

ESTTA Tracking number: **ESTTA237166**

Filing date: **09/17/2008**

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

Proceeding	91185094
Party	Plaintiff Boston Red Sox Baseball Club Limited Partnership
Correspondence Address	Roberto Ledesma Cowan, Liebowitz & Latman, P.C. 1133 Avenue of the Americas New York, NY 10036 UNITED STATES rxl@cll.com, trademark@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Mary L. Kevlin
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Signature	/Mary L. Kevlin/
Date	09/17/2008
Attachments	SagerianMotSusp.PDF ( 3 pages )(25085 bytes )

Ref. No. 21307.026

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

In re Application Serial No. 77/288,830  
Filed: September 25, 2007  
For Mark: N (Stylized)  
Published in the Official Gazette: March 11, 2008

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BOSTON RED SOX BASEBALL :  
CLUB LIMITED PARTNERSHIP, :

Opposer, :

v. :

JEAN SAGERIAN, :

Applicant. :

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Opposition No. 91185094

Commissioner of Trademarks  
Attention: Trademark Trial and Appeal Board  
P.O. Box 1451  
Alexandria, VA 22313-1451

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

The parties held an initial discovery conference, in accordance with the TTAB rules, on September 16, 2008 and are now pursuing settlement discussions.

Opposer, by and through counsel, hereby moves for an order suspending the above-captioned proceeding for a period of three (3) months, until **December 17, 2008**. Applicant consented to this motion, which is requested to allow the parties to continue to engage in settlement discussions.

If the Board grants this motion, the parties request that six months of discovery be allowed and that the discovery cutoff be reset to six (6) months after the proceeding resumes 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 and other periods should be reset accordingly.

Dated: New York, New York  
September 17, 2008

Respectfully submitted,

COWAN, LIEBOWITZ & LATMAN, P.C.  
*Attorneys for Opposer*

By           /Mary L. Kevlin /            
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## CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of the foregoing MOTION ON CONSENT to be sent via EMail as agreed by the parties to Applicant who is also Applicant's Correspondent, Jean Sagerian, at [Northgatekids@aol.com](mailto:Northgatekids@aol.com) on September 17, 2008.

/Mary L. Kevlin /

Mary L. Kevlin