

ESTTA Tracking number: **ESTTA158349**

Filing date: **08/22/2007**

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

Proceeding	91179046
Party	Plaintiff Angels Baseball LP
Correspondence Address	Mary L. Kevlin, Esq. Cowan, Liebowitz & Latman P.C. 1133 Avenue of the Americas New York, NY 10036 UNITED STATES rxl@cll.com, trademark@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Roberto Ledesma
Filer's e-mail	rxl@cll.com, trademark@cll.com
Signature	/Roberto Ledesma/
Date	08/22/2007
Attachments	socialangelsmotion.PDF (3 pages)(20381 bytes)

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

In re Application Serial No. 78/576,803
Filed: February 28, 2005
For Mark: SOCIAL ANGELS
Published in the Official Gazette: February 20, 2007

-----X
ANGELS BASEBALL LP, :
 :
 :
 :
 Opposer, : Opposition No. 91179046
 :
 v. :
 :
 WISE MANAGEMENT SERVICES, :
 LTD., :
 :
 :
 Applicant. :
-----X

Commissioner of Trademarks
Attn: Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451

**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 six (6) months until February 22, 2008. Thomas H. Van Hoozer, counsel for Applicant, consented to this motion to suspend, which is requested to allow the parties time to pursue settlement discussions.

In the event that the Board denies this motion, Opposer consent 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 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
August 22, 2007

Respectfully submitted,

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

By: /Roberto Ledesma/

Mary L. Kevlin
Richard S. Mandel
Kieran G. Doyle
Roberto Ledesma
1133 Avenue of the Americas
New York, New York 10036
(212) 790-9200
Attorneys for Opposer

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing MOTION ON CONSENT TO SUSPEND was sent via first class, postage paid mail to Applicant's attorney Thomas H. Van Hoozer, HOVEY WILLIAMS LLP, 2405 GRAND BLVD STE 400, KANSAS CITY, MO 64108-2525, on August 22, 2007.

/Roberto Ledesma/
Roberto Ledesma