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

Proceeding	92062263
Party	Plaintiff Jai Group, S.A.
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**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

**REPLY TO RESPONDENT'S OPPOSITION TO
MOTION TO CONSOLIDATE CANCELLATIONS**

PETITIONER Jai Group, S.A. files this Reply to RESPONDENT Genesis NYC Enterprises, Inc. DBA Tecno Group's Opposition to Motion to Consolidate Cancellations and states the following:

The Board may, in its discretion, order cases consolidated prior to joinder of issue. The Board can, as it generally does, freely agree to join cases such as these in the interest of justice and judicial economy.

Saving time, effort, and expense, which may be gained from consolidation is the main goal why the Board allows cancellations and/or oppositions to consolidate. As opposed to

any prejudice or inconvenience that may be caused thereby to any of the parties.

The parties in both cases are the same, the issues are similar, and both cancellations involve common questions of law or fact. Furthermore, for economic reasons, both Jai Group, S.A. and Genesis NYC Enterprises, would benefit from a joint and consolidated cancellation proceeding by avoiding multiplication and duplication of work and time required for these matters.

The parties are not strangers to each other. Therefore, the Cancellations are no surprise to either party.

The goal of any judicial proceedings should and always be, to avoid unnecessary delays.

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

Dated: October 9, 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 9th 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 9th day of October 2015 to the following person(s):

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