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

Proceeding	91193364
Party	Defendant RichRelevance, Inc.
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Submission	Other Motions/Papers
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Date	02/22/2010
Attachments	RichRelevance Motion to Consolidate (Opp No 91193364).pdf ( 3 pages ) (130677 bytes )

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

In the Matter of Application Serial No. 77/745,840  
Published in the Official Gazette on September 22, 2009  
Mark: RICHRELEVANCE

ChoiceStream, Inc.		
	Opposer,	
	v.	Opposition No. 91/193,364
RichRelevance, Inc.,		
	Applicant.	

**MOTION TO CONSOLIDATE**

Pursuant to Federal Rule of Civil Procedure 42(a) and TBMP § 511, Applicant RichRelevance, Inc. ("Applicant") hereby requests that the Trademark Trial and Appeal Board (the "Board") consolidate the following opposition and cancellation proceedings:

<b>Proceeding No.</b>	<b>Mark/Serial/Reg. No.</b>	<b>Applicant/Registrant</b>	<b>Opposer/Petitioner</b>
Opposition No. 91/193,364	RICHRELEVANCE 77/745,840	RichRelevance, Inc.	ChoiceStream, Inc.
Cancellation No. 92/051,945	RICHRELEVANCE 3,471,575	RichRelevance, Inc.	ChoiceStream, Inc.

The foregoing proceedings involve common questions of law and fact and identical marks and parties. Likewise, Applicant's Answers to the Notice of Opposition and Petition to Cancel raise similar issues of fact and defenses, including a counterclaim to cancel ChoiceStream, Inc.'s Registration Nos. 3,378,178 and 3,657,301 for the mark REALRELEVANCE.

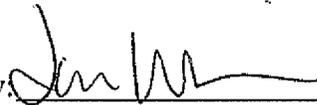
Consolidation of these proceedings will save the Board and the parties significant time, effort, and expense. For example, the parties could issue and answer one set of discovery

responses, produce a single set of documents, and take half as many depositions. This motion is sought for the purposes of judicial economy and not for reasons of delay.

Dated: New York, New York  
February 22, 2010

Respectfully submitted,

Quinn Emanuel Urquhart Oliver & Hedges,  
LLP

By:  \_\_\_\_\_

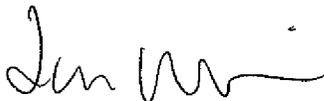
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ATTORNEYS FOR APPLICANT  
RICHRELEVANCE, INC.

**CERTIFICATE OF SERVICE**

I certify that on the 22nd day of February, 2010, I caused a true copy of Applicant RichRelevance, Inc.'s MOTION TO CONSOLIDATE to be served on Opposer's attorney, Phi Lan M. Tinsley, K&L Gates LLP, State Street Financial Center, One Lincoln Street, Boston, MA 02111-2950, via First Class mail.



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Lori E. Weiss