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

Proceeding	92052048
Party	Defendant Dassa Holdings Ltd.
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Submission	Motion to Consolidate
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Attachments	20100806 Motion to Consolidate with Consent.pdf (3 pages)(17263 bytes)

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

SILK WATER SOLUTIONS INC.,

Petitioner,

v.

DASSA HOLDINGS LTD.,

Respondent.

Cancellation Proceedings
Nos. 92052048, 92052049

Mark: SILK BALANCE
Reg. No. 3,335,526



Mark: SILKBALANCE
Reg. No. 3,360,078

MOTION TO CONSOLIDATE WITH CONSENT

Pursuant to Fed. R. Civ. P. 42(a) and Trademark Board Manual of Procedure § 511, Respondent Dassa Holdings Ltd., with Petitioner's consent, moves the Board to consolidate Cancellation Proceedings Nos. 92052048 and 92052049.

Both cancellation proceedings were brought by the Petitioner, Silk Water Solutions Inc., against the single Respondent, Dassa Holdings Ltd. Thus there is identity of the parties. *See Bigfoot 4x4 Inc. v. Bear Foot Inc.*, 5 U.S.P.Q.2d 1444 (T.T.A.B. 1987). The proceedings involve common issues of law and fact. Consolidation of these two proceedings will save the Board, as well as the respective parties, the time, effort and expense of pursuing these proceedings separately. Petitioner's counsel, David A. Lowe, has consented to this Motion on August 3, 2010 via email. *See Helene Curtis Industries, Inc. v. Suave Shoe Corp.*, 13 U.S.P.Q.2d 1618 (T.T.A.B. 1989) (approving stipulation of the parties to consolidate).

This Motion is timely in that Respondent filed Answers to each of the Petitions for Cancellation earlier today, August 6, 2010.

Respectfully submitted,

Dated: August 6, 2010

By: /s/ *Jeremy M. Roe*

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Attorneys for Respondent

CERTIFICATE OF ELECTRONIC FILING

I hereby certify that this **MOTION TO CONSOLIDATE CONSENT** is being electronically filed with the United States Patent and Trademark Office Trademark Trial and Appeal Board today, August 6, 2010.

/s/ Jeremy M. Roe _____

Attorney for Respondent

CERTIFICATE OF SERVICE

The undersigned hereby certifies that one copy of the foregoing **MOTION TO CONSOLIDATE CONSENT** was served upon Counsel for Petitioner by first-class mail, postage pre-paid, this 6th day of August, 2010, addressed as follows:

David A. Lowe, Esq.
BLACK LOWE & GRAHAM, PLLC
701 Fifth Avenue, Suite 4800
Seattle, WA 98104

/s/ Jeremy M. Roe _____

Attorney for Respondent