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Filing date: **07/03/2012**

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 PC 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
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Signature	/Scott P. Ceresia/
Date	07/03/2012
Attachments	MATHLETICS - Motion to Suspend (July 3, 2012).pdf (3 pages)(11322 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 continuing the suspension of the proceedings in this matter for a period of two (2) months, until **September 3, 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 toward a resolution of this matter. Since the last suspension, Applicant sent Opposer a set of revised settlement terms that reflected the parties’ prior discussions and narrowed the remaining issues to be negotiated. Subsequently, Opposer’s outside counsel sent the revised settlement terms to Opposer’s in-house counsel for review. Opposer’s junior in-house counsel thereafter discussed the revised settlement terms with Opposer’s outside counsel. The additional time is requested to allow Opposer’s senior in-house

counsel the time to submit a response to Applicant's revised settlement terms, 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
July 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 July 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.

/Scott P. Ceresia/
Scott P. Ceresia