ESTTA Tracking number: **ESTTA486171**

Filing date: **07/30/2012**

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	Maryann E. Licciardi
Filer's e-mail	mel@cll.com, trademark@cll.com, jmn@cll.com
Signature	/Maryann E. Licciardi/
Date	07/30/2012
Attachments	SAN FRANCISCO (Gogo) - Motion on Consent to Continue Suspension 073012.pdf (3 pages)(12300 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 **September 30, 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 in this matter. Since the last suspension request, the parties have had additional 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 agreement which, if accepted, would resolve this matter without the need to continue 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 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
July 30, 2012

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
212-790-9200

Docket No. 21307.023

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on July 30, 2012, I caused a true and complete copy of the foregoing *Motion On Consent To Continue Suspension Of The Proceedings And To Extend Discovery Period If Opposition Is Resumed* 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
July 30, 2012

/Maryann E. Licciardi/
Maryann E. Licciardi