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Filing date: **11/10/2015**

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

Proceeding	91224750
Party	Plaintiff Threshold Enterprises, Ltd.
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Submission	Motion to Consolidate
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Date	11/10/2015
Attachments	Motion to Consolidate.pdf(35903 bytes )

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

In the matter of trademark application Serial Nos. 86/565,379, 86/565,384, and 86/639,547

Marks: TRU SOURCE, TRUSOURCE, and   
Published in the Official Gazette on August 11, 2015

Threshold Enterprises Ltd., )  
 )  
 Opposer, )  
 ) Opposition No. 91/224,750  
vs. )  
 )  
Glanbia Nutritionals (Ireland) Limited, )  
 )  
 Applicant. )  
\_\_\_\_\_ )

UNITED STATES PATENT AND TRADEMARK OFFICE  
Trademark Trial and Appeal Board  
P.O. Box 1451  
Alexandria, VA 22313-1451

**MOTION TO CONSOLIDATE**

Opposer Threshold Enterprises Ltd. (“Opposer”) moves to consolidate the instant proceeding with Opposition Proceeding No. 91/224,791 (the “791 Opp.”). The proceedings involve identical parties, and similar marks, and consolidating these proceedings will save time, effort, expense.

At issue in the instant proceeding are U.S. Trademark Application Serial No. 86/565,379 for the mark TRU SOURCE, U.S. Trademark Application Serial No. 86/565,384 for the mark TRUSOURCE, and U.S. Trademark Application Serial No. 86/639,547 for the mark , all in the name of Glanbia Nutritionals (Ireland) Limited, an Ireland limited liability partnership

("Applicant"). At issue in the '791 Opp. is U.S. U.S. Trademark Application Serial No. Serial No.

86/639,563 for the mark , also in the name of Applicant.

Accordingly, Opposer respectfully requests that the Board enter an order consolidating the instant proceeding and the '791 Opp.

Respectfully submitted,

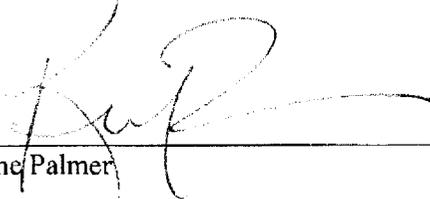
Dated: November 10, 2015

/s/ JESSICA BROMALL SPARKMAN  
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**PROOF OF SERVICE**

It is hereby certified that on **November 10, 2015**, a copy of the foregoing MOTION TO CONSOLIDATE has been sent by first class mail, postage prepaid to Applicant at the correspondence address of record in the Patent and Trademark Office:

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