

ESTTA Tracking number: **ESTTA955415**

Filing date: **02/20/2019**

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

Proceeding	92070299
Party	Plaintiff Fiesta Hotels & Resorts, S.L.
Correspondence Address	MICHAEL J BROWN MICHAEL J BROWN LAW OFFICE LLC 354 EISENHOWER PARKWAY, PLAZA 1, 2ND FLOOR, SUITE 2025 LIVINGSTON, NJ 07039 UNITED STATES michael@mjbrownlaw.com 973-577-6300
Submission	Other Motions/Papers
Filer's Name	Michael J. Brown
Filer's email	michael@mjbrownlaw.com
Signature	/MichaelJBrown/
Date	02/20/2019
Attachments	UngES-0508-9 Motion for Consolidation.pdf(19816 bytes )

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

-----X	:		
Fiesta Hotels & Resorts, S.L.	:		
Opposer,	:		
-against-	:		Opposition No. 91245576
	:		
George Alvarez	:		App. No. 87/874585
	:		
Applicant.	:		Mark: TRSCORALHOTEL.COM
-----X	:		
-----X	:		
Fiesta Hotels & Resorts, S.L.	:		
Petitioner,	:		
-against-	:		Cancellation No. 92070299
	:		
George Alvarez	:		Reg. No. 5524373
	:		
Registrant.	:		Mark: TRSYUCATANHOTEL.COM
-----X	:		

Submitted via ESTTA

**PLAINTIFF'S MOTION TO CONSOLIDATE**

Plaintiff is the opposer and petitioner in the above-identified opposition and cancellation proceedings, brought against the same defendant as applicant and registrant, respectively.

Plaintiff believes that the issues in both proceedings will be identical, and that the same or similar facts will be relevant in both proceedings. Plaintiff is asserting rights in the same marks in both proceedings for the same services.

The marks owned by defendant in both proceedings are similar in appearance and meaning.

The issues in both proceedings involve essentially common questions of law and fact, as well as identical parties.

The pleadings in both proceedings are nearly identical. Defendant has answered both proceedings with nearly identical admissions, denials, and affirmative defenses.

Plaintiff respectfully requests consolidation of the two proceedings, for purposes of efficiency and ease of prosecution. See, TBMP §511.

