

ESTTA Tracking number: **ESTTA460513**

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

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	ROBERT A RIETHER COWAN LIEBOWITZ & LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036 UNITED STATES rar@ccl.com, jmn@ccl.com, trademark@ccl.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Seth Shaifer
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Signature	/Seth Shaifer/
Date	03/07/2012
Attachments	MOC to Suspend 030712 Opp 91200834.pdf ( 3 pages )(20289 bytes )



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  
March 7, 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 March 7, 2012, I caused a true and correct copy of the foregoing *Motion on Consent to Suspend 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, 9800 Fredericksburg Rd, San Antonio, TX 78288-0001, Attn: Manuel Rivera.

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/Seth Shaifer/  
Seth Shaifer