

ESTTA Tracking number: **ESTTA27904**

Filing date: **03/10/2005**

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

Proceeding	91164357
Party	Plaintiff Padres L.P. ,
Correspondence Address	Antonio Borrelli Cowan, Liebowitz & Latman, P.C. 1133 Avenue of the Americas New York, NY 10036
Submission	Motion on Consent to Suspend Proceedings and to Extend Discovery Period if Opposition is Resumed
Filer's Name	Antonio Borrelli
Filer's e-mail	axb@cll.com, trademark@cll.com
Signature	/Antonio Borrelli/
Date	03/10/2005
Attachments	MUNDOPADRES.PDF (3 pages)

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

----- x

PADRES L.P., :

Opposer, :

v. :

Opposition No. 91 164,357

ERESMAS INTERACTIVA, S.A., :

Applicant. :

----- x

**MOTION ON CONSENT TO SUSPEND PROCEEDINGS
AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED**

Opposer, by and through counsel, hereby moves for an order suspending the proceedings in this matter for a period of six (6) months, until **September 10, 2005**.

Applicant’s counsel consented to this motion, which is requested to allow the parties to pursue settlement discussions.

In the event that the Board denies this motion, Opposer consents to an extension of time for Applicant to file an answer or otherwise respond to the Notice of Opposition until sixty (60) days after such denial.

If the Board grants this motion, in the event that the matter is taken out of suspense, Opposer consents to an extension of time for Applicant to answer or otherwise respond to the Notice of Opposition until sixty (60) days after the proceedings resume. Additionally, the

parties request that six months of discovery be allowed and that the discovery cut off be reset to six (6) months after the proceedings resume so that the parties will have the full period of discovery in the event that the matter is not able to be resolved. The trial periods should be reset accordingly.

Dated: New York, New York
March 10, 2005

COWAN, LIEBOWITZ & LATMAN, P.C.

By /Antonio Borrelli/
Mary L. Kevlin
Antonio Borrelli
1133 Avenue of the Americas
New York, New York 10036-6799
(212) 790-9200
Attorneys for Opposer

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing MOTION ON CONSENT was sent via first class, postage paid mail to Applicant's attorney, Jeffrey L. Van Hoosear, Esq., Knobbe, Martens, Olson & Bear LLP, 2040 Main Street, 14th Floor, Irvine, CA 92614, on March 10, 2005.

/Antonio Borrelli/

Antonio Borrelli