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

Proceeding	91181979
Party	Plaintiff Angels Baseball LP
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Submission	Other Motions/Papers
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Attachments	IBIZA ANGELS Motion to Reset Deadlines.pdf ( 3 pages )(11178 bytes )

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

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ANGELS BASEBALL LP,	:	
	:	
Opposer,	:	Opposition No. 91181979
	:	
v.	:	
IBIZA ANGELS LIMITED,	:	
	:	
Applicant.	:	
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**OPPOSER’S MOTION TO RESET DEADLINES**

Opposer, by and through counsel, hereby requests that the Board issue an Order resetting the answer, discovery and trial periods. The Board’s Order dated May 28, 2009 granted Opposer’s motion to resume proceedings. However, when resetting the dates, the Board allowed 60 days before the next deadline as opposed to the 30 days before the next deadline that were allowed in the Board’s December 30, 2008 Order granting Opposer’s last motion on consent to suspend. The practical effect of allowing 60-days before the next deadline, instead of 30-days, is to delay proceedings beyond when they would have resumed naturally, had the Board not granted Opposer’s motion to resume.

In order to avoid the delay caused by dates as reset in the Board’s May 28, 2009 Order, Opposer respectfully requests that the Board issue a new Order, superseding the last, resetting Applicant’s time in which to answer the Notice of Opposition, as well as the discovery and trial periods allowing only 30 days before the Answer deadline.

**Conclusion**

For the foregoing reasons, Opposer respectfully requests that the Board issue an order resetting Applicant's deadline in which to answer the Notice of Opposition along with the discovery and trial periods as set forth above.

Dated: New York, New York  
May 29, 2009

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 TO RESET DEADLINES was sent via First Class Mail, postage paid to Applicant's counsel, Brian R. McGinley, Esq., Sonnenschein, Nath & Rosenthal LLP, PO Box 061080, Chicago, Illinois 60606-1080, on May 29, 2009.

/Jill K. Tomlinson/

Jill K. Tomlinson