

ESTTA Tracking number: **ESTTA734688**

Filing date: **03/21/2016**

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	MARYANN E LICCIARDI COWAN LIEBOWITZ & LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036-6799 UNITED STATES mel@cll.com, trademark@cll.com, las@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Maryann E. Licciardi
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Signature	/Maryann E. Licciardi/
Date	03/21/2016
Attachments	REVERSE THE CURSE - Motion on Consent to Suspend 032116.pdf(18533 bytes )

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

In re Application Serial No. 85527846  
 Filed: January 28, 2012  
 For Mark: REVERSE THE CURSE  
 Published in the Official Gazette: June 19, 2012

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CHICAGO CUBS BASEBALL CLUB, LLC,	:	Opposition No. 91208483
	:	
Opposer,	:	
	:	
v.	:	
	:	
REVERSE THE CURSE, INC.,	:	
	:	
Applicant.	:	
-----X		

**MOTION ON CONSENT TO SUSPEND PROCEEDINGS**

Opposer, by and through counsel, hereby moves for an order suspending the proceedings in this matter for a period of sixty days, until **May 20, 2016**, and resetting all subsequent dates as follows:

<b>Proceedings Resume:</b>	05/20/2016
<b>Time to Answer:</b>	05/21/2016
<b>Deadline for Discovery Conference:</b>	06/20/2016
<b>Discovery Opens:</b>	06/20/2016
<b>Initial Disclosures Due:</b>	07/20/2016
<b>Expert Disclosures Due:</b>	11/17/2016
<b>Discovery Closes:</b>	12/17/2016

<b>Plaintiff Pretrial Disclosures :</b>	01/31/2017
<b>Plaintiff's 30-day Trial Period Ends :</b>	03/17/2017
<b>Defendant's Pretrial Disclosures :</b>	04/01/2017
<b>Defendant's 30-day Trial Period ends :</b>	05/16/2017
<b>Plaintiff's Rebuttal Disclosures :</b>	05/31/2017
<b>Plaintiff's 15-day Rebuttal Period Ends :</b>	06/30/2017

Applicant's counsel consented to this motion, which is requested to allow the parties to continue to try to finalize the settlement of this matter. Significant progress has been made toward the resolution of this matter. The parties have been negotiating the terms of settlement, and multiple drafts of an agreement have been exchanged. Since the last extension request, Opposer's new outside attorney reviewed Opposer's in-house counsel's comments regarding the draft agreement, as well as the settlement history for this matter. Thereafter, Opposer's outside counsel revised the draft agreement to incorporate and address the comments provided by Opposer's in-house counsel. Opposer's outside counsel then forwarded the revised draft agreement to Opposer's in-house counsel with a detailed explanation of the changes therein and the outstanding issues, which relate to certain provisions governing the use and proposed registration of Applicant's mark. The additional time is requested to allow Opposer's in-house counsel to discuss the revised agreement with Opposer, for Opposer's counsel to then forward the revised agreement to Applicant's counsel for review, and for the parties to continue to try to resolve any outstanding issues. The parties note that they remain committed to resolving this matter in a timely fashion and that, if accepted by all parties, the agreement will resolve this matter without the need to proceed with the opposition.

The parties also request that the proceedings be suspended pending disposition of this motion, to avoid the passing of deadlines.

Dated: New York, New York  
March 21, 2016

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

By: /Maryann E. Licciardi/

Mary L. Kevlin  
Maryann E. Licciardi

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New York, New York 10036  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on March 21, 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  
March 21, 2016

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/Maryann E. Licciardi/  
Maryann E. Licciardi