

ESTTA Tracking number: **ESTTA581778**

Filing date: **01/14/2014**

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

Proceeding.	91204727
Applicant	Plaintiff Athletics Investment Group LLC d/b/a The Oakland Athletics Baseball Company
Other Party	Defendant Stuart Adamson and Hilary Claire Adamson
Have the parties held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2)?	No

Motion for an Extension of Answer or Discovery or Trial Periods With Consent

The Defendant's Time to Answer is currently set to close on 01/17/2014. Athletics Investment Group LLC d/ b/a The Oakland Athletics Baseball Company requests that such date be extended for 90 days, or until 04/17/2014, and that all subsequent dates be reset accordingly.

Time to Answer :	04/17/2014
Deadline for Discovery Conference :	05/17/2014
Discovery Opens :	05/17/2014
Initial Disclosures Due :	06/16/2014
Expert Disclosure Due :	10/14/2014
Discovery Closes :	11/13/2014
Plaintiff's Pretrial Disclosures :	12/28/2014
Plaintiff's 30-day Trial Period Ends :	02/11/2015
Defendant's Pretrial Disclosures :	02/26/2015
Defendant's 30-day Trial Period Ends :	04/12/2015
Plaintiff's Rebuttal Disclosures :	04/27/2015
Plaintiff's 15-day Rebuttal Period Ends :	05/27/2015

The grounds for this request are as follows:

- *Parties are engaged in settlement discussions*
- *Progress has been made towards settlement of this matter. Since the institution of the proceedings, the parties have had substantial settlement negotiations, and have prepared, revised, and exchanged a draft settlement agreement. Specifically, since the parties last sought suspension of the proceedings on October 2, 2013, Applicant's counsel reviewed the draft settlement agreement that was prepared by Opposer's counsel. In mid-October, Applicant's counsel made preliminary revisions to the agreement, and around November 21, 2013, Applicant and Applicant's counsel discussed Applicant's counsel's initial changes to the agreement. Thereafter, Applicant's counsel revised the agreement in accordance with his conference with his client, and Applicant and Applicant's counsel have conferred regarding a few open terms in the agreement. The additional time is requested to allow Applicant to complete its revisions to the agreement, and for the parties to continue to work towards settlement of this matter. The parties*

believe that they will timely resolve any open issues. If the settlement agreement is accepted, this matter will be resolved without the need to proceed with the Opposition.

Athletics Investment Group LLC d/b/a The Oakland Athletics Baseball Company has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Athletics Investment Group LLC d/b/a The Oakland Athletics Baseball Company has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Respectfully submitted,

/Aryn M. Emert/

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