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

Proceeding	91162503
Party	Plaintiff St. Louis Cardinals LLC
Correspondence Address	Mary L. Kevlin Cowan, Liebowitz & Latman, P.C. 1133 Avenue of the Americas New York, NY 10036 UNITED STATES mlk@cll.com
Submission	Motion to Suspend for Settlement Discussions
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Date	11/18/2009
Attachments	STL (NLM) - Motion on Consent to Continue Suspension 111809.PDF (3 pages) (12423 bytes)

business concerns of Opposer and points previously raised by Applicant, Opposer has engaged in a series of internal discussions relating to the proposed terms, the possible redrafting of certain points in the settlement agreement and issues raised by Applicant. Additionally, Opposer's in-house counsel and Applicant's counsel recently participated in a telephone settlement conference to discuss these remaining issues. The additional time is requested to allow the Parties time to further negotiate the outstanding settlement terms. If accepted, the settlement agreement would resolve this Opposition without the need to continue with the Opposition, and would also resolve other related U.S. and international matters.

If the Board grants this motion, in the event that the matter is taken out of suspense, the parties request that six months of discovery be allowed and that the discovery cut off 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 should be reset accordingly.

Dated: New York, New York
November 18, 2009

Respectfully submitted,

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

By: /Maryann E. Licciardi/
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Certificate of Service

The undersigned hereby certifies that a true and correct copy of the foregoing Motion on Consent to Continue Suspension of Proceedings was served on Applicant by mailing a copy, by First Class Mail, postage prepaid, to Applicant's attorney Michael Elbein, Esq., Hovey Williams LLP, 10801 Mastin Blvd., 84 Corporate Woods, Overland Park, KS 66210 on November 18, 2009.

Dated: New York, New York
November 18, 2009

/Maryann E. Licciardi/

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