

ESTTA Tracking number: **ESTTA699880**

Filing date: **10/02/2015**

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

Proceeding	92062263
Party	Plaintiff Jai Group, S.A.
Correspondence Address	ALBERT BORDAS ALBERT BORDAS PA 5975 SUNSET DR STE 607 MIAMI, FL 33143-5174 UNITED STATES tm@bordasiplaw.com
Submission	Motion to Consolidate
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Date	10/02/2015
Attachments	151002.Motion to Consolidate.pdf(65833 bytes)

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

In the Matter of:

Cancellation No. 92062263
Registration No.: 4358012
Filed: September 17, 2015
Trademark: TS & Design
Registrant: Genesis NYC Enterprises, Inc., DBA Tecno Group

Jai Group, S.A.

PETITIONER,

v.

Genesis NYC Enterprises, Inc.

DBA Tecno Group

RESPONDENT

MOTION TO CONSOLIDATE CANCELLATIONS

PLEASE TAKE NOTICE, pursuant to Fed.R.Civ.P. 42(a) the Petitioner, Jai Group, S.A., requests that the present Cancellation be consolidated with Cancellation No. 92062245 for Registration No. 4756033 filed on August 21, 2015 for the Trademark: TST & Design, Registrant: JAI GROUP SA, Registered on: June 16, 2015.

Fed.R.Civ.P. 42(a) When actions involving a common question of law or fact are pending before the court, it may order a joint hearing or trial of any or all the matters in issue in the actions; it may order all the actions consolidated; and it may make such orders concerning proceedings therein as may tend to avoid unnecessary costs or delay.

As grounds therefore, Petitioner states that the requested consolidation will serve the

Court's interests in achieving the most efficient use of its resources, as well as maintaining consistency in its decisions. These interests will be served because both Cancellations involve essentially the same parties or the same, similar, or related issues.

The undersigned attorney for Jai Group, SA sought consent to file the present Motion as stipulated, but today, October 2, 2015, the attorney for Genesis NYC Enterprises, Inc. refused, stating "We may reconsider the matter after all pleadings have been entered."

Genesis NYC Enterprises will not be prejudiced with the consolidation of the present Cancellations by this Court. Jai Group, SA does not file this Motion to delay either of the Cancellations and does so in the Court's interests in achieving the most efficient use of its resources, as well as maintaining consistency in its decisions.

Wherefore, Jai Group, SA prays that this Court consolidate Cancellation No. 92062263 and Cancellation No. 92062245.

Dated: October 2, 2015

Respectfully submitted,

/Albert Bordas/
Albert Bordas, Esq.

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CERTIFICATE OF ONLINE SUBMISSION

I certify that a true and correct copy of the foregoing was filed online with the Trademark Trial and Appeal Board using ESTTA, this 2nd day of October, 2015.

By: /Albert Bordas/
Albert Bordas, Esq.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served per agreement electronically via e-mail this 2nd day of October 2015 to the following person(s):

Counsel for Respondent:

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