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

Proceeding no.	91268942
Party	Defendant Starface World, Inc.
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
TRADEMARK TRIAL AND APPEAL BOARD**

SHANGHAI REYOUNGEL MEDICAL
TECHNOLOGY COMPANY LIMITED,
Opposer,

v.

STARFACE WORLD, INC.,
Applicant.

Opposition No. 91268942
Application Ser. No. 88510158
Mark: STARFACE

Opposition No. 91273923
Application Ser. No. 90326799
Mark: STARFACE

REPLY TO OPPOSITION TO MOTION TO CONSOLIDATE PROCEEDINGS

Applicant Starface World, Inc. (“Starface”) submits this reply to the opposition by Shanghai Reyoungel Medical Technology Company Limited (“Opposer”) of Starface’s motion to consolidate Opposition Nos. 91268942 and 91273923.

Consolidation of Opposition Nos. 91268942 and 91273923 is appropriate. Each proceeding involves identical parties, Starface’s same STARFACE mark for related goods, Opposer’s same allegations under Trademark Act Section 2(d) and fraud on the United States Patent and Trademark Office, and Starface’s same denials and affirmative defenses. Opposer even admits that the facts of the case may be similar.

Opposer fails to articulate why the grounds in each opposition are so unique that piecemeal and/or duplicative discovery and prosecution will be avoided by continuing two proceedings or why the cases will not overlap in records and the briefs. Similarly, Opposer fails to articulate why judicial economy would not be served by consolidation. Given that the opposed marks are identical and involve the same allegations, much of the discovery and evidence at trial will be the same in both cases.

The procedural posture of the cases are very similar: the discovery period in Opposition No. 91268942 only opened on December 20, 2021, and the discovery period in 91273923 is not yet open until later this month, March 2022. At this early stage in each proceeding, consolidation is warranted to avoid requiring the parties to partake in two separate discovery proceedings over Starface's same STARFACE mark, Opposer's same allegations, and Starface's same denials and affirmative defenses.

Trying Opposition Nos. 91268942 and 91273923 together is appropriate, and the single consolidated proceeding will serve the interests of procedural economy, promote efficiency, and conserve the time, effort, and resources of the Board.

Accordingly, Starface requests that the Board consolidate Opposition Nos. 91268942 and 91273923, issue a new scheduling order to reflect the consolidation, and suspend each proceeding pending a decision on this motion.

Respectfully submitted,

March 10, 2022

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and complete copy of the foregoing was served on
Opposer's counsel of record at yangao@ipspeedy.com:

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March 10, 2022

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