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Filing date: **07/27/2011**

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

Proceeding	91195609
Party	Plaintiff Minnesota Twins, LLC
Correspondence Address	MARY L KEVLIN COWAN LIEBOWITZ & LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036 UNITED STATES mel@cll.com, trademark@cll.com
Submission	Motion to Suspend for Settlement Discussions
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Date	07/27/2011
Attachments	1256827_1.pdf (3 pages)(12373 bytes)

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

In re Application Serial Nos. 77/813,908 and 77/813,912

Filed: August 27, 2009

For Mark: MINNESOTA WILD (Stylized)

Published in the Official Gazette: January 19, 2010

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MINNESOTA TWINS, LLC,

Opposer,

Opposition No. 91195609

v.

MINNESOTA WILD HOCKEY
CLUB, L.P.,

Applicant.

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**MOTION ON CONSENT TO CONTINUE SUSPENSION OF PROCEEDINGS
AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED**

Opposer, by and through counsel, hereby moves for an order continuing the suspension of the above-captioned proceeding for a period of six (6) months, until **January 27, 2012**.

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

Progress has been made towards a resolution in this matter. Opposer’s in-house counsel has discussed and proposed settlement terms consistent with negotiations with Applicant’s counsel. Opposer’s in-house counsel is now planning a call with Applicant’s counsel to further negotiate possible settlement terms. The additional time is requested for counsel for both parties to have this call, continue discussions and resolve any outstanding issues. Any potential

agreement between the parties would resolve this matter without the need to proceed with the opposition proceedings.

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.

If the Board grants this motion, the Board should also reset Applicant's time to answer or otherwise respond to the Notice of Opposition. Additionally, the parties request that six (6) 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
July 27, 2011

Respectfully submitted,
COWAN, LIEBOWITZ & LATMAN, P.C.
Attorneys for Opposer

By /Robert A. Riether/
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on July 27, 2011, I caused a true and complete copy of the foregoing *Motion On Consent To Continue Suspension of Proceedings And To Extend Discovery Period If Opposition Is Resumed* to be sent via First Class Mail, postage paid, to applicant's attorney, Mary J. Sotis, Esq., Frankfurt Kurnit Klein & Selz PC, 488 Madison Avenue, New York, New York 10022 and Applicant's Correspondent of Record, Thomas H. Prochnow, NHL Enterprises LP, 1185 Avenue of the Americas, New York, NY 10036-2601.

Dated: New York, New York
July 27, 2011

/Robert A. Riether/
Robert A. Riether