

ESTTA Tracking number: **ESTTA556195**

Filing date: **08/26/2013**

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

Proceeding	91206079
Party	Plaintiff Athletics Investment Group LLC d/b/a The Oakland Athletics Baseball Company
Correspondence Address	SCOTT P CERESIA COWAN LIEBOWITZ A& LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036 UNITED STATES spc@cll.com, jmn@cll.com, trademark@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Scott P. Ceresia
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Signature	/Scott P. Ceresia/
Date	08/26/2013
Attachments	MATHLETICS (Opp. No. 91206079) - Motion to Suspend (Aug. 26, 2013).pdf(12955 bytes )



a further revised agreement to Opposer's in-house counsel for review. The additional time is requested to allow Opposer's in-house counsel the time to review and submit comments on the revised settlement agreement, to further negotiate the few remaining points in the settlement, and for the parties to commit to their agreed-upon terms in a redrafted agreement which, when finalized, would allow them to resolve this matter without the need to proceed with the Opposition.

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.<sup>1</sup>

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<sup>1</sup> The parties note that on June 5, 2013, Opposer, with the consent of Applicant, filed a motion to consolidate this Opposition with related Opposition No. 91197518, which remains pending before the Board. In the motion to consolidate, the parties requested that the schedule for the opposition proceedings be conformed by adopting the dates as set in the instant opposition proceeding. Concurrently with the filing of this motion to suspend, Opposer, with Applicant's consent, is filing a motion to suspend Opposition No. 91197518 pending the Board's disposition of the motion to consolidate and to conform the dates of that proceeding pursuant to that motion.

Dated: New York, New York  
August 26, 2013

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

By: /Scott P. Ceresia/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on August 26, 2013, 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 attorney of record and correspondent, Barry F. Soalt, Esq., Procopio Cory Hargreaves & Savitch LLP, 525 B Street, Suite 2200, San Diego, CA 92101.

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/ Scott P. Ceresia/  
Scott P. Ceresia