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

Proceeding	91197573
Party	Plaintiff Chase Brass, LLC
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Date	01/24/2011
Attachments	11.01.24 Chase's Response to Mtn to Consolidate.PDF ( 2 pages )(26223 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
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Chase Brass & Copper Company, LLC,	)	
a Delaware limited liability company,	)	
as a licensee of Sambo Copper	)	
Alloy Co., Ltd., a Japanese corporation,	)	
	)	
Opposer,	)	Opposition No. 91/197,571
	)	Opposition No. 91/197,573
	)	Opposition No. 91/197,574
	)	
v.	)	
	)	
Sipi Metals Corp., an Illinois corporation,	)	
	)	
Applicant.	)	

**CHASE’S RESPONSE TO APPLICANT’S  
MOTION TO CONSOLIDATE OPPOSITION PROCEEDINGS**

Although undated, it is assumed that on January 3, 2011, Sipi Metals Corp. (hereinafter “Applicant”) filed a Motion to Consolidate Opposition Proceedings. Opposer, Chase Brass & Copper Company, LLC (“Chase”), by and through its attorneys, responds to Applicant’s Motion to Consolidate (“Applicant’s Motion”) as follows:

Chase filed separate Notices of Opposition to trademark application Serial Nos. 77/947,618, 77/947,606, and 77/947,614. However, Chase consents to consolidating Opposition Nos. 91/197,571, 91/197,573, and 91/197,574, and would have consented to the motion if contacted by Applicant’s counsel.

It is Chase’s belief that, although the oppositions were filed on the same day, Opposition No. 91/197,571 to Applicant’s mark ECO BRONZE is the “parent” case – meaning all papers filed with the Board should be filed in Opposition No. 91/197,571. *See* Trademark Trial and Appeal Board Manual of Procedure §511.

WHEREFORE, Chase respectfully requests the Board to:

1. GRANT Applicant's Motion to Consolidate Opposition Nos. 91/197,571, 91/197,573, and 91/197,574; and
2. Such other relief as the Board deems just and proper.

Dated: January 24, 2011

Respectfully submitted,

By: /s/ Molly B. Edwards  
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*Attorneys for Opposer*

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served via U.S. Mail, postage fully pre-paid, on this 24th day of January, 2011, upon the following:

Robert S. Beiser  
Vedder Price, P.C.  
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*Attorneys for Applicant*

/s/ Molly B. Edwards