

**THE UNITED STATES PATENT AND TRADEMARK OFFICE**

**Applicant:** COYOTES ICE, LLC : BEFORE THE  
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: :  
**Trademarks:** COYOTES ICE SPORTS : TRADEMARK TRIAL  
COYOTES ICE SPORTS : AND  
: :  
: :  
: : APPEAL BOARD

**Serial Nos.:** 86135128 and 86135177

**Attorney:** STEVEN J. LAUREANTI

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**MOTION TO CONSOLIDATE**

The applicant is seeking registration on the Principal Register for COYOTES ICE SPORTS (standard characters) and COYOTES ICE SPORTS (stylized) for the following class 35 services: "Retail sporting goods stores; Retail stores featuring hockey and figure skating equipment, merchandise and novelties, namely, hockey helmets, hockey sticks, hockey gloves, hockey pads, hockey pants, hockey socks, hockey stakes, hockey apparel, hockey protective gear, hockey jerseys, hockey masks, hockey novelty items, hockey bags, hockey pucks and training aids, figure skating skates, figure skating apparel, figure skating gloves, figure skating novelty items, figure skating bags." The applicant has filed an *ex parte* appeal to the Board in both cases.

The examining attorney refused both applications under Trademark Act Section 2(d) based on the same registered marks Nos. 3655451, 3688377, and 4379914.

Because the cases involve common issues of law and fact, the examining attorney respectfully requests consolidation of the cases for purposes of efficiency and ease of prosecution. TBMP §1214.

Respectfully submitted,

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