

ESTTA Tracking number: **ESTTA580627**

Filing date: **01/08/2014**

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

Proceeding	91212417
Party	Defendant TSM Artist Management, Inc.
Correspondence Address	KYLE ANNE CITRYNELL SEILLER WATERMAN LLC 462 S 4TH ST FL 22 LOUISVILLE, KY 40202-3466 UNITED STATES citrynell@derbycitylaw.com, laurabevarly@derbycitylaw.com
Submission	Request to Withdraw as Attorney
Filer's Name	Kyle Anne Citrynell
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Signature	/Kyle Anne Citrynell/
Date	01/08/2014
Attachments	_0108143931_001.pdf(67213 bytes)

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

Application Serial No. 85453355
Mark: COMEDY CARAVAN

_____)	
Coldstream Equity Group, Inc.)	
d/b/a Comedy Caravan)	
Petitioner,)	
)	
v.)	Opposition No. 91212417
)	Serial No. 85453355
TSM Artist Management, Inc.)	
Registrant.)	
_____)	

MOTION TO WITHDRAW

Comes Kyle Anne Citrynell and the firm of Seiller Waterman, LLC (“Movant”), counsel for Registrant, TSM Artist Management, Inc., and, pursuant to Trademark Rule 2.19(b) and 37 C.F.R. §1040(c)(1)(iv) and (vi), moves this Court to enter the attached Order granting their motion to withdraw as counsel for Registrant in this action. As grounds for this Motion, counsel states as follows:

1) There has been an irretrievable breakdown in the attorney-client relationship rendering it unreasonably difficult for Movant to carry out its employment effectively and such that counsel can no longer represent Registrant because Registrant has failed to communicate with Movant regarding this matter and, likewise, failed to return calls and written correspondence since at least July 8, 2013.

2) Movant notified Registrant of her withdrawal and intent to file the necessary documents to withdraw with the Trademark Trial and Appeal Board on September 17, 2013, which

notice included reminders of the deadline to respond and all further deadlines set in this action. Registrant has been allowed ample time to locate and employ another practitioner to represent it in this matter.

3) All papers and property that relate to this proceeding and to which the Registrant is entitled have previously been delivered to the Registrant.

4) No portion of any fees paid were paid in advance and there are no unearned fees to be refunded to Registrant by Movant.

5) Movant properly served this request upon Registrant and every other party to this proceeding as set forth below and as set forth in the prior motions filed on September 25, 2013 and October 29, 2013.

Respectfully submitted,

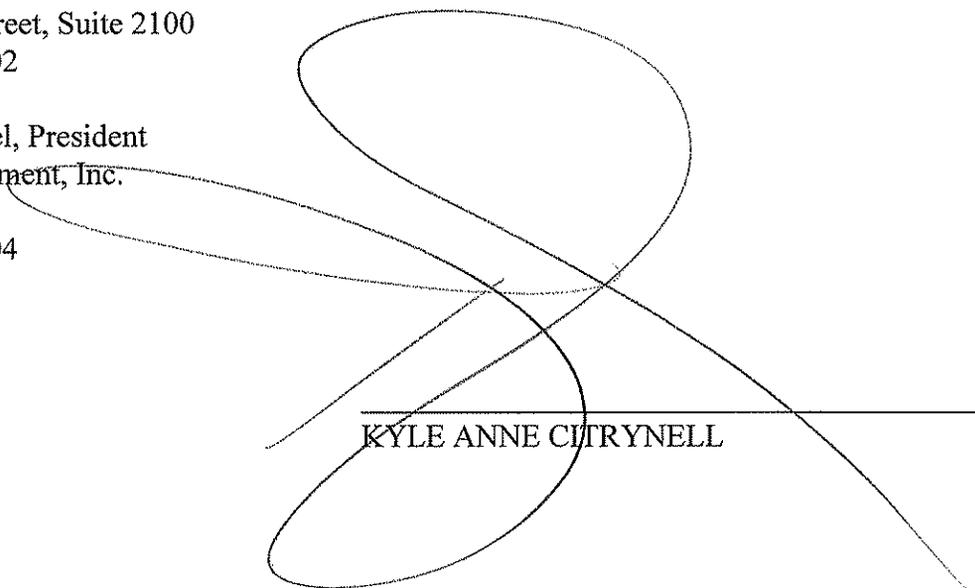
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Movant

CERTIFICATE

It is hereby certified that a true and complete copy of the foregoing has been served this 8 day of January, 2014, via First Class Mail, postage prepaid to the following:

William H. Mooney
Lynch, Cox, Gilman & Goodman PSC
500 W. Jefferson Street, Suite 2100
Louisville, KY 40202

Mr. Thomas S. Sobel, President
TSM Artist Management, Inc.
P.O. Box 4129
Louisville, KY 40204



KYLE ANNE CITRYNELL