

ESTTA Tracking number: **ESTTA546251**

Filing date: **07/01/2013**

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

Proceeding	91208911
Party	Defendant Sunshine C & C, Inc.
Correspondence Address	KUSCHA HATAMI RAJ ABHYANKER PC 1580 WEST EL CAMINO REAL SUITE 13 MOUNTAIN VIEW, CA 94040-2462 UNITED STATES kuscha@legalforcelaw.com, michelle@legalforcelaw.com
Submission	Request to Withdraw as Attorney
Filer's Name	Kuscha Hatami
Filer's e-mail	kuscha@legalforcelaw.com, minal@legalforcelaw.com
Signature	/Kuscha Hatami/
Date	07/01/2013
Attachments	Zen Burger.pdf(72651 bytes )

## REQUEST FOR WITHDRAWAL FROM EMPLOYMENT

Kuscha Hatami and Raj Abhyanker P.C., as Attorney of Record for Serial Number [85677047](#), seeks to withdraw from employment and attorney of record for the Opposition Number 91208911 for reasons stated below:

1. Raj Abhyanker P.C. has taken reasonable steps to avoid foreseeable prejudice to the rights of the client.
2. Raj Abhyanker P.C. has notified the client of their desire to withdraw from employment, and has allowed time for employment of another practitioner.
3. Phone and email communications have been made in an attempt to determine if our services will be retained. As of July 1, 2013, no intent to proceed with the opposition has been communicated to Raj Abhyanker P.C. to carry out the employment effectively.
4. Raj Abhyanker P.C. has delivered to the client all papers and property to which the client is entitled.
5. Raj Abhyanker P.C. has communicated to the client the seriousness of the matter and the respective due date for which the opposition response must be submitted.
6. Fees that have been paid in advance by the client have been earned. Any unearned fees paid by the client have been refunded.
7. Client has failed to honor an agreement to pay retainer in advance of the performance of legal services related to opposition proceedings.

/Kuscha Hatami/  
Kuscha Hatami  
Raj Abhyanker P.C.

## PROOF OF SERVICE

I hereby certify that a true and complete copy of the **Request for Withdrawal from Employment** was forwarded by first class postage pre-paid mail by depositing the same with the US Postal Service on this 2nd day of July, 2013, to the following attorney of record for Opposer Fox Restaurant Concepts LLC and Applicant for the Zen Burger mark:

Glenn S. Bacal  
Bacal Law Group PC  
6991 East Camelback Road, Suite D102  
Scottsdale, AZ. 85251

Sunshine C & C Inc  
Attn: Irma Sevin  
197 Hilltop Crescent  
Walnut Creek, CA. 94597

/Kuscha Hatami/  
Kuscha Hatami Fard  
Raj Abhyanker P.C.