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

Proceeding	91230403
Party	Defendant Luigi Boschin
Correspondence Address	BRUNO TARABICHI OWENS TARABICHI LLP 4750 ALMADEN EXPY 124-359 SAN JOSE, CA 95118 UNITED STATES Email: btarabichi@owenstarabichi.com
Submission	Request to Withdraw as Attorney
Filer's Name	Bruno Tarabichi
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Signature	/bruno tarabichi/
Date	02/07/2018
Attachments	02 Motion to Withdraw - Securrency TM Opposition.pdf(83421 bytes)

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

Securrency, Inc.,

Opposer,

v.

Luigi Boschin,

Applicant.

Opposition No. 91230403
Application Serial No. 86/904,230
Mark: SECURENCY

MOTION TO WITHDRAW AS ATTORNEY

The Board previously denied this Motion for failure to include a proof of service on Applicant. This deficiency has now been corrected.

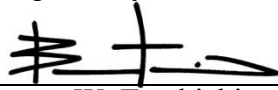
Pursuant to 37 C.F.R. §§ 2.19 and 10.40, Applicant’s counsel, Bruno Tarabichi and Owens Tarabichi LLP, requests permission to withdraw from representing Applicant in this opposition proceeding. Good causes exists for the request to withdraw because Applicant has breached his engagement agreement by (i) refusing to make himself available to communicate with counsel about this opposition proceeding, and (ii) failing to pay his legal bills for the last four months and is unwilling to provide a retainer in advance of future services. Moreover, the engagement agreement permits Owens Tarabichi LLP to withdraw as counsel upon a failure to pay legal bills or provide a retainer. Pursuant to 37 C.F.R. §§ 10.40(c)(1)(vi), counsel may withdraw when its client “[h]as failed to pay one or more bills rendered by the practitioner for an unreasonable period of time or has failed to honor an agreement to pay a retainer in advance of the performance of legal bills.”

Furthermore, Bruno Tarabichi and Owens Tarabichi LLP has taken reasonable steps to avoid foreseeable prejudice to the rights of Applicant by providing Applicant with reasonable notice of its intent to file the instant withdrawal should Applicant fail to pay his invoices, which provided Applicant with ample time to either pay her invoices or employ another practitioner.

Moreover, counsel understands that, should this request be granted, the Board will suspend proceedings to allow Applicant to find new counsel or file a paper stating that he intends to represent himself. Finally, all papers relating to this proceeding to which Applicant is entitled have been delivered to him. As such, Bruno Tarabichi and Owens Tarabichi LLP respectfully requests that the Board permit it to withdraw as Applicant's counsel.

Dated: February 7, 2018

Respectfully submitted,



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Luigi Boschini

CERTIFICATE OF SERVICE

I hereby certify that, on February 7, 2018, a true and complete copy of the following document:

MOTION TO WITHDRAW AS ATTORNEY

has been served by email on

Kevin Keener
kevin.keener@keenerlegal.com
Keener & Associates, PC
161 North Clark Street, Suite 4700
Chicago, IL 60601

and has been served by email and first class mail on

Luigi Boschini
luigi@me.com
1950 S. Ocean Drive, Suite L
Hallandale, Florida 33009

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.

Dated: February 7, 2018



Bruno W. Tarabichi