

ESTTA Tracking number: **ESTTA727319**

Filing date: **02/16/2016**

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

Proceeding	92062918
Party	Plaintiff adidas AG, adidas International Marketing B.V., Reebok International Limited
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Date	02/16/2016
Attachments	RBX_Motion to Consolidate and Suspend.PDF(316074 bytes)

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

adidas AG, adidas International Marketing B.V.,
and Reebok International Limited.,

Opposers/Petitioners,

v.

TRB Acquisitions LLC.,

Applicant/Registrant.

Opposition No. 91225378

Cancellation No. 92062918

**JOINT MOTION TO CONSOLIDATE OPPOSITION NO. 91225378
AND CANCELLATION NO. 92062918 AND TO SUSPEND THE PROCEEDINGS**

Opposers/Petitioners adidas AG and adidas International Marketing B.V., (collectively “adidas”), as well as Reebok International Limited (“Reebok” and together with adidas, “Petitioners”) and Applicant/Registrant TRB Acquisitions LLC (“TRB”) jointly move the Board pursuant to TBMP §511 and Fed R. Civ. P. 42(a) to consolidate Opposition No. 91225378 and Cancellation No. 92062918 (together “Proceedings”) and pursuant to 37 C.F.R. §2.117(a) and TBMP §510.02(a) to suspend the Proceedings in light of a pending civil action styled *adidas America, Inc., adidas AG, adidas International Marketing B.V., Reebok International LTD., and Reebok International Limited v. TRB Acquisitions LLC.*, Civil Action No. 3:15-cv-02113-SI, currently pending in the United States District Court for the District of Oregon (the “Civil Action”). The parties agree that the Civil Action involves the same parties and identical marks, as well as common questions of law and fact. **Exhibit A** is a copy of the Complaint in the Civil Action. **Exhibit B** is a copy of the Answer in the Civil Action.

Consolidation of these Proceedings is appropriate because they involve the same Applicant/Registrant and identical marks, as well as common questions of law and fact. The answer and discovery deadlines for both Proceedings are similar, and in fact, no answer has been filed nor any discovery exchanged up to this point. Therefore, such consolidation will tend to avoid unnecessary duplication of effort for the Board and the parties and would not be prejudicial to the parties.

In addition, Petitioners and TRB, for good cause, jointly move the Board pursuant to 37 C.F.R. §2.117(a) and TBMP §510.02(a) to suspend the Proceedings in light of the Civil Action. The Civil Action may be dispositive of or at a minimum have a bearing on these Proceedings because it involves issues in common with those in these Proceedings. Accordingly, the parties respectfully request suspension of the Proceedings pending the outcome of the Civil Action.

[signatures on the following page]

Dated: February 16, 2016

Respectfully submitted,

KILPATRICK TOWNSEND & STOCKTON LLP

By:  _____

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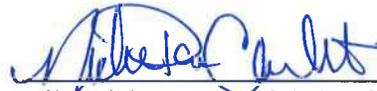
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Joint Motion to Consolidate Opposition No. 91225378 and Cancellation No. 92062918 and to Suspend the Proceedings has been served on TRB Acquisitions LLC by mailing said copies on February 16, 2016, via first class mail, postage prepaid, and addressed as follows:

Michelle Mancino Marsh
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A handwritten signature in blue ink, appearing to read "Michelle Mancino Marsh", written over a horizontal line.

Kilpatrick Townsend & Stockton, LLP