

ESTTA Tracking number: **ESTTA1141289**

Filing date: **06/18/2021**

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

| | |
|------------------------|--|
| Proceeding | 91216503 |
| Party | Plaintiff Sturgis Motorcycle Rally, Inc. |
| Correspondence Address | JASON M SNEED SNEED PLLC 445 SOUTH MAIN STREET, SUITE 400 DAVIDSON, NC 28036 UNITED STATES Primary Email: jsneed@sneedlegal.com Secondary Email(s): litigation@sneedlegal.com, Sarah@SneedLegal.com, msneed@sneedlegal.com 844-763-3347 |
| Submission | Request to Withdraw as Attorney |
| Filer's Name | Jason M. Sneed |
| Filer's email | jsneed@sneedlegal.com, sarah@sneedlegal.com, msneed@sneedlegal.com, litigation@sneedlegal.com |
| Signature | /Jason M. Sneed/ |
| Date | 06/18/2021 |
| Attachments | 2021-06-18 Motion to Withdraw as Representative - DEJORIA - SMRI.pdf(101963 bytes) 2021-06-18 Declaration of Jason M Sneed - Oppn 91216503.pdf(225421 bytes) |

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

| | | |
|--------------------------------|---|-------------------------|
| STURGIS MOTORCYCLE RALLY, INC. |) | |
| |) | |
| Opposer |) | Opposition No. 91216503 |
| |) | |
| v. |) | |
| |) | |
| JOHN PAUL DEJORIA, |) | |
| |) | |
| Applicant. |) | |
| |) | |

MOTION TO WITHDRAW AS REPRESENTATIVE

Pursuant to Rules 2.19(b) and 11.116 of the Trademark Rules of Practice, 37 C.F.R. §2.19(b) and 11.116, Counsel for Opposer Sturgis Motorcycle Rally, Inc. (“Opposer”) hereby respectfully requests that they be permitted to withdraw from representation of Opposer in this matter. This request is based upon 37 C.F.R. §11.116(b)(5) (“the client fails substantially to fulfill an obligation to the practitioner regarding the practitioner’s services and has been given reasonable warning that the practitioner will withdraw unless the obligation is fulfilled”); 37 C.F.R. § 11.116(b)(6) (“The representation will result in an unreasonable financial burden on the practitioner”), and 37 C.F.R. §11.116(b)(7)(“other good cause for withdrawal exists”). This Motion is supported by the accompanying Declaration of Jason M. Sneed.

Respectfully submitted,

Dated: June 18, 2021

/Jason M. Sneed/
Jason M. Sneed, Esq.
Sarah C. Hsia, Esq.
Megan E. Sneed, Esq.
SNEED PLLC
445 South Main Street
Suite 400
Davidson, North Carolina 28036

Tel: 844-763-3347
JSneed@SneedLegal.com
Sarah@SneedLegal.com
MSneed@SneedLegal.com

*Attorney for Opposer, Sturgis
Motorcycle Rally, Inc.*

CERTIFICATE OF FILING

I hereby certify that on June 18, 2021, I filed the foregoing *Motion to Withdraw as Representative* with the Trademark Trial and Appeal Board via electronic means, through the ESTTA system.

Dated: June 18, 2021

/Jason M. Sneed/
Jason M. Sneed
An Attorney for Opposer

CERTIFICATE OF SERVICE

The undersigned counsel of record hereby certifies that a copy of the foregoing *Motion to Withdraw as Representative* was served by email to the following correspondent of record:

John Paul DeJoria
1888 Century Park East, Suite 1600
Los Angeles, CA 90067

Applicant and Correspondent

Dated: June 18, 2021

/Jason M. Sneed/
Jason M. Sneed
An Attorney for Opposer

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

| | | |
|--------------------------------|---|-------------------------|
| STURGIS MOTORCYCLE RALLY, INC. |) | |
| |) | |
| Opposer |) | Opposition No. 91216503 |
| |) | |
| v. |) | |
| |) | |
| JOHN PAUL DEJORIA, |) | |
| |) | |
| Applicant. |) | |

DECLARATION OF JASON M. SNEED

I, Jason M. Sneed, state as follows:

1. I am a member in the law firm SNEED PLLC (the "Firm"), which represents Opposer Sturgis Motorcycle Rally, Inc. ("SMRI" or "Opposer") in the above-captioned Opposition proceeding.
2. The client, SMRI has failed substantially to fulfill an obligation to the Firm regarding the Firm's services to Opposer, and Opposer has been given reasonable warning that the Firm will withdraw unless the obligation in fulfilled.
3. Further, continued representation of Opposer will result in an unreasonable financial burden on the Firm and its practitioners.
4. The Firm has provided reasonable notice to Opposer and allowed for the employment of other counsel.
5. Opposer has been informed of the current status of this proceeding, and has access to all pleadings in this matter.
6. In accordance with 28 U.S.C. § 1746, I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief

Dated: June 18, 2021



Jason M. Sneed, Esq.