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

Proceeding	90112577
Applicant	The New York Times Company
Applied for mark	HUNGRY CITY
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Submission	Motion to consolidate
Attachments	Motion to Consolidate.pdf(432186 bytes)
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Date	12/28/2021

**BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD IN
THE U.S. PATENT AND TRADEMARK OFFICE**

Re: Application Serial No. 90112577
Mark: HUNGRY CITY
Appeal Instituted: October 6, 2021
Appeal Brief due: January 14, 2022

MOTION TO CONSOLIDATE

Applicant, The New York Times Company, through its undersigned counsel, moves to consolidate the pending appeals in Application Serial Nos. 90112577, 90112154, 90115155, 90106071, 90115491, and 90115337.

The refusal at issue in each of the referenced applications is the same, *i.e.*, a refusal to register the goods identified in Class 16 under Sections 1, 2 and 45 of the Lanham Act. The TBMP provides for consolidation in this situation. *See* TBMP §1214 (“When an applicant has filed an ex parte appeal to the Board in two or more copending applications, and the cases involve common issues of law or fact, the Board, upon request by the applicant or examining attorney or upon its own initiative, may order the consolidation of the appeals for purposes of briefing, oral hearing, and/or final decision”). In view therefore, Applicant submits that consolidation is appropriate and will be the most efficient way of addressing the appeals.

Respectfully submitted,

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