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

Proceeding.	91193036
Applicant	Defendant THOIP
Other Party	Plaintiff Disney Consumer Products, Inc., Disney Destinations LLC

Motion for Suspension in View of Civil Proceeding With Consent

The parties are engaged in a civil action which may have a bearing on this proceeding. Accordingly, THOIP hereby requests suspension of this proceeding pending a final determination of the civil action. Trademark Rule 2.117.

THOIP has secured the express consent of all other parties to this proceeding for the suspension and resetting of dates requested herein.

THOIP has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Respectfully submitted,
/MSchwimmer/
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01/22/2010

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

DISNEY CONSUMER PRODUCTS, INC. and DISNEY DESTINATIONS LLC,	:	
Opposers,	:	
- against -	:	Opposition Nos: 91192955, 91193030, 91193031, 91193032, 91193033, 91193034, 91193036, 91193038, 91193040, 91193041, 91193042, 91193043
THOIP (A Chorion Limited Company),	:	
Applicant.	:	

CONSENTED AND STIPULATED MOTION TO CONSOLIDATE AND SUSPEND

Applicant, THOIP (A Chorion Limited Company), by its undersigned counsel hereby moves, pursuant to TBMP §511 and with the consent of the Opposers in each of the above-referenced matters, namely, DISNEY CONSUMER PRODUCTS, INC. and DISNEY DESTINATIONS LLC, to consolidate Opposition Nos.: 91192955, 91193030, 91193031, 91193032, 91193033, 91193034, 91193036, 91193038, 91193040, 91193041, 91193042, 91193043 ("the Oppositions"). In support thereof, THOIP states as follows:

1. There were fifteen (15) previous oppositions involving the same parties for the same overlapping issues which were consolidated by the TTAB pursuant to a consented motion by the parties herein under Opposition No.: 91192402 (the "Consolidated Opposition").

2. The twelve (12) oppositions referenced herein involve the same parties, DISNEY CONSUMER PRODUCTS, INC., DISNEY DESTINATIONS LLC and THOIP, as the Consolidated Opposition.

3. The grounds for opposition and the underlying facts subject to discovery in all Oppositions are similar and substantially overlap each other and those in the Consolidated Opposition. For that reason, the parties believe that consolidation thereof will save the parties and the Board's time, effort and expense that would otherwise be duplicated across multiple proceedings during discovery.

4. Consolidation will not result in prejudice to either party, as shown by the parties' agreement to consolidate with the Consolidated Opposition.

5. The parties respectfully request that the Oppositions be consolidated.

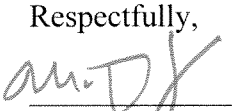
6. In addition, Applicant and Opposers are currently engaged in federal civil litigation in the Southern District of New York, Civil No.: 08-Civ-6823-SAS (the "Civil Action"). The Civil Action may have a bearing on the Oppositions and therefore THOIP moves with the consent of Opposers pursuant to CFR §2.117(a) to suspend the Oppositions until the termination of the Civil Action.

7. Suspension will not result in prejudice to either party as shown by the parties' agreement to suspend.

8. The parties respectfully request that the Oppositions be consolidated and suspended with the Consolidated Opposition until termination of the Civil Action.

Dated: January 22, 2010

Respectfully,



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CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing Consented and Stipulated Motion to Consolidate and Suspend upon Opposers by depositing one copy thereof in a sealed envelope in the United States mail, first-class, postage prepaid, on January 22, 2010, addressed as follows:

Melanie Bradley
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Martin Schwimmer