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Filing date: **03/16/2015**

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

Proceeding	91197089
Party	Plaintiff Los Angeles Dodgers LLC
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Submission	Motion to Extend
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Signature	/Don M. Obert/
Date	03/16/2015
Attachments	BROOKLYN BURGER; Opp. No. 91207958 Mot Extend 03162015 .pdf(11706 bytes)

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

In re Application Serial No. 77/750,645
Filed: June 3, 2009
For Mark: BROOKLYN BURGER (Stylized)
Published in the Official Gazette: April 27, 2010

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LOS ANGELES DODGERS, LLC,
Opposer,
v.
A. STEIN MEAT PRODUCTS, INC.,
Applicant.
-----X

Opposition No. 91197089

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

The parties have, through their counsel, conducted their mandatory discovery conference on August 15, 2014, and now Opposer, with the consent of Applicant's counsel, hereby requests that the Deadline for Initial Disclosures and all remaining dates be suspended for thirty (60) days as follows to discuss settlement:

Initial Disclosures Due:	05/18/2015
Expert Disclosures Due:	09/15/2015
Discovery Period to Close:	10/15/2015
Plaintiff Pretrial Disclosures:	11/29/2015
Plaintiff's 30-day Trial Period Ends:	01/13/2016

Defendant/Counterclaim Plaintiff's Pretrial Disclosures:	01/28/2016
30-day Trial Period for Defendant and Plaintiff in the Counterclaim:	03/13/2016
Counterclaim Defendant's and Plaintiff's Rebuttal Disclosures Due:	03/28/2016
30-day Trial Period for Counterclaim Defendant and Rebuttal Testimony as Plaintiff Ends:	05/12/2016
Counterclaim Plaintiff's Rebuttal Disclosures Due:	05/27/2016
15-day Rebuttal Period for Counterclaim Plaintiff Ends:	06/26/2016
Plaintiff's Trial Brief Due:	08/25/2016
Defendant's Trial Brief and Plaintiff in the Counterclaim Due:	09/24/2016
Brief for Defendant in the Counterclaim and Reply Brief, if any, for Plaintiff Due:	10/24/2016
Reply Brief, if any, for Plaintiff in the Counterclaim Due:	11/08/2016

If the Board grants this motion, the Board should reset the trial periods and other periods as outlined above.

Dated: New York, New York
March 16, 2015

Respectfully submitted,

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

By: /Don M. Obert/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on March 16, 2015, I caused a true and correct copy of the foregoing Motion On Consent To Suspend And To Extend Discovery Period If Opposition Is Resumed to be sent via First Class Mail, postage prepaid, to Applicant's Attorney and Correspondent of Record, Robert T. Maldonado, Esq., Cooper & Dunham LLP, 30 Rockefeller Plaza, New York, New York 10012.

New York, New York

Dated:

March 16, 2015

/Don M. Obert/

Don M. Obert