

ESTTA Tracking number: **ESTTA295415**

Filing date: **07/15/2009**

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

Proceeding	91190619
Party	Plaintiff Major League Baseball Properties, Inc.
Correspondence Address	Roberto Ledesma Cowan, Liebowitz and Latman P.C. 1133 Avenue of the Americas New York, NY 10036 UNITED STATES rxl@cll.com, trademark@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Roberto Ledesma
Filer's e-mail	rxl@cll.com, trademark@cll.com
Signature	/Roberto Ledesma/
Date	07/15/2009
Attachments	majorleagueENTmotion2.pdf (3 pages)(8231 bytes)

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

In re Application Serial No. 77/530,544

Filed: July 24, 2008

For Mark: MAJOR LEAGUE ENT and Design

Published in the Official Gazette: December 16, 2008

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MAJOR LEAGUE BASEBALL	:	
PROPERTIES, INC.,	:	
	:	Opposition No. 91190619
Opposer,	:	
v.	:	
	:	
CHRISTOPHER BIRNBAUM,	:	
	:	
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 suspending the above-captioned proceeding for a period of three (3) months, until **October 15, 2009**. Applicant 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 (6) months of discovery be allowed and that the discovery cutoff be reset to six (6) months after the proceeding resumes 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 and other periods should be reset accordingly.

Dated: New York, New York
July 15, 2009

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

By /Roberto Ledesma/
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a copy of the foregoing Motion on Consent to be sent via first class, postage paid mail to Applicant and Correspondent of Record, Christopher Birnbaum, 3329 New England Dr., Rockford, IL 61109-2518 on July 15, 2009.

_____/Roberto Ledesma/

Roberto Ledesma