

ESTTA Tracking number: **ESTTA721287**

Filing date: **01/19/2016**

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

Proceeding	91208483
Party	Plaintiff Chicago Cubs Baseball Club, LLC
Correspondence Address	ARYN M EMERT COWAN LIEBOWITZ & LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036-6799 UNITED STATES ame@cll.com, jmn@cll.com, trademark@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Maryann E. Licciardi
Filer's e-mail	mel@cll.com, trademark@cll.com, las@cll.com
Signature	/Maryann E. Licciardi/
Date	01/19/2016
Attachments	REVERSE THE CURSE - Motion on Consent to Suspend 011916.pdf(19166 bytes)

Defendant's Pretrial Disclosures :	01/30/2017
Defendant's 30-day Trial Period ends :	03/16/2017
Plaintiff's Rebuttal Disclosures :	03/31/2017
Plaintiff's 15-day Rebuttal Period Ends :	04/30/2017

Applicant's counsel consented to this motion, which is requested to allow the parties to continue to engage in settlement discussions.

Significant progress has been made toward the resolution of this matter. The parties have been negotiating the terms of settlement, and drafts of an agreement have been exchanged. Since the last extension request, Opposer's outside counsel reviewed Applicant's comments to the agreement, and Opposer's outside counsel, Applicant's counsel and Applicant held a telephone conference to discuss those comments on November 20, 2015. Thereafter, on December 1, 2015, Opposer's outside counsel, Applicant's counsel and Applicant held another settlement telephone conference. On the same date, Opposer's outside counsel and Opposer's in-house counsel exchanged substantive emails regarding the outstanding settlement issues, and Opposer's outside counsel prepared a revised agreement and sent the same to Opposer's in-house counsel for review.

Subsequently, however, as of early January 2016, the in-house attorney handling this matter is no longer with the offices of Opposer's in-house counsel. Further, last week, the outside attorney who was handling this matter left the offices of Opposer's outside counsel. Nevertheless, on January 15, 2016, the new contact at the offices of Opposer's in-house counsel provided preliminary written comments to Opposer's outside counsel to the most recent version of the agreement, which Opposer's new outside attorney is now reviewing. The parties' respective counsel are expected to discuss those preliminary comments within the next week, in

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on January 19, 2016, I caused a true and complete copy of the foregoing *Motion on Consent to Suspend Proceedings* to be sent by First Class Mail, postage prepaid, to Applicant's Attorney and Correspondent of Record, Eduardo Drake, Fantastic IP Consulting, 1367 Willow St, Apt 318, Minneapolis, Minnesota 55403-2580.

Dated: New York, New York
January 19, 2016

/Maryann E. Licciardi/
Maryann E. Licciardi