

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MAJOR LEAGUE BASEBALL PROPERTIES,  
INC.,

10 Civ. 0732 (RWS)

Plaintiff,

ECF Case

–against–

THE UPPER DECK COMPANY, LLC,

Defendant.

**NOTICE OF CROSS-MOTION**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and all pleadings and papers so far filed in this action, Defendant The Upper Deck Company, LLC through its attorneys Quinn Emanuel Urquhart Oliver & Hedges, LLP, shall cross-move this Court on February 12, 2010 for an order bifurcating and staying discovery with respect to Plaintiff Major League Baseball Properties, Inc.’s claims for trademark damages pursuant to Rule 42(b) of the Federal Rules of Civil Procedure.

DATED: New York, New York  
February 10, 2010

QUINN EMANUEL URQUHART  
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