



## GENERAL OBJECTIONS

1. There are parties and issues in the federal case<sup>1</sup> that are not relevant to the opposition<sup>2</sup>. See registrant's exhibits A and B enclosed.

2. The parties have invested a considerable amount of time in these proceedings. Judicial economy dictates that the keystone issue present in the cancellation be decided by this specialized tribunal. The federal courts will benefit from the Board's decision allowing them to engage in other issues surrounding those proceedings.

Registrant has procrastinated with discovery. Petitioner in good faith has worked with Registrant and has already granted extensions of time to produce discovery.

For these reasons, Registrant's motion should be denied.

Respectfully submitted,  
**SANCHELIMA & ASSOCIATES, P.A.**

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Albert Bordas, Esq.

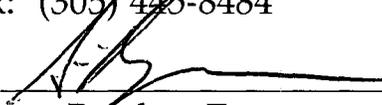
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<sup>1</sup> Case No: 02-CIV-20543, Southern District of Florida.

<sup>2</sup> Cancellation No: 92,040,135

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of **PETITIONER'S MEMORANDUM IN OPPOSITION TO OPPOSER'S MOTION TO SUSPEND PROCEEDINGS**, was mailed this 17th day of May, 2002 to Attorney for Registrant, Jorge Espinosa; Sandler, Travis & Rosenberg, P.A., at 5200 Blue Lagoon Drive, Suite 600, Miami, FL 33126.

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**CERTIFICATE OF EXPRESS MAILING**

**Express Mail Label No.:**

**Dated: May 17, 2002**

I hereby certify that this correspondence is being deposited with the United States Postal Service's "Express Mail Post Office to Addressee" service pursuant to 37 C.F.R. § 1.10 in an envelope addressed to the Honorable Assistant Commissioner of Trademarks, Box: TTAB/NO FEE, 2900 Crystal Drive, Arlington, Va. 22202-3513 on the above-mentioned date.

Date: 5/17/2002

By:   
Leslie Fuentes  
Paralegal