

ESTTA Tracking number: **ESTTA615360**

Filing date: **07/14/2014**

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 07/14/2014. Minnesota Twins, LLC requests that such date be extended for 90 days, or until 10/12/2014, and that all subsequent dates be reset accordingly.

Time to Answer :	10/12/2014
Deadline for Discovery Conference :	11/11/2014
Discovery Opens :	11/11/2014
Initial Disclosures Due :	12/11/2014
Expert Disclosure Due :	04/10/2015
Discovery Closes :	05/10/2015
Plaintiff's Pretrial Disclosures :	06/24/2015
Plaintiff's 30-day Trial Period Ends :	08/08/2015
Defendant's Pretrial Disclosures :	08/23/2015
Defendant's 30-day Trial Period Ends :	10/07/2015
Plaintiff's Rebuttal Disclosures :	10/22/2015
Plaintiff's 15-day Rebuttal Period Ends :	11/21/2015

The grounds for this request are as follows:

- *Parties are engaged in settlement discussions*
- *The parties are engaged in productive settlement discussions. Since the last suspension deadline, the parties have been in regular contact and have made progress towards resolution of this matter. Throughout late April and into May, the parties had many discussions and correspondence to address the parallel Canadian matter, which is part of the impending overall settlement. Most recently, with regard to the United States matter and the overall settlement agreement, in-house counsel for Applicant and in-house counsel for Opposer spoke directly on the matter during the week of June 30. These discussions led to a redraft of the pending proposed settlement agreement, which was subsequently delivered by outside counsel for Applicant to in-house counsel for Opposer. Additionally, these recent communications led to Applicant making a new proposal for potential stream line of settlement of both the U.S. and Canadian pending oppositions, which was communicated by email on July 11, 2014 and is currently being considered by Opposer. The parties remain confident that settlement is likely. The additional time is needed for pursuit and consideration of the most recent revision of the settlement agreement and for consideration*

*of the newest proposals made. Then, the parties will need the time to negotiate the details and memorialize them into the draft agreement which, when finalized will allow the parties to resolve this matter and the matter in Canada without the need to proceed with the Oppositions.*

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,  
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07/14/2014