

TTAB

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

KARIN MODELS,)
S.A.R.L.)
)
Petitioner,)
)
v.)
)
Brunel, Jean Luc)
)
Registrant.)

Cancellation No.: **92044040**
Registration Nos.: 2114051 & 2115957
Marks: KARIN (words only)
KARIN MODELS (and design)
International Class: 035

MOTION TO EXTEND TIME

Applicant, Jean Luc Brunel, through his undersigned attorney, hereby moves for a one (1) month extension of time, to and including **March 14, 2005**, in which to answer or otherwise plead to the Petition to Cancel Registration Numbers 2,114,051 and 2,115,957 filed in the above-captioned matter. The undersigned attorney was retained on February 11, 2005, and contacted Steven E. Eisenberg and Erica W. Stump, counsel for Petitioner on February 11, 2005, in an effort to obtain their consent to this motion. Counsel for Petitioner, KARIN MODELS, S.A.R.L., were unable to confer with their client and consent to an extension within the limited time required to file this motion.

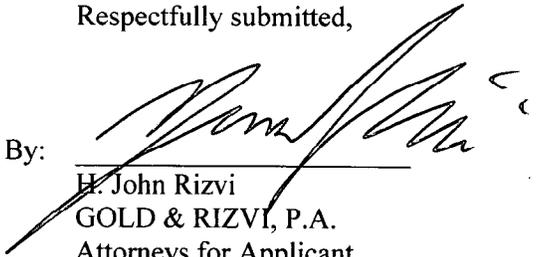
As grounds in support of granting this motion, Defendant respectfully submits that he was unable to locate and retain counsel, the undersigned, until February 11, 2005. Counsel, having just now been retained, requires time to review the Petition, gather sufficient facts, analyze the pertinent law, and prepare and file an appropriate response. Counsel is unable to accomplish these tasks in the time remaining for a response.



02-17-2005

WHEREFOR, it is respectfully requested that this motion be granted and that Registrant be allowed an enlarged period of time up to and including March 14, 2005, to respond to the Petition to Cancel Registration Numbers 2,114,051 and 2,115,957 filed in the above-captioned matter.

Respectfully submitted,

By: 

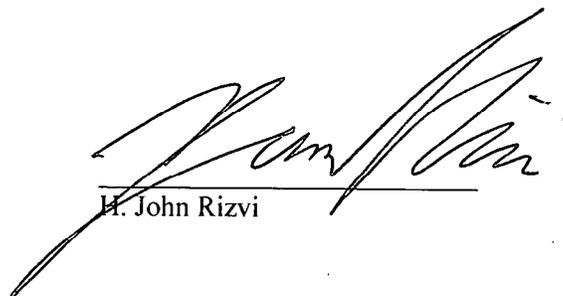
H. John Rizvi
GOLD & RIZVI, P.A.
Attorneys for Applicant
600 N. Pine Island Road
Suite 450
Plantation, Florida 33324-1311
(954) 583-9600

Date: February 11, 2005
Atty. Docket: 1225.0100

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing MOTION TO EXTEND TIME has been sent to Steven e. Eisenberg, Esq. and Erica W. Stump, counsel for Petitioner, via First Class Mail, postage pre-paid, to:

Feldman Gale, P.A.
201 South Biscayne Boulevard
Miami Center- Suite 1920
Miami, FL 33131



H. John Rizvi

Certificate of Mailing

I hereby certify that this correspondence (regarding pending Cancellation No. 92044040) is being deposited with the United States Postal Service with sufficient postage as First-class mail in an envelope addressed to:

Commissioner for Trademarks
2900 Crystal Drive
Arlington, Virginia 22202-3514

on FEBRUARY 11, 2005 _____
Date Signature

H. John Rizvi
Typed or printed name of
person signing certificate