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Filing date: **03/21/2005**

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	Petitioner's Response to Motion to Extend Time
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Date	03/21/2005
Attachments	Response to Motion To Extend Time.pdf (3 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.

RESPONSE TO MOTION TO EXTEND TIME

Petitioner hereby responds to Respondent's second Motion to Extend Time to respond to Petitioner's 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 asked for a thirty-day (30) extension of time to respond to the Petition to Cancel. Counsel for Petitioner contacted their client, who is in Paris, France regarding the extension, but did not get in touch with their client until Monday morning and Petitioner was already in receipt of Respondent's Motion to Extend Time. Petitioner did not file a response.
3. On March 10, 2005, counsel for Respondent contacted counsel for Petitioner and asked for an additional fifteen (15) days to respond. Counsel for Petitioner conveyed to counsel for Respondent that Petitioner agreed to a one-week extension. Instead, on March 14, 2005, Respondent filed another Motion to Extend Time again asking for an additional thirty (30) additional days to respond to the Petition to Cancel.

4. Petitioner does not object to a two-week extension of time to respond to the Petition to Cancel, making a response due on or before March 28, 2005. Petitioner respectfully requests that this be the final extension of time for Respondent to respond to the Petition to Cancel.

WHEREFORE, Petitioner respectfully requests that Respondent's Motion be granted in part and denied in part, making Respondent's response due on March 28, 2005 and that the Board further order that this is the final extension of time for Respondent to respond to the Petition to Cancel.

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: March 21, 2005

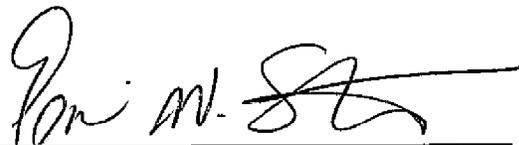
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CERTIFICATE OF MAIL AND CERTIFICATE OF SERVICE

Date of Deposit: March 21, 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)