

ESTTA Tracking number: **ESTTA747063**

Filing date: **05/18/2016**

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 114 WEST 47TH STREET NEW YORK, NY 10036-1525 UNITED STATES mel@cll.com, trademark@cll.com, las@cll.com, njh@cll.com, szl@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Maryann E. Licciardi
Filer's e-mail	njh@cll.com, szl@cll.com, mel@cll.com, trademark@cll.com
Signature	/Maryann E. Licciardi/
Date	05/18/2016
Attachments	REVERSE THE CURSE - Motion on Consent to Suspend 051816.pdf(118127 bytes)

Plaintiff's 30-day Trial Period Ends :	06/15/2017
Defendant's Pretrial Disclosures :	06/30/2017
Defendant's 30-day Trial Period ends :	08/14/2017
Plaintiff's Rebuttal Disclosures :	08/29/2017
Plaintiff's 15-day Rebuttal Period Ends :	09/28/2017

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 in-house counsel reviewed the revised draft agreement, and discussed the same and all outstanding issues with Opposer. Thereafter, on April 25, 2016, Opposer's in-house counsel forwarded a revised draft agreement to Opposer's outside counsel for review. Opposer's in-house counsel and Opposer's outside counsel exchanged emails regarding the proposed changes to the agreement on April 25, 2016 and April 28, 2016, May 4, 2016, May 9, 2016 and May 16, 2016. Opposer's outside counsel then further revised the agreement based upon those communications and, on May 17, 2016, forwarded the revised agreement to Applicant's counsel for review. The additional time is requested to allow Applicant's in-house counsel to discuss the revised agreement with Applicant and for the parties to continue to negotiate any outstanding issues, which relate to certain terms governing the use and registration of Applicant's mark. 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
May 18, 2016

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

By: /Maryann E. Licciardi/
Mary L. Kevlin
Maryann E. Licciardi

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on May 18, 2016, I caused a true and complete copy of the foregoing *Motion on Consent to Continue Suspension of 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
May 18, 2016

/Maryann E. Licciardi/
Maryann E. Licciardi