

ESTTA Tracking number: **ESTTA847622**

Filing date: **09/22/2017**

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

Proceeding	92064262
Party	Plaintiff Tribal-care Insurance LLC
Correspondence Address	DANIEL ZAMUDIO ZAMUDIO LAW PROFESSIONALS PC 233 SOUTH COLFAX, SUITE B GRIFFITH, IN 46319 UNITED STATES Email: dan@zlawpro.com
Submission	Request to Withdraw as Attorney
Filer's Name	Daniel Zamudio
Filer's email	dan@zlawpro.com, paralegal@zlawpro.com
Signature	/Daniel Zamudio/
Date	09/22/2017
Attachments	Motion To Withdraw with Exhibit A.pdf(123082 bytes )

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

In re Registration No. 4062744 for the Mark  
Tribalcare registered on November 29, 2011.

Tribal-Care Insurance LLC,  
**Petitioner,**

v.

Alliant Specialty Insurance Services, Inc.,  
**Registrant.**

Cancellation No. 92064262  
Registration No. 4062744

**MOTION FOR LEAVE TO WITHDRAW**

Plaintiff by counsel, Attorney Daniel Zamudio of Zamudio Law Professionals, PC, hereby moves the court for leave to withdraw from representing the Plaintiff in this case, and in support thereof states the following:

1. Plaintiff has failed to substantially fulfill their obligations to the above named lawyer regarding the lawyers' services.
2. Plaintiff has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled, a notice of intention to withdraw dated July 24, 2017 is attached hereto and incorporated herein as Exhibit "A". The undersigned attorney's office also spoke to Ms. Monica Paunovici regarding the undersigned attorney's intent to withdraw on August 24, 2017 and again sent Exhibit "A" to her via regular mail.
3. The continued representation will result in an unreasonable financial burden on the lawyer and has been rendered unreasonably difficult by the client.
4. That the last known address, telephone number and email of the Plaintiff is as

follows: Tribal-Care Insurance, 9167 Wicker Avenue, Suite 11, St. John, Indiana 46373 and  
3 North Court Street, Suite 2, Crown Point, Indiana 46307 Attention: Monica Paunovici,  
**monica@tribal-care.com**.

WHEREFORE, the above named attorney, Daniel Zamudio, moves this court grant this  
motion for leave to withdraw, order his respective appearance be withdrawn, and order all other  
relief that is just and proper in the premises.

Respectfully submitted,

/s/ Daniel Zamudio  
Daniel Zamudio, Atty No. 26942-45  
Zamudio Law Professionals, PC  
233 South Colfax  
Griffith, Indiana 46319  
Phone (219) 924-2300  
Fax (219) 924-2401  
dan@zlawpro.com

Certificate of Service

I certify that on **September 21, 2017**, service was made of a copy of the foregoing document  
either electronically as allowed by this tribunal or by US First Class Mail on those persons listed  
below.

**Attorney Donald Whitlow Bivens**  
**Musick, Peeler & Garrett LLP**  
**225 Broadway, Suite 1900**  
**San Diego, CA 92101**  
**w.bivens@mpglaw.com**

**Tribal-Care Insurance**  
**ATTN: Ms. Monica Paunovici**  
**9167 Wicker Avenue, Suite 11**  
**St. John, Indiana 46373**  
**monica@tribal-care.com**

**Tribal-Care Insurance**  
**ATTN: Ms. Monica Paunovici**  
**3 North Court Street, Suite 2**  
**Crown Point, Indiana 46307**  
**monica@tribal-care.com**

/s/Daniel Zamudio

# Zamudio Law Professionals

233 S. Colfax St., Griffith, IN 46319  
Telephone: (219) 924-2300, Facsimile: (219) 924-2401  
Email: general@zlaupro.com

Daniel Zamudio  
Christie R. DeHaan  
Kimberly L. Roethler

July 24, 2017

Tribal-Care Insurance  
ATTN: Ms. Monica Paunovici  
9167 Wicker Avenue, Suite 11  
St. John, Indiana 46373

Dear Ms. Paunovici,

We hope this letter finds you well. Please be advised that the current balance in your trust account is \$0 with an outstanding balance of \$347.31. Per your fee agreement, at this time it is necessary for you to shore up your account in the amount of \$3,500.00. You may issue a check in the amount of \$3,847.31 payable to the name of the firm, as shown above.

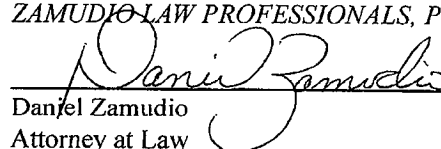
We cannot diligently represent you if we do not receive payment as agreed. Failure on your part to uphold this agreement will result in a serious hindrance of communications in regard to your matters. Your matters are very important and we believe you will need consistent and diligent legal representation. Should we not receive payment from you within ten (10) days of the date of this letter, we will be forced to withdraw from all matters in which we represent you.

If we withdraw from your matters, know that you may be defaulted in any cases for which we represent you. This would be a serious problem and one that should, and always be avoided by making the above deposit into your trust account as agreed.

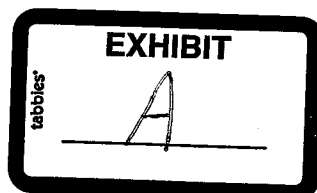
If you have any questions, please call our office.

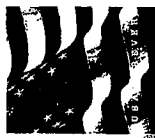
Respectfully yours,

ZAMUDIO LAW PROFESSIONALS, PC

  
Daniel Zamudio  
Attorney at Law

DZ/kb





**Zamudio**  
**Law Professionals**  
233 South Colfax Street  
Griffith, Indiana 46319

Tribal-Care Insurance  
ATTN: Ms. Monica Paunovici  
9167 Wicker Avenue, Suite 11  
St. John, Indiana 46373