

ESTTA Tracking number: **ESTTA608042**

Filing date: **06/04/2014**

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

Proceeding.	91205124
Applicant	Plaintiff Detroit Tigers, Inc.
Other Party	Defendant The Detroit Motorcylce Company, LLC dba Detroit Motorcycle Company
Have the parties held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2)?	Yes

Motion for an Extension of Answer or Discovery or Trial Periods With Consent

The Close of Discovery is currently set to close on 06/10/2014. Detroit Tigers, Inc. requests that such date be extended for 90 days, or until 09/08/2014, and that all subsequent dates be reset accordingly.

Time to Answer :	CLOSED
Deadline for Discovery Conference :	CLOSED
Discovery Opens :	CLOSED
Initial Disclosures Due :	CLOSED
Expert Disclosure Due :	08/09/2014
Discovery Closes :	09/08/2014
Plaintiff's Pretrial Disclosures :	10/23/2014
Plaintiff's 30-day Trial Period Ends :	12/07/2014
Defendant's Pretrial Disclosures :	12/22/2014
Defendant's 30-day Trial Period Ends :	02/05/2015
Plaintiff's Rebuttal Disclosures :	02/20/2015
Plaintiff's 15-day Rebuttal Period Ends :	03/22/2015

The grounds for this request are as follows:

- *Parties are engaged in settlement discussions*
- *Progress has been made towards settlement of this matter. Since the institution of the proceedings, the parties have had substantial settlement negotiations, and have prepared, revised, and exchanged a draft settlement agreement. Specifically, since the parties last sought suspension of the proceedings, Opposer's in-house counsel completed its review of the draft agreement, and relayed its comments to Opposer's outside counsel. Opposer's outside counsel reviewed such comments, revised the agreement accordingly, and relayed the revised agreement to Applicant's counsel for consideration. Additionally, Opposer's counsel and Applicant's counsel held settlement conferences regarding the matter. The additional time is requested to allow Applicant time to review the agreement, and for the parties to work towards resolving the matter. The parties strongly believe they will timely resolve any open issues. If the agreement is accepted, there will be no need to move forward with the Opposition.*

Detroit Tigers, Inc. has secured the express consent of all other parties to this proceeding for the extension and resetting of dates requested herein.

Detroit Tigers, Inc. has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Respectfully submitted,

/Aryn M. Emert/

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