

ESTTA Tracking number: **ESTTA476312**

Filing date: **06/05/2012**

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

Proceeding	91200834
Party	Plaintiff Chicago Cubs Baseball Club, LLC
Correspondence Address	MARY L KEVLIN COWAN LIEBOWITZ & LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036 UNITED STATES sis@cll.com, mlk@cll.com, jmn@cll.com, trademark@cll.com, rar@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Seth Shaifer
Filer's e-mail	sis@cll.com, jmn@cll.com, trademark@cll.com
Signature	/Seth Shaifer/
Date	06/05/2012
Attachments	MOC to Suspend 060512 Opp 91200834.pdf (3 pages)(20412 bytes)

toward an agreement as necessary. If accepted, the settlement agreement 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 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 (6) 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 5, 2012

Respectfully submitted,

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

By: /Seth Shaifer/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on June 5, 2012, I caused a true and correct copy of the foregoing *Motion on Consent to Continue Suspension of Proceedings and Extend Discovery Period if Opposition is Resumed* to be sent via First Class Mail, postage prepaid, to Applicant and Correspondent of Record, United Services Automobile Association, Attn: Manuel Rivera, 9800 Fredericksburg Rd, San Antonio, TX 78288-0001, Attn: Manuel Rivera.

/Seth Shaifer/
Seth Shaifer