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Filing date: **06/19/2009**

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

Proceeding	91188101
Party	Plaintiff Detroit Tigers, Inc.
Correspondence Address	Maryann Penney Cowan, Liebowitz & Latman, P.C. 1133 Avenue of the Americas New York, NY 10036 UNITED STATES mxp@cll.com, trademark@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Maryann E. Licciardi
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Signature	/Maryann E. Licciardi/
Date	06/19/2009
Attachments	TIGER DREAMZ - Motion on Consent to Continue Suspension 061909.pdf (3 pages)(11817 bytes)

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

In re Application Serial No. 77/380,065
Filed: January 24, 2008
For Mark: TIGER DREAMZ LUXURY PET BEDS and Design
Published in the Official Gazette: July 1, 2008

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DETROIT TIGERS, INC.,	:	
	:	
Opposer,	:	
v.	:	Opposition No. 91188101
	:	
KIRSTEN NELSON,	:	
	:	
Applicant.	:	
-----X	:	

**MOTION ON CONSENT TO CONTINUE SUSPENSION OF PROCEEDING
AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED**

Opposer, by and through counsel, hereby moves for an order continuing the suspension of the proceedings in this matter for a period of six (6) months, until **December 22, 2009**.

Applicant’s counsel consented to this motion, which is requested to allow the parties to engage in settlement discussions.

Progress has been made toward the settlement of this matter. Opposer’s counsel and Applicant’s prior counsel have discussed the terms of a potential settlement, and Opposer’s counsel has drafted a proposed agreement. The additional time is requested to allow Opposer to review and comment on the draft agreement, and for Opposer’s counsel to then forward the agreement to Applicant’s new counsel for review and consideration. If accepted, any settlement agreement would resolve this matter without the need to proceed with this opposition.

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 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
June 19, 2009

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

By: Maryann E. Licciardi/
Mary L. Kevlin
Richard S. Mandel
Maryann E. Licciardi

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on June 19, 2009, I caused a true copy of the foregoing MOTION ON CONSENT to be sent via First Class Mail, postage paid, to Applicant's Attorney of Record, Dale F. Regelman, Esq., Quarles & Brady LLP, One South Church Avenue, Suite 1700, Tucson, AZ 85701-1621.

Dated: New York, New York
June 19, 2009

/Maryann E. Licciardi/
Maryann E. Licciardi