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

Proceeding	91265458
Party	Plaintiff Information Builders, Inc.
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Submission	Motion to Consolidate
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Attachments	IBI D170US Motion to Consolidate.pdf(235795 bytes)

cancellation and simultaneously request consolidation. It is recommended to file the request for consolidation in a separate submission in ESTTA.

The cases involve common questions of law and fact. The parties in the proceedings are the same. The marks are very similar. All three of the Defendant's marks contain the dominant term FOCUS which is alleged to be likely to cause confusion with Plaintiff's mark FOCUS. The goods and services in the Defendant's two applications and single registration are similar in that they concern data reporting software for use in the field of restaurant management.

For the foregoing reasons, Plaintiff respectfully requests that the Board favorably consider this motion for consolidation.

Respectfully submitted,

INFORMATION BUILDERS, INC.

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CERTIFICATE OF SERVICE

It is hereby certified that a copy of the foregoing Motion to Consolidate has been forwarded October 16, 2020 by email to:

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