

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

STEPHEN A. WESTLAKE,)	
)	
Petitioner,)	Cancellation No. 92/052,260
)	(Serial No. 77/378,015)
)	
EDGAR ALEXANDER BARRERA)	
)	
Respondent.)	

CONTINUED MOTION TO EXTEND THE TIME
TO SECURE NEW LEGAL COUNSEL

Comes now the Respondent EDGAR ALEXANDER BARRERA and hereby submits a Continued Motion to Extend the Time to Secure New Legal Counsel in the above-captioned Opposition proceeding.

1. I was originally hospitalized for acute pancreatitis in September, 2010 and nearly died. Recovery from this condition typically takes a year or more. I have only been able to resume part of my normal work schedule within the last week, and am still in considerable pain. My medical problems have been fully documented for the court in letters from my physician.

2. Additionally, I was hospitalized again with acute pancreatitis on October 26, 2011 and was discharged on October 29, 2011. I am continuing my convalescence and have been ordered to avoid stress due to my health condition.

4. Regardless, I am continuing to move forward with this proceeding and to obtain new legal counsel, in spite of numerous unanticipated events, I have subsequently encountered.

3. In light of the above and the following unforeseen circumstances, I have been unable to secure new legal counsel before this time:



11-15-2011

a.) A close family member was hospitalized due to a home invasion on November 4, 2011. He suffered a brain concussion and multiple abrasions. I have had to also subsequently look after him as well, due to his poor health status, which has compounded the situation.

b.) The electricity was off at my residence for four days due to a power outage, caused by a severe storm, which made it virtually impossible to transact any business during this time period. This was an unavoidable occurrence, an "Act of God," which caused a further delay.

4. I have been working diligently to secure new legal counsel but it has taken much longer than I originally anticipated.

5. I have spoken with a number of prospective attorneys and have contacted others as well whom I am waiting to interview. I am doing all I possibly can to resolve this matter as soon as possible.

6. I have been placed at a significant disadvantage with the sudden and abrupt withdrawal of Mr. McAuliffe as legal counsel.

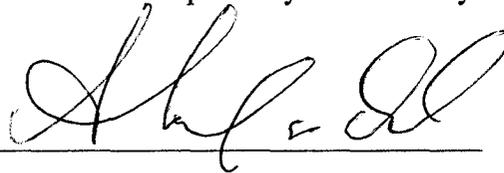
7. Unfortunately, I have to seek new legal counsel to represent me in this proceeding. Since I am not represented by legal counsel at this time, I therefore, must respectfully make this request on my own behalf.

Respondent, under the circumstances, needs a further extension of time and respectfully pleas upon this Court to grant him this Continued Motion to Extend the Time to Secure New Legal Counsel of not less than thirty additional days.

The interests of justice will be served if this continuance is granted.

WHEREFORE, Respondent respectfully seeks this Continued Motion to Extend the Time to Secure New Legal Counsel based upon the foregoing reasons.

Certified and Respectfully submitted by:

A handwritten signature in black ink, appearing to read "Edgar Barrera", written over a horizontal line.

Edgar Alexander Barrera, Respondent

10 Castania Ct.

St. Augustine, FL 32086

Telephone (386) 852-0012

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing instrument was placed in the United States Mail, postage prepaid, this 10th day of November, 2011, addressed to:

Mark Levy, 700 Security Mutual Bldg., 80 Exchange Street, Binghamton, NY 13902

and

Kevin Guyette, 19 Chenango St. #1101, Binghamton, NY 13901-2904