

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

KARIN MODELS,	)	
S.A.R.L.	)	
	)	
Petitioner,	)	
	)	Cancellation No.: <b>92044040</b>
v.	)	Registration Nos.: 2114051 & 2115957
	)	Marks: KARIN (words only)
	)	KARIN MODELS (and design)
Brunel, Jean Luc	)	International Class: 035
	)	
Registrant.	)	

**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 April 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 has conferred with Erica W. Stump, counsel for Petitioner on March 11, 2005, and with both Erica W. Stump and Steven E. Eisenberg on March 14, 2005, in an effort to obtain their consent to this motion. Counsel for Petitioner, KARIN MODELS, S.A.R.L., consented only to a one week extension of time to and including March 21, 2005 and were not amenable to an extension beyond a week.

The undersigned attorney respectfully submits that an extension of one week is insufficient additional time within which to answer or otherwise plead. As grounds in support of granting this motion, Counsel submits that he has requested file wrappers and a complete title history search for Registration Numbers 2,114,051 and 2,115,957, and is awaiting receipt of these documents for review. Additionally, as the Applicant, Jean Luc Brunel, has been traveling extensively outside of the country, he has not had an opportunity to meet with the undersigned

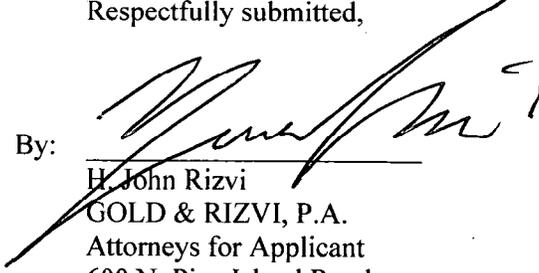


03-22-2005

attorney to assist in the investigation of the chain of title (including both recorded and unrecorded instruments) or otherwise be available to assist in the preparation of a response. There are a number of issues relating to the availability of unrecorded assignment documents that need to be investigated and Counsel respectfully requests a one month extension of time within which to accomplish the same.

WHEREFOR, it is respectfully requested that this motion be granted and that Registrant be allowed an enlarged period of time up to and including April 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: March 14, 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

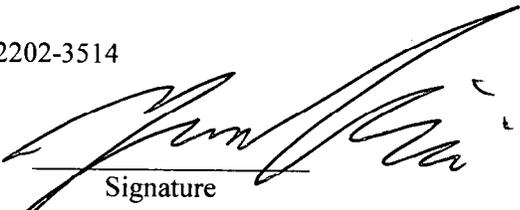


H. John Rizvi

**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 3/14/05   
Date Signature

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