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

Proceeding	91269725
Party	Defendant Sports Logos International, LLC,
Correspondence Address	BEN NATTER HAUG PARTNERS LLP 745 FIFTH AVE NEW YORK, NY 10151 UNITED STATES Primary Email: bnatter@haugpartners.com Secondary Email(s): docket@haugpartners.com, kkoemm@haugpartners.com, bdahl@haugpartners.com 212-588-0800
Submission	Motion to Consolidate
Filer's Name	Michael Barer
Filer's email	mbarer@haugpartners.com
Signature	/Michael Barer/
Date	06/28/2021
Attachments	Motion to Consolidate Opposition No. 91269725.pdf(125811 bytes)

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

Gravy Keg, LLC,	:	
	:	
Opposer,	:	
	:	Opposition No. 91269725
v.	:	
	:	
Sports Logos International, LLC,	:	
	:	
Applicant.	:	
	:	

MOTION TO CONSOLIDATE

Applicant, Sports Logos International, LLC (“Applicant”), by and through its undersigned counsel, hereby requests that the Board consolidate Opposition Nos. 91269724, 91269728, 91269730, 91269722, 91269723, 91269725, 91269726, 91269727, 91269731, 91269867, 91269866, 91269865, 91269863, 91269862, 91269876, 91269875, 91269874, 91269873, 91269872, 91269871, 91269869, 91269868, 91269883, 91269882, 91269881, 91269880, 91269879, 91269878, 91269877, and 91269884 (collectively, the “Opposition Proceedings”). “When cases involving common questions of law or fact are pending before the Board, the Board may order the consolidation of the cases.” TBMP § 511; *see* FED. R. CIV. P. 42(a). The Board weighs “the savings in time, effort, and expense, which may be gained from consolidation, against any prejudice or inconvenience that may be caused thereby,” in determining whether to consolidate. TBMP § 511. The Board will also consider the identity of the parties. *Id.*

Applicant submits that the Opposition Proceedings involve identical parties and common questions of law and fact. In particular, the Opposition Proceedings involve oppositions to the registration of Applicant’s marks by Gravy Keg, LLC (“Opposer”) on the basis of priority and

likelihood of confusion. Applicant alleges in the Opposition Proceedings that Opposer has not used the Subject Marks in commerce. Accordingly, the Opposition Proceedings involve common questions of law and fact. Moreover, the savings in time, effort, and expense which will be gained by consolidating 30 separate oppositions involving common questions of law and fact outweigh any prejudice or inconvenience that may be caused thereby. Accordingly, Applicant respectfully requests that the Board consolidate the Opposition Proceedings.

Dated: New York, NY
June 28, 2021

Respectfully Submitted,

HAUG PARTNERS LLP

By: /Ben Natter/

Ben Natter, Esq.
745 Fifth Avenue
New York, New York 10151
Tel: (212) 588-0800
Email: bnatter@haugpartners.com
docket@haugpartners.com

Attorneys for Applicant

CERTIFICATE OF SERVICE

On this 28th day of June, 2021, a true and correct copy of the foregoing document was served by e-mailing a copy to Opposer's counsel: John L. Gueltzow, at the addresses of: trademark@beckman-weil.com and jgueltzow@beckman-weil.com, as required by the Trademark Trial and Appeal Board.

/s/ Michael Barer

Michael Barer