

ESTTA Tracking number: **ESTTA458282**

Filing date: **02/23/2012**

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

Proceeding	91202100
Party	Defendant Isaac S. Daniel
Correspondence Address	ALBERTO INTERIAN III ISAAC DANIEL GROUP INC 3401 SW 160TH AVENUE, SUITE 430 MIRAMAR, FL 33027 UNITED STATES alberto.interian@isaacdanielgroup.com, Judith.parrish@isaacdanielgroup.com, legal@isaacdanielgroup.com
Submission	Motion to Consolidate
Filer's Name	Alberto Interian III, Esq.
Filer's e-mail	alberto.interian@isaacdanielgroup.com, Judith.parrish@isaacdanielgroup.com, legal@isaacdanielgroup.com
Signature	/alberto interian III/
Date	02/23/2012
Attachments	Motion_to_Consolidate.pdf (3 pages)(89834 bytes)

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

International Data Group, Inc., and
IDG Communications, Inc.

Joint Opposers,

v.

Isaac S. Daniel,

Applicant.

Opposition No.: 91/202,100 (PARENT)
Trademark: IDG (042)

Opposition No.: 91/202,101
Trademark: IDG ISAAC DANIEL
GROUP INC. & Design (035)

Opposition No.: 91/202,116
Trademark: IDG (035)

Opposition No.: 91/202,169
Trademark: IDG ISAAC DANIEL
GROUP INC. & Design (042)

CONSENTED MOTION TO CONSOLIDATE AND RESET TRIAL SCHEDULE

This Consented Motion to Consolidate and Reset Trial Schedule is being submitted pursuant to Federal Rule of Civil Procedure 42(a) and TBMP Section 511. Each proceeding has similar parties and involves substantially identical questions of fact and law. Additionally, consolidation would equally benefit the parties and avoid duplication of effort, loss of time, and the extra expense involved in conducting these proceedings separately. *See*, Federal Rule of Civil Procedure 42(a).

The parties hereby request that the all filings are made in the “parent” proceeding, the one that was first instituted with Opposition No. 91/202,100. Therefore, upon order of the Trademark Trial and Appeal Board, granting this Consented Motion to Consolidate and Reset Trial Schedule, presentation of all proceedings will be done on the same record and briefs, whereby, only a single copy of any paper or motion is filed in the parent case, bearing all opposition numbers in the caption. *See, Helene Curtis Industries Inc. v. Suave Shoe Corp.*, 13 USPQ2d 1618 (TTAB 1989).

The parties further requests that the Board set a common trial schedule for all proceedings as follows:

Expert Disclosure Due:	07/21/2012
Discovery Closes:	08/20/2012
Plaintiff's Pretrial Disclosures:	10/04/2012
Plaintiff's 30-day Trial Period Ends:	11/18/2012
Defendant's Pretrial Disclosures:	12/03/2012
Defendant's 30-day Trial Period Ends:	01/17/2013
Plaintiff's Rebuttal Disclosures:	02/01/2013
Plaintiff's 15-day Rebuttal Period Ends:	03/03/2013

Applicant and Joint Opposers agree with the relief being sought herein and assert that good cause has been shown.

WHEREFORE, the parties respectfully requests this Board consolidate the proceedings and reset trial schedule accordingly.

Dated: February 23, 2012.

Respectfully submitted,

Attorney for Joint Opposers: <u>/Mark B. Harriason/</u> Mark B. Harrison, Esq. Rebecca Liebowitz, Esq. Michael Hall, Esq. Jeremy Klass, Esq. VENABLE P.O. Box 34385 Washington, D.C. 20043-9998 Telephone: 202/344-4800 Facsimile: 202/344-8300 MBHarrison@Venable.com	Attorney for Applicant <u>/Alberto Interian III/</u> Alberto Interian III, Esq. <i>Attorney for Applicant</i> Registration No.: 62,712 Isaac Daniel Group, Inc. 3401 SW 160 th Ave., Suite 430 Miramar, FL 33027 Tel: (305) 371-5858 Fax: (954) 374-8728 alberto.interian@isaacdaneilgroup.com
--	--

CERTIFICATE OF ELECTRONIC FILING

I hereby certify that This CONSENTED MOTION TO CONSOLIDATE AND RESET TRIAL SCHEDULE is being filed electronically via ESTTA on February 23, 2012:

/Alberto Interian III/
Alberto Interian III, Esq.
Registration No.: 62,712