

ESTTA Tracking number: **ESTTA332892**

Filing date: **02/18/2010**

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

Proceeding	91191514
Party	Plaintiff The Baseball Club of Seattle, L.P.
Correspondence Address	Jane Shih Cowan, Liebowitz & Latman, P.C. 1133 Avenue of the Americas New York, NY 10036 UNITED STATES jss@cll.com, trademark@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Jane Shih
Filer's e-mail	jss@cll.com, trademark@cll.com
Signature	/Jane Shih/
Date	02/18/2010
Attachments	BR BLUEROCKS.pdf (3 pages)(11765 bytes)

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
February 18, 2010

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

By: /Jane Shih/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on February 18, 2010, 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 Attorney and Correspondent of Record, D. Scott Poley, Esq., Professional Baseball Promotion Corp, 201 Bayshore Dr., SE, St. Petersburg, FL 33701-3903.

/Jane Shih/
Jane Shih