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

Proceeding	91222111
Party	Plaintiff Security Equipment Corporation
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Submission	Motion to Consolidate
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Date	08/18/2015
Attachments	MtntoConsolidateProceedings.pdf(80428 bytes)

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

SECURITY EQUIPMENT CORPORATION) Opposition No. 91222110) Mark POLICE MAGNUM
Opposer,) Serial No. 85/896,701
vs.) Opposition No. 91222111
PAUL HOWELL) Mark POLICE MAGNUM) Serial No. 85/907,083
Applicant.)

CONSENTED MOTION TO CONSOLIDATE PROCEEDINGS

Security Equipment Corporation ("Opposer") respectfully states as follows for its Motion to Consolidate Proceedings:

- 1. The opposition proceedings seek to oppose two marks of Applicant Paul Howell. In proceeding 91222110, the mark is POLICE MAGNUM in standard character lettering. In proceeding 91222111, the mark comprises the words POLICE MAGNUM in combination with a design element.
 - 2. The goods listed in the applications for both marks are identical.
 - 3. The parties in both proceedings are identical.
- 4. The grounds for opposition in both proceedings raise similar factual and legal issues.
- 5. Consolidation will save the Board and the parties time, effort and expense and is sought for purposes of judicial economy and not for delay.
- 6. Applicant, through its counsel, has consented to this motion to consolidate the proceedings.

WHEREFORE, Security Equipment Corporation respectfully requests that Opposition No. 91222110 and Opposition No. 91222111 be consolidated.

Respectfully submitted,

SPENCER FANE BRITT & BROWNE LLP

Bv

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Attorneys for Opposer Security Equipment Corporation

Alennt Roth

CERTIFICATE OF SERVICE

A copy of the foregoing was mailed, via first-class mail, postage prepaid, this day of August, 2015, to the following:

Carl J. Spagnuolo McHale & Slavin, P.A. 2588 PGA Blvd. Palm Beach Gardens, Florida 33410-2910

Attorney for Applicant