

ESTTA Tracking number: **ESTTA171414**

Filing date: **10/29/2007**

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

Proceeding	91180313
Party	Plaintiff National Audubon Society, Inc.
Correspondence Address	Antonio Borrelli Cowan, Liebowitz & Latman, P.C. 1133 Avenue of the Americas New York, NY 10036 UNITED STATES axb@cll.com, trademark@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Antonio Borrelli
Filer's e-mail	axb@cll.com, trademark@cll.com
Signature	/Antonio Borrelli/
Date	10/29/2007
Attachments	michigan.pdf (3 pages)(20949 bytes)

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

----- x

NATIONAL AUDUBON SOCIETY, INC., :

Opposer, :

v. :

MICHIGAN AUDUBON SOCIETY, :

Applicant. :

----- x

**MOTION ON CONSENT TO SUSPEND PROCEEDING
AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED**

Opposer, by and through counsel, hereby moves for an order suspending the above-captioned proceeding for a period of six (6) months, until **April 29, 2008**. Applicant’s counsel 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.

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 should be reset accordingly.

Dated: New York, New York
October 29, 2007

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

By /Antonio Borrelli/
Jonathan Z. King
Deborah K. Squiers
Antonio Borrelli
1133 Avenue of the Americas
New York, New York 10036-6799
(212) 790-9200

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, John A. Waters, Esq., Varnum Riddering Schmidt & Howlett LLP, P.O. Box 352, Grand Rapids, MI 49501-0352 on October 29, 2007.

/Antonio Borrelli/

Antonio Borrelli