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

Proceeding	92047954
Party	Plaintiff GGW Marketing, LLC
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Submission	Appearance of Counsel/Power of Attorney
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Signature	/LES/
Date	03/13/2008
Attachments	mtn-sbj.pdf ( 3 pages )(844950 bytes )

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Commissioner for Trademarks, P.O. Box 1451, Alexandria, Virginia 22313-1451 on the date shown below:

Date: March 13, 2008 \_\_\_\_\_  
Nancy Tapia

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

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GGW MARKETING, LLC and MANTRA  
FILMS, INC.,

Petitioner,

v.

SBJ Productions, LLC

Registrant.

Cancellation No.: 92047954

Application Serial No.: 78/485128

MOTION TO APPOINT NEW COUNSEL AND REQUEST TO REOPEN DISCOVERY AND  
DISCLOSURE

APPEARANCE OF NEW COUNSEL

Revoking all previously appointed attorneys, GGW Marketing, LLC and Mantra Films, Inc. hereby appoint Lisa Shulman, Esq., Associate Counsel Mantra Films, Inc., having offices at 1601 Cloverfield Blvd, Ste. 420S, Santa Monica, CA 90404, to represent them in this proceeding. Please address all correspondence to:

Lisa Shulman, Esq.  
1601 Cloverfield Blvd. Ste 420S  
Santa Monica, CA 90404  
Tel: 310-566-1822  
Fax: 310-566-1826

REQUEST TO REOPEN DISCOVERY

In the matter of the above-identified proceeding, prior counsel, J. Alison Grabell attorney at Venable, LLP, paper-filed a Petition to Withdraw as Representative, on March 4, 2008, pursuant to 37 CFR §§2.19 (b) and 10.40(a), notice of which was given to Petitioner only days before the paper-filing.

Now, as In-House Associate Counsel for Mantra Films, Inc. and GGW Marketing, LLC, I have been tasked with handling the pending Trademark matters, though admittedly this is unfamiliar territory. It is my recent understanding that prior counsel has been "pens down" since as early as October 2007 though they were still somewhat involved in the proceedings before the Board and the monitoring thereof. During this most chaotic time of transition all matters have been in flux with a lot of back and forth communications between Petitioner and its prior counsel as it had not been determined whether Venable, LLP would continue to represent Mantra Films, Inc. and GGW Marketing, LLC, in this and other matters before the Board.

Prior to receipt of intent to withdraw, Petitioner was unsure of the status of impending matters and the deadlines related to them. The Trademark Office has not yet ruled on the Petition To Withdraw, however, due to the uncertainty and ambiguity surrounding representation in the above-identified proceeding a few important deadlines have passed, including the time for discovery. It is with regret that Petitioner must inform the Board that it has neither conducted discovery on its own, nor has discovery been conducted on its behalf.

While Petitioner understands the burden to initiate discovery lies with the moving party, it respectfully asks the Board to note that Registrant did not either contact Petitioner, or Petitioner's prior counsel, before closure of the discovery period. Although both parties let the deadline pass without contact, Petitioner maintains that its lack of communication was unintentional and had it been afforded more time to either clarify its representation issue or become actively involved in the proceedings, all deadlines would have been strictly adhered. In light of the turmoil surrounding this situation, Petitioner was both ill prepared to handle this proceeding on its own and unsure of the precise deadlines pertaining to it.

I humbly admit that while I find myself in uncharted territory with respect to the proceedings of the Trademark Trial and Appeals Board, I am working diligently to get up to speed and manage the various matters facing Petitioner. Due to these extenuating circumstances, the confusion surrounding Petitioner's representation herein, coupled with the lack of time to prepare and confer with the Registrant, it is respectfully requested that the Board grant an extension of time and reopen discovery pursuant to 37 CFR §§2.120(a)(3) and FRCP 6(b) on the grounds set forth in TMBP §403.04.

Respectfully submitted,

Date: 3/13/08

By:   
Lisa E. Shulman, Esq.  
Mantra Films, Inc.  
Attorney for Petitioner

CERTIFICATE OF SERVICE

The undersigned, attorney for Petitioners, hereby certifies that she served, by First Class Mail, a true and correct copy of the Motion to Appoint New Counsel and Request To Reopen Discovery, upon the following on this 13<sup>th</sup> day of March, 2008:

Aiello Salvatore  
SBJ Productions, LLC  
3301 Beach Port Drive  
Las Vegas, NV 89117



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