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

Proceeding	85527029
Applicant	World Trade Centers Association, Inc.
Applied for Mark	WTC
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Submission	Motion to Consolidate and Extend Briefings Deadline
Attachments	Motion to Consolidate and Extend Briefings Deadline.pdf ( 2 pages )(75345 bytes )
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Date	05/01/2013

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

In re Trademark Applications of	)	William G. Breckenfeld, Esq.
World Trade Centers Association, Inc.	)	Trademark Attorney
	)	
Serial Nos.: 85/527,029 (WTC, Cl. 9)	)	Trademark Law Office 116
85/527,119 (WTC, Cl. 14)	)	
85/473,617 (WTC, Cl. 16)	)	
85/473,613 (WTC, Cl. 18)	)	
85/527,008 (WORLD TRADE CENTER, Cl. 9)	)	
85/527,100 (WORLD TRADE CENTER, Cl. 14)	)	
85/474,746 (WORLD TRADE CENTER, Cl. 16)	)	
85/474,748 (WORLD TRADE CENTER, Cl. 18)	)	

**APPLICANT’S MOTION TO CONSOLIDATE AND  
EXTEND BRIEFINGS DEADLINE**

Applicant World Trade Centers Association, Inc. hereby moves that the above-referenced eight appeals be consolidated, and that the deadline for Applicant to file its consolidated appeal brief be extended to June 29, 2013, which is the current briefing deadline for Application Serial No. 85/527,008.

All eight appeals arise out of the Patent and Trademark Office’s refusal to register the marks WTC and WORLD TRADE CENTER on the grounds that the marks allegedly do not function as trademarks to identify and distinguish Applicant’s goods from those of others and do not indicate the source of Applicant’s goods. The Board may order the consolidation of ex parte appeals where the cases involve common questions of law or fact. TBMP § 1214; *see also In re Country Music Association, Inc.*, 100 USPQ2d 1824, 1827 (TTAB 2011) (granting motion to consolidate due to common questions of fact and of law, and because the records were largely identical). In making a determination as to consolidation, the Board takes into account savings in time, effort, and expense due to consolidation weighed against any prejudice or inconvenience which may be caused. TBMP § 511.

Here, all eight appeals involve the same questions of law and fact, namely, whether the Examining Attorney improperly refused registration on the grounds of failure to function as a mark, and also contain substantially identical records. Consolidation will be advantageous in that it will save time, effort, and expense for all concerned parties. Accordingly, Applicant respectfully requests consolidation of the appeals.

Applicant also requests that the date for Applicant to file its brief in the consolidated appeal be set for June 29, 2013. This date is 60 days from the April 30, 2013 date on which action resumed on the appeal involving Application Serial No. 85/527,008.

Respectfully submitted,

World Trade Centers Association, Inc.

By: /Ilene B. Tannen/

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