ESTTA Tracking number: **ESTTA474114**

Filing date: **05/23/2012**

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

Proceeding	91203112
Party	Plaintiff San Francisco Baseball Associates L.P.
Correspondence Address	MARYANN E LICCIARDI COWAN LIEBOWITZ & LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036 UNITED STATES mel@cll.com, jmn@cll.com, trademark@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Seth Shaifer
Filer's e-mail	mel@cll.com, jmn@cll.com, trademark@cll.com, sis@cll.com
Signature	/Seth Shaifer/
Date	05/23/2012
Attachments	Motion on Consent to Suspend 052312.pdf (4 pages)(26219 bytes)

Ref No. 21307.023 TRADEMARK

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

In re Application Serial No. 85/282,274
Filed: March 31, 2011
For Mark: SAN FRANCISCO and Design
Published in the Official Gazette: August 30, 2011

SAN FRANCISCO BASEBALL ASSOCIATES L.P.,	:	Opposition No. 91203112
Opposer,	:	
v.	:	
GOGO SPORTS INC.,	:	
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 THE 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 sixty (60) days, until **August 1, 2012**. Applicant's counsel consented to this motion, which is requested to allow the parties to continue to engage in settlement discussions. Such order would extend all deadlines in the above-captioned proceeding as follows:

Proceedings Resume:	8/2/2012
Initial Disclosures Due:	9/1/2012

Expert Disclosures Due :	12/30/2012
Discovery Period to Close :	01/29/2013
Plaintiff Pretrial Disclosures :	03/15/2013
Plaintiff's 30-day Trial Period Ends :	04/29/2013
Defendant's Pretrial Disclosures :	05/14/2013
Defendant's 30-day Trial Period ends :	06/28/2013
Plaintiff's Rebuttal Disclosures :	07/13/2013
Plaintiff's 15-day Rebuttal Period Ends :	08/12/2013

Progress has been made in this matter. Since the last suspension, Opposer's outside counsel and Applicant's counsel have had substantive discussions, both internally with their clients and with each other, regarding terms of a settlement of the matter. The additional time is requested for the parties to continue to negotiate the framework of a possible settlement. If accepted, the settlement agreement would resolve this matter without the need to continue with the opposition proceedings.

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 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
May 23, 2012

Respectfully submitted,

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

By: /Seth Shaifer /

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Docket No. 21307.023

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on May 23, 2012, I caused a true and complete copy of the foregoing *Motion on Consent to Continue Suspension* to be sent via First Class Mail, postage prepaid, to Applicant's attorney and Correspondent of Record, Al Mohajerian, Esq., Mohajerian Inc., 2029 Century Park East 19th Floor, Los Angeles, CA 90067.

Dated: New York, New York
May 23, 2012

/Seth Shaifer/
Seth Shaifer