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

Proceeding	92065930
Party	Plaintiff Root Four Imagination Inc.
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Submission	Motion to Consolidate
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Signature	/Christine Lebron-Dykeman/
Date	06/07/2017
Attachments	Motion to Consolidate.pdf(20413 bytes)

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

Root Four Imagination Inc. Petitioner, v. Esurance Insurance Services, Inc Registrant.	Cancellation. No.: 92065930 Registration No.: 5,083,816 Registered: November 15, 2016 Cancellation No.: 92065891 Registration No.: 4,512,663 Registered: April 8, 2014

MOTION TO CONSOLIDATE

Trademark Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1451
Alexandria, VA 22313-1451

COMES NOW Petitioner, Root Four Imagination, Inc., and hereby moves to consolidate Trademark Cancellations Nos. 92065930 and 92065891. Each of these cancellation proceedings involves the same parties and essentially the same legal issues. As a result, under TBMP 511 and Federal Rule of Civil Procedure 42(a), consolidating these cancellation proceedings before the Board will result in substantial savings in time, effort, and expense, both for the Board and the parties, with minimal prejudice or inconvenience.

The underlying factual issue in each of these cancellation proceedings is Registrant's exclusive right to use "SafeDriver" in commerce with the goods in the registration. Because this same factual issue is central to each of the cancellation proceedings, consolidation of these

proceedings will result in substantial time and expense savings, as it will be unnecessary to serve duplicate discovery and file duplicative motions in each individual cancellation proceeding. Further, neither party will be prejudiced by such consolidation, as these proceedings are still in their infancy. Rather, the parties will benefit from the reduction in duplicative effort. Accordingly, it will be beneficial to both the parties and the Board to consolidate these proceedings, and the Board should exercise its discretion to do so.

Accordingly, Petitioner hereby respectfully requests that its motion to consolidate be granted, and that Trademark Cancellation Nos. 92065930 and 92065891 be consolidated before the Board.

Respectfully submitted,

/s/ Christine Lebrón-Dykeman
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ATTORNEYS FOR PETITIONER
ROOT FOUR IMAGINATION INC.

CERTIFICATE OF FILING

I hereby declare that the foregoing document has been filed via the Electronic System for Trademark Trials and Appeals (ESTTA) this 7th day of June, 2017.

/s/ Christine Lebrón-Dykeman

CERTIFICATE OF SERVICE

I hereby declare that the foregoing instrument was served upon the following this 7th day of June, 2017, via email:

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