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

Proceeding	91221325
Party	Plaintiff Red Bull GmbH
Correspondence Address	Martin R. Greenstein TechMark a Law Corporation 4820 Harwood Road, 2nd Floor San Jose, CA 95124 UNITED STATES MRG@TechMark.com, AMR@TechMark.com, LZH@TechMark.com, DMP@TechMark.com
Submission	Other Motions/Papers
Filer's Name	Angelique M. Riordan
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Signature	/Angelique M. Riordan/
Date	11/12/2015
Attachments	RB v Jordi Nogues Jordi Nogues S.L. - Consolidated Proceeding No. 92061202 - Supplement to Mtn to Consolidate.pdf(136116 bytes )

CERTIFICATE OF ELECTRONIC FILING

I hereby certify that this correspondence is being filed electronically with the Trademark Trial and Appeal Board via ESTTA, on the date below:  
November 12, 2015 /Angelique M. Riordan/  
Angelique M. Riordan

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

_____ )	<b>Opposition No.:</b>	<b>91-221,325</b>
RED BULL GMBH, )	<b>Serial No.:</b>	<b>86/324,277</b>
)	<b>Trademark:</b>	
<b>Opposer/Petitioner</b> )		
)		
<b>v.</b> )		
)		
JORDI NOGUES <sup>1</sup> /JORDI NOGUES, S.L., )	<b>Cancellation No.:</b>	<b>92-061,202</b>
)	<b>Registration No.:</b>	<b>4,471,520</b>
)	<b>Trademark:</b>	
<b>Applicant/Registrant</b> )		
_____ )		

**SUPPLEMENT TO MOTION TO CONSOLIDATE PROCEEDINGS**

Opposer/Petitioner, RED BULL GMBH (“Red Bull”) hereby submits a supplement to its Motion to Consolidate Proceedings<sup>2</sup>, filed November 11, 2015. As noted in Red Bull’s Motion to Consolidate Proceedings, Applicant/Registrant JORDI NOGUES/JORDI NOGUES, S.L. (“Nogues”) was considering Red Bull’s request for consent to consolidation of the above-captioned Opposition No. 91-221,325 and Cancellation No. 92-061,202. Since Red Bull’s motion to consolidate was filed, Nogues has provided its consent to consolidation.<sup>3</sup> Please note that this supplement, like Red Bull’s motion to consolidate, is being filed concurrently in Opposition No. 91-221,325 and Cancellation No. 92-061,202.

Based on the above, Red Bull’s previously-filed Motion to Consolidate Proceedings and the instant supplement, indicating Nogues’ consent to consolidation, Red Bull maintains its requests that the Board issue an order granting this Motion to Consolidate Proceedings, wherein the consolidated schedule

<sup>1</sup> Improperly amended to Jordi Nogues, S.L.  
<sup>2</sup> See Motion to Consolidate Proceedings (“Motion to Consolidate”), Docket No. 8 (November 11, 2015).  
<sup>3</sup> See Exhibit A.

is consistent with the more recently instituted Cancellation No. 92-061,202.

Dated: November 12, 2015

Respectfully submitted,

Neil D. Greenstein  
Martin R. Greenstein  
Angelique M. Riordan  
Leah Z. Halpert  
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By: /Neil D. Greenstein/  
Neil D. Greenstein  
Attorney for Red Bull GmbH

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **SUPPLEMENT TO MOTION TO CONSOLIDATE PROCEEDINGS** is being served on November 12, 2015, by deposit of same in the United States Mail, first class postage prepaid, in an envelope addressed to counsel for Applicant/Registrant Jordi Nogues/Jordi Nogues, S.L. at:

NICHOLAS D. WELLS  
KIRTON MCCONKIE  
60 E SOUTH TEMPLE STE 1800  
SALT LAKE CITY, UT 84111-1032  
UNITED STATES

/Angelique M. Riordan/  
Angelique M. Riordan

# **EXHIBIT A**

**Subject:** RE: Red Bull GMBH v. Jordi Nogues/Jordi Nogues, S.L. - Opposition No. 91/221,325 and Cancellation No. 92/061,202 - Courtesy Copy  
**From:** "Joshua S. Rupp" <jrupp@kmclaw.com>  
**Date:** 11/12/2015 10:49 AM  
**To:** 'Angel Riordan' <amr@techmark.com>  
**CC:** Nicholas Wells <nwells@kmclaw.com>, Sherry Glendening <sglending@kmclaw.com>, "ndg@techmark.com" <ndg@techmark.com>, "mrg@techmark.com" <mrg@techmark.com>, "lzh@techmark.com" <lzh@techmark.com>, "dmp@techmark.com" <dmp@techmark.com>

Angel,

Thank you for your email and for the courtesy copy of the Motion to Consolidate. Registrant/Applicant Jordi Nogues, S.L. does not have any opposition to the Motion to Consolidate so long as it is clear that the cancelation and opposition proceedings, respectively, may require the application of separate and distinct legal standards governing their ultimate resolution. With this understanding in mind, Registrant/Applicant Jordi Nogues, S.L. hereby consents to the Motion to Consolidate.

Please let me know how you would prefer to communicate the foregoing to the Board in view of the pending Motion to Consolidate.

Regards,  
Josh

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**From:** Angel Riordan [mailto:amr@techmark.com]  
**Sent:** Thursday, November 12, 2015 10:38 AM  
**To:** Joshua S. Rupp  
**Cc:** Nicholas Wells; Sherry Glendening; ndg@techmark.com; mrg@techmark.com; lzh@techmark.com; dmp@techmark.com  
**Subject:** Red Bull GMBH v. Jordi Nogues/Jordi Nogues, S.L. - Opposition No. 91/221,325 and Cancellation No. 92/061,202 - Courtesy Copy

Dear Josh,

Please see the attached courtesy copy of Red Bull's Motion to Consolidate, as filed yesterday with the Board in both proceedings, noting that you are currently considering whether or not you will provide consent to the consolidation. The service copy has been sent to you by first class mail.

We look forward to hearing from you should your client decide to consent to this consolidation.

Best,

Angel

----- Forwarded Message -----

**Subject:** RE: Red Bull GMBH v. Jordi Nogues/Jordi Nogues, S.L. - Opposition No. 91/221,325 and Cancellation No. 92/061,202 - Voicemail Follow-up  
**Date:** Wed, 11 Nov 2015 18:25:41 +0000  
**From:** Joshua S. Rupp <jrupp@kmclaw.com>  
**To:** 'Angel Riordan' <amr@techmark.com>

CC:Nicholas Wells <[nwells@kmclaw.com](mailto:nwells@kmclaw.com)>, Sherry Glendening <[sglending@kmclaw.com](mailto:sglending@kmclaw.com)>

Angel,

Thank you for your follow up email. I did receive your VM, and we are considering your qu

Thanks,

Josh