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

Proceeding	91211791
Party	Plaintiff Kansas City Royals Baseball Corporation
Correspondence Address	LISA M WILLIS COWAN LIEBOWITZ & LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036 UNITED STATES mxt@cll.com, trademark@cll.com, jmn@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Maya L. Tarr
Filer's e-mail	mxt@cll.com, trademark@cll.com, jmn@cll.com
Signature	/Maya L. Tarr/
Date	03/10/2015
Attachments	THE LAST ROYALS MOCS 3-10-15.pdf(67436 bytes)

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

In re Application Serial No. 85/700,042
Filed: August 9, 2012
For Mark: THE LAST ROYALS
Published in the Official Gazette: January 29, 2013

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KANSAS CITY ROYALS BASEBALL	:	
CORPORATION,	:	Opposition No. 91211791
	:	
Opposer,	:	
	:	
v.	:	
	:	
SCOT FAMILY REUNION, LLC,	:	
	:	
Applicants.	:	
-----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 thirty (30) days, until **April 10, 2015**. Applicant consented to this motion, which is requested to allow the parties to finalize settlement.

Progress has been made towards a resolution of this matter. Since the institution of the proceedings, the parties have had verbal and written settlement negotiations, and have drafted, reviewed and proposed settlement terms, and exchanged drafts of the agreement. Specifically, since the last suspension, Opposer’s outside counsel revised the draft agreement and relayed Applicant’s counsel’s comments to Opposer’s in-house counsel via email on January 12, 2015. On January 14, 2015, Opposer’s in-house counsel provided comments to the revised agreement, and on January 15, 2015, Opposer’s outside counsel shared the revised agreement with Applicant’s counsel. On February 16, 2015, Applicant’s counsel sent a couple of additional

comments to the agreement via email to Opposer's outside counsel. On February 25, 2015, Opposer's outside counsel sent a revised version of the agreement to Opposer's in-house counsel reflecting Applicant's comments. On March 2, 2015, Applicant's counsel and Opposer's outside counsel communicated via the phone regarding the status of the agreement, and Opposer's outside counsel corresponded via email with Opposer's in-house counsel regarding the same. On March 4, 2015, Opposer's outside counsel sent a revised agreement to Applicant's counsel via email. On March 9, 2015, Applicant's counsel indicated that Applicant accepted the last version of the agreement, and on March 10, 2015, Opposer's outside counsel sent execution copies of the agreement to Applicant's counsel for execution by the Applicant. The additional time is requested for the Parties to circulate the execution copies of the agreement and to finalize this matter.

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. The parties also request that proceedings be suspended pending disposition of this motion.

Dated: New York, New York
March 10, 2015

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

By: /Maya L. Tarr/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on March 10, 2015, I caused a true and correct copy of the foregoing Motion to Suspend to be sent via First Class Mail, postage prepaid, to Attorney and Correspondent of Record, Laxmi Vijaysankar, Serling Rooks Ferrara Mckoy & Worob LLP, 119 5th Avenue, Floor 3, New York, New York 10003-1007

/Maya L. Tarr/

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