

ESTTA Tracking number: **ESTTA786556**

Filing date: **12/02/2016**

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

Proceeding	91229667
Party	Defendant Michael R.Radcliff
Correspondence Address	RICHARD M. BLANK Richrd Mark Blnk Esquire 19 Ledgewood Cmns Millwood, NY 10546-1026 rmb@blanklegal.com
Submission	Motion for Relief from entry of Default Judgment
Filer's Name	Richard Blank
Filer's e-mail	rmb@blanklegal.com
Signature	/rb/
Date	12/02/2016
Attachments	IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD.pdf(515033 bytes)

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

CYBERNET ENTERTAINMENT, LLC

Opposer;

v.

MICHAEL R.RADCLIFF

Applicant.

In re App. No: 86700538 For the Mark: KINK STARTER App. Filed: July 22, 2015

Motion

Applicant hereby motions to the court that the default be withdrawn and that the court allow Applicant to appear and answer through counsel, Richard Mark Blank, Esquire by January 15, 2017 under special circumstances.

Counsel has had family medical issues that have caused counsel to need the requested delay. The road has been tough as we are now at hospices stage.

/Richard Blank/
Attorney for Applicant

The below copied email was also sent today.

Richard Mark Blank Esq.

245 Main Street, Suite 400

White Plains, NY 10546

917 830 4702

December 2, 2016

[Julien Swanson](#)
Austin Law Group
799 Castro Street
San Francisco, CA 94114
UNITED STATES
swanson@austinlawgroup.com
Phone: 4152824511

Dear Julien:

I request your consent to request the Judge withdraw the default and allow us 45 days additional time to answer by January 15, 2017 and move the other dates accordingly.

I have been mostly out for the last 90 days dealing with a very sick family member who is now in hospices.

Regards,

Richard Blank

ALEX AUSTIN (SBN JULIEN SWANSON (SBN 193957) AUSTIN LAW GROUP 799 Castro Street San Francisco CA 94114 austin@austinlawgroup.com swanson@austinlawgroup.com Attorneys for CYBERNET ENTERTAINMENT LLC IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD CYBERNET ENTERTAINMENT, LLC Opposer; v. MICHAEL R.RADCLIFF Applicant. Opposition No. _____ In re App. No: 86700538 For the Mark: KINK STARTER App. Filed: July 22, 2015 Applicant: MICHAEL R.RADCLIFF Published: July 26, 2016 Opposer: Cybernet Entertainment LLC 799 Castro Street San Francisco CA 94114 Applicant: Michael R.Radcliff P.O. Box 70 Elka Park, New York, 12427 Represented by: RICHARD M. BLANK Richard Mark Blank Esquire 19 Ledgewood Cmns Millwood, New York, 10546-1026