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

Proceeding	92058052
Party	Plaintiff Bugatti International S.A.
Correspondence Address	SUSAN B FLOHR BLANK ROME LLP 600 NEW HAMPSHIRE AVE NW WASHINGTON, DC 20037 UNITED STATES trademarks@blankrome.com
Submission	Motion to Consolidate
Filer's Name	Susan B. Flohr
Filer's e-mail	trademarks@blankrome.com
Signature	/sbf/
Date	12/12/2013
Attachments	motion to consolidate121213-052749PM.pdf(85447 bytes)

Pursuant to Trademark Trial and Appeal Board Manual of Procedure Section 511, T.B.M.P. § 511, and Federal Rule of Civil Procedure 42(a), Fed. R. Civ. P. 42(a) (2007), Petitioner, Bugatti International S.A., seeks to consolidate the above-referenced actions for purposes of discovery and all other proceedings related to the instant referenced co-pending actions.

The above co-pending cancellation proceedings involve common issues of law and fact, including without limitation, the fact that each of the marks covered by the registrations for which cancellation is being sought comprises the wording BUGATTI, and the parties are the same. Federal Rule of Civil Procedure 42(a) establishes that, “[w]hen actions involving a common question of law or fact are pending before the court . . . it may order all the actions consolidated.” Fed. R. Civ. P. 42(a). In the instant matters, consolidation of these proceedings will save time, effort and expenses without any prejudice or inconvenience to Petitioner, Registrant or the Trademark Trial and Appeal Board.

This Motion was consented to by Registrant’s counsel of record, Ralph Cathcart , by email on December 12, 2013. It is submitted that this motion is made for good cause and not for purposes of delay and the Board is therefore respectfully requested to grant same.

