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

Proceeding	92042674
Party	Plaintiff James A. Frost
Correspondence Address	Susan B. Flohr Blank Rome LLP 600 New Hampshire Ave., N.W., The Watergate Washington, DC 20037
Submission	Motion to Consolidate
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Signature	/SBF/
Date	03/25/2004
Attachments	wtmotion.pdf (3 pages)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

APPLICANT: James Hollis Glover

PETITIONER: James A. Frost

CANCELLATION NOS.: 92042689; 92042674; and 92042720

SERIAL NOS.: 75/631,659; 75/631,660; and 75/887,325

TRADEMARKS: HAND MADE WHITE TAIL CUTLERY and Design;
WHITE TAIL CUTLERY HAND MADE and Design; and
WHITE TAIL

FILING DATES: February 2, 1999; February 2, 1999; and
January 4, 2000

CLASS: 8

To: Commissioner for Patents and Trademarks
2900 Crystal Drive
Arlington, VA 22202-3514

Attn: Trademark Trial and Appeal Board

MOTION TO CONSOLIDATE CANCELLATION PROCEEDINGS

Pursuant to Trademark Trial and Appeal Board Manual of Procedure Section 511, T.B.M.P. § 511, and Federal Rule of Civil Procedure 42(a), Fed. R. Civ. P. 42(a) (2004), Applicant seeks to consolidate the above-referenced cancellation actions for purposes of discovery and all other proceedings related to the instant referenced co-pending actions.

The above co-pending cancellation proceedings involve common issues of law and fact, including without limitation, identical or closely related trademarks and identifications of goods. Federal Rule of Civil Procedure 42(a) establishes that, “[w]hen actions involving a common question of law or fact are pending before the court . . . it may order all the actions consolidated.” Fed. R. Civ. P. 42(a). In the instant matters, consolidation of these proceedings will save time,

effort and expenses without any prejudice or inconvenience to Applicant or the Examining Attorney.

Please deduct any necessary fees for this Motion to Consolidate from our Deposit Account, No. 02-2555.

Respectfully submitted,

Dated: March 25, 2004

By:

James A. Frost



Susan B. Flohr
David M. Perry
His Attorneys

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CERTIFICATE OF ELECTRONIC FILING

I hereby certify that this document is being deposited with the Commissioner for Patents and Trademarks, Attn: Trademark Trial and Appeal Board, via Electronic System for Trademark Trials and Appeals (ESTTA), on March 25, 2004.



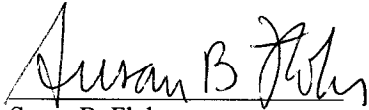
Tami DeVitis

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 2.119, I, Susan B. Flohr, do hereby certify that I have on this 25th day of March, 2004, mailed by first class United States Mail, postage prepaid, the foregoing MOTION TO CONSOLIDATE CANCELLATION PROCEEDINGS to the following:

Stephan Land McDavid, Esquire
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Susan B. Flohr