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

Proceeding	92067393
Party	Plaintiff Intrust Financial Corporation
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Submission	Motion to Consolidate
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE
TRADEMARK TRIAL AND APPEAL BOARD**

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)	
Intrust Financial Corporation,)	Opposition No. 91238004
)	Application Serial No. 85839152
)	Mark: ENTRUST
Opposer/Petitioner,)	Filed: February 1, 2013
)	
)	Cancellation No. 92067393
)	Registration No. 4,804,450
)	Mark: ENTRUST
v.)	Registered: September 1, 2015
)	
)	Cancellation No. 92067394
)	Registration No. 5,306,752
)	Mark: ENTRUST LEARNING CENTER
The Entrust Group, Inc.,)	Registered: October 10, 2017
)	
Applicant/Respondent.)	Cancellation No. 92067461
)	Registration No. 4,675,889
)	Mark: ENTRUST
)	Registered: January 20, 2015
)	
_____)	

**JOINT MOTION FOR CONSOLIDATION OF
OPPOSITION AND CANCELLATION PROCEEDINGS**

Pursuant to Federal Rule of Civil Procedure 42(a) and TBMP § 511, Opposer/Petitioner Intrust Financial Corporation (“Intrust”) and Applicant/Respondent The Entrust Group, Inc. (“Entrust”) move the Board to consolidate Opposition No. 91238004, Cancellation No. 92067393, Cancellation No. 92067394, and Cancellation No. 92067461.

Consolidation of these proceedings is appropriate because each involves common questions of law and fact. Here, the parties in each proceeding are identical, Entrust’s trademarks overlap, Intrust relies on the same common law and registered marks in each proceeding, and each proceeding includes an allegation that Entrust’s marks are likely to cause

confusion with Intrust’s marks. Resolution of each of these proceedings requires the Board to determine the extent of Entrust’s trademark rights, if any, in the terms “Entrust” and “Entrust Learning Center.”

Consolidation of these proceedings will not prejudice either party, it will streamline the litigation, and it will avoid duplicating the time, effort, and expense necessary to litigate multiple proceedings individually. *See, e.g., Wis. Cheese Group, LLC v. Comercializadora de Lacteos y Derivados, S.A. de C.V.*, 118 U.S.P.Q.2D (BNA) 1262, 1264 (Trademark Trial & App. Bd. March 30, 2016) (consolidating when “the proceedings involve common questions of law and fact,” including similar marks and similar causes of action).

Accordingly, Intrust and Entrust respectfully request that the Board consolidate Opposition No. 91238004, Cancellation No. 92067393, Cancellation No. 92067394, and Cancellation No. 92067461 for purposes of discovery and trial and to reset a common schedule for discovery, testimony, and trial dates for the consolidated proceedings.

Respectfully submitted,

Date: May 8, 2018

By: /Michael J. Norton/
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