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Filing date: **09/25/2015**

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

Proceeding	91219182
Party	Plaintiff St. Louis Cardinals, LLC
Correspondence Address	MARY L KEVLIN COWAN LIEBOWITZ & LATMAN PC 1133 AVENUE OF THE AMERICAS NEW YORK, NY 10036 UNITED STATES ame@cll.com, jmn@cll.com, trademark@cll.com
Submission	Other Motions/Papers
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Date	09/25/2015
Attachments	MOTION TO AMEND - CHICAGO CARDINALS and RACINE CARDINALS.pdf(122795 bytes)

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

In re Application Serial Nos. 86/201,164 and 86/209,236
Filed: February 22, 2014 and March 3, 2014
For Mark: CHICAGO CARDINALS and RACINE CARDINALS
Published in the Official Gazette: July 8, 2014

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ST. LOUIS CARDINALS, LLC, :
Opposer, :
v. : Opposition No. 91219182
POCKET MAPS WORLDWIDE LTD., :
Applicant. :

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

**MOTION ON CONSENT TO AMEND
APPLICATION SERIAL NOS. 86/201,164 AND 86/209,236 AND,
IF ACCEPTED, TO WITHDRAW THE OPPOSITION ON CONSENT AND
MOTION ON CONSENT TO SUSPEND PROCEEDINGS**

Pursuant to Rule 2.133 of the Trademark Rules of Practice, Applicant respectfully requests that the above-captioned applications be amended by adding the bolded language “; **all the foregoing relating to a historical football team and not relating to baseball or softball or a baseball or softball team, baseball or softball league, baseball or softball mascot or baseball or softball stadium**” to the end of the description of goods in each application as follows:

a) App. Serial No. 86/201,164

ATHLETIC UNIFORMS; BOXER SHORTS; CAP VISORS; CAPS; COATS; HATS; JACKETS; JERSEYS; PANTS; PARKAS; SHIRTS AND SHORT-SLEEVED SHIRTS; SHORT-SLEEVED OR LONG-SLEEVED T-SHIRTS; SHORTS; SPORTS CAPS AND HATS; SWEAT PANTS; SWEAT SHORTS; SWEATERS; SWEATSHIRTS; T-SHIRTS; UNIFORM; **ALL THE FOREGOING RELATING TO A HISTORICAL FOOTBALL TEAM AND NOT RELATING TO BASEBALL OR SOFTBALL OR A BASEBALL OR SOFTBALL TEAM, BASEBALL OR SOFTBALL LEAGUE, BASEBALL OR SOFTBALL MASCOT OR BASEBALL OR SOFTBALL STADIUM** in International Class 25

b) App. Serial No. 86/209,236

ATHLETIC UNIFORMS; BOXER SHORTS; CAPS; CAPS WITH VISORS; COATS; HATS; JACKETS; JERSEYS; PANTS; PARKAS; SHIRTS AND SHORT-SLEEVED SHIRTS; SHORTS; SWEAT PANTS; SWEAT SHORTS; SWEATERS; SWEATSHIRTS; T-SHIRTS; UNIFORMS; **ALL THE FOREGOING RELATING TO A HISTORICAL FOOTBALL TEAM AND NOT RELATING TO BASEBALL OR SOFTBALL OR A BASEBALL OR SOFTBALL TEAM, BASEBALL OR SOFTBALL LEAGUE, BASEBALL OR SOFTBALL MASCOT OR BASEBALL OR SOFTBALL STADIUM** in International Class 25

It is respectfully submitted that these amendments do not require republication as the amendments of the descriptions of goods narrow rather than broaden the scope of the applications.

These amendments are made pursuant to an Agreement between Applicant and Opposer, who has consented to these amendments. If the amendments are approved by the Board, Opposer, with Applicant's consent, requests that the opposition be withdrawn without prejudice.

The parties further request that the consolidated opposition proceeding be suspended pending disposition of this motion.

CONCLUSION

Applicant respectfully requests that this request to amend the application be granted in its entirety.

Dated: September 24, 2015

Respectfully submitted,

POCKET MAPS WORLDWIDE LTD.

Applicant

By: 

R. K. Wilson

P.O. Box 100321

Denver, Colorado 80250-0321

CONSENTED TO:

COWAN, LIEBOWITZ & LATMAN, P.C.

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By: 

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on September 25, 2015, I caused a true and complete copy of the foregoing *Motion on Consent to Amend Application, and, if Accepted, to Withdraw the Opposition on Consent and Motion on Consent to Suspend Proceedings* to be sent by First Class Mail, postage pre-paid, to Applicant and Correspondent of Record, R.K. Wilson, Pocket Maps Worldwide LTD, P.O. Box 100321, Denver, CO 80250-0321.

Dated: New York, New York
September 25, 2015

/Aryn M. Emert/

Aryn M. Emert