

ESTTA Tracking number: **ESTTA477566**

Filing date: **06/12/2012**

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

Proceeding	91200595
Party	Plaintiff Atlanta National League Baseball Club, Inc.
Correspondence Address	ELISE C KASELL COWAN LIEBOWITZ LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036 UNITED STATES eck@cll.com, jmn@cll.com, trademark@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Seth Shaifer
Filer's e-mail	sis@cll.com, trademark@cll.com, jmn@cll.com, eck@cll.com
Signature	/Seth Shaifer/
Date	06/12/2012
Attachments	Disney 595 Motion on Consent 061212.pdf (3 pages)(20633 bytes)

review Applicant's in-house counsel's comments to the revised draft agreement and for the parties to continue to negotiate a finalized settlement agreement. If accepted, the settlement agreement would resolve this matter without the need to proceed with the opposition proceeding.

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 until sixty (60) days after such denial.

If the Board grants this motion, the Board should also reset Applicant's time to answer or otherwise respond to the Notice of Opposition until thirty (30) days after the suspension ends. Additionally, the parties request that six months of discovery be allowed and that the discovery cutoff be reset to six (6) months after the proceedings resume 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 periods and other periods should be reset accordingly.

Dated: New York, New York
June 12, 2012

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

By: / Seth Shaifer/

Mary L. Kevlin
Richard S. Mandel
Elise C. Kasell
Seth Shaifer
1133 Avenue of the Americas
New York, New York 10036
(212)790-9200

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on June 12, 2012, I caused a true and correct copy of the foregoing Motion to Suspend to be sent via First Class Mail, postage prepaid, to Applicant's Attorney and Correspondent of Record, Brian A. Rupp, The Walt Disney Company, 500 S. Buena Vista Street, Burbank, California 91521-0007 with a courtesy copy to Kevin Daley, The Walt Disney Company, 500 S. Buena Vista Street, Burbank, California 91521-0007.

/ Seth Shaifer/

Seth Shaifer