

Certificate of Mailing

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as First Class mail in an envelope addressed to: Commissioner for Trademarks, P.O. Box 1451, Alexandria, Virginia 22313-1451, on April 18, 2007.

Name of Person Signing Certificate: John E. Russell, Esq.

Signature: _____

Date of Signing: _____ 4/18/07

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

Federacion National de Cafeteros de)
Colombia, a/k/a National Federation of)
Coffee Growers of Colombia,)

Opposer,)

) Opposition Nos., 91173301,
) 91173312, 91175127, & 91175126
) 91173313

78717575

v.)

Ulises Valdez and Adelina Valdez,)

Applicant.)

Commissioner for Trademarks
P.O. Box 1451
Alexandria, VA 22313-1451

**APPLICANTS ULISES VALDEZ AND ADELINA VALDEZ'S AND OPPOSER
FEDERACION NATIONAL DE COLUMBIA'S STIPULATED MOTION FOR
CONSOLIDATION OF OPPOSITIONS**

The parties to the above actions, Ulises Valdez and Adelina Valdez, (hereinafter "Applicants"), and Federacion National de Cafeterios Colombia, a/k/a National Federation Coffee Growers of Colombia, (hereinafter "Opposer"), hereby seek to have the five "VALDEZ



FAMILY” Opposition proceedings consolidated into one action. At present, there are five different opposition proceedings pending before the Board, which concern the following Marks: (1) VALDEZ FAMILY CELLARS (No. 91175126); (2) VALDEZ FAMILY WINES (No. 91175127); (3) VALDEZ FAMILY VINEYARDS (No. 91173301); (4) VALDEZ FAMILY WINE CELLARS (No. 91173313); and (5) VALDEZ FAMILY WINERY (No. 91173312). Each of the underlying applications at issue in these Opposition proceedings involve the identical goods, namely “wine.”

As the parties in each of the five Opposition proceedings above are the same, and the proceedings involve substantially identical questions of law and fact, the parties have stipulated to request a consolidation of these five actions into one. This consolidation will be advantageous to both the parties and the Board, as it will avoid the duplication of effort, loss of time, and extra expense involved in the conducting of the proceedings individually. *See* Rule 42(a) of the Federal Rules of Civil Procedure; TBMP § 511. The most recent Answer with regard to the above actions was filed on February 28, 2007, and as a result, the issues have all been joined. As the Opposition regarding VALDEZ FAMILY VINEYARDS (No. 91173301) was the first Opposition to be filed with the TTAB, it is presumed this will serve as the “parent” file in this matter. It should also be noted that counsel for the Opposer, David J. Kera, Esq., consented to this above consolidation request via e-mail on April 2, 2007.

DATED this 18th day of April, 2007.

Respectfully submitted,

Ulises Valdez and Adelina Valdez

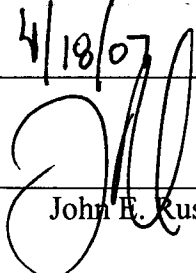
By: 

John E. Russell, Esq.
Attorney for Applicants
ALLMARK TRADEMARK
4041 Sugar Maple Drive, Suite A
Danville, CA 94506
Telephone: (925) 648-4839
Facsimile: (925) 648-4358

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **APPLICANTS AND OPPOSERS STIPULATED MOTION FOR CONSOLIDATION OF OPPOSITIONS** was mailed on April 18, 2007, first-class postage prepaid, to counsel for Opposer:

David J. Kera, Esq.
Oblon, Spivak, McClelland, Maier, & Neustadt, P.C.
1940 Duke Street
Alexandria, VA 22314

Date: 4/18/07


John E. Russell, Esq.