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Filing date: **06/30/2011**

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

Proceeding	92052940
Party	Plaintiff Edgecraft Corporation
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Submission	Motion to Consolidate
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Date	06/30/2011
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Edgecraft Corporation	:	
	:	
Petitioner,	:	
	:	
v.	:	Cancellation Nos.: 92052940
	:	92054092
Smith Abrasives, Inc.	:	92054104
	:	
Respondent.	:	

**JOINT REQUEST FOR CONSOLIDATION AND TO EXTEND DISCOVERY AND  
TESTIMONY DEADLINES**

Pursuant to Federal Rule of Civil Procedure 42(a) and TBMP § 511, the parties hereby respectfully request that the Board consolidate Cancellation Proceeding Nos. 92052940, 92054092 and 92054104. .

The undersigned has conferred with Respondent's counsel who has consented to this Joint Request for Consolidation.

The parties in all three proceedings are the same, and involve common issues of law and fact and the same mark, EDGEWARE. It is respectfully submitted that consolidated proceedings will allow the parties and the Board to avoid unnecessary duplication of effort and resources and will enable the issues to be addressed in an efficient manner without any inconvenience or prejudice to the parties or the Board. Because the parties are currently engaged in discovery and discovery has included the other EDGEWARE marks that are the subject of the two recently filed Petitions and the parties discussed consolidation on June 3, 2011, it is believed that no prejudice or inconvenience will occur as a result of consolidation.

Presently, Answers to the two recently filed Petitions for Cancellation are due by July 23 and July 24, 2011. It is respectfully requested that the Board permit Answers to be filed on the same date, i.e., July 24, 2011, and thereafter that the scheduling order for Cancellation No. 92052940 (the "Parent Cancellation") apply for all proceedings, and that any modifications to the schedule or other papers be filed in the Parent Cancellation.

Additionally, the parties are actively engaged in discovery and respectfully request the Board extend all outstanding deadlines in the Parent Cancellation by thirty days to allow more time to pursue ongoing discovery. As extended, the close of discovery would be September 2, 2011.

For the reasons stated above, it is respectfully requested that the proceedings be consolidated.

Respectfully submitted,  
CONNOLLY BOVE LODGE & HUTZ LLP

Date: June 30, 2011

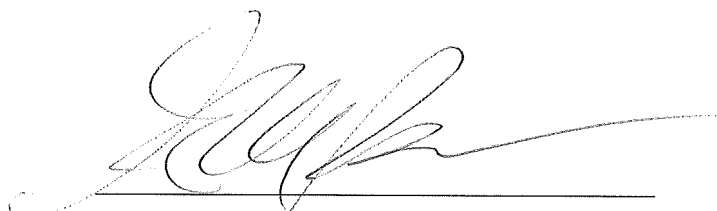
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Attorneys for Petitioner

**CERTIFICATE OF SERVICE**

I hereby certify that on this 30th day of June 2011, a true and correct copy of the foregoing document was caused to be served on the following parties as indicated:

**VIA FIRST CLASS MAIL (with courtesy  
copy via E-Mail)**

Kathryn B. Perkins, Esq.,  
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