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

Proceeding	91205340
Party	Defendant Miguel A. Maya
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Submission	Motion to Consolidate
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Date	07/30/2012
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
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Plentyoffish Media Inc.

Opposer,

Opposition No. 91205340

-against-

Serial No. 85494932

Miguel A. Maya,

Applicant,
-----X

MOTION TO CONSOLIDATE

Pursuant to Rule 42(a) of the Federal Rules of Civil Procedure, Applicant Miguel A. Maya ("Applicant") hereby moves to consolidate this action for all purposes with, Cancellation Action No. 92055201, a virtualiy identical action brought in this Court by the Opposer, Plentyoffish Media, Inc. ("Opposer").

Counsel for Applicant has attempted to confer with counsel for Opposer via email and telephone on multiple occasions about this motion and was unable to get in contact with him or a response since the 6th day of July 2012.

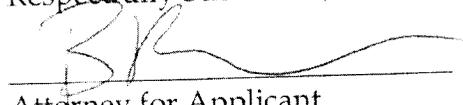
BACKGROUND

On the 16th day of February 2012 the Opposer filed a Petition for Cancellation against Applicant's trademark, Plenty Of Pros, Registration # 4099815 / Serial # 85097486 which offers online business directories featuring

listings of professional service providers. Subsequently, on the 29th day of May 2012 the Opposer filed a Notice of Opposition against Applicant's other pending trademark, PlentyOfPros, Serial # 85494932 that offers on-line social networking services geared to professional service providers. Hence, both trademarks involve a common question of law. For the foregoing reason, it is believed that consolidating the foregoing cases would save both parties and the Board time, expense and efforts without causing any prejudice or inconvenience to the opposing party.

DATED: 30th day of July 2012

Respectfully Submitted,



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