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

Proceeding	91197518
Party	Plaintiff Athletics Investment Group LLC d/b/a The Oakland Athletics Baseball Company
Correspondence Address	JILL K. TOMLINSON COWAN LIEBOWITZ LATMAN 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036 UNITED STATES jkt@cll.com, trademark@cll.com, rar@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Scott P. Ceresia
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Signature	/Scott P. Ceresia/
Date	01/03/2012
Attachments	MATHLETICS - Motion to Suspend (Jan. 3, 2012).pdf ( 3 pages )(11169 bytes )

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

In re Application Serial Nos. 77/875,559 and 77/875,579

Filed: November 18, 2009

For Marks: MATHLETICS

Published in the Official Gazette: August 3, 2010

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ATHLETICS INVESTMENT GROUP LLC D/B/A :  
THE OAKLAND ATHLETICS BASEBALL :  
COMPANY, :

Opposition No. 91197518

Opposer,

v.

3P LEARNING PTY LIMITED, :  
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 suspending the proceedings in this matter for a period of three (3) months, until **April 3, 2012**. Applicant’s counsel consented to this motion, which is requested to allow the parties to continue to engage in settlement discussions.

Since the last suspension in this matter, Applicant’s counsel and Opposer’s outside counsel conducted a telephone call where they discussed Opposer’s revised settlement terms. Subsequently, Applicant’s counsel sent Opposer a letter setting forth Applicant’s response to Opposer’s revised settlement terms. Opposer’s outside counsel forwarded this letter to Opposer’s in-house counsel for review and comments. The additional time is requested to allow Opposer’s in-house counsel an opportunity to review Applicant’s response to the revised

settlement terms and provide its comments to Opposer's outside counsel, and for the parties to continue negotiating a potential settlement of this matter.

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  
January 3, 2012

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

By:  /Scott P. Ceresia/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on January 3, 2012, I caused a true and correct 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 prepaid, to Applicant's attorney of record and correspondent, Barry F. Soalt, Esq., Procopio Cory Hargreaves & Savitch LLP, 525 B Street, Suite 2200, San Diego, CA 92101.

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/Scott P. Ceresia/  
Scott P. Ceresia