

ESTTA Tracking number: **ESTTA634492**

Filing date: **10/22/2014**

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

Proceeding	92059807
Party	Defendant Intertape Polymer Corp.
Correspondence Address	THOMAS W BROOKE HOLLAND & KNIGHT LLP 800 17TH ST NW WASHINGTON, DC 20006 UNITED STATES thomas.brooke@hklaw.com, ptdocketing@hklaw.com
Submission	Motion to Consolidate
Filer's Name	Thomas W. Brooke
Filer's e-mail	thomas.brooke@hklaw.com, ptdocketing@hklaw.com
Signature	/Thomas W. Brooke/
Date	10/22/2014
Attachments	mottoconsolidateIPG_10_22_2014_15_05_45_053.pdf(57634 bytes)

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

Berry Plastics Corporation and Covalence)	
Specialty Adhesives LLC)	
)	Cancellation No.: 92,059,807
Petitioners)	
)	Registrant No.; 4,522,020
v.)	
Intertape Polymer Corp.)	
)	
Registrant)	

Berry Plastics Corporation and Covalence)	
Specialty Adhesives LLC)	
)	Cancellation No.: 91,217,831
Opposers)	
)	Serial No.: 86/106,393
v.)	
Intertape Polymer Corp.)	
)	
Applicant)	

CONSENTED MOTION TO CONSOLIDATE

Intertape Polymer Corp. ("Intertape") hereby moves to consolidate Cancellation No. 92,059,807 and Opposition No. 91,217,831. Both cases are between Berry Plastics Corporation and Covalence Specialty Adhesives LLC as the Plaintiffs and Intertape Polymer Corp. as the Defendant. The issues in both cases are the same. The marks in question are IRON GRIP in relation to the Cancellation action and IRON GRIP & DESIGN in relation to the Notice of Opposition.

Counsel for the Plaintiffs Berry Plastics Corporation and Covalence Specialty Adhesives LLC agreed to this Motion on October 20, 2014.

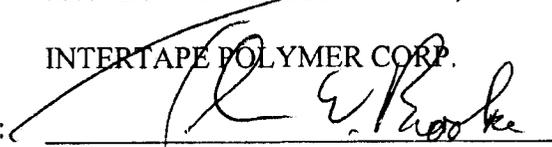
Consolidation of these case will save time and money and judicial resources for the parties and for the Board.

Therefore Intertape Polymer Corp., with the consent of Berry Plastics Corporation and Covulence Specialty Adhesives LLC, requests that these cases be consolidated.

RESPECTFULLY SUBMITTED,

INTERTAPE POLYMER CORP.

BY:


Thomas W. Brooke
HOLLAND & KNIGHT LLP
800 17th Street, N.W.
Washington, DC 20006
(202) 663-7271

DATED:

Oct. 22, 2014

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Consented Motion to Consolidate was furnished by U.S. Mail and email to counsel for Petitioner to the following Jonathan P. Froemel and Joan L. Long, Barnes & Thornburg LLP address: P.O. Box 2786, Chicago, Illinois 60606 on October 22, 2014:



Thomas W. Brooke

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