOVA DISPENSARY & Design in connection with the following Class 25 services: Hoodies; Jackets; Long-sleeved shirts; Polo shirts; Shirts; Sweatshirts; T-shirts.
2. While the parties discussed settlement prior to discovery, those efforts were not successful. The parties therefore engaged in discovery in due course.
3. The discovery period for the instant proceeding closed on May 17, 2021.
4. The parties agreed to resume settlement discussions in the summer of 2021. Throughout the Fall of 2021, the parties continued such negotiations and exchanged proposed settlement terms.

5. Further suspensions of the proceedings were sought to provide the parties time to resolve the remaining issues. On November 29, 2021, the Board granted Opposer's consented motion of November 27, 2021, extending the Opposer's 30-day trial period to close on February 12, 2022.

6. The Board advised that further motions to suspend must be supported by a detailed report to establish good cause.

7. A detailed report of the parties' communications and proposed timetable for resolution of the dispute is attached as Exhibit A.

8. The parties have reached agreement on settlement terms and are now in the process of finalizing a settlement agreement.

WHEREFORE, the parties respectfully request that the Board suspend the proceedings in this Opposition for 30-days, up to and including March 16, 2022.

/s/ Stephenie Yeung
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Counsel for Opposer Villanova University

Date: February 11, 2022

/s/ Steven J. Laureanti
Steven J. Laureanti
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Counsel for Applicant NAZ Holdings, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of February 2022, I caused a true and correct copy of the foregoing to be served upon the following via electronic mail:

Steven J. Laureanti
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/Stephenie Yeung/
Stephenie Yeung

Exhibit A

Progress Report of Settlement Negotiations

Communications between the parties since December 1, 2021:

Date and Method of Communication	General Nature of Communication
December 15, 2021 (Email)	After consulting with Opposer, counsel for Opposer invited Applicant's counsel to schedule a call to discuss the latest iteration of the proposed terms of settlement.
December 16, 2021 (Email)	Email from Applicant's counsel to schedule call for December 21, 2021
December 17, 2021 (Email)	Email from Opposer counsel including invitation to Zoom meeting on December 21, 2021
December 21, 2021 (Zoom)	Parties met to discuss outstanding issues including language around parties' cooperation should confusion develop in the future and Applicant's apparel goods.
December 23, 2021 (Email)	Counsel for Opposer sent a revised set of proposed terms and materials showing Opposer's apparel goods.
December 23, 2021 (Email)	Applicant's counsel emailed Opposer's counsel with further revisions to the proposed terms.
December 29, 2021 (Email)	Opposer's counsel emailed Applicant's counsel to advise that Opposer university was on Winter holiday break and will respond to Applicant's latest revisions to the proposed terms in the new year.
January 10, 2022 (Email)	Opposer's counsel emailed Applicant's counsel on two issues of the proposed terms.
January 17, 2022 (Email)	Opposer's counsel emailed Applicant's counsel to follow up on the January 10, 2022 email.
January 25, 2022 (Telephone)	Counsel for parties discussed remaining settlement terms. The parties agreed to settle

	in principle with the settlement agreement to be drafted.
February 1, 2022 (Email)	Counsel for parties finalized draft settlement agreement and agreed to present to both parties for acceptance on February 2, 2022.

List of issues that have been resolved:

All issue have been resolved. The parties have agreed to a settlement agreement in principle.

List of issues that remain to be resolved:

Counsel for the parties have finalized a settlement agreement and are in the process of presenting to parties for approval.

Proposed timetable for resolution of the unresolved issues:

The parties believe that the necessary actions to be taken by both parties to finalize the settlement agreement may reasonably be accomplished in the next 30 days.