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

Proceeding	91245120
Party	Defendant Caldera + Lab, LLC
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Submission	Motion to Consolidate
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Date	01/16/2019
Attachments	Motion to Consolidate CALDERA LAB 01-16-19.pdf(92383 bytes )

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

In the Matter of Application Serial No. 87/842,002  
for the mark CALDERA LAB  
Published in the Official Gazette on: September 4, 2018

S. C. Johnson & Sons, Inc.,	)	
	)	
Opposer,	)	Opposition No. 91245120
	)	
v.	)	
	)	
Caldera + Lab, LLC,	)	
	)	
Applicant.	)	
	)	

**APPLICANT CALDERA + LAB, LLC'S MOTION TO CONSOLIDATE**

Pursuant to T.B.M.P. § 511 and Fed. R. Civ. P. 42(a), Caldera + Lab, LLC (“Applicant”) hereby moves to consolidate Opposition No. 91245109 and Opposition No. 91245120 based on the following:

1. On December 3, 2018, Opposer S. C. Johnson & Son, Inc. initiated Opposition No. 91245109, against Trademark Application Serial No: 87/841,997 for CALDERA.
2. Applicant Caldera + Lab, LLC is the assignee of Trademark Application Serial No: 87/841,997.
3. On December 4, 2018, Opposer S. C. Johnson & Son, Inc. initiated Opposition No. 91245120 against Applicant Caldera + Lab, LLC’s Trademark Application Serial No. 87/842,002.
4. The opposed trademark in both opposition proceedings comprise the element CALDERA.

5. The Opposer and Applicant parties in both opposition proceedings are the same.
6. Opposer S. C. Johnson & Son, Inc. has pleaded the same registrations in both opposition proceedings.
7. Opposer S. C. Johnson & Son, Inc. has pleaded the same basis for opposition, Trademark Act Section 2(d), in both proceedings.
8. Opposer S. C. Johnson & Son, Inc.'s counsel has indicated to Caldera + Lab, LLC's counsel that it does not oppose consolidations of the proceedings.

WHEREFORE, Applicant Caldera + Lab, LLC requests that the Board grant this motion and consolidate Opposition No. 91245109 and Opposition No. 91245120.

Respectfully submitted,

Date: January 16, 2019

/Ben T. Lila/  
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Caldera + Lab, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on the below date a copy of the foregoing APPLICANT CALDERA + LAB, LLC'S MOTION TO CONSOLIDATE has been served via email on the following:

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Date: January 16, 2019

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Caldera + Lab, LLC