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Filing date: **08/26/2009**

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

Proceeding	91181979
Party	Plaintiff Angels Baseball LP
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 Extend
Filer's Name	Jill K. Tomlinson
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Date	08/26/2009
Attachments	IBIZA ANGELS Motion to Extend Deadlines.pdf (3 pages)(11486 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.	:	
-----	x	

**MOTION ON CONSENT TO EXTEND DEADLINE FOR INITIAL
DISCLOSURES AND ALL SUBSEQUENT DISCOVERY
AND TRIAL DATES**

Opposer's and Applicant's counsel held their discovery conference on August 25, 2009. Opposer, with the consent of Applicant, hereby moves the Trademark Trial and Appeal Board to extend all current dates in the above-identified proceeding for a period of sixty (60) days, without prejudice to the rights of either party, and to reset all Trial Dates as follows:

Initial Disclosures Due:	November 24, 2009
Expert Disclosures Due:	March 24, 2010
Discovery Closes:	April 23, 2010
Plaintiff's Pretrial Disclosures:	June 7, 2010
Plaintiff's 30-day Trial Period Ends:	July 22, 2010
Defendant's Pretrial Disclosures:	August 6, 2010
Defendant's 30-day Trial Period Ends:	September 20, 2010
Plaintiff's Rebuttal Disclosures:	October 5, 2010
Plaintiff's 15-day Rebuttal Period Ends:	November 4, 2010

This Motion on Consent is being filed in order to allow Applicant, whose counsel has announced his intention to withdraw from representation of Applicant in this matter, the opportunity to find new counsel if it so chooses and for the parties to continue to investigate the possibilities of mutually acceptable resolution of the conflict between them without the need to further proceed with this opposition.

This Motion on Consent was agreed to by Applicant's counsel, Brian R. McGinley, Esq. It is submitted that in view of the foregoing, good cause has been shown for this Request, and it is respectfully requested that the motion be granted.

August 26, 2009

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

By: /Jill K. Tomlinson/
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CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of the foregoing MOTION ON CONSENT TO EXTEND INITIAL DISCLOSURES DEADLINE AND ALL SUBSEQUENT DISCOVERY AND TRIAL DATES to be 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 August 26, 2009.

/Jill K. Tomlinson/

Jill K. Tomlinson