

ESTTA Tracking number: **ESTTA562679**

Filing date: **10/02/2013**

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, trademark@cll.com, jmn@cll.com
Submission	Motion to Extend
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Signature	/Don M. Obert/
Date	10/02/2013
Attachments	C and Design (USAA) Opp No 91200834 Mot Ext Dates 100214.pdf(17243 bytes)

substantively address the objectives of its client and the scope of the agreement in light of the additional draft provisions.

With the consent of Applicant's outside counsel, on August 14, 2013, Opposer's outside counsel filed with the Board a Motion On Consent To Consolidate Opposition Proceedings And To Conform Opposition Schedules ("Consolidation Motion") covering this proceeding, opposition number 91200834, and a parallel proceeding identified by opposition number 91203117. As part of that Consolidation Motion, the parties sought to conform both proceedings by adopting the discovery and trial dates set forth in opposition number 91203117. As the Board has not issued a decision on the Consolidation Motion, the parties now move to extend the initial disclosures deadline and discovery and trial dates in the captioned proceeding for an additional 30-days from the discovery and trial dates set forth in the Consolidation Motion. The parties seek this additional time in order to: (1) permit the Board sufficient opportunity to rule on the Consolidation Motion; (2) provide the parties with additional time to serve their initial disclosures; and (3) provide the parties with additional opportunity to continue their work towards settlement of this matter. The requested 30-day extensions are as follows:

Initial Disclosures Due:	11/01/13
Expert Disclosures Due:	03/01/14
Discovery Closes:	03/31/14
Plaintiff's Pretrial Disclosures:	05/15/14
Plaintiff's 30-day Trial Period Ends:	06/29/14
Defendant's Pretrial Disclosures:	07/14/14
Defendant's 30-day Trial Period Ends:	08/28/14

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a copy of the foregoing Motion on Consent to Extend Initial Disclosures Deadline And Discovery And Trial Dates to be sent via first class, postage paid mail to Applicant's correspondent of record for the opposition, Wendy C. Larson, Esq., at Pirkey Barber PLLC, 600 Congress Avenue, Suite 2120, Austin, Texas 78701, on October 2, 2013.

/Don M. Obert/

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