ESTTA Tracking number: **ESTTA447317**

Filing date: **12/20/2011**

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 PC 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	12/20/2011
Attachments	STL SAINT LOUIS ATHLETICA - Motion on Consent to Continue Suspension 122011.pdf (3 pages)(12949 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 two (2) months, until **February 20, 2012**. 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. Since the last continuation, there has been a change in circumstances on the part of Applicant which has prompted the parties to alter their settlement approach. The parties' respective counsel have discussed this revised approach, and Opposer's counsel has drafted a new agreement reflecting the same. The new draft agreement has been forwarded to Opposer's in-house counsel for review. The additional

time is requested for Opposer's in-house counsel to complete its review of the new draft agreement, for Opposer to forward the new agreement to Applicant's counsel for review, and for the parties to continue to explore a settlement of this matter. The additional time is also requested to accommodate holiday schedules, including the closing of the offices of Opposer's in-house counsel between December 23, 2011 and January 3, 2012. If accepted, any agreement would resolve this matter without the need to proceed with the opposition proceeding.

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
December 20, 2011

Respectfully submitted,

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

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

1133 Avenue of the Americas
New York, New York 10036-6799
(212) 790-9200

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on December 20, 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 attorneys Susan Reiss, Esq., Shearman & Sterling LLP, Intellectual Property Docketing, 599 Lexington Avenue, New York, New York 10022 and Vicki Veenker, Shearman & Sterling LLP, Five Palo Alto Square, 6th Floor, 3000 El Camino Real, Palo Alto, California 94306-2155.

Dated: New York, New York
December 20, 2011

/Maryann E. Licciardi/
Maryann E. Licciardi