

ESTTA Tracking number: **ESTTA737366**

Filing date: **04/01/2016**

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

Proceeding	92062578
Party	Plaintiff Gap (Apparel), LLC
Correspondence Address	JAMES D WEINBERGER FROSS ZELNICK LEHRMAN & ZISSU PC 866 UNITED NATIONS PLAZA, 6TH FLOOR NEW YORK, NY 10017 UNITED STATES jweinberger@fzlz.com, fkohn@fzlz.com
Submission	Motion to Consolidate
Filer's Name	James D. Weinberger
Filer's e-mail	jweinberger@fzlz.com, fkohn@fzlz.com
Signature	/s/ James D. Weinberger
Date	04/01/2016
Attachments	Motion to Consolidate (Versace 19.69) (F1913969x96B9E).pdf(40117 bytes )

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

GAP (APPAREL), LLC,

Petitioner, Opposer

-against-

VERSACE 19.69 ABBIGLIAMENTO  
SPORTIVO S.R.L.,

Registrant, Applicant

**Opposition Nos. 91222574 and  
91226782, Cancellation No. 92062578**

**MOTION ON CONSENT TO CONSOLIDATE  
PROCEEDINGS AND RESET DEADLINES**

Pursuant to Federal Rule of Civil Procedure 42(a) and Trademark Trial and Appeal Board Manual of Procedure Section 511, Opposer Gap (Apparel), LLC, with the consent of Applicant Versace 19.69 Abbigliamento Sportivo S.r.l., hereby requests that Opposition Nos. 91222574 and 91226782 and Cancellation No. 92062578 (the “Proceedings”) be consolidated. The Proceedings involve identical parties and marks that share a common element (V 19 69 ITALIA & Design), shown below,



as well as common and substantially overlapping facts, law, discovery and evidence. As such, consolidation of the proceedings would save considerable time, effort and expense.

Opposer further requests that the Board set reset the schedule, as follows:

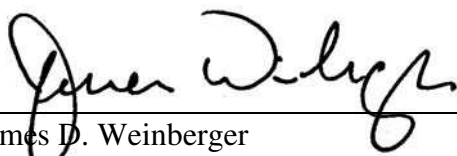
Time to Answer in Opp. No. 91226782      4/22/2016

Deadline for Discovery Conference	5/18/2016
Discovery Opens	5/18/2016
Initial Disclosures Due	5/18/2016
Expert Disclosures Due	9/11/2016
Discovery Closes	10/11/2016
Plaintiff's Pretrial Disclosures	11/25/2016
Plaintiff's 30-day Trial Period Ends	1/9/2017
Defendant's Pretrial Disclosures	1/24/2017
Defendant's 30-day Trial Period Ends	3/10/2017
Plaintiff's Rebuttal Disclosures	3/25/2017
Plaintiff's 15-day Rebuttal Period Ends	4/24/2017

Counsel for Applicant, Mike Keyes, Esq. of Dorsey & Whitney, consented to this motion via written correspondence on March 31, 2016.

Dated: New York, New York  
April 1, 2016

FROSS ZELNICK LEHRMAN & ZISSU, P.C.

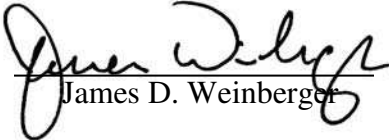
By:   
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*Attorneys for Opposer*

**CERTIFICATE OF SERVICE**

I hereby certify that, on April 1, 2016, the foregoing **MOTION ON CONSENT TO CONSOLIDATE PROCEEDINGS AND RESET DEADLINES** was sent by email, on agreement, to Applicant's counsel of record as follows:

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James D. Weinberger