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

Proceeding	91232631
Party	Plaintiff Eczacibasi Holding Anonim Sirketi
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Submission	Motion to Consolidate
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Date	10/13/2017
Attachments	Stipulation to Consolidate - South Shore Slag - Eczacibasi.pdf(31048 bytes)

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

ECZACIBASI HOLDING ANONIM
SIRKETI.,

Opposer,

v.

SOUTH SHORE SLAG, LLC,

Applicant.

Opposition No. 91232631 (Parent)
Opposition No. 91232633
Opposition No. 91236235
Cancellation No. 92065355

Opposition No. 91234852

**STIPULATION TO CONSOLIDATE
CASES**

The parties Opposer Eczacibasi Holding Anonim Sirketi and Applicant South Shore Slag, LLC, by and through their respective counsel, hereby stipulate and agree as follows:

WHEREAS, Opposer filed the instant Opposition No. 91234852 on June 1, 2017;

WHEREAS, the parties are involved in the opposition and cancellation cases at Opposition No. 91232631 (Parent), Opposition No. 91232633, Opposition No. 91236235, and Cancellation No. 92065355, which cases were consolidated by order of the Board on April 12, 2017;

WHEREAS, counsel for the parties have conferred, and the parties agree that Opposition No. 91234852 should be consolidated with the previously consolidated proceedings because all

of the cases involve the same parties and common questions of law or fact, and also because consolidation would advance the interests of judicial economy;

WHEREAS, in each of the above-referenced cases, Registrant has filed and Answer, the parties have held their discovery conference, and the parties have exchanged initial disclosures;

WHEREAS, the parties agree that the following case schedule (currently in place for Opposition No. 91234852) shall be adopted for the fully consolidated proceedings:

- a. Expert Disclosures Due: 1/7/2018
- b. Discovery Closes: 2/6/2018
- c. Plaintiff's Pretrial Disclosures Due: 3/23/2018
- d. Plaintiff's 30-day Trial Period Ends: 5/7/2018
- e. Defendant's Pretrial Disclosures Due: 5/22/2018
- f. Defendant's 30-day Trial Period Ends: 7/6/2018
- g. Plaintiff's Rebuttal Disclosures Due: 7/21/2018
- h. Plaintiff's 15-day Rebuttal Period Ends: 8/20/2018
- i. Plaintiff's Opening Brief Due: 10/19/2018
- j. Defendant's Brief Due: 11/18/2018
- k. Plaintiff's Reply Brief Due: 12/3/2018

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the approval of the Board, that:

Opposition No. 91234852, Opposition No. 91232631, Opposition No. 91232633, Opposition No. 91236235, and Cancellation No. 92065355 are hereby consolidated and may be presented on the same record and briefs. The Board file will be maintained in Opposition No. 91232631 as the “parent” case. The above-stated case schedule is hereby adopted for the consolidated proceedings. The parties should no longer file separate papers in connection with each proceeding. Only a single copy of each paper should be filed by the parties and each paper should bear the case captions as set forth below.

Opposition No. 91232631 (Parent)
Opposition No. 91232633
Opposition No. 91236235
Cancellation No. 92065355
Opposition No. 91234852

Dated: October 6, 2017

By: /s/ David G. Oberdick
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Attorneys for Opposer

CERTIFICATE OF SERVICE

I am over the age of 18 and am not a party to this action. I am employed in the County of Santa Clara, California, and my business address is 12 South First Street, 12th Floor, San Jose, California 95113.

I hereby certify that on October 13, 2017, I served the foregoing **STIPULATION TO CONSOLIDATE CASES** via email by sending the document to the person(s) at the email address(es) listed below.

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Dated: October 13, 2017

By: /Kevin Viau/
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