

ESTTA Tracking number: **ESTTA762660**

Filing date: **08/04/2016**

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, tay@cll.com, mel@cll.com, trademark@cll.com
Signature	/Maryann E. Licciardi/
Date	08/04/2016
Attachments	REVERSE THE CURSE - Motion on Consent to Suspend 080416.pdf(18021 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

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

MOTION ON CONSENT TO CONTINUE SUSPENSION OF PROCEEDINGS

Opposer, by and through counsel, hereby moves for an order continuing the suspension of the proceedings in this matter for a period of ninety days, until **November 15, 2016**, and resetting all subsequent dates as follows:

Proceedings Resume:	11/16/2016
Time to Answer:	11/17/2016
Deadline for Discovery Conference:	12/17/2016
Discovery Opens:	12/17/2016
Initial Disclosures Due:	01/16/2017
Expert Disclosures Due:	05/16/2017
Discovery Closes:	06/15/2017
Plaintiff Pretrial Disclosures :	07/30/2017
Plaintiff's 30-day Trial Period Ends :	09/13/2017
Defendant's Pretrial Disclosures :	09/28/2017

Defendant's 30-day Trial Period ends :	11/12/2017
Plaintiff's Rebuttal Disclosures :	11/27/2017
Plaintiff's 15-day Rebuttal Period Ends :	12/27/2017

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 a resolution. 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 outside counsel communicated with Applicant’s counsel regarding the agreement by email on June 29, 2016, July 20, 2016 and August 2, 2016, and Applicant is reviewing the revised agreement and Opposer’s comments in connection with the same. The additional time is requested for Applicant to provide written feedback regarding the revised agreement, for the parties to continue to negotiate any outstanding issues, which relate to certain terms governing the use and registration of Applicant’s mark, and also to accommodate Opposer’s outside counsel’s vacation schedule during the month of August. 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

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

By: /Maryann E. Licciardi/
Mary L. Kevlin
Maryann E. Licciardi
114 West 47th Street
New York, New York 10036-1525
(212)790-9200

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on August 4, 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
August 4, 2016

/Maryann E. Licciardi/
Maryann E. Licciardi