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

Proceeding	91203201
Party	Defendant Balbina Taguines
Correspondence Address	BRUNO W TARABICHI OWENS TARABICHI LLP 111 N MARKET ST, SUITE 730 SAN JOSE, CA 95113 UNITED STATES btarabichi@owenstarabichi.com
Submission	Request to Withdraw as Attorney
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Date	10/04/2012
Attachments	Requst to Withdraw (v2).pdf (3 pages)(82741 bytes)

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

Automotive Rentals, Inc.,

Opposer,

v.

Balbina Taguines,

Applicant.

Opposition No. 91203201

Application Serial No. 85/366,857

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REQUEST TO WITHDRAW AS APPLICANT'S ATTORNEY

Pursuant to 37 C.F.R. §§ 2.19 and 10.40, Registrant's counsel, Owens Tarabichi LLP, requests permission to withdraw from representing Applicant in this opposition proceeding. Good causes exists for the request to withdraw because Applicant has both discharged Owens Tarabichi LLP as counsel and because Applicant has breached her engagement agreement with Owens Tarabichi LLP by failing to make herself available to confer with counsel. As such, Owens Tarabichi LLP is required to withdraw as counsel.

Moreover, Registrant's engagement agreement with Owens Tarabichi LLP permits Owens Tarabichi LLP to withdraw as counsel upon a failure to make himself available to meet and confer with counsel. Pursuant to 37 C.F.R. §§ 10.40(c)(1)(iv) and (vi), counsel may withdraw when its client "renders it unreasonably difficult for the practitioner to carry out the employment effectively."

Furthermore, Owens Tarabichi LLP has taken reasonable steps to avoid foreseeable prejudice to the rights of Applicant by providing Applicant with notice of its intent to file the instant withdrawal. Moreover, we understand that, should this request be granted, the Board will suspend proceedings to allow Applicant to find new counsel or file a paper stating that she

intends to represent herself. All papers relating to this proceeding to which Applicant is entitled have been delivered to him. Finally, there is no unearned fee to return and, in fact, Applicant currently owes fees, which remain unpaid.

As such, Owens Tarabichi LLP respectfully requests that the Board permit it to withdraw as Applicant's counsel. Applicant's contact information is Balbina Taguines, 4701 Mohamed Oaks Ct., Sacramento, CA 95841, arttaguines@yahoo.com.

Dated: October 4, 2012

Respectfully submitted,



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Attorneys for Applicant

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the following document:

REQUEST TO WITHDRAW AS APPLICANT'S ATTORNEY

has been served on by email on

Applicant at

Balbina Taguines, 4701 Mohamed Oaks Ct., Sacramento, CA 95841, arttaguines@yahoo.com

and Opposer at

Patricia Kane Williams
Law Office of Patricia Kane Williams LLC
418 Washington Ave.
Haddonfield, NJ 08033
pat@patriciakanewilliams.com

on October 4, 2012.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.

Date: October 4, 2012



Bruno W. Tarabichi