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Filing date: **06/07/2012**

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

Proceeding	91202841
Party	Plaintiff The Cincinnati Reds LLC
Correspondence Address	MAYA L TARR COWAN LIEBOWITZ & LATMAN 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036 UNITED STATES mxt@cll.com, jmn@cll.com, trademark@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Maya L. Tarr
Filer's e-mail	mxt@cll.com, jmn@cll.com, trademark@cll.com
Signature	/Maya L. Tarr/
Date	06/07/2012
Attachments	MS. RED Motion to Continue Suspension - June 7, 2012.pdf ( 3 pages )(11408 bytes )

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

In re Application Serial No. 85/151,260  
Filed: October 13, 2010  
For Mark: MS. RED  
Published in the Official Gazette: June 7, 2011

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THE CINCINNATI REDS LLC,	:	
	:	Opposition No. 91202841
Opposer,	:	
	:	
v.	:	
	:	
DANIELLE BIMONTE,	:	
	:	
Applicant.	:	
-----X		

**MOTION ON CONSENT TO CONTINUE SUSPENSION OF PROCEEDINGS  
AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED**

Opposer, by and through counsel, hereby moves for an order further suspending the proceedings in this matter for a period of three (3) months, until **September 9, 2012**. Applicant’s counsel consented to this motion, which is requested to allow the parties to engage in settlement discussions.

Progress has been made toward the resolution of this matter. Opposer’s junior in-house counsel has reviewed a draft of a settlement agreement prepared by Opposer’s outside counsel that reflects the settlement negotiations between the parties. The additional time is requested to allow the in-house supervising attorney to review the revised agreement, and for the parties to continue to work towards settlement of this 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 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 7, 2012

Respectfully submitted,

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

By:           / Maya L. Tarr/

Mary L. Kevlin  
Richard S. Mandel  
Maya L. Tarr  
1133 Avenue of the Americas  
New York, New York 10036  
(212)790-9200

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on June 7, 2012, I caused a true and correct copy of the foregoing Motion on Consent to Continue Suspension of Proceedings and to Extend Discovery Period if Opposition is Resumed to be sent via First Class Mail, postage prepaid, to Applicant's counsel and correspondent of record, Wallace Collins, 250 E. 39<sup>th</sup> Street, Apt. 9K, New York, NY 10016-0073.

/Maya L. Tarr/  
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Maya L. Tarr