

ESTTA Tracking number: **ESTTA115649**

Filing date: **12/19/2006**

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

Proceeding	91173874
Party	Defendant Seattle Pacific Industries, Inc. Seattle Pacific Industries, Inc. 1633 Westlake Avenue North Seattle, WA 981096214
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Date	12/19/2006
Attachments	SP-MotionForConsolidation(.80004).PDF (3 pages)(60710 bytes)

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

LEVI STRAUSS & CO.,)	
)	Opposition No. 91173874
Opposer,)	
)	Serial Nos. 78/833311
v.)	
)	
SEATTLE PACIFIC INDUSTRIES, INC.,)	
)	
Applicant.)	
<hr style="width: 100%;"/>)	Docket Nos. 920006.80004

**APPLICANT’S MOTION FOR CONSOLIDATION OF
OPPOSITION PROCEEDINGS**

Applicant Seattle Pacific Industries, Inc. (“Applicant”) hereby moves the Board for an Order consolidating the instant opposition proceeding with *Levi Strauss & Co. v. Seattle Pacific Industries, Inc.* Opposition No. 91173873, filed against United States Trademark Application Serial No. 78/833308 for the design mark therein.

A motion for suspension of the instant proceeding is being filed concurrently herewith to allow the Board to make a determination of the instant motion prior to the opening of Applicant’s testimony period.

Consolidation is appropriate in that the instant proceeding, and Opposition No. 91173873 involves identical parties, similar marks, and substantially the same issues. In both proceedings, Opposer has asserted likelihood of confusion arising from Opposer’s Arcuate Mark and Applicant’s mark. Consolidation would serve the interests of

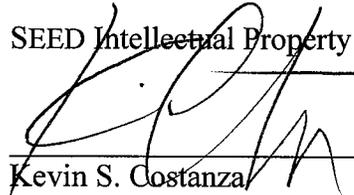
judicial economy, resulting in reduced expenditure of time and resources by both parties as well as the Board.

Accordingly, Applicant moves that these proceedings be consolidated for all purposes and decided by the Board on the same record and briefs.

DATED this 19TH day of December, 2006.

Respectfully submitted,

SEED Intellectual Property Law Group PLLC

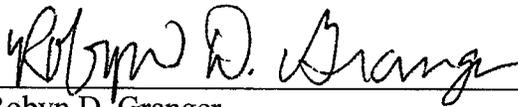


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CERTIFICATE OF SERVICE

I, Robyn D. Granger, hereby certify that the above **APPLICANT'S MOTION FOR CONSOLIDATION OF OPPOSITION PROCEEDINGS** was served on counsel for Opposer by depositing same with the U.S. Postal Service, first-class postage prepaid, on December 19, 2006, addressed as follows:

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Robyn D. Granger