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

Proceeding no.	91288787
Party	Defendant Convene, Inc.
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Submission	Motion to Consolidate
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**THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

<b>SENTRY CENTERS HOLDINGS, LLC,</b>	)	
Opposer,	)	
	)	Opposition No. 91288787
v.	)	
	)	
<b>CONVENE, INC. DBA AZEUS CONVENE</b>	)	
Applicant.	)	

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**CONSENT MOTION TO CONSOLIDATE INTER PARTES PROCEEDINGS**

Applicant Convene, Inc. dba Azeus Convene (“Applicant”), requests that the Board consolidate Opposition No. 91288787 with the Consolidated Parent Case 91277954 (the “Parent Case”), so that the proceedings are presented on the same record and briefs. Applicant provides the following factual background and legal basis in support this Motion.

1. Sentry Centers Holdings, LLC (“Opposer”) instituted the above-captioned Opposition No. 91288787 against International Classes 09, 38, 41 and 42 of Application Serial No. 90/552039, for CONVENE (“Applicant’s Mark”).2. Applicant and Opposer are the same common parties in several TTAB proceedings, which have been consolidated under the Parent Case. In the Parent Case, Applicant asserts claims related to Opposer’s trademark applications seeking registration of the marks CONVENE, CONVENE STUDIO, and CONVENE STREAM (“Opposer’s Applications”) in Classes 09 and 42. 3. Pursuant to 37 C.F.R. § 2.116(a), the procedure and practice of *inter partes* trademark proceedings shall be governed by the Federal Rules of Civil Procedure wherever applicable and appropriate and except as otherwise provided. Rule 42(a) of the Federal Rules of Civil Procedure provides that when actions involving a common question of law or fact are pending before a court, that court may order the actions consolidated to avoid unnecessary costs and delay. Consolidation is discretionary with the Board, and may be ordered upon motion granted by the Board, or upon stipulation of the parties approved by the Board, or upon the Board’s

own initiative. *See, e.g., Hilson Research Inc. v. Soc’y for Human Res. Mgmt.*, 27 USPQ2d 1423 (TTAB 1993).

4. Consolidation of the Opposition proceedings 91288787 and 91277954 is practical, as it would promote judicial economy and avoid unnecessary costs and delay because both proceedings involve identical parties, identical and/or substantially similar and related grounds for opposition, related opposed applications, and significantly overlapping questions of fact and law. Moreover, consolidation of these Opposition Proceedings would not impose any prejudice on either party.

5. Opposer’s counsel consented to the consolidation of this opposition with the Parent Case by email on March 18, 2024.

Thus, Applicant requests that the Board consolidate the above-captioned Opposition Nos. 91288787 and 91277954, with Opposition Proceeding No. 91277954 named as the operative, parent proceeding.

Respectfully submitted,

CONVENE, INC. D/B/A AZEUS CONVENE

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Dated: March 20, 2024

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served via electronic mail,  
e-mail, on March 20, 2024, to:

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s/ Cheryl L. Burbach