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Filing date: **05/11/2005**

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

Proceeding	92044040
Party	Plaintiff KARIN MODELS, S.A.R.L. ,
Correspondence Address	STEVEN E. EISENBERG. FELDMANGALE, P.A. 201 SOUTH BISCAYNE BOULEVARD MIAMI CENTER- SUITE 1920 MIAMI, FL 33131
Submission	Response to Registrant's Fourth Motion for Extension of Time
Filer's Name	Erica W. Stump
Filer's e-mail	estump@FeldmanGale.com
Signature	/es/
Date	05/11/2005
Attachments	Response to Fourth Extension.pdf (4 pages)

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

KARIN MODELS,
S.A.R.L.,
A Societa A Responsabilita
Limitata, Petitioner,

Cancellation Number: 92044040
Registration Numbers: 2,114,051 and 2,115,957
Mark: KARIN and KARIN MODELS (and design)
International-Class: 035

vs.

JEAN LUC BRUNEL,

An Individual,
Respondent.

**KARIN MODELS, S.A.R.L.'S RESPONSE TO
FOURTH MOTION TO EXTEND TIME**

Petitioner hereby responds to Respondent's Fourth Motion to Extend Time to respond to the Petition to Cancel as follows:

1. On January 3, 2005, the Board sent a notice setting, *inter alia*, the deadline for Respondent to respond to the Petition to Cancel for Monday, February 14, 2005.
2. On Friday, February 11, 2005, counsel for Respondent filed his First Motion to Extend Time, asking for a thirty-day (30) extension of time to respond to the Petition to Cancel.
3. On March 14, 2005, Respondent filed his Second Motion to Extend Time again asking for an additional thirty (30) additional days to respond to the Petition to Cancel. Petitioner did not consent to the Second Motion and filed a response asking that this be the final extension of time for Respondent to respond to the Petition to Cancel.
4. On April 14, 2005, Respondent filed his Third Motion to Extend Time asking for an additional two (2) weeks to respond to the Petition to Cancel, which Petitioner consented.

5. On April 28, 2005, Respondent filed his Fourth Motion to Extend Time asking for “a two (2) week extension of time, to and including May 30, 2005.”¹ In his Fourth Motion, Respondent misstated that undersigned counsel was “unable to obtain their client’s consent.” ~~The truth is that undersigned counsel explicitly conveyed to Respondent’s counsel that Petitioner~~ would not consent to yet another extension of time.

6. Petitioner’s counsel likewise misstates that its proposed settlement agreement is “expected to resolve this matter shortly.” Although the parties have engaged in various discussions in attempt to resolve this matter, the parties have not reached a settlement as of the ~~filing of this motion; and although discussions may continue, Petitioner does not know if these~~ discussions will result in a resolution of this matter. Therefore, Petitioner desires to move forward with the Petition to Cancel.

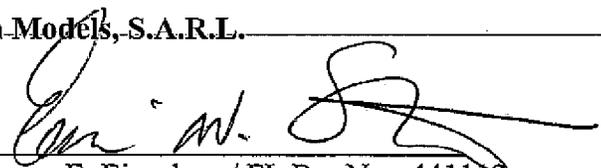
¹ Counsel is unsure whether Respondent is asking for two (2) weeks from April 28, 2005, which would be May 12, 2005 or whether Respondent is asking for an additional thirty (30) days from April 28, 2005, which would be May 30, 2005.

WHEREFORE, Petitioner respectfully requests that Respondent's Motion be denied and ordering Petition to respond no later than fifteen (15) days from the date of the Order.

Respectfully submitted,

~~Karin Models, S.A.R.L.~~

By:


Steven E. Eisenberg/ FL Bar No.: 441112
Erica W. Stump/ FL Bar No.: 427632
Attorneys for Petitioner

Dated: May 11, 2005

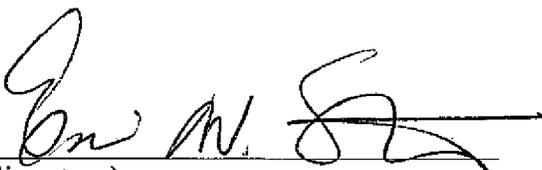
FeldmanGale, P.A.
201 South Biscayne Boulevard
Miami Center – Suite 1920
Miami, Florida 33131
Telephone (305) 358-5001
Facsimile (305) 358-3309

CERTIFICATE OF MAIL AND CERTIFICATE OF SERVICE

Date of Deposit: May 11, 2005

I HEREBY CERTIFY that this paper is being submitted electronically via the Electronic System for Trademark Trial and Appeals. ~~I further certify that a copy of this paper is being~~ deposited with the United States Postal Service via First Class U.S. Mail in an envelope addressed to H. John Rizvi, Esq., Gold & RIZVI, P.A., 600 N. Pine Island Road, Suite 450, Plantation, Florida 33324 and by facsimile to (954) 452-0765.

Erica W. Stump
(Printed name)


(Signature)