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Filing date: **05/12/2014**

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

Proceeding	91206096
Party	Plaintiff St. Louis Cardinals, LLC
Correspondence Address	MARYANN E LICCIARDI COWAN LIEBOWITZ LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036 UNITED STATES mrm@cll.com, trademark@cll.com, jmn@cll.com
Submission	Motion to Suspend for Settlement Discussions
Filer's Name	Meichelle R. MacGregor
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Signature	/Meichelle R. MacGregor/
Date	05/12/2014
Attachments	CARDENALES_MOTION_TO_SUSPEND.pdf(105487 bytes )

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

In re Application Serial No. 85/227,694  
Filed: January 27, 2011  
For Mark: CARDENALES DE NUEVO LEÓN  
Published in the Official Gazette: January 17, 2012

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ST. LOUIS CARDINALS, LLC,  
  
Opposer,  
  
v.  
  
CESÁRIO SÁNCHEZ CHÁVEZ,  
  
Applicant.  
----- X

Opposition No. 91206096

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

**MOTION ON CONSENT TO SUSPEND PROCEEDINGS  
AND TO EXTEND DISCOVERY PERIOD IF OPPOSITION IS RESUMED**

Opposer, by and through counsel, hereby moves for an order suspending the proceedings in this matter for a period of ninety (90) days, up to and including **August 10, 2014**. Applicant consented to this motion, which is requested to allow the parties to continue to discuss a settlement of this matter.

Significant progress has been made towards settlement in this matter. Since the institution of the proceedings, the parties have had verbal and written settlement negotiations and discussed the core terms of a resolution. Opposer’s outside counsel has prepared a draft settlement agreement, which has been sent to Opposer’s in-house counsel for review. Opposer states that there was recent departure among Opposer’s small in-house counsel department,

which necessitated transitioning the departing counsel's numerous matters to the remaining in-house counsel. Opposer's expects to be able to provide Applicant's representative with the agreement in the near future.

The parties are jointly committed to reaching an amicable resolution of this matter and request an additional suspension to allow Opposer's counsel to review and finalize the agreement so that it can be sent to applicant's representative for review and that the parties can attempt to resolve the remaining issues relating to the applicant's use and registration of the applicant's mark. The parties believe that they will timely resolve any remaining issues.

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 Board should also reset Applicant's time to answer or otherwise respond to the Notice of Opposition until thirty (30) days after the suspension ends. 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

Docket No. 21307.021

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 12, 2014

COWAN, LIEBOWITZ & LATMAN, P.C.  
*Attorneys for Opposers*

By: / Meichelle R. MacGregor /  
Mary L. Kevlin  
Richard S. Mandel  
Meichelle R. MacGregor

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on May 12, 2014, I caused a true and complete copy of the foregoing *Motion On Consent To Suspend Proceedings And To Extend Discovery Period If Opposition Is Resumed* to be sent via First Class Mail, postage paid, to Applicant's Domestic Representative and Correspondent of Record, Elsa Torres, 1209 San Dario Avenue, PMB A-215, Laredo, Texas 78040-4515.

Dated: New York, New York  
May 12, 2014

/ Meichelle R. MacGregor/  
Meichelle R. MacGregor