ESTTA Tracking number: **ESTTA414546**

Filing date: **06/15/2011**

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

Proceeding	91197813
Party	Plaintiff Athletics Investment Group LLC d/b/a The Oakland Athletics Baseball Company
Correspondence Address	MARYANN E. LICCIARDI COWAN, LIEBOWITZ and LATMAN, P.C. 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036 UNITED STATES mel@cll.com, trademark@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Maryann E. Licciardi
Filer's e-mail	mel@cll.com, jmn@cll.com, trademark@cll.com
Signature	/Maryann E. Licciardi/
Date	06/15/2011
Attachments	SAINT LOUIS ATHLETICA - Motion on Consent to Continue Suspension 061511.pdf (3 pages)(12350 bytes)

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

In re Application Serial Nos. 77/771,531, 77/771,539, 77/771,555 and 77/782,943
Filed: June 30, 2009 (77/771,531, 77/771,539 and 77/771,555) and July 16, 2009 (77/782,943)
For Marks: SAINT LOUIS ATHLETICA, STL SAINT LOUIS ATHLETICA and Shield Design, STL SAINT LOUIS ATHLETICA and Shield Color Design, and SAINT LOUIS ATHLETICA and Design
Published in the Official Gazette: June 15, 2010

ATHLETICS INVESTMENT GROUP LLC d/b/a THE OAKLAND ATHLETICS BASEBALL COMPANY, Opposer,	:	
v.	:	Opposition No. 91197813
WOMEN'S SOCCER, LLC, Applicant.	:	

Commissioner for Trademarks
Attn: Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451

MOTION ON CONSENT TO CONTINUE SUSPENSION OF PROCEEDINGS 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 20, 2011**. Applicant's counsel consented to this motion, which is requested to allow the parties to continue to engage in settlement discussions.

Progress has been made toward the resolution of this matter. The parties' respective counsel have discussed potential settlement terms and, since the last suspension, Opposer's

counsel has forwarded a draft proposed agreement to Applicant's counsel. The additional time is requested for Applicant to review the agreement, and for the parties to continue to explore a settlement of this matter.

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 parties request that the Board 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 15, 2011

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

By /Maryann E. Licciardi/
Mary L. Kevlin
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Maryann E. Licciardi

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on June 15, 2011, I caused a true and complete copy of the foregoing *Motion On Consent To Continue Suspension of Proceedings And To Extend Discovery Period If Opposition Is Resumed* to be sent via First Class Mail, postage paid, to Applicant's attorney and Correspondent of Record, Susan Reiss, Esq., Shearman & Sterling LLP, Intellectual Property Docketing, 599 Lexington Avenue, New York, NY 10022.

Dated: New York, New York
June 15, 2011

/Maryann E. Licciardi/
Maryann E. Licciardi