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

Proceeding	91249768
Party	Plaintiff DSM IP Assets B.V.
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Submission	Motion to Consolidate
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Signature	/Duane M. Byers/
Date	09/10/2019
Attachments	4662-3822 consented to motion consolidate oppositions filed 9 september 2019 - QUALI Quali Quali-C v QUALIA QUALIA FOCUS QUALIA MIND CAFFEINE FREE.pdf(121705 bytes )

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

_____	)	
DSM IP Assets B.V.	)	
Opposer	)	
	)	
v.	)	Opposition No. 91241675
	)	Application No. 87614280
Neurohacker Collective, LLC	)	QUALIA
Applicant	)	
_____	)	
DSM IP ASSETS B.V.	)	
Opposer	)	
	)	
v.	)	Opposition No. 91247771
	)	Application No. 88188466
	)	QUALIA FOCUS
Neurohacker Collective, LLC	)	
Applicant	)	
_____	)	
DSM IP Assets B.V.	)	
Opposer	)	
	)	
v.	)	Opposition No. 91249768
	)	Application No. 88188588
Neurohacker Collective, LLC	)	QUALIA MIND CAFFEINE FREE
Applicant	)	

**CONSENTED TO MOTION TO CONSOLIDATE**

Opposer hereby moves to consolidate the above-identified proceedings for judicial efficiency and to minimize expense for the parties.

Applicant has consented to this Motion to Consolidate.

Two of the proceedings (91241675 and 91247771) have already been consolidated, and the Board advised the parties in those consolidated proceedings to “promptly inform the Board of any other Board proceedings or related cases within the meaning of Fed. R. Civ. P. 42, so that

the Board can consider whether further consolidation is appropriate.” See Order of June 6, 2019, page 2, fn 1. In this regard, Opposer identified those consolidated oppositions in its Notice of Opposition filed on July 25, 2019 against Application No. 88188588.

The three proceedings concern the Applicant’s QUALIA, QUALIA FOCUS, and QUALIA MIND CAFFEINE FREE trademark applications identified above, and each of the proceedings concern Opposer’s Quali, QUALI, and QUALI-C trademark registration nos. 3976526, 3918909, and 4060244.

Date: September 10, 2019

Respectfully submitted,

**NIXON & VANDERHYE P.C.**

By: /Duane M. Byers/

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DSM IP Assets B.V.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing is being served on this date by email on the attorney for applicant at:

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