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Filing date: **07/29/2019**

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

Proceeding	91243960
Party	Defendant Baidu Online Network Technology (Beijing Co. Ltd.
Correspondence Address	KEITH W MEDANSKY DLA PIPER LLP US 444 WEST LAKE STREET, SUITE 900 CHICAGO, IL 60606-0089 UNITED STATES ch.tm@dlapiper.com 312-468-4000
Submission	Motion to Consolidate
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Date	07/29/2019
Attachments	NOA 91243960.pdf(84007 bytes) Extension of Time 072919.pdf(112635 bytes) Motion to Consolidate 072919.pdf(114708 bytes)

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

ARROWARE INDUSTRIES, INC.,

Opposer,

v.

BAIDU ONLINE NETWORK
TECHNOLOGY (BEIJING) CO., LTD.,

Applicant.

Opposition No.: 91243960

Application Ser. No.: 87/515,130

NOTICE OF APPEARANCE

Please substitute and recognize the undersigned counsel as counsel for Applicant in this proceeding.

Respectfully submitted,

Dated: July 29, 2019

New York, NY

By: //Ben Natter//

Ben Natter

Haug Partners, LLP

745 Fifth Avenue

New York, NY 10151

Attorneys for Applicant

BAIDU ONLINE NETWORK

TECHNOLOGY (BEIJING) CO., LTD.

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing NOTICE OF APPEARANCE has been served on Opposer's counsel of record, Timur Slonim, Mintz Levin Cohn Ferris Glovsky and Popeo PC, 666 Third Avenue, New York, NY 10017 by forwarding said copy on this date via email to TESlonim@mintz.com.

Dated: July 29, 2019

//Ben Natter//

Ben Natter

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
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ARROWARE INDUSTRIES, INC.,

Opposer,

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BAIDU ONLINE NETWORK
TECHNOLOGY (BEIJING) CO., LTD.,

Applicant.

Opposition Nos. 91244377,

91244378, 91244379, 91243953,

91243958, 91243960, 91243747,

91243746, 91243592, 91244939,

91244940, 91244942

MOTION FOR EXTENSION OF TIME TO ANSWER

Applicant, BAIDU ONLINE NETWORK TECHNOLOGY (BEIJING) CO., LTD.

("Applicant") by and through its counsel, requests that the Board extend the time to answer or reply to the above-referenced Notices of Opposition by thirty (30) days.

Additional time is necessary to investigate the validity of the pleaded mark and for counsel, who has taken over the case today, to prepare a response. The request is necessary for the reasons set forth above and is not being submitted for the purpose of delay.

This motion is being filed electronically.

Respectfully submitted,

Dated: July 29, 2019
New York, NY

By: //Ben Natter//

Ben Natter
Haug Partners, LLP
745 Fifth Avenue
New York, NY 10151
Attorneys for Applicant
BAIDU ONLINE NETWORK
TECHNOLOGY (BEIJING) CO., LTD.

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing MOTION FOR EXTENSION OF TIME has been served on Opposer's counsel of record, Timur Slonim, Mintz Levin Cohn Ferris Glovsky and Popeo PC, 666 Third Avenue, New York, NY 10017 by forwarding said copy on this date via email to TESlonim@mintz.com.

Dated: July 29, 2019

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
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91244940, 91244942

MOTION TO CONSOLIDATE OPPOSITION PROCEEDINGS

Applicant, BAIDU ONLINE NETWORK TECHNOLOGY (BEIJING) CO., LTD.

("Applicant") by and through its counsel, hereby moves to consolidate the above-referenced Opposition proceedings pursuant to Fed. R. Civ. P. 42(a).

The Opposition proceedings ("Proceedings") involve similar marks containing the term APOLLO.

The parties are identical in all Proceedings.

The Proceedings involve common questions of law and fact. Discovery in all Proceedings is likely to overlap. Further, consolidation of the Proceedings would avoid duplication and save the parties and the Trademark Trial and Appeal Board ("TTAB") time, effort, and expense.

The issues presented overlap one another and it is appropriate to order the Proceedings consolidated.

This motion is being filed electronically.

Respectfully submitted,

Dated: July 29, 2019
New York, NY

By: //Ben Natter//

Ben Natter
Haug Partners, LLP
745 Fifth Avenue
New York, NY 10151
Attorneys for Applicant
BAIDU ONLINE NETWORK
TECHNOLOGY (BEIJING) CO., LTD.

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing MOTION TO CONSOLIDATE OPPOSITION PROCEEDINGS has been served on Opposer's counsel of record, Timur Slonim, Mintz Levin Cohn Ferris Glovsky and Popeo PC, 666 Third Avenue, New York, NY 10017 by forwarding said copy on this date via email to TESlonim@mintz.com.

Dated: July 29, 2019

//Ben Natter//
Ben Natter