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Filing date: **02/15/2021**

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

Proceeding	92075895
Party	Defendant Shenzhen See Me Here Electronics Co., Ltd
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Submission	Request to Withdraw as Attorney
Filer's Name	Nazly Aileen Bayramoglu
Filer's email	tm@bayramoglu-legal.com, nazly@bayramoglu-legal.com
Signature	/Nazly Aileen Bayramoglu/
Date	02/15/2021
Attachments	Request to Withdraw.pdf(96245 bytes)

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

NXP B.V.

Petitioner,

vs.

SHENZHEN SEE ME HERE
ELECTRONICS CO., LTD,

Registrant.

Cancellation Proceeding No.: 92075895

Registration No.: 4865727

TBMP 513.01 Motion to Withdraw as Representative; and Request to extend deadline for
discovery conference

I. Motion to Withdraw:

Pursuant to 37 CFR 2.19(b), the undersigned seeks to withdraw as US attorney of record for Registrant. The undersigned believes that the requirements of § 11.116 of this chapter are met and requests approval by motion granted by the Trademark Trial and Appeal Board.

37 CFR §11.116 (a) provides that a practitioner may withdraw from representing a client if (among other reasons): (3) the Practitioner is discharged.

Here, the Registrant has terminated the firm from representation for this matter.

The undersigned has complied with the requirements of 37 C.F.R. § 11.116(c) and 37 C.F.R. § 11.116(d) in that this request (1) specifies the basis for the request; (2) the practitioner states herewith that the client has terminated representation (3) the practitioner states herewith

that all papers and property that relate to the proceeding and to which the client is entitled have been delivered to the client; (4) the practitioner states herewith that no fees have been paid in advance to the undersigned that are not refunded; and (5) the practitioner provides herewith proof of service of the request upon the client itself and upon every other party to the proceeding.

II. Request to extend the response deadline for current discovery conference:

A discovery conference deadline of February 15, 2021 was set by the Board. The undersigned requests that the Registrant's deadline for conducting said discovery conference be extended until the Registrant is able to retain new counsel, as needed, but not less than 30 days.

III. The Undersigned believes neither party will be prejudiced by this request to withdraw:

As discovery has not yet begun and the parties have not yet exchanged initial disclosures or any discovery there is no prejudice to either party in a short delay while Registrant seeks an alternative arrangement for US counsel.

Since undersigned counsel has not undertaken substantial representation other than the filing of an answer, new counsel coming onto the case should require a relatively short period of time to come up to speed.

The undersigned concludes that neither party would be prejudiced by the Board granting the undersigned's motion to withdraw.

Respectfully submitted,

BAYRAMOGLU LAW OFFICES LLC

By: /s/ Nazly Aileen Bayramoglu

NAZLY AILEEN BAYRAMOGLU, ESQ.

(NM Bar No. 151569)

DAVID SILVER, ESQ.

(Cal. Bar No. 312445)

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Henderson, Nevada 89074

Attorneys for Registrant

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ELECTRONICS CO., LTD

CERTIFICATE OF SERVICE

I, Nazly Aileen Bayramoglu, hereby certify that on February 15, 2021 I served a true and correct copy of the foregoing MOTION TO WITHDRAW AS REPRESENTATIVE; AND REQUEST TO EXTEND DEADLINE FOR DISCOVERY CONFERENCE attached thereto by electronic mail upon:

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By: */s/ Nazly Aileen Bayramoglu*

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