

ESTTA Tracking number: **ESTTA113114**

Filing date: **12/05/2006**

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

Proceeding	91173891
Party	Plaintiff Indianapolis Colts, Inc., NFL Properties LLC
Correspondence Address	Andrea J. Chiller Quinn Emanuel Urquhart Oliver & Hedges LLP 51 Madison Avenue New York, NY 10010 UNITED STATES andreachiller@quinnemanuel.com, claudiabogdanos@quinnemanuel.com
Submission	Motion to Consolidate
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Signature	/Andrea J. Chiller/
Date	12/05/2006
Attachments	colts consol.pdf (3 pages)(34379 bytes)

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

In the Matters of Application Serial Nos. 78/578,409 and 78/578,427



Mark:

INDIANAPOLIS COLTS, INC. and NFL
PROPERTIES LLC,

Opposers,

Opposition No: 91/173,891

-against-

Opposition No: 91/174,122

SKIDMORE COLLEGE,

Applicant.

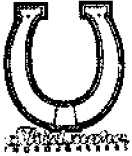
MOTION TO CONSOLIDATE

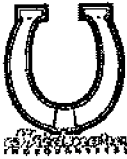
Pursuant to Federal Rule of Civil Procedure 42(a) and TBMP § 511, Opposers

Indianapolis Colts, Inc. and NFL Properties LLC (“Opposers”) hereby request that the

Trademark Trial and Appeal Board (the “Board”) consolidate the following opposition

proceedings:

Opposition No.	Mark Serial Number	Applicant	Opposers
91/173,891	78/578,409; 	Skidmore College	Indianapolis Colts, Inc. and NFL Properties LLC

91/578,427	78/578,427; 	Skidmore College	Indianapolis Colts, Inc. and NFL Properties LLC
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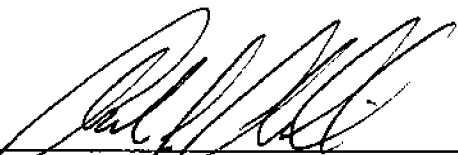
The foregoing proceedings involve common questions of law and fact, identical marks, and identical parties. Likewise, Applicant's answers to the Notices of Opposition will raise similar issues of fact and defenses.

Consolidation of these proceedings will save the Board and the parties significant time, effort, and expense. For example, Applicant could file and serve a single Answer, the parties could issue and answer one set of discovery responses, produce one set of documents, and take half as many depositions. This motion is sought for the purposes of judicial economy, and not for reasons of delay.

Dated: New York, New York
December 4, 2006

Respectfully submitted,

Quinn Emanuel Urquhart Oliver & Hedges,
LLP

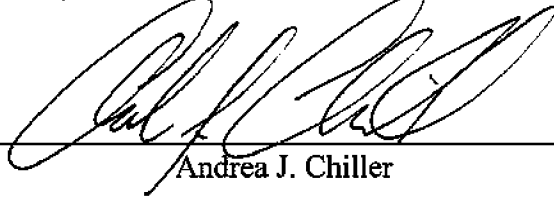
By: 

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ATTORNEYS FOR OPPOSERS
INDIANAPOLIS COLTS, INC.
and NFL PROPERTIES LLC

CERTIFICATE OF SERVICE

I certify that on December 4, 2006, I caused to be served a copy of OPPOSERS' MOTION TO CONSOLIDATE by FedEx to Joseph F. Nicholson, counsel for Opposers, at Kenyon & Kenyon, 1 Broadway, New York, New York 10004.



Andrea J. Chiller