

ESTTA Tracking number: **ESTTA441016**

Filing date: **11/15/2011**

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

Proceeding	91201083
Party	Plaintiff Minnesota Twins, LLC
Correspondence Address	ARYN M EMERT COWAN LIEBOWITZ AND LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036 UNITED STATES ame@cll.com, jmn@cll.com, trademark@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Aryn M. Emert
Filer's e-mail	ame@cll.com, jmn@cll.com, trademark@cll.com
Signature	/Aryn M. Emert/
Date	11/15/2011
Attachments	111115 - Motion on Consent to Suspend - Twins Special - 3 Months.PDF ( 3 pages )(25459 bytes )



counsel for review. The additional time is requested to allow Opposer's in-house counsel to review the draft agreement, and for the parties to continue to work towards settlement of this multi-jurisdictional matter.

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. 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  
November 15, 2011

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

By:  /Aryn M. Emert/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on November 15, 2011, 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, Rebecca Lederhouse, Baker & McKenzie LLP, Suite 3500, One Prudential Plaza, 130 E. Randolph Dr, Chicago, Illinois 60601.

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/Aryn M. Emert /  
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