

ESTTA Tracking number: **ESTTA511879**

Filing date: **12/19/2012**

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, P.C. 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	Aryn M. Emert
Filer's e-mail	ame@cll.com, jmn@cll.com, trademark@cll.com
Signature	/Aryn M. Emert/
Date	12/19/2012
Attachments	MOCS - REVERSE THE CURSE - 3 months.pdf (3 pages)(10715 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, 2011
For Mark: REVERSE THE CURSE
Published in the Official Gazette: June 19, 2012

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

**MOTION ON CONSENT TO SUSPEND PROCEEDINGS
AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED**

Opposer, by and through counsel, hereby moves for an order suspending the proceedings in this matter for a period of three (3) months, until **March 19, 2013**. Applicant’s counsel consented to this motion, which is requested to allow the parties to engage in settlement discussions.

In the event that the Board denies this motion, Opposer consents to an extension of time for Applicant to file an answer or otherwise respond to the Notice of Opposition until sixty (60) days after such denial.

If the Board grants this motion, the Board should also reset Applicant’s time to answer or otherwise respond to the Notice of Opposition until thirty (30) days after the suspension ends. Additionally, the parties request that six months of discovery be allowed and that the discovery cutoff be reset to six (6) months after the proceedings resume so that the parties will have the full

period of discovery in the event that the matter is not able to be resolved. The trial periods and other periods should be reset accordingly.

Dated: New York, New York
December 19, 2012

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

By: /Aryn M. Emert/
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on December 19, 2012, I caused a true and correct copy of the foregoing Motion to Suspend to be sent via 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.

/Aryn M. Emert/
Aryn M. Emert