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

Proceeding no.	91281548
Party	Defendant Emma A. Okyere
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Submission	Withdrawal of Counterclaim
Filer's name	Robert Varkonyi
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Signature	/robert varkonyi/
Date	05/22/2023
Attachments	4866-0259-8244 v.1 2023-05-11- Mtn and Brief to Vol Withdraw Grounds. pdf(181481 bytes )

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

<b>Alcora Corp.,</b> Opposer  v.  <b>Emma Okyere,</b> Applicant	In the matter of Application No. <b>90/532,199</b>  For the mark <b>MODERN NATURED</b>  Date of Appl. Feb. 17, 2021  Opposition No. <b>91/281,548</b>
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**Trademark Trial and Appeal Board**  
U.S. Patent and Trademark Office  
P.O. Box 1451  
Alexandria, VA 22313-1451

**APPLICANT’S MOTION TO VOLUNTARILY WITHDRAW APPLICANT’S  
COUNTERCLAIMS WITHOUT PREJUDICE**

Emma Okyere (herein “Applicant”) by its attorneys, hereby respectfully requests to voluntarily withdraw Applicant’s counterclaims without prejudice (herein “the Withdraw Motion”) based on to 37 C.F.R. §2.114(c). Applicant’s Withdraw Motion, seeking an order to voluntarily withdraw Applicant’s counterclaims, is being made after an answer to Applicant’s counterclaims was submitted. Applicant notes the Withdraw Motion is filed after the parties held a discovery conference pursuant to 37 C.F.R. §2,120(a)(1) and before discovery has been initiated by either party. Accordingly, Applicant and Opposer have executed this Withdraw Motion.

Very respectfully,

For Applicant:

May 11, 2023

By: 

Robert Varkonyi  
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Attorneys for Applicant

For Opposer:

May 11, 2023

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

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**CERTIFICATION OF APPLICANT’S MOTION TO VOLUNTARILY WITHDRAW  
APPLICANT’S COUNTERCLAIMS WITHOUT PREJUDICE**

The undersigned hereby certifies that Motion to Voluntarily Withdraw Applicant’s Counterclaims Without Prejudice is, to the best of the undersigned knowledge, information and belief upon reasonable inquiry:

- (a) complete and correct as of the execution of this certification;
- (b) each response and objection is not frivolous, and is consistent with the Rules;
- (c) each response and objection is not propounded for any improper purpose;
- (d) each response and objection is not unduly burdensome or expensive.

Date: May 22, 2023

By:   
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