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Filing date: **06/06/2007**

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

Proceeding	91172722
Party	Plaintiff Washington Nationals BaseballClub, LLC as assignee of Baseball Expos, L.P. Washington Nationals BaseballClub, LLC as assignee of Baseball Expos, L.P. Baseball Expos, L.P. RFK Stadium2400 East Capitol Street, S.E. Washington, DC 20003 UNITED STATES
Correspondence Address	Heather L. Jensen Cowan, Liebowitz & Latman, P.C. 1133 Avenue of the Americas New York, NY 10036 UNITED STATES hlj@cll.com, trademark@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Meichelle R. MacGregor
Filer's e-mail	mrm@cll.com, trademark@cll.com
Signature	/Meichelle R. MacGregor/
Date	06/06/2007
Attachments	washnationalswhite.PDF (2 pages)(20162 bytes)

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

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WASHINGTON NATIONALS BASEBALL CLUB, LLC, as assignee of BASEBALL EXPOS, L.P.,	:
	:
Opposer,	Opposition No. 91,172,722
	:
v.	:
DARRYL WHITE,	:
	:
Applicant.	
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**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 60 days, up to and including August 16, 2007. Applicant consented to this motion, which is requested to allow the parties to continue to engage in settlement discussions.

Since the last suspension request, Opposer’s counsel and Applicant’s counsel have discussed settlement terms. The additional time is sought so that Applicant and Opposer can continue to discuss settlement.

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, in the event that the matter is taken out of suspense, Opposer consents to an extension of time for Applicant to answer or otherwise respond to the Notice of Opposition until sixty (60) days after the proceedings resume. 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 should be reset accordingly.

Dated: New York, New York
June 6, 2007

COWAN, LIEBOWITZ & LATMAN, P.C.

By /Meichelle R. MacGregor/
Mary L. Kevlin
Meichelle R. MacGregor
1133 Avenue of the Americas
New York, New York 10036-6799
(212) 790-9200
Attorneys for Opposer

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Motion on Consent was sent via first class, postage paid mail to Applicant's attorney, E. Leonard Rubin, Sachnoff & Weaver, Ltd., 10 South Wacker Drive, Chicago, IL 60606-7507 on June 6, 2007.

/Meichelle R. MacGregor/
Meichelle R. MacGregor