

ESTTA Tracking number: **ESTTA53022**

Filing date: **11/11/2005**

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

Proceeding	91167377
Party	Plaintiff BASEBALL EXPOS, L.P. TEXAS RANGERS BASEBALL PARTNERS 1000 BALLPARK WAY, SUITE 400 ARLINGTON, TX 76011
Correspondence Address	MARY L. KEVLIN COWAN LIEBOWITZ & LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036
Submission	Motion on Consent to Suspend Proceedings and for Extension of Time to File an Answer
Filer's Name	Lawrence W. Greene
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Signature	/Lawrence W. Greene/
Date	11/11/2005
Attachments	appletonsuspensionconsent.pdf (3 pages)

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.

The parties request that, in the event that the matter is taken out of suspense 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 11, 2005

Respectfully submitted,

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

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing MOTION ON CONSENT TO SUSPEND PROCEEDINGS AND FOR EXTENSION OF TIME TO FILE ANSWER was sent via first class, postage paid mail to Applicant's attorney, D. Scott Poley, Esq., at Professional Baseball Promotion Corporation, 201 Bayshore Drive S.E., Saint Petersburg, FL 33701, on November 11, 2005

/Lawrence W. Greene/
Lawrence W. Greene