

ESTTA Tracking number: **ESTTA568120**

Filing date: **10/30/2013**

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

Proceeding	91204211
Party	Defendant Michael Jason Bendinelli
Correspondence Address	AARON ISRAELS AARON ISRAELS PC 4155 E JEWELL AVE, SUITE 502 DENVER, CO 80222 UNITED STATES israelsplc@gmail.com
Submission	Request to Withdraw as Attorney
Filer's Name	Aaron Israels
Filer's e-mail	israelsplc@gmail.com
Signature	/Aaron Israels/
Date	10/30/2013
Attachments	updated withdraw 11.pdf(91984 bytes )

UNITED STATES PATENT AND TRADEMARK OFFICE  
TRADEMARK TRIAL AND APPEALS BOARD

In the Matter of Application Serial No. 85/351051  
Filed June 20, 2011  
For the Service Mark: BACK TO THE ROOTS  
Published in the Official Gazette on November 8, 2011

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B.T.T.R. Ventures, LLC,	)	
	)	Opposition No. 91204211
Opposer,	)	
	)	
v.	)	
	)	
Michael Jason Bendinelli,	)	
	)	
Applicant.	)	

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**MOTION TO WITHDRAW AS COUNSEL FOR APPLICANT/DEFENDENT**

Aaron Israels, of the law firm Aaron Israels, P.C. (“Attorney”), states his Motion to Withdraw as Counsel for Applicant/Defendant in Opposition No. 91204211, as follows:

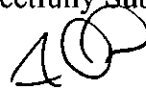
1. Attorney states that the reason for his withdraw is the lack of payment of invoices within a reasonable period of time.
2. Attorney states that he has given notice to the Applicant/Defendant that he is withdrawing from employment and will be filing the necessary documents with the Trademark and Appeal Board.
3. Attorney states that there is time for Applicant to employ another attorney before Applicant’s next due date in Opposition No. 91204211. The next deadline is for Plaintiff’s Pretrial Disclosures, which are due on March 22, 2014. Defendant’s Pretrial Disclosures are due on May 21, 2014.

4. Attorneys state that all papers and property that relate to the proceeding and to which the client is entitled have been delivered to or available to the client. Attorney is willing to provide a complete copy of client's file to client and/or their new attorney.
5. Attorney has notified Applicant of any responses that may be due and the deadline for any responses, and further, has informed Applicant of all deadlines in this proceeding.

WHEREFORE Attorney requests that this Motion to Withdraw be granted and that the Attorney be permitted to withdraw from this opposition proceeding.

Dated: 10-30, 2013

Respectfully Submitted,



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Aaron Israels  
Aaron Israels, P.C.  
Attorney for Applicant  
4155 E. Jewell Ave., Ste. 502  
Denver, Colorado 80222  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of this Motion to Withdraw was served on the following:

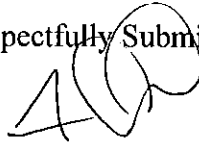
Michael Jason Bendinelli  
103 Shoreview Rd.  
Chelsea, Michigan 48118

Ms. Dawn Newton, Esq.  
Fitzgerald, Abbott & Beardslly  
1220 Broadway, 21<sup>st</sup> Floor  
Oakland, California 94612

via U.S.P.S. first class mail on 10-30, 2013.

Dated: 10-30, 2013

Respectfully Submitted,



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