

ESTTA Tracking number: **ESTTA632852**

Filing date: **10/14/2014**

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 10/14/2014. Athletics Investment Group LLC d/b/a The Oakland Athletics Baseball Company requests that such date be extended for 30 days, or until 11/13/2014, and that all subsequent dates be reset accordingly.

Time to Answer :	11/13/2014
Deadline for Discovery Conference :	12/13/2014
Discovery Opens :	12/13/2014
Initial Disclosures Due :	01/12/2015
Expert Disclosure Due :	05/12/2015
Discovery Closes :	06/11/2015
Plaintiff's Pretrial Disclosures :	07/26/2015
Plaintiff's 30-day Trial Period Ends :	09/09/2015
Defendant's Pretrial Disclosures :	09/24/2015
Defendant's 30-day Trial Period Ends :	11/08/2015
Plaintiff's Rebuttal Disclosures :	11/23/2015
Plaintiff's 15-day Rebuttal Period Ends :	12/23/2015

The grounds for this request are as follows:

- *Parties are unable to complete discovery/testimony during assigned period*
- *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 multiple drafts of the settlement agreement. Specifically, since the parties last sought an extension of the proceedings, Applicants' counsel reviewed with Applicants the latest version of the draft settlement agreement prepared by Opposer, and Applicants accepted the terms of the agreement. Thereafter, Applicants' counsel advised Opposer's counsel that Applicants accepted the terms of the agreement and requested that Opposer's counsel prepare and send Applicants execution copies of the agreement. Additionally, the parties' counsel conferred regarding this matter on August 14th, September 2nd, October 1st, October 13th, and October 14th. The additional time is requested to allow Opposer's outside counsel to prepare*

and send Applicants execution copies of the agreement, and for the parties to wrap up this matter. If the agreement is accepted, this matter will be resolved, and there will be no need to proceed with the Opposition. Additionally, 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 fourteen (14) days after such denial.

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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10/14/2014