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

Proceeding	91220573
Party	Defendant Linda Grandia
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Submission	Request to Withdraw as Attorney
Filer's Name	Anthony M. Keats
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Signature	/Anthony M. Keats/
Date	09/01/2015
Attachments	Withdrawal of Attorney - 91220573.pdf(15232 bytes )

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

**In re: Application Serial No. 86/235,052**  
**Mark: MISS MULTIVERSE**  
**Filed: March 28, 2014**  
**Published on October 14, 2014**

<b>MISS UNIVERSE L.P., LLLP,</b>	)	<b>Opposition No. 91220573</b>
	)	
<b>Opposer,</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>LINDA GRANDIA,</b>	)	
	)	
<b>Applicant.</b>	)	
	)	
	)	
	)	

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**WITHDRAWAL OF ATTORNEY**

Commissioner for Trademarks  
P.O. Box 1451  
Alexandria, Virginia 22313-1451

Dear Madam:

Pursuant to C.F.R. 37 § 11.116, for the reasons provided herein, the undersigned requests to withdraw as the Attorney of Record for the subject trademark application and Linda Grandia, the applicant (“Applicant”), in connection therewith.

I have contacted the Applicant numerous times in writing with respect to her failure to pay our firm’s retainer in order to engage our firm’s legal services. We have notified Applicant, Ms. Grandia, of our intention to withdraw as their counsel. Ms. Grandia indicated that for the present she will be representing herself in Pro Per.

Most recently, I sent by E-mail and Certified Mail, Return Receipt Requested, addressed to the Applicant, a letter notifying the Applicant that based on Applicant’s failure to pay retainer, our firm no longer continue to provide legal services on her behalf, and, thus, cannot continue to represent the Applicant in connection with its trademark matters. The letter provided the Applicant with a docket of the deadlines for any actions required in the opposition proceeding.

Based upon the Applicant's failure to pay the retainer, the Applicant has failed to fulfill its obligations as a client. I have diligently and over time undertaken reasonable steps to communicate with the Applicant regarding payment.

Furthermore, to represent Applicant in this Opposition proceeding without payment for services from the Applicant places an unreasonable financial and resources burden on my law firm, and is rendered impracticable and unreasonable, if not impossible.

Given the above, I respectfully request that the Commissioner grant this request to withdraw as the Attorney of Record for Applicant.

**Declaration**

The undersigned being hereby warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. Section 1001, and that such willful false statements and the like may jeopardize the validity of this document, declares that he is properly authorized to execute this document on behalf of the Applicant; and all statements made of his own knowledge are true and that all statements made on information and belief are believed to be true.

Respectfully submitted,

/Anthony M. Keats/

Anthony M. Keats  
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