

ESTTA Tracking number: **ESTTA571581**

Filing date: **11/19/2013**

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

Proceeding	91213514
Party	Plaintiff Rangers Baseball LLC
Correspondence Address	Scott P. Ceresia Cowan, Liebowitz & Latman, P.C. 1133 Avenue of the Americas New York, NY 10036 UNITED STATES SPC@CLL.COM, jmn@cll.com, trademark@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Scott P. Ceresia
Filer's e-mail	spc@cll.com, jmn@cll.com, trademark@cll.com
Signature	/Scott P. Ceresia/
Date	11/19/2013
Attachments	SANTA ROSA ACADEMY RANGERS - Motion to Suspend (Nov. 19, 2013).pdf(11488 bytes )

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

In re Application Serial No. 85/808,308  
Filed: December 20, 2012  
For Mark: SANTA ROSA ACADEMY RANGERS and Design  
Published in the Official Gazette: May 21, 2013

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RANGERS BASEBALL LLC,	:	
Opposer,	:	Opposition No. 91213514
	:	
v.	:	
	:	
SANTA ROSA ACADEMY 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 **February 19, 2014**. Applicant 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. 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  
November 19, 2013

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

By: /Scott P. Ceresia/

Mary L. Kevlin  
Richard S. Mandel  
Scott P. Ceresia  
1133 Avenue of the Americas  
New York, New York 10036  
(212)790-9200

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on November 19, 2013, I caused a true and correct copy of the foregoing *Motion on Consent to Suspend* to be served via First Class Mail, postage prepaid, upon Applicant Santa Rosa Academy Inc., 28237 La Piedra Road, Menifee, California 92584, Attn: Laura Badillo, Executive Director/Principal.

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/Scott P. Ceresia/  
Scott P. Ceresia