

ESTTA Tracking number: **ESTTA610922**

Filing date: **06/19/2014**

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

Proceeding.	91208483
Applicant	Plaintiff Chicago Cubs Baseball Club, LLC
Other Party	Defendant Reverse The Curse, Inc.
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 06/19/2014. Chicago Cubs Baseball Club, LLC requests that such date be extended for 90 days, or until 09/17/2014, and that all subsequent dates be reset accordingly.

Time to Answer :	09/17/2014
Deadline for Discovery Conference :	10/17/2014
Discovery Opens :	10/17/2014
Initial Disclosures Due :	11/16/2014
Expert Disclosure Due :	03/16/2015
Discovery Closes :	04/15/2015
Plaintiff's Pretrial Disclosures :	05/30/2015
Plaintiff's 30-day Trial Period Ends :	07/14/2015
Defendant's Pretrial Disclosures :	07/29/2015
Defendant's 30-day Trial Period Ends :	09/12/2015
Plaintiff's Rebuttal Disclosures :	09/27/2015
Plaintiff's 15-day Rebuttal Period Ends :	10/27/2015

The grounds for this request are as follows:

- *Parties are engaged in settlement discussions*
- *Progress has been made towards a resolution of this matter. Since the institution of the proceedings, Opposer's outside counsel and Applicant's counsel engaged in discussions regarding terms for a proposed settlement agreement. Thereafter, Opposer's outside counsel conferred with Opposer regarding such terms, and Opposer's outside counsel prepared a term sheet and relayed it to Applicant for consideration. Applicant reviewed the term sheet, and relayed a counterproposal to Opposer's outside counsel. The parties held settlement discussions regarding the core terms for an agreement, and Opposer's outside counsel relayed such terms to Opposer's in-house counsel for consideration. Thereafter, Applicant became engaged in a separate business transaction that affected the terms negotiated between the parties. Accordingly, Applicant is in the process of revising its latest settlement proposal for Opposer's consideration. The additional time is therefore requested to allow Applicant time to revise its latest settlement proposal, and for the parties to continue to work towards settlement of this matter. The parties believe this will*

timely resolve this matter.

Chicago Cubs Baseball Club, LLC has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Chicago Cubs Baseball Club, LLC 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/

Aryn M. Emert

ame@cfl.com, jmn@cfl.com, trademark@cfl.com

eduardo@fantasticIPconsulting.com, eduardo.drake@gmail.com

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