

ESTTA Tracking number: **ESTTA598615**

Filing date: **04/15/2014**

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

Proceeding.	91195609
Applicant	Plaintiff Minnesota Twins, LLC
Other Party	Defendant Minnesota Wild Hockey Club, L.P.
Have the parties held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2)?	No

Motion for an Extension of Answer or Discovery or Trial Periods With Consent

The Defendant's Time to Answer is currently set to close on 04/15/2014. Minnesota Twins, LLC requests that such date be extended for 90 days, or until 07/14/2014, and that all subsequent dates be reset accordingly.

Time to Answer :	07/14/2014
Deadline for Discovery Conference :	08/13/2014
Discovery Opens :	08/13/2014
Initial Disclosures Due :	09/12/2014
Expert Disclosure Due :	01/10/2015
Discovery Closes :	02/09/2015
Plaintiff's Pretrial Disclosures :	03/26/2015
Plaintiff's 30-day Trial Period Ends :	05/10/2015
Defendant's Pretrial Disclosures :	05/25/2015
Defendant's 30-day Trial Period Ends :	07/09/2015
Plaintiff's Rebuttal Disclosures :	07/24/2015
Plaintiff's 15-day Rebuttal Period Ends :	08/23/2015

The grounds for this request are as follows:

- *Parties are engaged in settlement discussions*
- *Since the last suspension deadline, the parties have made continual progress towards resolution of this matter. Over past months, outside counsel for Applicant has reviewed the draft agreement received from in-house counsel for Opposer on January 16, 2014, in light of the objectives of Applicant in these matters, and has corresponded with Applicant relating to the draft agreement. Counsel for the parties have had several conversations on March 27 and April 1, 2014, regarding certain issues in the United States matter and the parallel Canadian matter, which is part of the impending overall settlement. Most recently, counsel for Applicant again discussed and corresponded on April 15, 2014 with in-house counsel for Opposer regarding outstanding issues in the overall settlement and draft agreement. Counsel for Applicant is currently working on revisions to the draft agreement reflecting these past discussions. The parties remain confident that settlement remains on track for resolution of both disputes through this settlement. The additional time is needed for Applicant's revisions to the settlement agreement, which memorializes the*

terms of the agreement for this matter and the matter between the parties in Canada involving the same marks and similar issues, to be finished and for that proposed draft to be sent to Opposer and its counsel for review and comment, and for any remaining issues to be negotiated so that this written Agreement, when finalized, will allow the parties to resolve this matter and the matter in Canada, without the need to proceed with the Opposition.

Minnesota Twins, LLC has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Minnesota Twins, LLC has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Respectfully submitted,

/Don M. Obert/

Don M. Obert

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