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Filing date: **10/08/2014**

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

Proceeding	91209936
Party	Plaintiff Los Angeles Dodgers LLC
Correspondence Address	MARY L KEVLIN COWAN LIEBOWITZ & LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036 UNITED STATES trademark@cll.com, jmn@cll.com, lmr@cll.com
Submission	Motion to Suspend for Settlement Discussions
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Signature	/Lindsay Rodman/
Date	10/08/2014
Attachments	LA CHOPPERS - Motion on Consent To Suspend 10.8.14.pdf(90361 bytes )



small in-house counsel department, which necessitated transitioning the departing counsel's numerous matters to the remaining in-house counsel. Shortly before the previous period of suspension, Applicant's counsel moved to another firm, in which there was a conflict with Opposer. During the previous suspension period, Opposer's in-house counsel and Applicant's counsel communicated via e-mail on July 31, 2014, August 5, 2014, September 17, 2014 and September 22, 2014 to address conflict waivers. Opposer's outside counsel also communicated with Applicant's firm via phone on or around August 26, 2014 regarding progress to formal conflict waivers. The parties have resolved this issue and are now able to move forward with settlement.

The parties note that they are jointly committed to reaching an amicable resolution and have made significant progress. The parties request an additional 90-day extension for opposing counsel to review and comment on the settlement agreement and to allow the parties to resolve any remaining issues which pertain to the use and registration of Applicant's mark. The parties believe they will timely resolve any remaining issues.

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 thirty (30) 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  
October 8, 2014

Respectfully submitted,

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

By:           /Lindsay M. Rodman/            
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on October 8, 2014, I caused a true and complete copy of the foregoing Motion on Consent to Suspend and to Reset Deadlines if Opposition is Resumed to be sent first class mail to the Applicant's Attorney and Correspondent of Record, Jonathan S. Pink, Esq., Lewis Brisbois Bisgaard & Smith LLP, 221 North Figueroa Street, Suite 1200, Los Angeles, CA 90012.

Dated: New York, New York  
October 8, 2014

/Lindsay M. Rodman/  
Lindsay M. Rodman