

TTAB

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September 14, 2005

Commissioner for Trademarks
P.O. Box 1451
Alexandria, VA 22313-1451

Re: *House of Blues Brands Corp. v. Celebrities Publishing Corporation*
Mark: **IN ROCK WE TRUST**
Opposition No.: 91165876; 91165899; 91165901
Attorney Docket No. 064163.0064

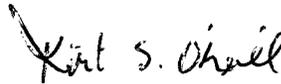
Dear Madam:

Enclosed please find the following for filing in the above-identified matter:

- Opposer's Motion for Consolidation; and
- A return receipt acknowledgment postcard.

The Commissioner is hereby authorized to charge any deficiency or credit any overpayment in the fees indicated above to Deposit Account No. 01-0477.

Respectfully submitted,



Kirt S. O'Neill

Enclosures



09-19-2005

U.S. Patent & TMOfc/TM Mail Rcpt Dt. #26

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

House of Blues Brands Corp.,	§	Serial Nos.: 78/441,156
	§	78/441,158
Opposer,	§	78/441,161
	§	
	§	Mark: IN ROCK WE TRUST
v.	§	
	§	
Celebrities Publishing Corporation,	§	Opposition Nos.: 91165876
	§	91165899
Applicant.	§	91165901

OPPOSER'S MOTION FOR CONSOLIDATION

Opposer, House of Blues Brands Corp., (hereinafter referred to as "Opposer"), by and through its undersigned counsel, files this motion for consolidation pursuant to TBMP § 511.

As grounds for this motion, Opposer states that:

On or about July 7, 2005, Opposer filed three Notices of Opposition identified as Opposition Nos. 91165876; 91165899; and 91165901. The Board issued its Scheduling Order for each proceeding within days of each other thereby setting the answer and discovery deadlines for each opposition proceeding also to coincide within days of each other.

The three oppositions concern the same mark and will involve many common issues. The parties are the same in each proceeding.

In order to streamline these opposition proceedings with respect to the various deadlines established by each scheduling order, counsel for Opposer is of the opinion that consolidation would benefit both the parties and the Board when submitting documents in response to these various deadlines.

PRAYER

WHEREFORE, premises considered, Opposer requests that the three opposition proceedings referenced above be consolidated and that the answer, discovery and testimony

Certificate of Service

I hereby certify that a true and complete copy of the foregoing Opposer's Motion for Consolidation has been served on opposing counsel by mailing said copy on September 14, 2005, via First Class Mail, postage prepaid to:

Robert Carson Godbey
Jess H. Griffiths
Chad M. Iida
Godbey Griffiths Reiss Chong
Pauahi Tower, Suite 2300
1001 Bishop Street
Honolulu, HI 96813

Name of Person Signing Certificate: Kirt S. O'Neill

Signature: Kirt S. O'Neill