

ESTTA Tracking number: **ESTTA1174486**

Filing date: **11/23/2021**

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

Proceeding	92078127
Party	Defendant Alejandro Andrade Andrade
Correspondence Address	ADAM J BRUNO BAY STATE IP LLC 10 POST OFFICE SQUARE SUITE 800 SOUTH BOSTON, MA 02109 UNITED STATES Primary Email: trademarks@baystatepatent.com 617-439-3200
Submission	Request to Withdraw as Attorney
Filer's Name	Adam J. Bruno
Filer's email	trademarks@baystatepatent.com
Signature	/Adam J. Bruno/
Date	11/23/2021
Attachments	Motion to Withdraw.pdf(66757 bytes)

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

)	Cancellation No. 92078127
)	
PLM Operations, LLC,)	Reg. No.: 5,368,423
)	Reg. Date: January 2, 2018
Petitioner,)	
)	
v.)	
)	Reg No.: 6,302,303
Alejandro Andrade Andrade,)	Reg Date: March 23, 2021
)	
Respondent.)	
)	

MOTION TO WITHDRAW AS REPRESENTATIVE

NOW COMES the undersigned attorney of record (“Practitioner”) for the Respondent Alejandro Andrade Andrade and respectfully requests leave to withdraw as counsel for the Respondent, and as grounds therefore states:

1. Pursuant to 37 CFR §2.19(b), 37 CFR §11.116(a)(3) and TMBP 513.01(a), “a practitioner shall not represent a client, or where representation has commenced, shall withdraw from the representation of a client if . . . The practitioner is discharged.”
2. The Respondent has discharged Practitioner and hired alternative counsel in the above referenced proceeding.
3. The Respondent does not object to the undersigned attorney withdrawing as counsel, as indicated in the consent signed below.
4. All papers and property that relate to the proceeding have been delivered to the Respondent electronically.
5. All fees paid to counsel have been earned, and all unearned funds have been refunded.

6. The Respondent has been notified of all upcoming deadlines regarding the Cancellation and the consequences of not meeting deadlines.
7. The last known address of the Respondent herein is:

Las Fuentes Avenida Circunvalación
número 44-A inter Zapopan,
Jalisco MEXICO 45070
8. To allow sufficient time to respond, Practitioner requests that the Board reset all deadlines, including, but not limited to, Respondent's deadline to Answer.

WHEREFORE, upon hearing thereof, the undersigned requests that the Board enter its order allowing withdrawal herein.

Respectfully submitted,

Bay State IP, LLC
10 Post Office Square, Suite 800 South
Boston, MA 02109
(617) 439-3200

By: /Adam J. Bruno/

Adam J. Bruno
Practitioner
November 23, 2021

Consented to:

Alejandro Andrade Andrade

Registrant
Las Fuentes Avenida Circunvalación
número 44-A inter Zapopan,
Jalisco MEXICO 45070

By: /Alejandro Andrade Andrade/
November 23, 2021

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing **MOTION TO WITHDRAW AS REPRESENTATIVE** was served upon Attorneys of record for Petitioner in these proceedings by electronic mail, addressed to:

Laura L. Chapman
lchapman@sheppardmullin.com

Pouneh Almasi
palmasi@sheppardmullin.com

On this 23rd day of November 2021.

By: /Adam J. Bruno/
Adam J. Bruno