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

Proceeding	92057717
Party	Defendant Ambrea C. Hanson
Correspondence Address	AMBREA C HANSON PO Box 2751 Madison, WI 53701 UNITED STATES Twentysixam@icloud.com
Submission	Response to Board Order/Inquiry
Filer's Name	Ambrea C. Hanson
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Date	09/23/2014
Attachments	Trademark Motion To Suspend.pdf(124356 bytes) Certificate of Service Motion to Suspend .pdf(112982 bytes)

United States Patent and Trademark Office
Trademark Trial and Appeal Board
PO Box 1451
Alexandria, VA 22313-1451

September 23, 2014

Petition for Cancellation No. 92057717
U.S. Registration No. 3,738,107

Samuel Katzin-Simon

v.

Ambrea C. Hanson

Motion to Suspend Proceedings

I, Ambrea C. Hanson, owner of U.S. Reg. No. 3,738,107 for the mark CHIEKi, hereby respectfully motion the Trademark Trial and Appeal Board to grant Suspension of Proceedings, for good cause, in the petition of cancellation No. 92057717 (pursuant to Trademark Rule 2.117(c) Stipulations and Motions), Samuel Katzin-Simon (Petitioner) v. Ambrea C. Hanson (Registrant).

As grounds therefore, Registrant shows that good cause is evident and a request for Suspension of Proceedings is required due to extenuating circumstances. Since December of 2013 Registrant has been attempting to escape domestic violence. From January of 2014 until September 19, 2014 Registrant has been seeking safety and shelter from the abuser and has not received service of proceedings, motions, actions, and the like, with exception to limited telephone communication with petitioner in early January. On September 3, 2014 Registrant was granted a Domestic Abuse injunction and Order of Protection against abuser by the State of Wisconsin (Wisconsin Circuit Court Case No. 14CV2397. Additionally, Registrant and her four (4) children have been homeless, including shelter through Domestic Abuse Intervention Services of Madison, Wisconsin until September 17th, 2014. Registrant requests the Trademark Trial and Appeal Board grant relief by suspending cancellation proceedings to remove excessive burden and strain during this difficult time.

Registrant has successfully filed a safe mailing address via Change of Correspondence Address form in accordance with the Trademark Rules of Practice.

WHEREFORE, Registrant requests that Suspension of Proceedings be granted.

Dated:

September 23, 2014
Madison, Wisconsin

Respectfully,

Ambrea C. Hanson
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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of this Motion To Suspend Proceedings was sent by U.S. mail to Susan Upton Douglass (Attorney for Petitioner), Fross Zelnick Lehrman & Zissu, P.C., 866 United Nations Plaza, New York, NY 10017, this 23rd day of September 2014.

Ambrea C. Hanson