

ESTTA Tracking number: **ESTTA484733**

Filing date: **07/20/2012**

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

Proceeding	91205662
Party	Plaintiff Detroit Tigers, Inc.
Correspondence Address	Lisa M. Willis Cowan, Liebowitz & Latman, P.C. 1133 Avenue of the Americas New York, NY 10036 UNITED STATES trademark@cll.com, jmn@cll.com, lmw@cll.com
Submission	Other Motions/Papers
Filer's Name	Lisa M. Willis
Filer's e-mail	trademark@cll.com, lmw@cll.com, jmn@cll.com
Signature	/Lisa M. Willis/
Date	07/20/2012
Attachments	TU and Tiger Design and TRINITY TIGERS - 7.20.12 Motion to Suspend.pdf ( 3 pages )(11714 bytes )

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

In re Application Serial Nos. 85/389,457 and 85/460,229  
Filed: August 4, 2011 and October 31, 2011  
For Marks: TU and Design and TRINITY TIGERS  
Published in the Official Gazette: December 20, 2011 and May 29, 2012

-----X		
DETROIT TIGERS, INC.,	:	
	:	
Opposer,	:	Opposition No. 91205662
	:	
v.	:	
	:	
TRINITY UNIVERSITY,	:	
	:	
Applicant.	:	
	:	
-----X		

Commissioner for Trademarks  
Attn: Trademark Trial and Appeal Board  
P.O. Box 1451  
Alexandria, VA 22313-1451

**MOTION ON CONSENT TO SUSPEND PROCEEDINGS  
AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED**

Opposer, by and through counsel, hereby moves for an order suspending the proceedings in this matter for a period of two (2) months, until **September 20, 2012**. Applicant’s counsel consented to this motion, which is requested to allow the parties to continue to engage in settlement discussions.

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 Consolidated Notice of Opposition until thirty (30) 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  
July 20, 2012

Respectfully submitted,

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

By: /Lisa M. Willis/

Mary L. Kevlin  
Richard S. Mandel  
Lisa M. Willis

1133 Avenue of the Americas  
New York, New York 10036  
(212)790-9200

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on July 20, 2012, I caused a true and correct copy of the foregoing Motion on Consent to Suspend to be sent via First Class Mail, postage prepaid, to Applicant's Correspondent and Attorney of Record, Matthew M. Jennings, Esq., Cox Smith Matthews Incorporated, 112 E Pecan St., Suite 1800, San Antonio, TX 78205-1521.

\_\_\_\_\_  
/Lisa M. Willis/  
Lisa M. Willis