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Filing date: **05/09/2011**

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

Proceeding	91181977
Party	Plaintiff The Cincinnati Reds LLC
Correspondence Address	ANTONIO BORRELLI COWAN LIEBOWITZ & LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036 UNITED STATES axb@cll.com, trademark@cll.com
Submission	Motion to Suspend for Settlement Discussions
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Date	05/09/2011
Attachments	REDDS motion of 5-9-11.pdf (3 pages)(12101 bytes)

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

In re Application Serial No. 78/921,294
Filed: June 30, 2006
For Mark: REDD'S
Published in the Official Gazette: July 24, 2007

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THE CINCINNATI REDS LLC,	:	Opposition No. 91181977
	:	
Opposer,	:	
	:	
v.	:	
	:	
SABMILLER INTERNATIONAL B.V.,	:	
	:	
Applicant.	:	
-----X	:	

**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 to suspend the proceedings in this matter for a period of four (4) months, until **September 9, 2011**. Applicant's counsel consented to this motion, which is requested to allow the parties to continue to engage in settlement discussions.

The parties have made significant progress in resolving this matter. Since the last suspension, Opposer and Opposer's counsel revised the proposed settlement agreement to try to accommodate the few modifications requested by Applicant and Applicant's counsel and sent a revised version to Applicant's counsel for review. The additional time is requested in order to allow Applicant to complete its review of the revisions proposed by Opposer and for the parties

to try to finalize the settlement of this matter. The parties believe they should be able to reach resolution of this remaining issue during the requested additional suspension period. If accepted, the settlement agreement would resolve this matter without the need to continue with the opposition proceedings. Additionally, the suspension is sought to accommodate the maternity leave of in-house counsel for Opposer.

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, the Board should also reset Applicant's time to answer or otherwise respond to the Notice of Opposition. Additionally, the parties request that six (6) 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 and other periods should be reset accordingly.

Dated: New York, New York
May 9, 2011

Respectfully submitted,

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

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on May 9, 2011, I caused a true and correct copy of the foregoing Motion to Suspend to be sent via First Class Mail, postage prepaid, to Applicant's Correspondent and Attorney of Record, Marta S. Levine, Esq., Quarles & Brady LLP, 411 East Wisconsin Avenue, Suite 2040, Milwaukee, WI 53202-4497.

/Carissa L. Alden/
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