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

Proceeding	92054956
Party	Plaintiff Jacques Henri Francois Guillemet and Lena Irene Hirzel
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Date	12/06/2012
Attachments	Motion to Withdraw as Counsel (Cancellation).pdf ( 3 pages )(25858 bytes )

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

Jacques Henri Francois Guillemet and Léna  
Irène Hirzel,

Petitioners,

-against-

Alan Ceppos and Frederic Rambaud,

Respondents.

Cancellation No. 92054956

**MOTION TO WITHDRAW AS COUNSEL**

Manatt, Phelps & Phillips, LLP, counsel for Petitioners, hereby moves to withdraw as counsel, to suspend this proceeding for thirty (30) days in order to permit Petitioners time to appoint new counsel, and to extend the discovery term for sixty (60) days after proceedings are resumed.

The grounds for this motion are that Petitioners have: insisted upon taking action with which counsel has a fundamental disagreement; have deliberately disregarded their obligation to counsel as to payment of fees and expenses; and have failed to cooperate in the representation, which has rendered representation of Petitioners unreasonably difficult for counsel to carry out effectively. Petitioners have been advised of counsel's intention to withdraw from representation in the event these above issues are not resolved and have been advised of all deadlines. Petitioners assent to the withdrawal of counsel.

Petitioners through counsel have served discovery requests on Respondents. Respondents have refused to respond to a number of Petitioners' discovery requests and have provided Petitioners with incomplete responses to others. Petitioners have informed

Respondents of their deficient and inadequate discovery responses, and have requested that Respondent consent to a 60-day extension of the discovery term to afford time for resolution of the aforesaid discovery issues and to complete Petitioners' discovery. No response has been received from the Respondents.

Dated: December 6, 2012

Respectfully submitted,

By:   
Mark I. Peroff

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of December, 2012, I served a true and correct copy of the foregoing Motion to Withdraw As Counsel by Federal Express, upon:

Mr. Jacques H.F. Guillemet  
Ms. Lena I. Hirzel  
59 rue de Turenne  
F-75003 PARIS  
France

Via First Class mail to:

Mr. Frederic Rambaud  
Mr. Alan Ceppos  
P.O. Box 110495  
Brooklyn, New York 11211

Courtesy copy via email to:

Sylvestre Dhombres, General Counsel  
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France  
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Alpa V. Patel