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

Proceeding	91210813
Party	Plaintiff SATA GmbH & Co. KG
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Submission	Plaintiff's Notice of Reliance
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Date	10/15/2015
Attachments	SATA Notice of Reliance.pdf(595477 bytes ) SATA Notice of Reliance - Exhibit 1.pdf(848522 bytes ) SATA Notice of Reliance - Exhibit 2.pdf(4759864 bytes ) SATA Notice of Reliance - Exhibit 4.pdf(4139197 bytes ) SATA Notice of Reliance - Exhibit 5.pdf(2894033 bytes ) SATA Notice of Reliance - Exhibit 6.pdf(195828 bytes ) SATA Notice of Reliance - Exhibit 7.pdf(130613 bytes ) SATA Notice of Reliance - Exhibit 8.pdf(231796 bytes ) SATA Notice of Reliance - Exhibit 9.pdf(519179 bytes ) SATA Notice of Reliance - Exhibit 10.pdf(296798 bytes ) SATA Notice of Reliance - Exhibit 11.pdf(401498 bytes ) SATA Notice of Reliance - Exhibit 14.pdf(301086 bytes ) SATA Notice of Reliance - Exhibit 15.pdf(322785 bytes ) SATA Notice of Reliance - Exhibit 16.pdf(336020 bytes ) SATA Notice of Reliance - Exhibit 17.pdf(213093 bytes ) SATA Notice of Reliance - Exhibit 18.pdf(313345 bytes ) SATA Notice of Reliance - Exhibit 19.pdf(186832 bytes ) SATA Notice of Reliance - Exhibit 20.pdf(1310031 bytes ) SATA Notice of Reliance - Exhibit 21.pdf(1253817 bytes ) SATA Notice of Reliance - Exhibit 22.pdf(990676 bytes ) SATA Notice of Reliance - Exhibit 23.pdf(2243975 bytes ) SATA Notice of Reliance - Exhibit 24.pdf(415785 bytes ) SATA Notice of Reliance - Exhibit 25.pdf(538231 bytes ) SATA Notice of Reliance - Exhibit 26.pdf(796554 bytes ) SATA Notice of Reliance - Exhibit 27.pdf(4148687 bytes ) SATA Notice of Reliance - Exhibit 29.pdf(241719 bytes ) SATA Notice of Reliance - Exhibit 30.pdf(630718 bytes ) SATA Notice of Reliance - Exhibit 31.pdf(365984 bytes ) SATA Notice of Reliance - Exhibit 32.pdf(519495 bytes ) SATA Notice of Reliance - Exhibit 33.pdf(280006 bytes ) SATA Notice of Reliance - Exhibit 34.pdf(886611 bytes ) SATA Notice of Reliance - Exhibit 35.pdf(508625 bytes ) SATA Notice of Reliance - Exhibit 36.pdf(805205 bytes ) SATA Notice of Reliance - Exhibit 37.pdf(48344 bytes ) SATA Notice of Reliance - Exhibit 38.pdf(72574 bytes ) SATA Notice of Reliance - Exhibit 39.pdf(293409 bytes ) SATA Notice of Reliance - Exhibit 40.pdf(816575 bytes )

	SATA Notice of Reliance - Exhibit 41.pdf(58138 bytes ) SATA Notice of Reliance - Exhibit 42.pdf(2072243 bytes ) SATA Notice of Reliance - Exhibit 43.pdf(438262 bytes ) SATA Notice of Reliance - Exhibit 44.pdf(58797 bytes ) SATA Notice of Reliance - Exhibit 45.pdf(813285 bytes ) SATA Notice of Reliance - Exhibit 46.pdf(308814 bytes ) SATA Notice of Reliance - Exhibit 47.pdf(279428 bytes ) SATA Notice of Reliance - Exhibit 48.pdf(37198 bytes ) SATA Notice of Reliance - Exhibit 49.pdf(321479 bytes ) SATA Notice of Reliance - Exhibit 50.pdf(485765 bytes ) SATA Notice of Reliance - Exhibit 51.pdf(398061 bytes ) SATA Notice of Reliance - Exhibit 52.pdf(188341 bytes ) SATA Notice of Reliance - Exhibit 53.pdf(602977 bytes ) SATA Notice of Reliance - Exhibit 54.pdf(256223 bytes ) SATA Notice of Reliance - Exhibit 55.pdf(56762 bytes ) SATA Notice of Reliance - Exhibit 56.pdf(580784 bytes ) SATA Notice of Reliance - Exhibit 57.pdf(628323 bytes ) SATA Notice of Reliance - Exhibit 58.pdf(275341 bytes ) SATA Notice of Reliance - Exhibit 63.pdf(293975 bytes ) SATA Notice of Reliance - Exhibit 64.pdf(710790 bytes ) SATA Notice of Reliance - Exhibit 65.pdf(790667 bytes ) SATA Notice of Reliance - Exhibit 66.pdf(1995728 bytes ) SATA Notice of Reliance - Exhibit 67.pdf(1654177 bytes ) SATA Notice of Reliance - Exhibit 68.pdf(1084267 bytes ) SATA Notice of Reliance - Exhibit 69.pdf(3100617 bytes )
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE  
TRADEMARK TRIAL AND APPEAL BOARD**

SATA GmbH & Co. KG,	)	
	)	
Opposer and Petitioner,	)	
v.	)	Consolidated
	)	Opposition No. 91210813
Mike Ghorbani,	)	
	)	Opposition No. 91217915
Applicant and Registrant.	)	
	)	Cancellation No. 92059849
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**NOTICE OF RELIANCE**

Pursuant to Stipulation duly entered into by Opposer/Petitioner, SATA GmbH & Co. KG (SATA) and Applicant/Registrant, Mike Ghorbani (Ghorbani or MG Distributor), such Stipulation having been filed with the Trademark Trial and Appeal Board on October 10, 2015, the parties have agreed that documents that they have produced to the other pursuant to Fed. R. Civ. Pro. 34 in these Consolidated proceedings may be made of record in this Opposition proceeding and be considered as being authentic and genuine.

SATA hereby makes of record the following documents produced in this matter, along with various printed publications, website references, dictionary definitions, official records and discovery Answers and Responses, in accordance with TBMP §§ 704 and 705.

Exhibit No.	Description	#
1	<p>SATA's First Set of Interrogatories (Nos. 1-22) and Ghorbani's Answers and Supplemental Answers to same. Believed especially pertinent are the Answers and Supplemental Answers to the following interrogatories:</p> <ul style="list-style-type: none"> <li>• Int. 1 - Ghorbani claims that the EURO mark was conceived spontaneously and that it was selected because it is simple and easy to pronounce. It is acknowledged that no documentation exists relating to the selection of EURO.</li> <li>• Int. 6 – Ghorbani describes his business as the importation, distribution and sale of paint spray guns and related equipment.</li> <li>• Int. 8 – Ghorbani states that he learned of SATA at trade shows and through industry publications, while working at a paint store.</li> <li>• Int. 14 – Ghorbani is the owner of MG Distributor.</li> <li>• Int. 17 – The geographic source of EURO paint spray guns is Taiwan.</li> <li>• Int. 18 – It is acknowledged that the MG Distributor website contained text about SATA paint spray guns.</li> <li>• Int. 21 – EURO goods (like SATA goods) are promoted at trade shows, through direct mailing and via the Internet.</li> </ul>	
2	SATA's Second Set of Interrogatories (Nos. 23-29) and Ghorbani's Answers and Supplemental Answers to same.	
3	<p>SATA's Third Set of Interrogatories (Nos. 30-63) and Ghorbani's answers thereto, incorrectly identified as Applicant's Third Supplemental Response to Opposer's First Set of Interrogatories. Believed especially pertinent are the answers to the following interrogatories:</p> <ul style="list-style-type: none"> <li>• Int. 30 – The manufacturer of EURO paint spray guns is located in Taiwan.</li> <li>• Int. 32 – Ghorbani, hiding behind the</li> </ul>	Protective Order

Exhibit No.	Description	#
	<p>Taiwanese manufacturer, states that he cannot opine as to what is meant by a reference to a "SATA type spray gun".</p> <ul style="list-style-type: none"> <li>• Int. 35 – SATA and Ghorbani attended at least some of the same trade shows, where Ghorbani looked to have SATA's booth distant from his own.</li> <li>• Int. 37 – Ghorbani acknowledges having run advertising comparing his paint spray guns to SATA's.</li> <li>• Int. 39 – Ghorbani has no information, nor any documents, relating to the claim made on the bodies of various of his EURO guns that the guns were "designed in Germany".</li> <li>• Int. 40 – The Taiwanese manufacturer brands Ghorbani's paint spray guns with EURO at Ghorbani's request.</li> <li>• Int. 55 – Ghorbani alleges that he is phasing out the "Design in Germany" designation he had placed on various of his Taiwanese manufactured goods. Some of the EURO guns, manufactured in Taiwan carry a "Design in Germany" legend.</li> <li>• Int. 61 – Ghorbani admits he has sent information about SATA products to his manufacturer in Taiwan.</li> </ul>	
4	<p>SATA's Fourth Set of Interrogatories (Nos. 64-70) and Ghorbani's answers thereto. Believed especially pertinent are the answers to the following interrogatories:</p> <ul style="list-style-type: none"> <li>• Int. 64 – Ghorbani's alleged expert witness was actually a vendor of Ghorbani's EURO paint spray guns.</li> <li>• Int. 66. – It is again acknowledged that Ghorbani has no knowledge of any facts supporting the claims made on his EURO paint spray guns that such were designed in Germany.</li> </ul>	
5	<p>SATA's First Set of Requests for Admission (Nos. 1-8) and Ghorbani's Responses thereto. Believed especially pertinent are the Responses to:</p> <ul style="list-style-type: none"> <li>• Adm. 1 – Acknowledging that the</li> </ul>	

Exhibit No.	Description	#
	<p>dictionary definition of EURO provided by SATA as Exhibit A “refers to EURO as a ‘preface’ for Europe”.</p> <ul style="list-style-type: none"> <li>• Adm. 5 – It is admitted that no sales advantage would be gained by having consumers associate a paint spray gun with a unit of currency.</li> <li>• Adm. 8 – It is acknowledged that SATA is a leading player in the paint spray gun industry.</li> </ul>	
6	Page from Ghorbani's website, source and date of printing depicted, offering for sale via online purchase his Taiwanese manufactured EURO paint spray guns.	
7	Page from Ghorbani's website, source and date of printing depicted, providing a portrayal of his Taiwanese manufactured paint spray gun with EURO emblazoned on the gun handle.	
8	Receipt from SEMA trade show in which Ghorbani lists SATA as a competitor in order to establish a booth location far from SATA's.	GHORBANI000055
9	Email from MG Distributor to “Sergio” in response to trade show booth visit, containing statement “EURO-Designed in Germany”.	MGD000416
10	Excerpt from SATA's publication depicting its spray guns and advertising the guns as being "developed and manufactured in Germany," with the phrase "German engineering - exceeding expectations". Relevant to establish that consumers are compelled to purchase spray guns that are German engineered and manufactured in Germany, that claims of European engineering and manufacturing are desirable within the paint spray gun industry.	MGD000093
11	Email correspondence between Ghorbani and Taiwanese manufacturer of his EURO paint spray guns, in which a shipment of spray guns is discussed whereby the manufacturer describes his Taiwanese guns as "our new SATA spray gun which looks like SATA 1000, NOT 3000 NOR 4000." Relevant in establishing the intent of both parties to profit from an illusion of European manufacture, design and craftsmanship on the Taiwanese EURO guns. Also relevant in establishing the control	MGD000541 – 542

Exhibit No.	Description	#
	available and exerted by Applicant in choosing language appearing on handle of EURO spray guns.	
12	Email correspondence between Ghorbani and Taiwanese manufacturer of his EURO paint spray guns, indicating a reference to a new "SATA type spray gun" that Ghorbani can order and "die cast EURO onto the gun body", indicating the desirability of a SATA type spray gun, the well known and appreciated quality of SATA guns, and that European design and manufacture are elements material to a potential purchaser's decision in choosing a paint spray gun.	MGD000379 Protective Order
13	Email correspondence between Ghorbani and his Taiwanese manufacturer of EURO guns confirming Ghorbani's selection and forwarding of a new EURO logo to his Taiwanese manufacturer. Relevant in establishing control exerted by Ghorbani in selection of the design and styling of what appears on the gun's handle.	MGD000546 Protective Order
14	Copy of page produced by Ghorbani during discovery which earlier appeared at MG Distributor's website extolling the virtues of SATA paint spray guns and recognizing SATA as a dominant presence in the spray gun market.	GHORBANI 000007
15	Copy of page produced by SATA to Ghorbani during discovery which earlier appeared at MG Distributor's website extolling the virtues of SATA paint spray guns and recognizing SATA as a dominant presence in the spray gun market.	S0485
16	Excerpt from third party website extolling attributes and quality of SATA paint spray guns, evidencing SATA's reputation in the paint spray gun industry.	S0509
17	Excerpt from a third party website that sells paint spray products, touting SATA spray equipment as providing a "uniform standard of quality which is recognized in the industry as superior", in addition to proclaiming that for over 100 years SATA has provided high tech spray equipment to over 85 countries, while stating that "by purchasing SATA equipment you can expect the very best." Relevant to show	S0498

Exhibit No.	Description	#
	the reputation of SATA individually, and Europe generally, within the paint spray gun industry as a source of quality craftsmanship, design and manufacture, all qualities that play a material role in a potential purchaser's decision of whether or not to buy a specific gun.	
18	Page from SATA's website evidencing usage of the term "SATA quality", establishing that high quality paint spray guns are manufactured in Europe, that SATA is a European company.	S0479
19	Newsletter page relevant for evidencing that SATA paint spray guns exhibit German Engineering, that German Engineering is a phrase with a meaningful connotation amongst potential consumers, that SATA is a widely known and recognized leader in the paint spray gun industry, that SATA guns are generally desirable.	S0018
20	Dictionary definition provided by the DK Illustrated Oxford Dictionary defining "Euro" as "Europe; European."	
21	Dictionary definition provided by the Random House Webster's college dictionary defining "Euro" as "a combining form meaning 'Europe,' referring esp. to W. Europe of the European Union."	
22	Dictionary definition provided by the American Heritage Dictionary of the English Language, Fourth Edition, recognizing that "Euro" is defined as "Europe; European."	
23	Internet pages from the official website of Bravo TV, source and date of printing depicted, providing clips, information and advertising for the television show "Euros of Hollywood," featuring six Europeans who move to Los Angeles to pursue their version of the American dream. Relevant for repeated usage of the term "Euros" and "Euro" as referring to and referencing Europe and European, in an American television show developed for an American audience.	S0804-0812
24	Internet pages, source and date of printing depicted, providing information about The European Virtual Observatory, referenced on the web pages as "EURO-VO," relevant in	S0813- 0814

Exhibit No.	Description	#
	providing evidence of the usage of the word "EURO" as a commonly used, and easily understood, meaning of Europe.	
25	Internet pages, source and date of printing depicted, providing a list of European cities that will host the UEFA EURO 2016, a high profile soccer tournament featuring strictly European nations. Relevant for displaying usage of the word "Euro" as meaning European, as the title of a soccer tournament viewed and followed closely by Americans.	S0836 -0837
26	Internet pages, source and date of printing depicted, providing information about Europe's annual powder metallurgy congress and exhibition, relevant for its prominent display and usage of the word "Euro" as meaning European, in the title of the event: "Euro PM2015 Congress & Exhibition."	S0801-0803
27	Internet pages, source and date of printing depicted, from Eurosport.com, a website offering sports news, scores, results and videos from European sporting matches and events, including soccer, tennis and cycling, all available for Americans who follow particular European teams or athletes. Relevant for usage of the word "Euro" as meaning and indicating Europe, European.	S0815 - 0830
28	Bill of Lading and related shipping documents relevant for establishing that Ghorbani's EURO guns are manufactured outside of Europe.	MGD000431 Protective Order
29	Third party website offering German paint spray guns for sale, referencing a "German type" spray gun and comparing this German model with \$500 German spray guns. Relevant in establishing Europe as an origin of paint spray guns and evidencing the desirability and prestige of European manufactured spray guns.	S0581
30	Excerpt from third party website conducting a paint spray comparison and touting SATA as a German company that has been making top quality spray guns for decades, establishing SATA as the "crème de la crème of the spray gun world", relevant to show that European origin, design and manufacture are material to the purchasing decision of a potential spray gun	S0496-0497

Exhibit No.	Description	#
	consumer.	
31	Excerpt from third party website touting the high quality and desirability of SATA spray guns in the paint spray gun industry, relevant for evidencing the association made amongst potential consumers between Europe and high quality paint spray guns.	S0507
32	Excerpt from third party website extolling attributes and quality of SATA paint spray guns, evidencing SATA's reputation in the paint spray gun industry.	S0492-0493
33	Excerpt from third party website extolling attributes and quality of SATA paint spray guns, evidencing SATA's reputation in the paint spray gun industry.	S0508
34	Excerpt from online message board in which experienced paint spray gun users acknowledge Europe's role in the design of gravity paint spray guns, as well as touting the high quality and performance of SATA paint spray guns, relevant in establishing that a goods-place association exists between paint spray guns and Europe, and that there is an established perception within the paint spray gun industry of the overall quality and prestige of European manufactured spray guns.	S0515-0516, S0523
35	Labels placed on SATA paint spray guns, relevant in establishing that high quality paint spray guns are recognized as originating from Europe.	S0547-0549
36	Third party website utilizing comparative advertising tactics in offering paint spray guns for sale; repeatedly referencing "German spray guns", "German guns" and "German counterpart" to make alleged favorable comparisons, relevant in establishing that consumers identify Europe as a known source of paint spray guns, and that purchasers of paint spray guns value European manufacture.	S0553-0554, 0556
37	Excerpt from third party website evidencing esteemed reputation of European paint spray guns ("TEKNA Spray Guns – Made in Europe for North America's Best Automotive Painters.") and German gun specifically ("Tekna's answer to Top German Spray Guns").	S0574

Exhibit No.	Description	#
38	Third party website offering for sale spray guns made in Europe with comparative references to German spray guns and "German S&* & spray guns". Relevant in establishing that the public associates spray guns with Europe, and that European spray guns have a reputation amongst consumers for high quality.	S0565
39	Third party website offering paint spray guns for sale and advertising that guns for sale are made in Europe, relevant in establishing that Europe is a known source of paint spray guns and that the designation of made in Europe is impactful in a potential purchaser's decision of whether to purchase the guns.	S0598
40	Internet pages from Devilbiss.com, source and date of printing depicted, containing general information about Devilbiss, a European paint spray gun company, and its paint spray gun products. Relevant to establish that paint spray gun purchasers recognize Europe as a geographic source of paint spray guns.	S0867-0869
41	Internet printout from Finishing Brands - Europe, source and date of printing depicted, containing general information concerning European paint spray gun companies Devilbiss, Ransburg and Binks, relevant in demonstrating that purchasers associate paint spray guns with Europe.	S0876
42	Third party website, source and date of printing depicted, listing various brands of paint spray guns available for sale on its website, utilizing descriptions for various of the guns as "comparable to the German spray," "sprays as well as \$700 German spray guns," "sprays as well as German Spray Guns at 1/3 the price," "better spray than the German 2000 series," "beats the Germans hands down," "considered by many to be the best European Spray Gun," "Wow! German engineering and production at its finest. German Spray's competitor in Germany. It's the BMW vs. Mercedes," "modeled after the German MiniSprayJet II." Language used relevant to demonstrate that consumers recognize Europe as a geographic origin of paint spray guns, and that designations	

Exhibit No.	Description	#
	of European manufacture, engineering and performance are material elements which impact a potential purchaser's decision of which paint spray gun to buy.	
43	Internet pages from EUROPAGES website, source and date of printing depicted, providing listings for European companies offering various paint spray guns. Relevant for establishing that "Euro" is a word commonly used and understood as meaning Europe, and also that Europe is a known origin of paint spray guns.	S0838-0849
44	Third party website offering for sale Spanish paint spray guns with comparative advertising references to "German competition" and quality "German Sat* guns". Relevant in establishing that purchasers associate paint spray guns with Europe and that European manufacture is a desirable characteristic.	S0576
45	Third party website offering German paint spray guns for sale, repeatedly touting German engineering, construction and overall origin, while claiming to be a part of Europe's "Elite spray gun series". Relevant in establishing that Europe is a known source of paint spray guns and that European manufacture is a desirable characteristic.	S0578-0580
46	Third party website offering Italian paint spray guns for sale, advertising quality comparable to more expensive German spray guns. Relevant in establishing Europe as a known and accepted origin of paint spray guns as well as the desirability of high end European spray guns and equipment.	S0585
47	Excerpt from third party website, source and date of printing depicted, offering for sale Italian paint spray guns which boasts of being the "#1 European Spray gun Company." Relevant in establishing that Europe is a known source of paint spray guns and that claiming to be the top European spray gun company evidences that consumers care where a paint spray gun is manufactured, and a European origin is material to their purchasing decision.	S0862
48	Third party website offering Italian paint spray guns for sale and claiming that the brand is	S0600

Exhibit No.	Description	#
	"Europe's #1 Spray Gun!" Relevant in establishing that Europe is a known source of paint spray guns and that the claim of being Europe's top spray gun has meaning, significance, offers prestige, and is a factor to be heavily considered by potential consumers.	
49	Third party website offering Italian paint spray guns featuring claims that the company is the "No. 1 European Spray Gun Company" and that the company is "one of Europe's top industrial leaders". Relevant in evidencing that Europe is a known source of paint spray guns and that claims to be Europe's superior paint spray gun company are meant to attract the business of potential consumers.	S0607
50	Third party website advertising European Hi-End Spray Equipment for sale. Relevant in establishing that purchasers associate paint spray guns with Europe, and that European paint spray equipment is perceived within the industry as being of high quality and desirable.	S0569-0570
51	Third party website offering Italian paint spray guns for sale specifically advertising that the guns exhibit "European Quality". Relevant in establishing that consumers associate paint spray guns with Europe and that the designation of European quality is material to the purchasing decision of a potential paint spray gun consumer.	S0551-0552
52	Third party website discussing a German brand of paint spray gun, alleging that the company's guns are used exclusively in the premier body shops of Europe. Relevant in establishing that consumers draw an association between Europe and paint spray guns as well as evidencing the prestige and reputation for quality that potential purchasers ascribe to Europe.	S0612
53	Online website listing, source and date of printing depicted, advertising for sale a "high pressure Europe style paint spray gun" from a Chinese manufacturer. Relevant to show the phrase "Europe style spray gun" as being alluring to potential purchasers, that "Europe style spray gun" is intended to draw upon the established reputation and high quality	

Exhibit No.	Description	#
	associated with European paint spray guns which would play a material role in the decision of a potential consumer of whether to purchase the gun.	
54	Third party website offering paint spray guns for sale, using alleged comparisons for various paint spray gun companies that their guns are "modeled after top German HVLP spray guns", that guns are "the finest German HVLP & LVLP spray guns in the world", and that an Italian company has "lead the way in spray gun design in Europe". Relevant in establishing that purchasers are likely to believe that spray guns originate in Europe, and that there is an established prestige associated with European companies and manufacture within the paint spray industry.	S0606
55	Third party website offering paint spray guns for sale and touting a "Hi-End European Design". Relevant in establishing that Europe is a known source of paint spray guns and that a designation of European design is meaningful to potential paint spray gun consumers.	S0589
56	Third party website offering for sale Asian manufactured paint spray guns, advertising that the guns being sold are "modeled after European spray guns" and offering alleged similarities to "\$600 European Spray guns". Relevant in establishing that Europe is a known source of paint spray guns and that the designation of having a paint spray gun modeled after a European model is a material factor considered by potential consumers.	S0592-0593
57	Ghorbani's advertisement depicting his Taiwanese manufactured EURO paint spray guns with language selected for the handle of the gun to read "Design in Germany" directly under the EURO mark. Relevant in establishing that a claim of European manufacture or design is desirable amongst potential paint spray gun consumers, that a European design would be a material factor in a consumer's decision whether to buy a certain spray gun, to show that consumers draw an association between German design and quality, prestige, and overall	MGD0000105

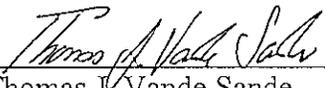
Exhibit No.	Description	#
	excellence.	
58	Email correspondence between Ghorbani and SEMA Trade Show organizers confirming Ghorbani's registration in 2012 SEMA show.	MGD000445
59	Email correspondence between Ghorbani and potential purchasers of his Taiwanese manufactured EURO paint spray guns, featuring Ghorbani's claim boasting "EURO - Designed in Germany" above pictures of Taiwanese guns. Relevant to show alleged European design inclusion as an attractive claim material to a potential consumer's decision to buy Ghorbani's EURO spray guns.	MGD000450 Protective Order
60	Email correspondence between Ghorbani and potential purchaser of his Taiwanese manufactured EURO paint spray guns in which potential purchaser states that he wishes to become a distributor of EURO guns because, at least in part, he likes that the EURO guns resemble SATA guns. Relevant in establishing that European design and manufacture is a material factor in a potential purchaser's decision to buy a particular paint spray gun, that the resemblance to a European paint spray gun is the reason this potential purchaser is interested in purchasing EURO guns from Ghorbani.	MGD000403 Protective Order
61	Email correspondence between Ghorbani and individual who will represent MG Distributor at Mexican Trade Show. Relevant for instruction to inform trade show attendees that Ghorbani's EURO guns are similar to SATA guns, and for the assertion that it is "very important" to know that all MG Distributor products are designed in Germany.	MGD000414 Protective Order
62	Email exchanges between Ghorbani and his Taiwanese manufacturer re: EURO goods manufactured in Taiwan and SATA copy guns.	MGD000462-463,464,470 Protective Order
63	Webpage printout, source and date of printing depicted, from the U.S. Department of State Website outlining U.S. relations with Taiwan and specifically stating that the United States acknowledges "the Chinese position that there is but one China and Taiwan is a part of China."	
64	Webpage printout, source and date of printing depicted, discussing counterfeiting generally as	S0909-0910

Exhibit No.	Description	#
	well as harms associated with counterfeiting, specifically mentioning that the manufacturing of counterfeits is most prevalent in "...nations throughout Asia, such as China and Taiwan." Relevant in demonstrating the established reputation of Chinese and Taiwanese goods as being inferior and often knockoffs.	
65	Internet article, source and date of printing depicted, reporting that 30,000 bottles of counterfeit wine were seized in Taiwan in addition to printing equipment used in the counterfeiting process. Relevant to demonstrate the reputation and belief amongst American consumers that Taiwanese products are inferior in quality and often counterfeits.	S0921-0923
66	Online article, source and date of printing depicted, discussing brazen examples of Chinese counterfeiting and specifically mentioning factories in Taiwan producing copied goods. Relevant to demonstrate established reputation of Chinese manufactured goods amongst the general public.	
67	Internet article, source and date of printing depicted, discussing China's status as a perceived and legitimate threat in the theft of intellectual property. Relevant in establishing China's reputation as a producer of inferior and illegitimate products often times with an understood goal of deceiving the purchasing public, and evidencing the esteem and desirability of European manufactured products.	
68	Internet article, source and date of printing depicted, entitled "In China, Why Piracy Is Here To Stay." Relevant to demonstrate reputation of Chinese goods as inferior and of low quality, and also to establish association amongst American consumers with Chinese goods and knockoff products.	S0905-0908
69	Online message forum with posts from paint spray gun users, source and date of printing depicted, characterizing Chinese paint spray guns as "crap", specifically mentioning a Taiwanese knockoff gun. Relevant in establishing the reputation within the paint spray	

Exhibit No.	Description	#
	gun industry and amongst potential purchasers that Chinese paint spray guns are generally undesirable and of inferior quality.	

Hall & Vande Sande, LLC

Date: 10/15/15

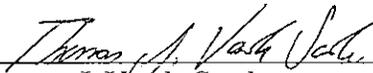
  
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CERTIFICATE OF SERVICE

The undersigned, Thomas J. Vande Sande, attorney for Opposer hereby certifies that one (1) copy of the foregoing "NOTICE OF RELIANCE" and those documents identified as Exhibits 1-69 were this day served on Applicant by mailing same, first class mail, to:

Payam Moradian, Esquire  
Keleti + Moradian LLP  
10880 Wilshire Blvd., Suite 1101  
Los Angeles, California 90024

Date: 10/15/15

  
\_\_\_\_\_  
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
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SATA GmbH & Co. KG, )  
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 v. ) Opposition No. 91210813  
 )  
 Mike Ghorbani )  
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 Applicant. )  
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OPPOSER'S FIRST SET OF INTERROGATORIES

Opposer, SATA GmbH & Co. KG, requests that Applicant answer within thirty days, under oath, and in accordance with the Federal Rules of Civil Procedure, the following interrogatories.

DEFINITIONS

1. As used herein, "Opposer" includes SATA GmbH & Co. KG, as well as its officers, directors, attorneys and all persons in privity with it with regard to the matters inquired about herein.
2. As used herein the designation "Applicant" refers to the named Applicant, and any and all predecessor or successor companies, assignors, corporations, or other business entities or individuals; any company, corporation or other business entity or individual affiliated with Applicant or owned by it in whole or in part, and the directors, officers, agents, employees and attorneys of any of them, including all persons acting or purporting to act on behalf of, or who are subject to the direction or control of, any of the foregoing. In each instance where an answer to an interrogatory differs as between Applicant and any predecessor or successor companies, corporations, assignor(s),

Exhibit 1

licensee(s) or any other business entities or person(s) as described above, the answer shall so state, shall set forth such difference(s) and shall state separately all information applicable to Applicant, and all information applicable to each such predecessor or successor company, assignor, licensee, corporation or other business entity or person as described above.

3. The term '789 refers to U.S. Trademark Application Serial No. 85/712,789 for the EURO and design mark.

4. The term "person" refers to any individual, corporation, proprietorship, association, joint venture, company, partnership or other business or legal entity, including governmental bodies and agencies.

5. The term "document" is used in its customary broad sense to include, without limitation, the following items, whether or not prepared by Applicant, whether printed or reproduced by any process, or written or produced by hand, and whether or not claimed to be privileged or otherwise excludable from discovery, namely, notes, letters, correspondence, communications, telegrams, memoranda, e-mails, summaries or records of telephone conversations, summaries or records of personal conversations, diaries, reports, laboratory and research reports, notebooks, charts, plans, drawings, photographs, minutes or records of meetings, including directors' meetings, reports and/or summaries of interviews, reports and/or summaries of investigations, opinions or reports of consultants, reports of trademark searches, trademark appraisals, opinions of counsel, agreements, reports or summaries of negotiations, brochures, pamphlets, advertisements, circulars, trade letters, press releases, drafts of documents, and all material fixed in a tangible or electronic medium of whatever kind known to or in the possession or control of the Applicant. "Document" or "documents" also includes all copies which are not identical to the original.

6. The term "communication" refers to any exchange or transfer, known to Applicant, of information between two or more persons, whether written, oral, electronic, or in any other form.

7. The term "business entity" means a partnership, corporation, proprietorship,

association or any other business organization, whether formal or informal.

8. The term "date" means the exact day, month and year, if ascertainable, or if not, the best approximation (including relationships to other events).

9. The masculine includes the feminine and vice versa; the singular includes the plural and vice versa.

10. As used herein, the term "control" or "controlled" means the power or ability of Applicant to direct the actions, management, or policies of any person, firm or corporation.

11. The term "describe in detail" means describe every fact, statistic, inference, supposition, estimate, consideration, conclusion, study or analysis known to Applicant which relates to the allegation or contention, or which Applicant believes to be evidence of the truth or accuracy of the allegation or contention, and to identify each document relating thereto.

12. Whenever an interrogatory requires the identification of a document, the answer shall state the following information with respect to each such document:

- (a) the date appearing on such document, and if no date appears thereon, the answer shall so state and shall give the date or approximate date such document was prepared;
- (b) the identifying or descriptive code number, file number, title or label of such document;
- (c) the general nature or description of such document (i.e., whether it is a letter, memorandum, e-mail, drawing, etc.) and the number of pages of which it consists;
- (d) the name of the person who signed such document and if it was not signed, the answer shall so state and shall give the name of the person or persons who prepared it;
- (e) the name of the person to whom such document was addressed and the name of each person other than such addressee to whom such document or copies thereof

were given or sent;

- (f) the name of the person having possession, custody or control of such document;
- (g) whether any draft, copy or reproduction of such document contains or has been subject to any postscript, notation, change, amendment or addendum not appearing on said document itself, and, if so, the answer shall identify as herein required each such draft, copy or reproduction;
- (h) the source or origin of said document and, if the document was not generated by Applicant, specify from whom the document was obtained and identify said person and that person's relationship to Applicant;
- (i) if such document was, but is no longer, in Applicant's possession or subject to its control, state what disposition was made of it and when.

13. If the attorney/client privilege or work product protection is claimed with respect to a document or oral communication for which identification is sought herein, with respect to each such interrogatory answer or document request response, a separate list of all such documents or oral communications shall be served with the answers hereto. Such separate list shall identify each document or oral communication by author, recipient and recipients of copies (including titles and whether or not they are attorneys), the date of such document or oral communication, and a summary of the subject matter of the document or oral communication.

14. Whenever an interrogatory requests the identification of an individual or person state, to the extent known, his or her full name, present or last known employer; and if employed by Applicant at any time, the period of time so employed, and the areas of responsibility during such times.

15. Whenever an interrogatory requests the identity of a company, corporation, or other business or legal entity, state to the extent known:

- (a) the full name;

- (b) the location of all divisions, branches or offices which are or were involved in any way with the matters referred to in the interrogatory; and
- (c) the identity of the person acting or purporting to act on behalf of the business entity in connection with the matters referred to in the interrogatory.

16. If Applicant elects to avail itself of the procedure authorized by Rule 33(d) of the Federal Rules of Civil Procedure, as that rule is applied and interpreted by the Trademark Trial and Appeal Board, Applicant shall classify or otherwise appropriately arrange and correlate its documents according to the specific interrogatory to which each such document is responsive. Similarly, in responding to Opposer's requests for production of documents, Applicant shall likewise classify or otherwise appropriately arrange and correlate its documents according to the specific document request to which each such document is responsive.

17. Whenever information requested in an interrogatory is itemized in subparagraphs, or subparts, Applicant shall answer each such subparagraph or subpart separately.

18. Where a document has been destroyed, or is alleged to have been destroyed, state the date of and reason for its destruction, identify each person having any knowledge of its destruction, and each person responsible for its destruction.

19. Once a person has been identified in an answer to an interrogatory, it shall be sufficient thereafter when identifying that person merely to state his or her name.

These interrogatories shall be deemed continuing and Applicant shall be obligated to change, supplement and amend its answers thereto as prescribed by the Federal Rules of Civil Procedure and the rules of the Trademark Trial and Appeal Board.

## INTERROGATORIES

### INTERROGATORY NO. 1

Describe the facts surrounding the selection of the EURO and design mark by Applicant, identifying relevant dates and the persons most closely connected with the selection of the mark. Identify all related documents.

### INTERROGATORY NO. 2

Identify each meeting or discussion at which the consideration, selection, approval or adoption of the EURO and design mark for use on any of Applicant's goods was discussed, and for each such meeting or discussion, identify each participant. Identify all related documents.

### INTERROGATORY NO. 3

Identify the individual(s) employed by or associated with Applicant who are most knowledgeable about Applicant's intended and/or actual use of the EURO and design mark.

### INTERROGATORY NO. 4

Identify and describe all goods and/or services in connection with which the EURO and design mark is used, or is intended to be used, by Applicant, and by any licensee or other entity using that mark with Applicant's permission. As to each item of goods and services state the annual revenues in dollars since use of the mark commenced.

### INTERROGATORY NO. 5

Identify the types and classes of purchasers of the goods and services offered by Applicant under the EURO and design mark.

INTERROGATORY NO. 6

Describe in detail the nature of Applicant's business.

INTERROGATORY NO. 7

With respect to each and every opinion of counsel which relates to or refers to Applicant's right to use or register the EURO and design mark, identify each written or oral communication providing each such opinion and each such communication requesting each such opinion. Provide the date any such opinion(s) was or were requested, as well as the date any such opinion was rendered.

INTERROGATORY NO. 8

Identify with specificity when and under what circumstances Applicant first learned of Opposer.

INTERROGATORY NO. 9

Describe in detail Applicant's first use of the EURO and design mark with respect to any and all goods. Identify all documents and things which Applicant contends supports its alleged first use date(s) and its alleged date(s) of first use in commerce.

INTERROGATORY NO. 10

Identify the person(s) most knowledgeable concerning:

- (a) the goods and any services offered by Applicant;
- (b) trademarks, trade names, and service marks used by Applicant;

- (c) advertising and advertising plans in connection with which the EURO and design mark have been or are currently used or are intended to be used.

INTERROGATORY NO. 11

Identify and describe in detail any conflict, allegation of infringement or controversy, whether currently pending or resolved, with any third party involving Applicant and the EURO and design mark. Identify all documents referring or relating thereto.

INTERROGATORY NO. 12

State Applicant's annual expenditures for advertising and/or promotion for each of Applicant's goods offered in connection with the EURO and design mark since the date of first use of that mark.

INTERROGATORY NO. 13

Identify all uses of the term EURO, either alone or in combination with another word or words, as a corporate name, trade name, service mark, trademark or other type of use by third parties in connection with painting related goods and services of which Applicant has knowledge.

INTERROGATORY NO. 14

Describe in detail the relationship between MG Distributors and Mike Ghorbani.

INTERROGATORY NO. 15

Describe in detail all facts upon which Applicant bases its contention that its spray guns are not inferior to Opposer's spray guns as asserted by Applicant in Paragraph 4 of its Answer.

INTERROGATORY NO. 16

Describe in detail all facts upon which Applicant bases its contention that its spray guns are sold to different potential customers as asserted by Applicant in Paragraph 4 of its Answer.

INTERROGATORY NO. 17

Identify the geographic origin of Applicant's goods which bear the EURO and design mark.

INTERROGATORY NO. 18

Identify all references to Opposer or its products presently or formerly appearing in any website owned or controlled by Applicant.

INTERROGATORY NO. 19

State what Applicant contends is the primary significance of "EURO" (a) in general and (b) as a portion of Applicant's mark.

INTERROGATORY NO. 20

Describe in detail all facts upon which Applicant bases its contention that purchasers of spray guns are sophisticated and unlikely to be confused, as asserted by Applicant in Paragraph 17, Applicant's Third Affirmative Defense.

INTERROGATORY NO. 21

Identify all media used by Applicant in the offering and promotion of those of Applicant's goods which bear the EURO and design mark.

INTERROGATORY NO. 22

Identify the person or persons most knowledgeable as to each of the answers provided to each of the foregoing Interrogatories.

HALL & VANDE SANDE, LLC

Date: \_\_\_\_\_

8/13/13

  
\_\_\_\_\_  
Thomas J. Vande Sande  
Attorneys for Opposer  
10220 River Road, Suite 200  
Potomac, Maryland 20854  
(301) 983-2500

CERTIFICATE OF SERVICE

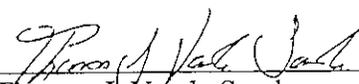
The undersigned, Thomas J. Vande Sande, attorney for Opposer, hereby certifies that one (1) copy of the foregoing "OPPOSER'S FIRST SET OF INTERROGATORIES" was this day served on Applicant by mailing same to:

Darius G. Adli, Esquire  
Adli Law Group P.C.  
444 South Flower Street, Suite 1750  
Los Angeles, California 90071

HALL & VANDE SANDE, LLC

Date:

8/13/13



Thomas J. Vande Sande  
Attorneys for Opposer  
10220 River Road, Suite 200  
Potomac, Maryland 20854  
(301) 983-2500



not waive any objections on the grounds of privilege, competency, relevance, materiality, authenticity, or admissibility of the information contained herein, and expressly reserves the right to use any of these responses or the subject matter contained in them during any subsequent proceeding, including the trial of this or any other action.

### **GENERAL OBJECTIONS**

The following general objections apply to, and are incorporated by reference in, every response to each interrogatory. Specific objections to the interrogatories are not intended to preclude, override, or withdraw any of the general objections to that request.

1. Applicant objects to each interrogatory, Definition, and Instruction to the extent that it seeks information neither relevant to any claim or defense in this action nor reasonably calculated to lead to the discovery of admissible evidence.
2. Applicant objects to each interrogatory, Definition, and Instruction to the extent that it seeks to impose requirements or obligations on Applicant in addition to, or different from, those imposed by the Federal Rules of Civil Procedure, the Local Rules of this Court, any applicable orders of this Court, or any stipulation or agreement between the parties.
3. Applicant objects to each interrogatory, Definition, and Instruction to the extent that it exceeds the scope of permissible discovery by calling for information that is protected from discovery by the attorney-client privilege, the work product doctrine, and/or any other applicable privilege or immunity. Nothing contained in these objections and responses is intended to be, or in any way constitutes, a waiver of any applicable privilege or immunity.

Inadvertent production of such information, document(s), and/or thing(s) shall not be deemed a waiver of any privilege or immunity.

4. Applicant objects to each interrogatory, Definition, and Instruction to the extent that it seeks information that is within the scope of a confidentiality agreement, protective order, settlement agreement, or other obligation that requires consent of any third party.

5. Applicant objects to each interrogatory, Definition, and Instruction as overly broad and unduly burdensome to the extent that it seeks information beyond what is available from a reasonable search of Applicant's files likely to contain relevant or responsive documents and a reasonable inquiry of Applicant's employees.

6. Applicant objects to each interrogatory, Definition, and Instruction to the extent that it seeks "each and every," "all," or "any" responsive information on the basis that such interrogatory is overly broad and unduly burdensome.

7. Applicant objects to each interrogatory, Definition, and Instruction to the extent that it directs Applicant to describe or state responsive information "in detail" on the basis that such interrogatory is overly broad and unduly burdensome.

8. Applicant objects to each interrogatory, Definition, and Instruction to the extent that it seeks information or identification of documents that are not within the possession, custody, or control of or refers to persons, entities, or events not known to Applicant, subjecting Applicant to unreasonable and undue annoyance, oppression, burden, and expense, and imposing upon it an obligation to discover information or materials from third parties or services who are equally accessible to the Opposer.

9. Applicant objects to each interrogatory, Definition, and Instruction to the extent that it seeks information that does not already exist.

10. Applicant objects to each interrogatory to the extent that it calls for legal conclusions or presents questions of pure law.

11. Applicant objects to each interrogatory, Definition, and Instruction as premature to the extent that it seeks expert discovery. Applicant will provide expert discovery in accordance with applicable orders of this Court.

12. Applicant objects to each interrogatory, Definition, and Instruction to the extent that it purports to attribute any special or unusual meaning to any technical or legal terms or phrases.

13. Applicant objects to each interrogatory, Definition, and Instruction to the extent that it seeks information outside the relevant geographical or temporal scope of this action.

14. Applicant objects to each interrogatory, Definition, and Instruction to the extent that it is vague, ambiguous, and unclear, including Opposer's use of terms that are not defined, vaguely and/or over broadly defined, and/or not susceptible to any single meaning's failure to object to a term defined by Opposer's in its First Set of interrogatories shall not be construed to mean that Applicant understands and/or agrees with the Definition.

15. Applicant objects to each interrogatory, Definition, and Instruction to the extent that (i) the discovery sought is unreasonably cumulative or duplicative, is publicly available, and/or is available to Opposer from a more convenient, less burdensome, or less expensive

source; (ii) the requesting party has had ample opportunity by discovery to obtain the information sought; or (iii) the burden or expense of the proposed discovery outweighs its likely benefit, taking into account the needs of the case, the amount in controversy, the parties' resources, the importance of the issues at stake in this action, and the importance of the proposed discovery in resolving the issues.

16. Applicant objects to the definitions of "Applicant", "You," or "Your" as overbroad, unduly burdensome, vague, ambiguous, unclear, and seeking information that is neither relevant to the claim or defenses of any party to this action, nor reasonably calculated to lead to the discovery of admissible evidence. These definitions, including, without limitation, phrases such as any "of its owners, partners, officers, directors, employees, affiliates, agents, counsel, attorneys, representatives, and anyone else action on behalf of THE APPLICANT or for THE APPLICANT's benefit," impermissibly enlarge the scope of the interrogatories and this action by seeking to apply these interrogatories to and/or request that Applicant respond on behalf of vague, overbroad, and burdensome categories of entities and include unnamed parties to this action.

17. Applicant objects to the Instructions to the extent they seek to impose a burden and/or duty to identify documents or business records in a manner inconsistent with Applicant's ordinary course of business or beyond the scope of the Federal Rules of Civil Procedure or any applicable local rules. Applicant *will* comply with the requirements of the Federal Rules of Civil Procedure and any applicable local rules.

18. Applicant objects to the Definitions, Instructions, and interrogatories to the extent

they seek to impose a burden and/or duty to provide and/or characterize financial data in a manner inconsistent with its ordinary course of business or beyond the scope of the Federal Rules of Civil Procedure or any applicable local rules. Applicant will comply with the requirements of the Federal Rules of Civil Procedure and any applicable local rules.

### **SPECIFIC RESPONSES AND OBJECTIONS**

Applicant incorporates by reference the General Objections set forth above into the Specific Responses set forth below. Applicant may repeat an objection for emphasis or some other reason. The failure to repeat any General Objection, however, does not waive any such objection to the interrogatory.

#### **INTERROGATORY NO.1**

Describe the facts surrounding the selection of the EURO and design mark by Applicant identifying relevant dates and the persons most closely connected with the selection of the mark. Identify all related documents.

#### **RESPONSE TO INTERROGATORY NO.1**

Subject to the foregoing objections, Applicant responds that Mike Ghorbani selected EURO name and design spontaneously.

#### **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO.1**

The Applicant has no documents relating to this interrogatory, and is not withholding any document due to a privilege or work product.

#### **SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO.1**

#### **APPLICANT'S THIRD SUPPLEMENTAL RESPONSE TO OPPOSER'S FIRST SET OF INTERROGATORIES**

Mr. Ghorbani recalls selecting the name Euro while he was working at a paint store. At the paint store, he remembers that there were two products with the name Euro. One of the products was a tape that was used to cover up an article before painting. Another product with the name Euro was a paint clear coat. He was drawn to the name Euro for being simple and easy to pronounce. EURO (without design) was originally selected circa 2005. EURO (with design) was selected circa 2010.

**INTERROGATORY NO.2**

Identify each meeting or discussion to which the consideration, selection, approval or adoption of the EURO and design mark for use on any of Applicant's goods was discussed, and for each such meeting or discussion, identify each participant. Identify all related documents.

**RESPONSE TO INTERROGATORY NO.2**

Subject to the foregoing objections, Applicant responds that no such specific meetings or discussions took place.

**INTERROGATORY NO.3**

Identify the individual(s) employed by or associate with Applicant who are most knowledgeable about Applicant's intended and/or actual use of the EURO and design mark.

**RESPONSE TO INTERROGATORY NO.3**

Subject to the foregoing objections, Mike Ghorbani is the person most knowledgeable about the subject of this interrogatory.

**INTERROGATORY NO.4**

APPLICANT'S THIRD SUPPLEMENTAL RESPONSE TO OPPOSER'S FIRST SET OF INTERROGATORIES

Identify and describe all goods and/or services in connection with which the EURO and design mark is used, or is intended to be used, by Applicant, and by any licensee or other entity using the mark with Applicant's permission. As to each item of goods and services state the annual revenues in dollars since used of the mark commenced.

RESPONSE TO INTERROGATORY NO. 4

Subject to the foregoing objections, Applicant responds that its use and intended uses of the EURO mark and design are identified in the application for the mark and include, e.g., paint Spray Gun, Air Brush, Compressor, etc.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 4

The following documents are responsive to this interrogatory: MGD0000103-MGD000221. The Applicant notes that documents MGD107-MGD-189 are highly confidential and attorney eyes only.

SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 4

The following documents are responsive to this interrogatory: MGD000471-MGD000475.

**INTERROGATORY NO.5**

Identify the types of classes of purchases of the goods and services offered by Applicant under the EURO and design mark.

RESPONSE TO INTERROGATORY NO.5

Subject to the foregoing objections, Applicant responds that its use and intended uses of the EURO mark and design are identified in the application for the mark.

APPLICANT'S THIRD SUPPLEMENTAL RESPONSE TO OPPOSER'S FIRST SET OF INTERROGATORIES

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 5

The following documents are responsive to this interrogatory: MGD0000103-MGD000221. The Applicant notes that documents MGD107-MGD-189 are highly confidential and attorney eyes only.

**INTERROGATORY NO.6**

Describe in detail the nature of Applicant's business.

RESPONSE TO INTERROGATORY NO.6

Subject to the foregoing objections, Applicant responds that business is that of import, distribution and sale of paint Spray Gun, Air Brush, Air Regulator, Filter and related products.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 6

The following documents are responsive to this interrogatory: MGD0000103-MGD000221. The Applicant notes that documents MGD107-MGD-189 are highly confidential and attorney eyes only.

**INTERROGATORY NO.7**

With respect to each and every opinion of counsel which relates to or refers to Applicant's right to use or register the EURO and design mark, identify each written or oral communication providing each such opinion and each such communication requesting each such opinion. Provide the date any such opinions(s) was or were requested, as well as the date any such opinion was rendered.

APPLICANT'S RESPONSES TO OPPOSER'S FIRST SET OF INTERROGATORIES  
APPLICANT'S THIRD SUPPLEMENTAL RESPONSE TO OPPOSER'S FIRST SET OF  
INTERROGATORIES

Subject to the foregoing objections, Applicant responds that no such opinions of counsel were obtained.

**INTERROGATORY NO.8**

Identify with specificity when and under what circumstances Applicant first learned of the Opposer.

**RESPONSE TO INTERROGATORY NO.8**

Subject to the foregoing objections, Applicant responds that it learned of the Opposer through trade shows and industry news.

**SUPPLEMENTAL RESPONSE TO INTERROGATORY NO.8**

The Applicant believes that he knew about the Opposer as early as 2002 when he worked at a paint store.

**INTERROGATORY NO.9**

Describe in detail Applicant's first use of the EURO and design mark with respect to any and all goods. Identify all documents and things which Applicant contends supports its alleged first use date(s) and its alleged date(s) of first use in commerce.

**RESPONSE TO INTERROGATORY NO. 9**

Subject to the foregoing objections, Applicant responds that it began its use of EURO as long as 8 years ago in connection with paint Spray Guns.

**SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 9**

APPLICANT'S THIRD SUPPLEMENTAL RESPONSE TO OPPOSER'S FIRST SET OF INTERROGATORIES

The Applicant has used in commerce the goods identified in the application for the mark at least as early as its statement of use date. The following documents are responsive to this interrogatory: MGD000107-189.

**INTERROGATORY NO. 10**

Identify the person(s) most knowledgeable concerning:

- (a) the goods and any services offered by Applicant;
- (b) trademarks, trade names, and service marks used by Applicant;
- (c) advertising and advertising plans in connection with which the EURO and design mark have been or are currently used or are intended to be used.

**RESPONSE TO INTERROGATORY NO. 10**

Subject to the foregoing objections, Applicant responds that Mike Ghorbani is the person most knowledgeable about the subject of this interrogatory.

**INTERROGATORY NO. 11**

Identify and describe in detail any conflict, allegation of infringement or controversy, whether currently pending or resolved, with any third party involving Applicant and the EURO and design mark. Identify all documents referring or relating thereto.

**RESPONSE TO INTERROGATORY NO. 11**

Subject to the foregoing objections, Applicant responds that it is not aware of any such information.

APPLICANT'S THIRD SUPPLEMENTAL RESPONSE TO OPPOSER'S FIRST SET OF INTERROGATORIES

**INTERROGATORY NO. 12**

State Applicant's annual expenditures for advertising and/or promotion for each of Applicant's goods offered in connection with the EURO and design mark since the date of first use of that mark.

**RESPONSE TO INTERROGATORY NO. 12**

Subject to the foregoing objections, Applicant responds that its annual expenditures on these items varies but are around \$50K.

**FIRST SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 12**

Applicant's advertising and promotion is illustrated in the following documents: MGD000073 and MGD000081.

**SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 12**

Applicant's annual advertising and promotion is provided in the following table:

2010	Approximately \$16000-17,000
2011	Approximately \$40,000
2012	Approximately \$40,000
2013	Approximately \$31000-32000
2014	Approximately \$18000-19000
Total	Approximately \$140k to 150k.

The following documents are responsive to this request: MGD000476 to MGD000534.

APPLICANT'S THIRD SUPPLEMENTAL RESPONSE TO OPPOSER'S FIRST SET OF INTERROGATORIES

**INTERROGATORY NO. 13**

Identify all uses of the term EURO, either alone or in combination with another word, or words, as a corporate name, trade name, service mark, trademark, or other type of use by third parties in connection with painting related goods and services of which Applicant has knowledge.

**RESPONSE TO INTERROGATORY NO. 13**

Subject to the foregoing objections, Applicant responds that it is currently aware of the use of EURO by only one entity, named Astro, Inc.

**SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 13**

Subject to the foregoing objections, see Response to Interrogatory No. 1.

**INTERROGATORY NO. 14**

Describe in detail the relationship between MG Distributors and Mike Ghorbani.

**RESPONSE TO INTERROGATORY NO. 14**

Subject to the foregoing objections, Applicant responds that it is the owner of MG Distributors, Inc.

**INTERROGATORY NO. 15**

Describe in detail all facts upon which Applicant bases its contention that its spray guns are not inferior to Opposer's spray guns as asserted by Applicant in Paragraph 4 of its Answer.

**RESPONSE TO INTERROGATORY NO. 15**

APPLICANT'S THIRD SUPPLEMENTAL RESPONSE TO OPPOSER'S FIRST SET OF INTERROGATORIES

Subject to the foregoing objections, Applicant responds that its contention that its spray guns are not inferior to Opposer's spray guns is based on Applicant's confidence in its products and the trust and confidence demonstrated by its customers in its products.

**SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 15**

The Opposer also has no evidence showing that the spray guns sold under the name Sata are of better quality than those sold under the name Euro. The Applicant's expert Michael DeMarco examined the Opposer's alleged evidence S 0481 and S 0480 and found no remarkable difference between the performance of the spray guns sold under Sata and Euro. Additionally, the spray pattern illustrated in S 0481 and S 0480 is a typical pattern for a spray gun (MGD000070).

**SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 15**

The following document is responsive to this request: MGD000395.

**INTERROGATORY NO. 16**

Describe in detail all facts upon which Applicant bases its contention that its spray guns are sold to different potential customers as asserted by Applicant in Paragraph 4 of its Answer.

**RESPONSE TO INTERROGATORY NO. 16**

Subject to the foregoing objections, Applicant responds that customers of its products have come to trust and have confidence in those products, including spray guns and repeatedly return to purchase those products. The price differential between Applicant's spray guns and those offered

by the Opposer is another basis for the difference in actual and potential customers of these products.

**SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 16**

The prices of Applicant's goods are present on invoices MGD107-MGD-189. The Opposer can compare those prices with its own prices.

**INTERROGATORY NO. 17**

Identify the geographic origin of Applicant's goods which bear the EURO and design mark.

**RESPONSE TO INTERROGATORY NO. 17**

Subject to the foregoing objections, Applicant responds that it is not able to determine the meaning of the above interrogatory and objects to the same as vague, ambiguous and nonsensical.

**FIRST SUPPLEMENTAL RESPONSE TO INTERROGATORY No. 17:**

Subject to the foregoing objections, Applicant responds that it is not able to determine the meaning of the above interrogatory and objects to the same as vague, ambiguous and nonsensical.

Subject to the foregoing objections, the geographic origin of Applicant's goods which bear the EURO and design mark is Taiwan.

**SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORY No. 17:**

**APPLICANT'S THIRD SUPPLEMENTAL RESPONSE TO OPPOSER'S FIRST SET OF INTERROGATORIES**

Subject to the foregoing objections, the Applicant's goods which bear the EURO and design mark are manufactured in Taiwan. The Taiwanese manufacturer of the Applicant's spray guns has designed its spray guns in Germany.

**INTERROGATORY NO. 18**

Identify all references to Oppose or its products presently or formerly appearing in any website owned or controlled by Applicant.

RESPONSE TO INTERROGATORY NO. 18

Subject to the foregoing objections, Applicant responds that subject to Federal Rule of Civil Procedure 33(d), all the discovery sought in this interrogatory may be obtained from, among other things, the non-privileged documents that have been produced and will be produced.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 18

Subject to the foregoing objections, the following documents is responsive to this request: S  

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0485.

**INTERROGATORY NO. 19**

State what the Applicant contends is the primary significance of "EURO" (a) in general and (b) as a portion of Applicant's mark.

RESPONSE TO INTERROGATORY NO. 19

Subject to the foregoing objections, Applicant responds that a primary significance of its Euro mark and design is its identification of Applicant's products that are identified by that mark.

APPLICANT'S THIRD SUPPLEMENTAL RESPONSE TO OPPOSER'S FIRST SET OF  
INTERROGATORIES

**INTERROGATORY NO. 20**

Describe in detail all facts upon which Applicant bases its contention that purchasers of spray guns are sophisticated and unlikely to be confused, as asserted by Applicant in Paragraph 17,

**RESPONSE TO INTERROGATORY NO. 20**

Subject to the foregoing objections, Applicant responds that, given their cost, customers of spray guns are likely to pay attention and take care to chose the brands that they have trust and confidence in and that they recognize.

**SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 20**

Subject to the foregoing objections, Applicant's purchasers of spray guns are sophisticated as can be seen from documents MGD000107 to MGD000189 (showing paint spray guns and related goods sold primarily to distributors of auto body shops), MGD000395 and MGD000403. The Applicant's expert has opined that these customers are sophisticated customers. "Expert Report of Michael Demarco in Support of Applicant Mike Ghorbani," Jan. 3, 2014, at page 5. The consumers of these goods are also sophisticated consumers [*See e.g.* S 0496 (showing a sophisticated consumer) or S 0482 (referring to the consumers of spray guns as professionals: "Professionals know that a dedicated primer/filler gun is as just important as a top coat gun" and discussing technical terms that can only be understood by a sophisticated consumer)].

**INTERROGATORY NO. 21**

Identify all media used by Applicant in the offering and promotion of those of Applicant's goods which bear the EURO and design mark.

APPLICANT'S THIRD SUPPLEMENTAL RESPONSE TO OPPOSER'S FIRST SET OF INTERROGATORIES

RESPONSE TO INTERROGATORY NO. 21

Subject to the foregoing objections, Applicant responds that it has utilized the internet, trade shows, direct mail for offering its goods.

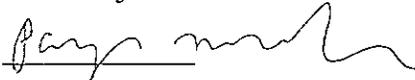
**INTERROGATORY NO. 22**

Identify the person or persons most knowledgeable as to each of the answers provided to each of the foregoing Interrogatories.

RESPONSE TO INTERROGATORY NO. 22

Subject to the foregoing objections, Applicant responds that Mike Ghorbani is the person most knowledgeable about the subject matter of this interrogatory.

As to Objections:

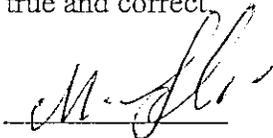


December 22, 2014

Payam Moradian  
Attorney for Mike Ghorbani  
10880 Wilshire Blvd, Suite 1101  
Los Angeles, CA 90024  
p@moradianlaw.com  
917-353-1919

As to Answers:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.



December 22, 2014

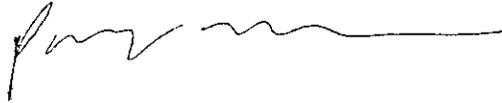
Mike Ghorbani

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been on July 2, 2014 duly served by depositing such copy with the US Postal Service, in an envelope addressed to:

Thomas J. Vande Sande  
Hall & Vande Sande, LLC  
10220 River Road, Suite 200  
Potomac, MD 20854.

By: /Payam Moradian/  
Payam Moradian

A handwritten signature in black ink, appearing to read 'Payam Moradian', is written over a horizontal line.

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

SATA GmbH & Co. KG,	)	
	)	
	)	
Opposer,	)	
	)	
v.	)	Opposition No. 91210813
	)	
Mike Ghorbani	)	
	)	
Applicant.	)	
_____	)	

OPPOSER’S SECOND SET OF INTERROGATORIES

Opposer, SATA GmbH & Co. KG, requests that Applicant answer within thirty days, under oath, and in accordance with the Federal Rules of Civil Procedure, the following interrogatories.

DEFINITIONS

1. As used herein, “Opposer” includes SATA GmbH & Co. KG, as well as its officers, directors, attorneys and all persons in privity with it with regard to the matters inquired about herein.
2. As used herein the designation “Applicant” refers to the named Applicant, and any and all predecessor or successor companies, assignors, corporations, or other business entities or individuals; any company, corporation or other business entity or individual affiliated with Applicant or owned by it in whole or in part, and the directors, officers, agents, employees and attorneys of any of them, including all persons acting or purporting to act on behalf of, or who are subject to the direction or control of, any of the foregoing. In each instance where an answer to an interrogatory differs as between Applicant and any predecessor or successor companies, corporations, assignor(s),

licensee(s) or any other business entities or person(s) as described above, the answer shall so state, shall set forth such difference(s) and shall state separately all information applicable to Applicant, and all information applicable to each such predecessor or successor company, assignor, licensee, corporation or other business entity or person as described above.

3. The term '789 refers to U.S. Trademark Application Serial No. 85/712,789 for the EURO and design mark.

4. The term "person" refers to any individual, corporation, proprietorship, association, joint venture, company, partnership or other business or legal entity, including governmental bodies and agencies.

5. The term "document" is used in its customary broad sense to include, without limitation, the following items, whether or not prepared by Applicant, whether printed or reproduced by any process, or written or produced by hand, and whether or not claimed to be privileged or otherwise excludable from discovery, namely, notes, letters, correspondence, communications, telegrams, memoranda, e-mails, summaries or records of telephone conversations, summaries or records of personal conversations, diaries, reports, laboratory and research reports, notebooks, charts, plans, drawings, photographs, minutes or records of meetings, including directors' meetings, reports and/or summaries of interviews, reports and/or summaries of investigations, opinions or reports of consultants, reports of trademark searches, trademark appraisals, opinions of counsel, agreements, reports or summaries of negotiations, brochures, pamphlets, advertisements, circulars, trade letters, press releases, drafts of documents, and all material fixed in a tangible or electronic medium of whatever kind known to or in the possession or control of the Applicant. "Document" or "documents" also includes all copies which are not identical to the original.

6. The term "communication" refers to any exchange or transfer, known to Applicant, of information between two or more persons, whether written, oral, electronic, or in any other form.

7. The term "business entity" means a partnership, corporation, proprietorship,

association or any other business organization, whether formal or informal.

8. The term “date” means the exact day, month and year, if ascertainable, or if not, the best approximation (including relationships to other events).

9. The masculine includes the feminine and vice versa; the singular includes the plural and vice versa.

10. As used herein, the term “control” or “controlled” means the power or ability of Applicant to direct the actions, management, or policies of any person, firm or corporation.

11. The term “describe in detail” means describe every fact, statistic, inference, supposition, estimate, consideration, conclusion, study or analysis known to Applicant which relates to the allegation or contention, or which Applicant believes to be evidence of the truth or accuracy of the allegation or contention, and to identify each document relating thereto.

12. Whenever an interrogatory requires the identification of a document, the answer shall state the following information with respect to each such document:

- (a) the date appearing on such document, and if no date appears thereon, the answer shall so state and shall give the date or approximate date such document was prepared;
- (b) the identifying or descriptive code number, file number, title or label of such document;
- (c) the general nature or description of such document (i.e., whether it is a letter, memorandum, e-mail, drawing, etc.) and the number of pages of which it consists;
- (d) the name of the person who signed such document and if it was not signed, the answer shall so state and shall give the name of the person or persons who prepared it;
- (e) the name of the person to whom such document was addressed and the name of each person other than such addressee to whom such document or copies thereof

were given or sent;

- (f) the name of the person having possession, custody or control of such document;
- (g) whether any draft, copy or reproduction of such document contains or has been subject to any postscript, notation, change, amendment or addendum not appearing on said document itself, and, if so, the answer shall identify as herein required each such draft, copy or reproduction;
- (h) the source or origin of said document and, if the document was not generated by Applicant, specify from whom the document was obtained and identify said person and that person's relationship to Applicant;
- (i) if such document was, but is no longer, in Applicant's possession or subject to its control, state what disposition was made of it and when.

13. If the attorney/client privilege or work product protection is claimed with respect to a document or oral communication for which identification is sought herein, with respect to each such interrogatory answer or document request response, a separate list of all such documents or oral communications shall be served with the answers hereto. Such separate list shall identify each document or oral communication by author, recipient and recipients of copies (including titles and whether or not they are attorneys), the date of such document or oral communication, and a summary of the subject matter of the document or oral communication.

14. Whenever an interrogatory requests the identification of an individual or person state, to the extent known, his or her full name, present or last known employer; and if employed by Applicant at any time, the period of time so employed, and the areas of responsibility during such times.

15. Whenever an interrogatory requests the identity of a company, corporation, or other business or legal entity, state to the extent known:

- (a) the full name;

- (b) the location of all divisions, branches or offices which are or were involved in any way with the matters referred to in the interrogatory; and
- (c) the identity of the person acting or purporting to act on behalf of the business entity in connection with the matters referred to in the interrogatory.

16. If Applicant elects to avail itself of the procedure authorized by Rule 33(d) of the Federal Rules of Civil Procedure, as that rule is applied and interpreted by the Trademark Trial and Appeal Board, Applicant shall classify or otherwise appropriately arrange and correlate its documents according to the specific interrogatory to which each such document is responsive. Similarly, in responding to Opposer's requests for production of documents, Applicant shall likewise classify or otherwise appropriately arrange and correlate its documents according to the specific document request to which each such document is responsive.

17. Whenever information requested in an interrogatory is itemized in subparagraphs, or subparts, Applicant shall answer each such subparagraph or subpart separately.

18. Where a document has been destroyed, or is alleged to have been destroyed, state the date of and reason for its destruction, identify each person having any knowledge of its destruction, and each person responsible for its destruction.

19. Once a person has been identified in an answer to an interrogatory, it shall be sufficient thereafter when identifying that person merely to state his or her name.

These interrogatories shall be deemed continuing and Applicant shall be obligated to change, supplement and amend its answers thereto as prescribed by the Federal Rules of Civil Procedure and the rules of the Trademark Trial and Appeal Board.

## INTERROGATORIES

### INTERROGATORY NO. 23

Describe in detail all information referred to in Applicant's Rule 26(A)(1) Initial Disclosures comprising or relating to Mr. Ghorbani's knowledge of the development, inspiration and creation of Applicant's mark. Identify all related documents.

### INTERROGATORY NO. 24

Identify all facts and all documents known to Applicant and/or in Applicant's possession which form the basis for those references to Opposer as set forth in Applicant's Rule 26(A)(1) Initial Disclosures.

### INTERROGATORY NO. 25

Explain in detail the basis for the decision to have included at Applicant's website text referring to Opposer and Opposer's products as evidenced by that document produced by Applicant and identified as "Ghorbani 000007". Identify all related documents.

### INTERROGATORY NO. 26

Explain in detail the basis for Applicant's selection of EURO as its mark. Identify all related documents.

### INTERROGATORY NO. 27

Describe in detail Applicant's responses to those potential customers expressing to Applicant either the assumption, the belief that, or an inquiry as to whether, Applicant's EURO marked goods emanate from Europe. Identify all related documents.

INTERROGATORY NO. 28

Does Applicant agree that potential purchasers of goods bearing the EURO mark would be more likely to conclude that those goods originate from Europe than from China? If not, explain in detail the basis for Applicant's contention that such is not likely the case.

INTERROGATORY NO. 29

Does Applicant acknowledge that there exists amongst a significant number of American consumers a bias against goods manufactured in, or imported from, China? If not, explain in detail the basis for Applicant's contention that such is not the case.

HALL & VANDE SANDE, LLC

Date:

2/28/14

  
\_\_\_\_\_  
Thomas J. Vande Sande  
Attorneys for Opposer  
10220 River Road, Suite 200  
Potomac, Maryland 20854  
(301) 983-2500

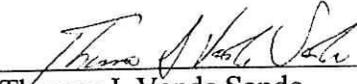
CERTIFICATE OF SERVICE

The undersigned, Thomas J. Vande Sande, attorney for Opposer, hereby certifies that one (1) copy of the foregoing "OPPOSER'S SECOND SET OF INTERROGATORIES" was this day served on Applicant by mailing same to:

Payam Moradian, Esquire  
Moradian Law  
10880 Wilshire Blvd., Suite 1101  
Los Angeles, California 90024

HALL & VANDE SANDE, LLC

Date: 2/28/14

  
\_\_\_\_\_  
Thomas J. Vande Sande  
Attorneys for Opposer  
10220 River Road, Suite 200  
Potomac, Maryland 20854  
(301) 983-2500

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

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SATA GmbH & Co. KG	)	
	)	Mark: EURO & Design
v.	)	Serial No.: 85/712789
Mike Ghorbani	)	Opposition No. 91/210813
	)	

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**APPLICANT MIKE GHORBANI'S SUPPLEMENTAL ANSWERS TO OPPOSER'S  
SECOND SET OF INTERROGATORIES**

Applicant Mike Ghorbani responds and objects to SATA GMBH & CO. KG's ("Sata" or "Opposer") Second Set of Interrogatories as follows:

**PRELIMINARY STATEMENT AND RESERVATION OF RIGHTS**

Applicant has not completed its discovery, investigation, research, or trial preparation. Applicant's responses may therefore depend upon information that has not yet been discovered or analyzed. These responses are based solely on the information obtained and reviewed to date. Applicant reserves the right to amend or supplement these objections and responses to the extent allowed by the Federal Rules of Civil Procedure after considering information obtained or reviewed through further discovery, investigation, or research. Applicant further reserves the right to produce or use any information or documents that are discovered after service of this response in support of, or in opposition to, any motion, in depositions, or at trial. Applicant does not waive any objections on the grounds of privilege, competency, relevance, materiality, authenticity, or admissibility of the information contained herein, and expressly reserves the right

to use any of these responses or the subject matter contained in them during any subsequent proceeding, including the trial of this or any other action.

### **GENERAL OBJECTIONS**

#### **GENERAL OBJECTION NO.1:**

All responses to Interrogatories are based upon the information presently known to Applicant and are given without prejudice to its right to adduce evidence discovered or analyzed subsequent to the date of these answers. Applicant expressly reserves the right to revise and supplement its answers to these Interrogatories in the event that its continuing investigation of the facts and/or discovery bring to light any additional information responsive to these Interrogatories.

#### **GENERAL OBJECTION NO.2:**

Applicant objects to these Interrogatories, and to each and every individual interrogatory, to the extent they seek information protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection. Without prejudice to this objection, Applicant will provide answers to these Interrogatories to the extent that such responses do not waive such privileges or protections.

#### **GENERAL OBJECTION NO.3:**

Applicant objects to these Interrogatories, including, but not limited to, the "Definitions" therein, and to each and every individual interrogatory, to the extent they purport to impose duties on Applicant that are greater than those imposed by the Federal Rules of Civil Procedure and/or the TBMP.

**GENERAL OBJECTION NO.4:**

Applicant objects to these Interrogatories, and to each and every individual interrogatory, to the extent they seek information outside of Applicant's possession, custody, or control, on the grounds that any such interrogatory is overly broad and unduly burdensome, seeks to impose discovery obligations in excess of those imposed by the Federal Rules of Civil Procedure and/or the TBMP, or would subject Applicant to unreasonable annoyance, burden, and expense.

**GENERAL OBJECTION NO.5:**

Applicant objects to these Interrogatories, and to each and every individual interrogatory, as unduly burdensome, oppressive and in violation of the Federal Rules of Civil Procedure and/or the TBMP to the extent they purport to require Applicant to respond on behalf of, or conduct any inquiry or investigation with respect to, any party other than Applicant. Applicant will only answer Interrogatories on its own behalf.

**GENERAL OBJECTION NO.6:**

Applicant objects to these Interrogatories, and to each and every individual interrogatory, to the extent they seek information that is not reasonably calculated to lead to the discovery of admissible evidence.

**GENERAL OBJECTION NO.7:**

Applicant objects to these Interrogatories, and to each and every individual interrogatory, as overly broad and unduly burdensome to the extent they do not include a limitation or proposed definition of a relevant time period.

**GENERAL OBJECTION NO.8:**

Applicant specifically reserves all objections as to the competence, relevancy, materiality and admissibility of its documents and interrogatory answers or the subject matter thereof, and all rights to object on any ground to the use of any document or interrogatory answer, or the subject matter thereof, in any subsequent proceeding, including without limitation to the trial of this or any action. Applicant expressly incorporates the above General Objections as though set forth fully in response to each of the following individual interrogatories, and, to the extent they are not raised in any particular response Applicant does not waive those objections. An answer to an interrogatory shall not be deemed a waiver of any applicable specific or general objections to an interrogatory.

**RESPONSES**

**INTERROGATORY NO. 23**

Describe in detail all information referred to in Applicant's Rule 26(A)(1) Initial Disclosures comprising or relating to Mr. Ghorbani's knowledge of the development, inspiration and creation of Applicant's mark. Identify all related documents.

Response to Interrogatory No. 23

Mr. Ghorbani recalls choosing the name Euro as a trademark because in a spontaneous fashion for its simplicity. After a search, the Applicant was not able to locate documents relating to the development, inspiration and creation of Applicant's mark.

Supplemental Response to Interrogatory No. 23

See Response to Interrogatory No. 1. Applicant has amended his Initial Disclosures accordingly to be consistent with his previous response(s).

**INTERROGATORY NO. 24**

Identify all facts and all documents known to Applicant and/or in Applicant's possession which form the basis for those references to Opposer as set forth in Applicant's Rule 26(A)(1) Initial Disclosures.

Response to Interrogatory No. 24

The Opposer sent a cease and desist letter to the Applicant regarding one of its patents that the Opposer knew or should have known did not cover the Applicant's spray guns (S0001-0002). The same cease and desist letter implied without any legal basis that a CE marking is limited to goods of European origin, where CE markings are applied regularly to goods originating outside of Europe (MGD 000099-102). The Applicant also possesses a picture of a Sata executive (MGD000074) at one of its booths that illustrates Sata's improper and unfair business practices towards the Applicant, where Sata sends an executive under false pretext to spy on the Applicant for purposes of initiating a legal proceeding.

The Opposer also has no evidence showing that the spray guns sold under the name Sata are of better quality than those sold under the name Euro. The Applicant's expert Michael DeMarco examined the Opposer's alleged evidence S 0481 and S 0480 and found no remarkable difference between the performance of the spray guns sold under Sata and Euro. Additionally, the spray pattern illustrated in S 0481 and S 0480 is a typical pattern for a spray gun (MGD000070).

The Opposer's business practices towards the Applicant have been unfair. Upon information and belief, the Opposer has taken no steps in stopping third parties to mark spray guns with the mark Euro (MGD000021). The Opposer only seeks to stop Mr. Ghorbani from using the mark Euro with design, and not any other third party. This specific targeting of Mr. Ghorbani is further illustrated by the Opposer lacking any evidence as to actual confusion regarding guns sold under the name Euro.

The Opposer does not advertise or label its products as "Made in Europe." The Opposer markets its products and labels its products as "made in Germany." (S0020, MGD000082-89). If the Opposer believed that a consumer would prefer a European made gun over a gun made in another region, it would have advertised its guns as "European Engineering" instead of "German Engineering." (S0020).

The Opposer has failed to produce any documents illustrating where each component of its spray guns are produced. The Opposer advertises that "SATA spray guns are exclusively developed and manufactured in Germany," (MGD000082-89) yet at least some components of Sata's spray guns are manufactured outside of Germany as admitted by the Opposer in its Interrogatory Response. The Applicant reserves the right to supplement this response after production of relevant documents relating to manufacture of parts of Sata's guns.

#### **INTERROGATORY NO. 25**

Explain in detail the basis for the decision to have included at Applicant's website text referring to Opposer and Opposer's products as evidenced by that document produced by Applicant and identified as "Ghorbani 000007". Identify all related documents.

#### Objection to Interrogatory No. 25

APPLICANT'S SUPPLEMENTAL ANSWERS TO OPPOSER'S SECOND SET OF  
INTERROGATORIES

Applicant objects to this Interrogatory for lacking relevance. This interrogatory is objected to as being incomplete, ambiguous, confusing, misleading, vague, unintelligible, and prejudicial since the document Applicant produced as MGD 000007 does not relate to the Opposer.

Response to Interrogatory No. 25

To the extent this Interrogatory refers to document S 0485, the Opposer has produced document S 0485 relating to a page on [www.mgdistributor.com](http://www.mgdistributor.com). The Applicant was not aware and did not authorize this page to be placed on [www.mgdistributor.com](http://www.mgdistributor.com). This page was placed by an independent website developer that the Applicant had retained. Upon receiving the Opposer's cease and desist letter, the Applicant first became aware of this page and immediately removed this page from [www.mgdistributor.com](http://www.mgdistributor.com).

**INTERROGATORY NO. 26**

Explain in detail the basis for Applicant's selection of EURO as its mark. Identify all related documents.

Objection to Interrogatory No. 26

Applicant objects to this interrogatory as duplicative, and already asked and answered.

Response to Interrogatory No. 26

Subject to the foregoing objections, see answer to Interrogatory number 23.

Second Response to Interrogatory No. 26

Subject to the foregoing objections, see answer to Interrogatory numbers 1 and 23.

**INTERROGATORY NO. 27**

Describe in detail Applicant's responses to those potential customers expressing to Applicant either the assumption, the belief that, or an inquiry as to whether, Applicant's EURO marked goods emanate from Europe. Identify all related documents.

Response to Interrogatory No. 27

The Applicant has not had any potential customers expressing to Applicant either the assumption, the belief that, or an inquiry as to whether, Applicant's EURO marked goods emanate from Europe.

**INTERROGATORY NO. 28**

Does Applicant agree that potential purchasers of goods bearing the EURO mark would be more likely to conclude that those goods originate from Europe than from China? If not, explain in detail the basis for Applicant's contention that such is not likely the case.

Objection

This Interrogatory is objected to for lacking relevance and highly prejudicial. The Applicant's goods are manufactured in Taiwan, and not China.

Response to Interrogatory No. 28

No. Consumers in the United States do not associate spray guns and related goods and services to originate from Europe. The consumers understand that a substantial number of these goods are manufactured in Asia and US. A consumer would look at the Made in Label before concluding that the goods are made in Europe. The consumers of these goods are also

sophisticated consumers [*See e.g.* S 0496 (showing a sophisticated consumer) or S 0482 (referring to the consumers of spray guns as professionals: “Professionals know that a dedicated primer/filler gun is as just important as a top coat gun” and discussing technical terms that can only be understood by a sophisticated consumer] who regularly paint cars, and are very knowledgeable about these goods and unlikely to be swayed into believing that the goods originate from Europe. The Applicant also incorporates by reference the report and testimony of its expert Michael DeMarco.

**INTERROGATORY NO. 29**

Does Applicant acknowledge that there exists amongst a significant number of American consumers a bias against goods manufactured in, or imported from, China? If not, explain in detail the basis for Applicant's contention that such is not the case.

Objection

This Interrogatory is objected to for lacking relevance and highly prejudicial. The Applicant's goods are manufactured in Taiwan, and not China.

Response to Interrogatory No. 29

The Applicant's goods are manufactured in Taiwan, and not China. This interrogatory is not relevant to the Applicant's goods. The Applicant does not believe that any bias against China extends to goods manufactured in Taiwan. Unlike China, Taiwan is known for hi-tech manufacturing. Furthermore, Inest Iwata, one of the leading manufacturers in this field (See testimony of Michael DeMarco), makes many of accessories for its spray guns in Taiwan. The

Applicant also incorporates by reference the report and testimony of its expert Michael DeMarco).

As to Objections:

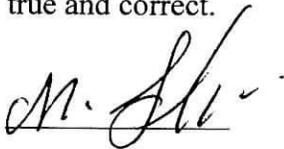


December 22, 2014

Payam Moradian  
Attorney for Mike Ghorbani  
10880 Wilshire Blvd, Suite 1101  
Los Angeles, CA 90024  
p@moradianlaw.com  
917-353-1919

As to Answers:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.



December 22, 2014

Mike Ghorbani

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been on December 22, 2014  
duly served by depositing such copy with the US Postal Service, in an envelope addressed to:

Thomas J. Vande Sande  
Hall & Vande Sande, LLC  
10220 River Road, Suite 200  
Potomac, MD 20854.

By: /Payam Moradian/  
Payam Moradian

A handwritten signature in cursive script, appearing to read "Payam Moradian", written in black ink.

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

SATA GmbH & Co. KG,	)	
	)	
Opposer,	)	
	)	
v.	)	Consolidated
	)	Opposition No. <b>91210813</b>
Mike Ghorbani,	)	
	)	Opposition No. 91217915
Applicant.	)	
	)	Cancellation No. 92059849

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**OPPOSER SATA GMBH & CO. KG'S FOURTH SET OF INTERROGATORIES**

Opposer, SATA GmbH & Co. KG, requests that Applicant answer within thirty days, under oath, and in accordance with the Federal Rules of Civil Procedure, the following interrogatories.

**DEFINITIONS**

1. As used herein, "Opposer" includes SATA GmbH & Co. KG, as well as its officers, directors, attorneys and all persons in privity with it with regard to the matters inquired about herein.

2. As used herein the designation "Applicant" refers to the named Applicant, and any and all predecessor or successor companies, assignors, corporations, or other business entities or individuals; any company, corporation or other business entity or individual affiliated with Applicant or owned by it in whole or in part, and the directors, officers, agents, employees and attorneys of any of them, including all persons acting or purporting to act on behalf of, or who are subject to the direction or control of, any of the foregoing. In each instance where an answer to an interrogatory differs as between Applicant and any predecessor or successor companies, corporations, assignor(s), licensee(s) or any other business entities or person(s) as

described above, the answer shall so state, shall set forth such difference(s) and shall state separately all information applicable to Applicant, and all information applicable to each such predecessor or successor company, assignor, licensee, corporation or other business entity or person as described above.

3. The term '789 refers to U.S. Trademark Application Serial No. 85/712,789 for the EURO and design mark. The term '768 refers to U.S. Trademark Application Serial No. 86/227,768 for the MG EURO mark. The term '295 refers to U.S. Trademark Reg. No. 3,428,295 for the EURO mark.

4. The term "person" refers to any individual, corporation, proprietorship, association, joint venture, company, partnership or other business or legal entity, including governmental bodies and agencies.

5. The term "document" is used in its customary broad sense to include, without limitation, the following items, whether or not prepared by Applicant, whether printed or reproduced by any process, or written or produced by hand, and whether or not claimed to be privileged or otherwise excludable from discovery, namely, notes, letters, correspondence, communications, telegrams, memoranda, e-mails, summaries or records of telephone conversations, summaries or records of personal conversations, diaries, reports, laboratory and research reports, notebooks, charts, plans, drawings, photographs, minutes or records of meetings, including directors' meetings, reports and/or summaries of interviews, reports and/or summaries of investigations, opinions or reports of consultants, reports of trademark searches, trademark appraisals, opinions of counsel, agreements, reports or summaries of negotiations, brochures, pamphlets, advertisements, circulars, trade letters, press releases, drafts of documents, and all material fixed in a tangible or electronic medium of whatever kind known to or in the possession or control of the Applicant. "Document" or "documents" also includes all copies which are not identical to the original.

6. The term "communication" refers to any exchange or transfer, known to Applicant, of information between two or more persons, whether written, oral, electronic, or in any other form.

7. The term "business entity" means a partnership, corporation, proprietorship, association or any other business organization, whether formal or informal.

8. The term "date" means the exact day, month and year, if ascertainable, or if not, the best approximation (including relationships to other events).
9. The masculine includes the feminine and vice versa; the singular includes the plural and vice versa.
10. As used herein, the term "control" or "controlled" means the power or ability of Applicant to direct the actions, management, or policies of any person, firm or corporation.
11. The term "describe in detail" means describe every fact, statistic, inference, supposition, estimate, consideration, conclusion, study or analysis known to Applicant which relates to the allegation or contention, or which Applicant believes to be evidence of the truth or accuracy of the allegation or contention, and to identify each document relating thereto.
12. Whenever an interrogatory requires the identification of a document, the answer shall state the following information with respect to each such document:
  - (a) the date appearing on such document, and if no date appears thereon, the answer shall so state and shall give the date or approximate date such document was prepared;
  - (b) the identifying or descriptive code number, file number, title or label of such document;
  - (c) the general nature or description of such document (i.e., whether it is a letter, memorandum, e-mail, drawing, etc.) and the number of pages of which it consists;
  - (d) the name of the person who signed such document and if it was not signed, the answer shall so state and shall give the name of the person or persons who

prepared it;

- (e) the name of the person to whom such document was addressed and the name of each person other than such addressee to whom such document or copies thereof were given or sent;
- (f) the name of the person having possession, custody or control of such document;
- (g) whether any draft, copy or reproduction of such document contains or has been subject to any postscript, notation, change, amendment or addendum not appearing on said document itself, and, if so, the answer shall identify as herein required each such draft, copy or reproduction;
- (h) the source or origin of said document and, if the document was not generated by Applicant, specify from whom the document was obtained and identify said person and that person's relationship to Applicant;
- (i) if such document was, but is no longer, in Applicant's possession or subject to its control, state what disposition was made of it and when.

13. If the attorney/client privilege or work product protection is claimed with respect to a document or oral communication for which identification is sought herein, with respect to each such interrogatory answer or document request response, a separate list of all such documents or oral communications shall be served with the answers hereto. Such separate list shall identify each document or oral communication by author, recipient and recipients of copies (including titles and whether or not they are attorneys), the date of such document or oral communication, and a summary of the subject matter of the document or oral communication.

14. Whenever an interrogatory requests the identification of an individual or person state, to the extent known, his or her full name, present or last known employer; and if employed by Applicant at any time, the period of time so employed, and the areas of responsibility during such times.

15. Whenever an interrogatory requests the identity of a company, corporation, or other business or legal entity, state to the extent known:

- (a) the full name;
- (b) the location of all divisions, branches or offices which are or were involved in any way with the matters referred to in the interrogatory; and
- (c) the identity of the person acting or purporting to act on behalf of the business entity in connection with the matters referred to in the interrogatory.

16. If Applicant elects to avail itself of the procedure authorized by Rule 33(d) of the Federal Rules of Civil Procedure, as that rule is applied and interpreted by the Trademark Trial and Appeal Board, Applicant shall classify or otherwise appropriately arrange and correlate its documents according to the specific interrogatory to which each such document is responsive. Similarly, in responding to Opposer's requests for production of documents, Applicant shall likewise classify or otherwise appropriately arrange and correlate its documents according to the specific document request to which each such document is responsive.

17. Whenever information requested in an interrogatory is itemized in subparagraphs, or subparts, Applicant shall answer each such subparagraph or subpart separately.

18. Where a document has been destroyed, or is alleged to have been destroyed, state the date of and reason for its destruction, identify each person having any knowledge of its destruction, and each person responsible for its destruction.

19. Once a person has been identified in an answer to an interrogatory, it shall be sufficient thereafter when identifying that person merely to state his or her name.

These interrogatories shall be deemed continuing and Applicant shall be obligated to change, supplement and amend its answers thereto as prescribed by the Federal Rules of Civil Procedure and the rules of the Trademark Trial and Appeal Board.

### **INTERROGATORIES**

#### **INTERROGATORY NO. 64**

Describe in detail the business relationship between Mike Ghorbani and/or M.G. Distributor on the one hand and Michael DeMarco and/or his business or employer on the other. Include in, but do not limit, your detailed description to specify the financial and commercial details surrounding Mr. Demarco's acquisition and sale of paint spray guns and related equipment obtained from M.G. Distributor.

#### **INTERROGATORY NO. 65**

Identify the name and address of the business through which Mr. DeMarco offers for sale EURO paint spray guns and/or related goods provided by Mike Ghorbani and/or M.G. Distributor.

#### **INTERROGATORY NO. 66**

Identify the party or person responsible for including the claim that EURO paint spray guns are, or were, designed in Germany as that assertion appeared (a) on EURO guns themselves and (b)

in advertising promoting Applicant's EURO guns.

**INTERROGATORY NO. 67**

Provide the factual basis underlying Applicant's claims that various of its EURO paint spray guns were designed in Germany. Identify all related documents.

**INTERROGATORY NO. 68**

Describe in detail the circumstances under which Mike Ghorbani and/or M.G. Distributor first learned of, approached, or was approached by, the Taiwanese manufacturer of Ghorbani's and/or M.G. Distributor's EURO paint spray guns. Identify all related documents.

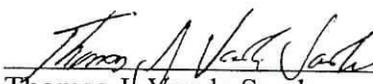
**INTERROGATORY NO. 69**

Describe in detail each reason for the inclusion of the "CE" symbol on Applicant's EURO guns sold in the U.S.

**INTERROGATORY NO. 70**

Describe with specificity each message intended to be conveyed to potential purchasers of Applicant's EURO paint spray guns through the appearance of the "CE" symbol on Applicant's EURO guns.

Date: 7/16/15

  
\_\_\_\_\_  
Thomas J. Vande Sande  
Lucas T. Vande Sande  
Hall & Vande Sande, LLC  
Attorneys for Opposer  
10220 River Road, Suite 200  
Potomac, Maryland 20854  
Phone: (301) 983-2500

**CERTIFICATE OF SERVICE**

The undersigned, Thomas J. Vande Sande, attorney for Opposer, hereby certifies that one (1) copy of the foregoing "OPPOSER SATA GMBH & CO. KG'S FOURTH SET OF INTERROGATORIES" were this day served on Applicant by mailing same, first class mail, to:

Payam Moradian, Esquire  
Moradian Law  
10880 Wilshire Blvd., Suite 1101  
Los Angeles, California 90024

Date: 7/16/15

  
\_\_\_\_\_  
Thomas J. Vande Sande  
HALL & VANDE SANDE, LLC  
Attorneys for Opposer  
10220 River Road, Suite 200  
Potomac, Maryland 20854  
(301) 983-2500



authenticity, or admissibility of the information contained herein, and expressly reserves the right to use any of these responses or the subject matter contained in them during any subsequent proceeding, including the trial of this or any other action.

### **GENERAL OBJECTIONS**

The following general objections apply to, and are incorporated by reference in, every response to each interrogatory. Specific objections to the interrogatories are not intended to preclude, override, or withdraw any of the general objections to that request.

1. Applicant objects to each interrogatory, Definition, and Instruction to the extent that it seeks information neither relevant to any claim or defense in this action nor reasonably calculated to lead to the discovery of admissible evidence.
2. Applicant objects to each interrogatory, Definition, and Instruction to the extent that it seeks to impose requirements or obligations on Applicant in addition to, or different from, those imposed by the Federal Rules of Civil Procedure, the Local Rules of this Court, any applicable orders of this Court, or any stipulation or agreement between the parties.
3. Applicant objects to each interrogatory, Definition, and Instruction to the extent that it exceeds the scope of permissible discovery by calling for information that is protected from discovery by the attorney-client privilege, the work product doctrine, and/or any other applicable privilege or immunity. Nothing contained in these objections and responses is intended to be, or in any way constitutes, a waiver of any applicable privilege or immunity. Inadvertent production of such information, document(s), and/or thing(s) shall not be deemed a waiver of any privilege or immunity.

4. Applicant objects to each interrogatory, Definition, and Instruction to the extent that it seeks information that is within the scope of a confidentiality agreement, protective order, settlement agreement, or other obligation that requires consent of any third party.
5. Applicant objects to each interrogatory, Definition, and Instruction as overly broad and unduly burdensome to the extent that it seeks information beyond what is available from a reasonable search of Applicant's files likely to contain relevant or responsive documents and a reasonable inquiry of Applicant's employees.
6. Applicant objects to each interrogatory, Definition, and Instruction to the extent that it seeks "each and every," "all," or "any" responsive information on the basis that such interrogatory is overly broad and unduly burdensome.
7. Applicant objects to each interrogatory, Definition, and Instruction to the extent that it directs Applicant to describe or state responsive information "in detail" on the basis that such interrogatory is overly broad and unduly burdensome.
8. Applicant objects to each interrogatory, Definition, and Instruction to the extent that it seeks information or identification of documents that are not within the possession, custody, or control of or refers to persons, entities, or events not known to Applicant, subjecting Applicant to unreasonable and undue annoyance, oppression, burden, and expense, and imposing upon it an obligation to discover information or materials from third parties or services who are equally accessible to the Opposer.
9. Applicant objects to each interrogatory, Definition, and Instruction to the extent that it seeks information that does not already exist.

10. Applicant objects to each interrogatory to the extent that it calls for legal conclusions or presents questions of pure law.
11. Applicant objects to each interrogatory, Definition, and Instruction as premature to the extent that it seeks expert discovery. Applicant will provide expert discovery in accordance with applicable orders of this Court.
12. Applicant objects to each interrogatory, Definition, and Instruction to the extent that it purports to attribute any special or unusual meaning to any technical or legal terms or phrases.
13. Applicant objects to each interrogatory, Definition, and Instruction to the extent that it seeks information outside the relevant geographical or temporal scope of this action.
14. Applicant objects to each interrogatory, Definition, and Instruction to the extent that it is vague, ambiguous, and unclear, including Opposer's use of terms that are not defined, vaguely and/or over broadly defined, and/or not susceptible to any single meaning's failure to object to a term defined by Opposer's in its First Set of interrogatories shall not be construed to mean that Applicant understands and/or agrees with the Definition.
15. Applicant objects to each interrogatory, Definition, and Instruction to the extent that (i) the discovery sought is unreasonably cumulative or duplicative, is publicly available, and/or is available to Opposer from a more convenient, less burdensome, or less expensive source; (ii) the requesting party has had ample opportunity by discovery to obtain the information sought; or (iii) the burden or expense of the proposed discovery outweighs its likely benefit, taking into account the needs of the case, the amount in controversy, the parties'

resources, the importance of the issues at stake in this action, and the importance of the proposed discovery in resolving the issues.

16. Applicant objects to the definitions of "Applicant", "You," or "Your" as overbroad, unduly burdensome, vague, ambiguous, unclear, and seeking information that is neither relevant to the claim or defenses of any party to this action, nor reasonably calculated to lead to the discovery of admissible evidence. These definitions, including, without limitation, phrases such as any "of its owners, partners, officers, directors, employees, affiliates, agents, counsel, attorneys, representatives, and anyone else action on behalf of THE APPLICANT or for THE APPLICANT's benefit," impermissibly enlarge the scope of the interrogatories and this action by seeking to apply these interrogatories to and/or request that Applicant respond on behalf of vague, overbroad, and burdensome categories of entities and include unnamed parties to this action.

17. Applicant objects to the Instructions to the extent they seek to impose a burden and/or duty to identify documents or business records in a manner inconsistent with Applicant's ordinary course of business or beyond the scope of the Federal Rules of Civil Procedure or any applicable local rules. Applicant will comply with the requirements of the Federal Rules of Civil Procedure and any applicable local rules.

18. Applicant objects to the Definitions, Instructions, and interrogatories to the extent they seek to impose a burden and/or duty to provide and/or characterize financial data in a manner inconsistent with its ordinary course of business or beyond the scope of the Federal Rules of Civil Procedure or any applicable local rules. Applicant will comply with the requirements of the Federal Rules of Civil Procedure and any applicable local rules.

## **SPECIFIC RESPONSES AND OBJECTIONS**

Applicant incorporates by reference the General Objections set forth above into the Specific Responses set forth below. Applicant may repeat an objection for emphasis or some other reason. The failure to repeat any General Objection, however, does not waive any such objection to the interrogatory.

### **INTERROGATORY NO. 64**

Describe in detail the business relationship between Mike Ghorbani and/or M.G. Distributor on the one hand and Michael DeMarco and/or his business or employer on the other. Include in, but do not limit, your detailed description to specify the financial and commercial details surrounding Mr. Demarco's acquisition and sale of paint spray guns and related equipment obtained from M.G. Distributor.

#### **Answer:**

Michael DeMarco and/or his business or employer was a vendor of many different branded spray guns, including those bearing the mark Euro. The following documents are responsive to this request: MGD000107 and MGD000116.

### **INTERROGATORY NO. 65**

Identify the name and address of the business through which Mr. DeMarco offers for sale EURO paint spray guns and/or related goods provided by Mike Ghorbani and/or M.G. Distributor.

#### **Answer:**

The following documents are responsive to this request: MGD000107 and MGD000116.

**INTERROGATORY NO. 66**

Identify the party or person responsible for including the claim that EURO paint spray guns are, or were, designed in Germany as that assertion appeared (a) on EURO guns themselves and (b) in advertising promoting Applicant's EURO guns.

The Applicant objects to this request to the extent it seeks information that is not in possession or custody of the Applicant, and to the extent this interrogatory is seeking an answer that has already been provided.

Subject to the foregoing objections, See response to interrogatory No. 39.

**INTERROGATORY NO. 67**

Provide the factual basis underlying Applicant's claims that various of its EURO paint spray guns were designed in Germany. Identify all related documents.

The Applicant objects to this request to the extent it seeks information that is not in possession or custody of the Applicant, and to the extent this interrogatory is seeking an answer that has already been provided.

Subject to the foregoing objections, See response to interrogatory No. 39.

**INTERROGATORY NO. 68**

Describe in detail the circumstances under which Mike Ghorbani and/or M.G. Distributor first learned of, approached, or was approached by, the Taiwanese manufacturer of Ghorbani's and/or M.G. Distributor's EURO paint spray guns. Identify all related documents.

Mr. Ghorbani approached its Taiwanese manufacturer at a convention in Las Vegas about a decade ago. Mr. Ghorbani does not recall the particular convention and has no documents relating to approaching the manufacturer.

**INTERROGATORY NO. 69**

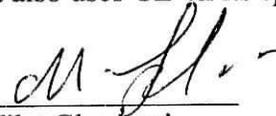
Describe in detail each reason for the inclusion of the "CE" symbol on Applicant's EURO guns sold in the U.S.

The following documents are responsive to this request: MGD000556.

**INTERROGATORY NO. 70**

Describe with specificity each message intended to be conveyed to potential purchasers of Applicant's EURO paint spray guns through the appearance of the "CE" symbol on Applicant's EURO guns.

There is no message intended to be conveyed to potential consumers. It is the Applicant's understanding that CE is a mark that typically appears on a wide variety of products, including sunglasses manufactured in Taiwan by Sata and labeled with CE. MGD000099-102. MGD552-555. Anest Iwata also uses CE on its spray guns that are made in Japan. MGD000062.

As to Answers:  August 19, 2015  
Mike Ghorbani

As to Objections:  August 19, 2015  
Payam Moradian

Keleti+Moradian LLP  
10880 Wilshire Blvd, Suite 1101  
Los Angeles, CA 90024  
310-307-4755  
p@moradianlaw.com

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and complete copy of the foregoing has been served on Thomas J. Vande Sande by mailing said copy on August 19, 2015 *via* First Class Mail, postage prepaid to:

Thomas J. Vande Sande  
Hall & Vande Sande, LLC  
10220 River Road, Suite 200  
Potomac, MD 20854

By: /Payam Moradian/

Payam Moradian

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

SATA GmbH & Co. KG,	)	
	)	
	)	
Opposer,	)	
	)	
v.	)	Opposition No. 91210813
	)	
Mike Ghorbani,	)	
	)	
Applicant.	)	
<hr style="border: 0.5px solid black;"/>		

**OPPOSER'S FIRST SET OF REQUESTS FOR ADMISSION**

Pursuant to Trademark Rule of Practice 2.120 (37 U.S.C. § 2.120), Trademark Trial and Appeal Board Manual of Procedure § 410, and Federal Rule of Civil Procedure 36, Opposer SATA GmbH & Co. KG, requests that Applicant Mike Ghorbani admit the truth of the Requests for Admissions set forth below within thirty (30) days after service of this Request.

**INSTRUCTIONS**

1. Your written response to these requests must comply with Rule 36 of the Federal Rules of Civil Procedure, in that if you do not admit each matter, you must separately respond under oath to each request within thirty (30) days of the service of this request by:
  - (a) Admitting so much of the matter involved in the request as is true, either as expressed in the request itself or as reasonably and clearly qualified by you;
  - (b) By denying so much of the matter involved in the request as is untrue; and

(c) Specifying so much of the matter involved in the request as to the truth of which the responding party lacks sufficient information or knowledge.

2. If your response to a particular request is that you lack information or knowledge as a reason for failure to admit all or part of a request for admission, then you shall state in the answer that a reasonable inquiry concerning the matter in the particular request has been made, and that the information known or readily obtainable is insufficient to enable you to admit that matter.
3. If your response is that only part of a request for admission is objectionable, the remainder of the request shall be answered.
4. If an objection is made to a request or to a part of a request, the specific ground for objection shall be set forth clearly in the response.

### **REQUESTS FOR ADMISSION**

#### **REQUEST FOR ADMISSION NO. 1:**

Admit that a definition of “EURO” as provided by the American Heritage Dictionary, fourth edition, appended hereto as Exhibit A, is “Europe; European.”

#### **REQUEST FOR ADMISSION NO. 2:**

Admit that use of the mark EURO for a paint spray gun manufactured outside of Europe is deceptive and misleading for potential purchasers.

#### **REQUEST FOR ADMISSION NO. 3:**

Admit that, according to the U.S. Department of State website, the United States acknowledges that Taiwan is a part of China.

**REQUEST FOR ADMISSION NO. 4:**

Admit that SATA enjoys a reputation within the paint spray gun industry as being highly regarded for quality paint spray guns and premier craftsmanship.

**REQUEST FOR ADMISSION NO. 5:**

Admit that there is no commercial advantage in having consumers of paint spray guns draw a correlation between a currency and a type of paint spray gun.

**REQUEST FOR ADMISSION NO. 6:**

Admit that a paint spray gun of European manufacture has more appeal to potential purchasers than a paint spray gun of Chinese manufacture.

**REQUEST FOR ADMISSION NO. 7:**

Admit that all documents produced by Applicant in discovery are genuine and authenticate copies of the originals of those documents.

**REQUEST FOR ADMISSION NO. 8:**

Admit that SATA is recognized as a leader in the paint spray gun industry.

Respectfully submitted,

HALL & VANDE SANDE, LLC

Date: \_\_\_\_\_

6/17/14

  
\_\_\_\_\_  
Thomas J. Vande Sande

Lucas T. Vande Sande

Attorneys for Opposer

10220 River Road, Suite 200

Potomac, Maryland 20854

(301) 983-2500

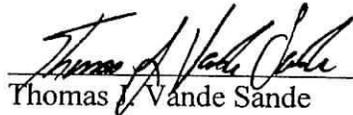
CERTIFICATE OF SERVICE

The undersigned, Thomas J. Vande Sande, attorney for Opposer hereby certifies that one (1) copy of the foregoing "OPPOSER'S FIRST SET OF REQUESTS FOR ADMISSION" was this day served on Applicant by mailing same, first class mail, to:

Payam Moradian, Esquire  
Moradian Law  
10880 Wilshire Blvd., Suite 1101  
Los Angeles, California 90024

Date:

6/17/14



Thomas J. Vande Sande  
HALL & VANDE SANDE, LLC  
Attorneys for Opposer  
10220 River Road, Suite 200  
Potomac, Maryland 20854  
(301) 983-2500

# Exhibit A

*The*  
American  
Heritage<sup>®</sup> Dictionary  
*of the English Language*

FOURTH EDITION

Words are included in this Dictionary on the basis of their usage. Words that are known to have current trademark registrations are shown with an initial capital and are also identified as trademarks. No investigation has been made of common-law trademark rights in any word, because such investigation is impracticable. The inclusion of any word in this Dictionary is not, however, an expression of the Publisher's opinion as to whether or not it is subject to proprietary rights. Indeed, no definition in this Dictionary is to be regarded as affecting the validity of any trademark.

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*Library of Congress Cataloging-in-Publication Data*

The American Heritage dictionary of the English language.—4th ed.

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(hardcover with CD ROM)

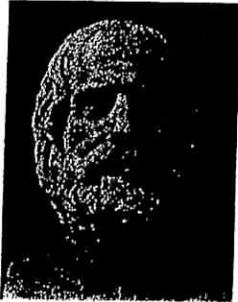
1. English language—Dictionaries

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423—dc21

00-025369

Manufactured in the United States of America



**Euripides**  
marble bust

**eu·pep·sia** (yōō-pēp'sē-ə, -shə) *n.* Good digestion. [Greek, from *eupeptos*, eupeptic. See **EUPETIC**.]

**eu·pep·tic** (yōō-pēp'tik) *adj.* **1a.** Relating to or having good digestion. **b.** Conducive to digestion. **2.** Cheerful; happy. [From Greek *eupeptos*: *eu-*, *eu-* + *peptin*, to digest; see **pek<sup>W</sup>** in Appendix I.] —**eu·pep'ti·cal·ly** *adv.*

**eu·phe·mism** (yōō-fə-miz'əm) *n.* The act or an example of substituting a mild, indirect, or vague term for one considered harsh, blunt, or offensive: "Euphemisms such as 'slumber room' . . . abound in the funeral business" (Jessica Mitford). [Greek *euphēmismos*, from *euphēmeîn*, to use auspicious words, from *euphēmiā*, use of auspicious words: *eu-*, *eu-* + *phēmē*, speech; see **bhā<sup>2</sup>** in Appendix I.] —**eu'phe·mist** *n.* —**eu'phe·mis'tic** (-miz'tik) *adj.* —**eu'phe·mis'ti·cal·ly** *adv.*

**eu·phe·mize** (yōō-fə-miz') *v.* -mized, -miz·ing, -miz·es —*tr.* To speak of or refer to by means of an euphemism. —*intr.* To use euphemisms. —**eu'phe·miz'er** *n.*

**eu·phen·ics** (yōō-fēn'tiks) *n.* (used with a *sing. verb*) The study or practice of phenotypic improvement of humans after birth. [Blend of **EU(GEN)ICS** and **PHEN(OTYPE)**.] —**eu·phen'ic** *adj.*

**eu·pho·ni·ous** (yōō-fō'nē-əs) *adj.* Pleasing or agreeable to the ear. —**eu·pho·ni·ous·ly** *adv.* —**eu·pho·ni·ous·ness** *n.*

**eu·pho·ni·um** (yōō-fō'nē-əm) *n.* A brass wind instrument similar to the tuba but having a somewhat higher pitch and a mellower sound. [From Greek *euphōnos*, sweet-voiced. See **EUPHONY**.]

**eu·pho·nize** (yōō-fə-niz') *tr.v.* -nized, -niz·ing, -niz·es To make pleasing in sound.

**eu·pho·ny** (yōō-fə-nē) *n., pl. -nies* Agreeable sound, especially in the phonetic quality of words. [French *euphonie*, from Late Latin *euphōnia*, from Greek *euphōniā*, from *euphōnos*, sweet-voiced: *eu-*, *eu-* + *phōnē*, sound; see **bhā<sup>2</sup>** in Appendix I.] —**eu·phon'ic** (yōō-fōn'tik) *adj.* —**eu·phon'i·cal·ly** *adv.*

**eu·phor·bi·a** (yōō-fōr'bē-ə) *n.* A plant of the genus *Euphorbia*, which includes the spurge. [Middle English *euforbia*, from Latin *euphorbia*, after *Euphorbus*, first-century A.D. Greek physician.]

**eu·pho·ri·a** (yōō-fōr'tē-ə, -fōr't-) *n.* A feeling of great happiness or well-being. [New Latin, from Greek, from *euphoros*, healthy: *eu-*, *eu-* + *pherein*, to bear; see **bher<sup>1</sup>** in Appendix I.] —**eu·phor'ic** (-fōr'tik, -fōr't-) *adj.* —**eu·phor'i·cal·ly** *adv.*

**eu·pho·ri·ant** (yōō-fōr'tē-ənt, -fōr't-) *n.* A drug that tends to produce euphoria. —**eu·pho'ri·ant** *adj.*

**eu·phot·ic** (yōō-fōt'ik) *adj.* Of, relating to, or being the uppermost layer of a body of water that receives sufficient light for photosynthesis and the growth of green plants.

**Eu·phra·tes** (yōō-frā'tēz) A river of southwest Asia flowing about 2,735 km (1,700 mi) from central Turkey through Syria and into Iraq, where it joins the Tigris River to form the Shatt al Arab. Its waters were a major source of irrigation for civilizations of ancient Mesopotamia.

**Eu·phro·sy·ne** (yōō-frōs'ə-nē) *n.* Greek Mythology One of the three Graces.

**eu·phu·ism** (yōō'fyōō-iz'əm) *n.* **1.** An affectedly elegant literary style of the late 16th and early 17th centuries, characterized by elaborate alliteration, antitheses, and similes. **2.** Affected elegance of language. [After *Euphuus*, a character in *Euphuus*, the *Anatomy of Wit and Euphuus* and his *England* by John Lyly, from Greek *euphuēs*, shapely: *eu-*, *eu-* + *phuein*, to grow, bring forth; see **bheue<sup>2</sup>** in Appendix I.] —**eu'phu·ist** *n.* —**eu'phu·is'tic**, **eu'phu·is'ti·cal** *adj.* —**eu'phu·is'ti·cal·ly** *adv.*

**eu·plas·tic** (yōō-plās'tik) *adj.* Readily transformed into tissue, as in the healing of a wound.

**eu·ploid** (yōō'plōid') *adj.* Having a chromosome number that is an exact multiple of the haploid number for the species. ♀ *n.* An organism having a euploid chromosome number. —**eu'ploidy** *n.*

**eup·ne·a** (yōōp-nē-ə) *n.* Normal, unlabored breathing. [New Latin, from Greek *eupnoia*, from *eupnoos*, breathing well: *eu-*, *eu-* + *pnōin*, to breathe; see **pneu-** in Appendix I.] —**eup·ne'ic** *adj.* —**eup·ne'i·cal·ly** *adv.*

**Eur.** *abbr.* **1.** Europe **2.** European

**Eur·a·sia** (yōō-rā'zhə) The land mass comprising the continents of Europe and Asia.

**Eur·a·sian** (yōō-rā'zhən) *adj.* **1.** Of or relating to Eurasia. **2.** Of mixed European and Asian descent. ♀ *n.* **1.** A person of mixed European and Asian descent. **2.** A native or inhabitant of Eurasia.

**Usage Note** *Eurasian* has been in use since the mid-19th century to refer to a person of mixed European and Asian birth. It was coined during the British rule over India and was long used primarily in designating a person born to a British father and an Indian mother. In a contemporary context *Eurasian* has a much wider application, denoting only that one parent is Asian and the other white—that is, either European or of European descent. • The geographic sense of *Eurasian* is quite distinct, referring to the extended landmass of Europe and Asia and especially to the large indeterminate region where the two continents join. Peoples indigenous to this region can also be termed *Eurasian*, creating a potential ambiguity when referring to an individual as opposed to a group or culture. If the ambiguity is not resolved by context, it may be necessary to use a phrase such as *a member of a Eurasian people* or *a person of European and Asian parentage* for clarity. See **Usage Note** at **Amerasian**.

**EURATOM** *abbr.* European Atomic Energy Community  
**eu·re·ka** (yōō-rē'ka) *interj.* Used to express triumph upon finding or discovering something. [Greek *heureka*, I have found (it) (supposedly exclaimed by Archimedes upon discovering how to measure the volume

of an irregular solid and thereby determine the purity of a gold object first person sing. perfect of *heuriskein*, to find.)

**Eu·re·ka** (yōō-rē'ka) A city of northwest California on Humboldt Bay, an arm of the Pacific Ocean. Lumbering, fishing, and tourism are important to its economy. Population: 27,025.

**eu·rhyth·mics** (yōō-rith'mīks) *n.* (used with a *sing. verb*) Variant of **eurythmics**.

**eu·rhyth·my** (yōō-rith'mē) *n.* Variant of **eurythmy**.

**Eu·rip·ides** (yōō-rī'pī-dēz') 480?–406 B.C. Greek dramatist who ranks with Sophocles and Aeschylus as the greatest classical tragedians. He wrote more than 90 tragedies, although only 18, including *Medea Hippolytus*, and *The Trojan Women*, survive in complete form. —**Eu·rip'i·de'an** *adj.*

**eu·ri·pus** (yōō-rī'pəs) *n., pl. -pi* (-pī') A sea channel characterized by turbulent and unpredictable currents. [Latin *euripus*, from Greek *euripos*: *eu-*, *eu-* + *rhipē*, rush (from *rhiptein*, to throw).]

**eu·ro** or **Eu·ro** (yōō'rō) *n., pl. -ros* or **-ro's** The basic unit of currency among participating European Union countries. Introduced in 1999 as an alternate denomination for noncash transactions, the euro is scheduled to replace the existing national units in these countries by 2002. [After **EUROPE**.]

**Euro-** *pref.* European; European: **Eurocommunism**.

**Euro·A·meri·can** (yōō'rō-ə-mēr'tē-kən) *n.* A U.S. citizen or resident of European descent. ♀ *adj.* **1.** Of or relating to Euro-Americans. **2.** Of or relating to Europe and America.

**Euro·bond** (yōō'rō-bōnd') *n.* A bond of a U.S. corporation issued in Europe.

**Eu·ro·cen·tric** (yōō'rō-sēn'trik) also **Eu·ro·po·cen·tric** (yōō-rō'pə-) *adj.* Centered or focused on Europe or European peoples, especially in relation to historical or cultural influence: "The . . . current revivals of classical architecture cannot be dissociated from attempts in other fields to assert the preeminence of Eurocentric Western culture" (Hugh Honour). —**Eu'ro·cen'trist** *n.* —**Eu'ro·cen'trist** *adj.* & *n.*

**Eu·ro·com·mu·nism** (yōō'rō-kōm'mū-niz'əm) *n.* The communism of certain western European Communist parties that support democratic political procedures and claim to be independent from the Soviet government. —**Eu'ro·com'mu·nist** *adj.* & *n.*

**Eu·ro·crat** (yōō'rō-krāt') *n.* An administrative official at the headquarters of the Common Market. —**Eu'ro·crat'ic** *adj.*

**Eu·ro·cur·rency** (yōō'rō-kūr'ən-sē, -kūr'-) *n., pl. -cies* Funds deposited in a bank when those funds are denominated in a currency differing from the bank's own domestic currency.

**Eu·ro·dol·lar** (yōō'rō-dōl'ər) *n.* A U.S. dollar on deposit with a bank abroad, especially in Europe.

**Eu·ro·mar·ket** (yōō'rō-mār'kit) *n.* **1.** The money market in Eurocurrency or Eurobonds. **2.** The Common Market.

**Eu·ro·pa** (yōō-rō'pə) *n.* **1.** Greek Mythology A Phoenician princess abducted to Crete by Zeus, who had assumed the form of a white bull, and by him the mother of Minos, Rhadamanthus, and Sarpedon. **2.** One of the four brightest satellites of Jupiter and the sixth in distance from the planet. It was originally sighted by Galileo. [Latin *Eurōpa*, from Greek *Eurōpē*.]

**Eu·rope** (yōō'rō'p) The sixth-largest continent, extending west from the Dardanelles, Black Sea, and Ural Mountains. It is technically a vast peninsula of the Eurasian land mass.

**Eu·ro·pe·an** (yōō'rō-pē'ən) *n.* **1.** A native or inhabitant of Europe. **2.** A person of European descent. ♀ *adj.* Of or relating to Europe or its peoples, languages, or cultures.

**European Community** or **European Communities** *Abbr.* **EC** An economic and political organization formed in 1967 from the consolidation of three western European treaty organizations, the European Economic Community, the European Coal and Steel Community, and the European Atomic Energy Community. Its members are the same as those of the European Economic Community.

**European corn borer** *n.* See **corn borer** (sense 1).

**European Economic Community** Informally the **Common Market**. *Abbr.* **EEC** An economic organization established in 1958 to reduce tariff barriers and promote trade among western European countries, including Belgium, Luxembourg, the Netherlands, France, Italy, and West Germany. The United Kingdom, Ireland, and Denmark joined in 1973, Greece in 1981, Spain and Portugal in 1986, and Austria, Finland, and Sweden in 1995.

**Eu·ro·pe·an·ism** (yōō'rō-pē'ə-niz'əm) *n.* Belief in or support of the economic or political unification of Europe. —**Eu'ro·pe·an·ist** *adj.* & *n.*

**Eu·ro·pe·an·ize** (yōō'rō-pē'ə-niz') *tr.v.* -ized, -iz·ing, -iz·es To make European. —**Eu'ro·pe·an·i·za'tion** (-ə-ni-zā'shən) *n.*

**European oyster** *n.* An oyster (*Ostrea edulis*) having a round flat shell and a metallic taste, native to northern Europe and cultured primarily in the northwestern United States and Maine. Also called **flat oyster**.

**European plan** *n.* *Abbr.* **EP** A hotel plan in which the rates include only the charges for a room and not for meals.

**European Union** *Abbr.* **EU** An economic and political union established in 1993 after the ratification of the Maastricht Treaty by members of the European Community, which forms its core. In establishing the European Union, the treaty expanded the political scope of the European Community, especially in the area of foreign and security policy, and provided for the creation of a central European bank and the adoption of a common currency by the end of the 20th century.

**eu·ro·pi·um** (yōō-rō'pē-əm) *n.* **Symbol** **Eu** A silvery-white, soft, rare-earth element occurring in monazite and bastnaesite and used to

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

RECEIVED

JUL 10 2014

-----  
SATA GmbH & Co. KG )

Opposer )

v. )

Mike Ghorbani )

Applicant )  
-----

Mark: EURO & Design **HALL & VANDE SANDE**

Serial No.: 85/712789

Opposition No. 91/210813

**APPLICANT'S RESPONSE TO REQUESTS FOR ADMISSION**

**REQUEST FOR ADMISSION NO.1:**

Admit that a definition of "EURO" as provided by the American Heritage Dictionary, fourth edition, appended hereto as Exhibit A, is "Europe; European."

Objection: The document was not produced during discovery and has no Bates number. The document (American Heritage Dictionary) speaks for itself. The document American Heritage Dictionary) may have been published before the adoption of Euro as a unit of currency in 2002.

Answer: Denied. The definition provided by the dictionary is that Euro is "The basic unit of currency among participating European Union countries. Introduced in 1999 as an alternate denomination for noncash transactions, the euro is scheduled to replace the existing national units in these countries by 2002. The document refers to Euro as a "preface" for Europe, *i.e.*, Euro by itself does not stand for and is not a definition of Europe.

**REQUEST FOR ADMISSION NO.2:**

Admit that use of the mark EURO for a paint spray gun manufactured outside of Europe is deceptive and misleading for potential purchasers.

Objection: Calls for a legal conclusion.

Answer: Denied. The use of the mark EURO for a paint spray gun manufactured outside of Europe is **not** deceptive and **not** misleading for potential purchasers.

**REQUEST FOR ADMISSION NO.3:**

Admit that, according to the U.S. Department of State website, the United States acknowledges that Taiwan is a part of China.

Objection: The Opposer has not produced the document that it is referring to or even attached such document; The Request is irrelevant and immaterial since any alleged United States acknowledgement that Taiwan is a part of China has no bearing on a consumer's view of goods produced in Taiwan.

Answer: Denied. The U.S. and China have a treaty that requires the U.S. government to give a special status to Taiwan. Taiwan and China have separate economies and governments.

**REQUEST FOR ADMISSION NO.4:**

Admit that SATA enjoys a reputation within the paint spray gun industry as being highly regarded for quality paint spray guns and premier craftsmanship.

Objection: The terms "highly regarded" and "premier craftsmanship" are vague. Sata's reputation is irrelevant.

Answer: Denied. SATA enjoys substantially the same reputation as Devilbliss and Anest Iwata.

**REQUEST FOR ADMISSION NO.5:**

Admit that there is no commercial advantage in having consumers of paint spray guns draw a correlation between a currency and a type of paint spray gun.

Answer: Admit

**REQUEST FOR ADMISSION NO.6:**

Admit that a paint spray gun of European manufacture has more appeal to potential purchasers than a paint spray gun of Chinese manufacture.

Objection: Irrelevant; immaterial. The Applicant's spray guns are manufactured in Taiwan and not China.

Answer: Denied. Europe encompasses many countries, and a spray gun that is made in China would have more appeal for example than a spray gun that is manufactured in Bulgaria. European manufactured spray guns do not have a better reputation than spray guns made in Taiwan.

**REQUEST FOR ADMISSION NO.7:**

Admit that all documents produced by Applicant in discovery are genuine and authenticate copies of the originals of those documents.

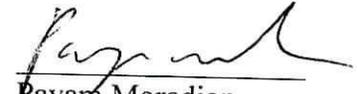
Answer: Admit

**REQUEST FOR ADMISSION NO.8:**

Admit that SATA is recognized as a leader in the paint spray gun industry.

Answer: Denied. SATA is recognized as an industry leader along with Devilbliss and Anest Iwata since these companies have the largest market share. This Request is denied to the extent it implies that SATA by itself is recognized as an industry leader.

Date: July 2, 2014



Payam Moradian  
Attorney for Mike Ghorbani  
10880 Wilshire Blvd,  
Suite 1101  
Los Angeles, CA 90024  
p@moradianlaw.com  
917-353-1919

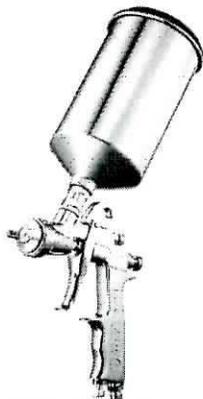
## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been on July 2, 2014 duly served by depositing such copy with the US Postal Service, in an envelope addressed to:

Thomas J. Vande Sande  
Hall & Vande Sande, LLC  
10220 River Road, Suite 200  
Potomac, MD 20854.

By: /Payam Moradian/  
Payam Moradian

Home / Products / Euro / Euro 2200 Series / Air Spray Gun 2200 Series



Double click on above image to view full picture

MORE VIEWS



**Air Spray Gun 2200 Series**

**HVLP Air Spray Gun**

Fluid Output: 150 l/min      Pattern Width: 310 m/m  
 Air Consumption: 270 l/min      Air Pressure: 15-28 PSI  
 Cup Capacity: 1000 c.c.      Air Inlet: 1/4" NPS Fluid Inlet M16 x 1.5P

Availability: In stock

**Available Models**

PRODUCT NAME	ORIFICE	PRICE	QTY
EUR-2212 Air Spray Gun	1.2mm	\$195.00	0
EUR-2213 Air Spray Gun	1.3mm	\$195.00	0
EUR-2214 Air Spray Gun	1.4mm	\$195.00	0
EUR-2215 Air Spray Gun	1.5mm	\$195.00	0
EUR-2216 Air Spray Gun	1.6mm	\$195.00	0
EUR-2218 Air Spray Gun	1.8mm	\$195.00	0
EUR-2220 Air Spray Gun	2.0mm	\$195.00	0
EUR-2225 Air Spray Gun	2.5mm	\$195.00	0
EUR-2001 Repair Kit		\$22.00	0

**Available Nozzles**

PRODUCT NAME	NEEDLE KIT	PRICE	QTY
EUR-2212N Nozzle Kit	1.2mm Set	\$70.00	0
EUR-2213N Nozzle Kit	1.3mm Set	\$70.00	0
EUR-2214N Nozzle Kit	1.4mm Set	\$70.00	0
EUR-2215N Nozzle Kit	1.5mm Set	\$70.00	0
EUR-2216N Nozzle Kit	1.6mm Set	\$70.00	0
EUR-2218N Nozzle kit	1.8mm Set	\$70.00	0
EUR-2220N Nozzle Kit	2.0mm Set	\$70.00	0
EUR-2225N Nozzle Kit	2.5mm Set	\$70.00	0

[Add to Cart](#)

[Add to Compare](#)

[Email to a Friend](#)

[Be the first to review this product](#)

**Details**

We are offering best hvlp gun, hvlp spray guns, 2200 Series, paint guns, hvlp sprayer guns etc

**Product Tags**

**Add Your Tags:**

Use spaces to separate tags. Use single quotes (') for phrases.

Exhibit 6

[Close Window](#)



[Close Window](#)

---

Exhibit 7

# Boat Space Plans.

This Professional Equipment will provide an elegant finish, with no leaking, spitting, or uneven spray patterns

Business Objective: Increase brand awareness in the industry

Product Categories: CCFI

Competition: Sata

IWATA

Pro-Tec

Sharpe

Special Requests:



**PAID**

Step 4: Promotional Tools

Step 5: Payment

Agree to Terms: Yes

Agree Date: 4/25/2012

SEMA Membership Dues: ~~\$350.00~~ ✓

Exhibit Space Total: \$3,990.00 ✓

Sponsorship Total: ~~\$0.00~~

GRAND TOTAL: \$4,340.00 - dk

Your Payment Type: Credit

Your Payment Today: \$1,347.50 (A)

Your Payment Plan: 25 %

Reference ID: 109390

Credit Card to Charge: 5154-XXXX-XXXX-XX43

Credit Card Auto Charge: Yes

You have chosen the 25% payment option and have agreed to have SEMA charge your credit card 3 equal payments as follows:

2nd deposit will be charged to credit card on July 9, 2012.

3rd deposit will be charged to credit card on August 13, 2012.

Final Payment will be charged to credit card on September 14, 2012.

Exhibitor Representative: : Patrick R

Exhibitor Representative Email: [mgdistributor@gmail.com](mailto:mgdistributor@gmail.com)

SEMA

Order Number: 109390

If you have any questions or require assistance in planning for the Show, contact Show Management at 702/450-7662, ext. 120 or e-mail [salesmgr@convexx.com](mailto:salesmgr@convexx.com).

MGD000416



MG DISTRIBUTOR <mgdistributor@gmail.com>

**It was nice seeing you**

1 message

M.G. Distributor <mgdistributor@gmail.com>  
To: srussignan@tiptop.com.ar

Thu, Nov 11, 2010 at 2:54 PM

Hi Sergio

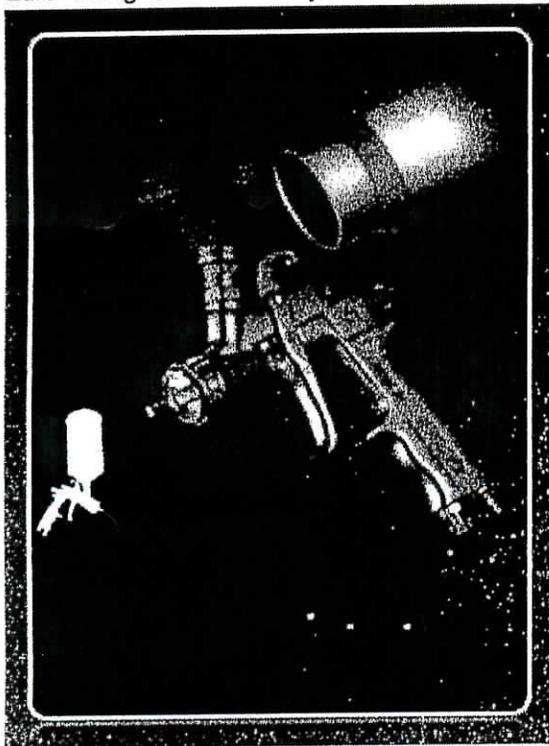
Thank you for visiting our booth at SEMA, your visit was very much appreciated and it was a pleasure to meet you.

We are very excited about the opportunity to introduce high value to you and your company; affordability and stellar quality is our top priority. Our easy to use HVLP spray guns will produce outstanding results, just the way it should be!

We Manufacture two HVLP air spray gun lines; **EURO** and **GOLDENSTAR**, all stainless steel built which depending on Nozzle size are compatible with Waterborne, Solvent or Base coat.

Our **GOLDENSTAR** line also include a wide variety of accessories. There is a one year warranty with all products and all replacement parts are also available.

Euro- Designed in Germany



Attorney Eyes Only

Highly Confidential

Trade Secret

<https://mail.google.com/mail/u/0/?ui=2&ik=08780c1b0a&view=pt&q=sata&qs=true&search=query&th=12c3d2584081069d&siml=12c3d2584081069d>

MGD000417

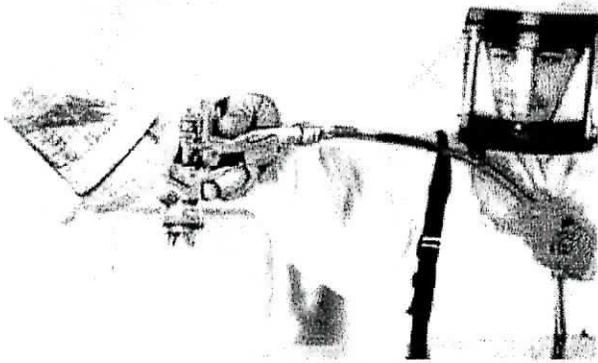
Here is a Wholesale graph for a comparable quality HVLP Spray guns:

Price per unit	How our Wholesale prices for our quality products compare to others			
\$600-\$650				
\$551-\$600	\$510.00			
\$451-\$500		\$470.00		
\$351-\$400				
\$251-\$300				
\$151-\$200				
\$101-\$150				
0-\$100			\$92.00	\$68.50
	<b>SATA™</b>	<b>IWATA™</b>	<b>EURO™</b>	<b>GOLDENSTAR™</b>

Please view our website at [www.mgdistributor.com](http://www.mgdistributor.com). For any additional questions please email us at [mgdistributor@gmail.com](mailto:mgdistributor@gmail.com) or call our office at (213) 627-1011 or directly to my cell (310) 367-5166

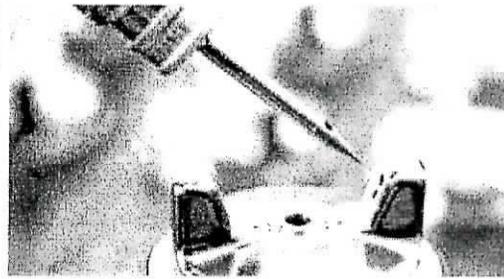
We are looking forward to doing business with you!

Respectfully,  
Mike Ghorbani  
M.G. Distributor, Inc.  
[mgdistributor@gmail.com](mailto:mgdistributor@gmail.com)  
[www.mgdistributor.com](http://www.mgdistributor.com)  
M: 310.367.5166  
T: 213.627.1011  
F: 213.627.2070  
711 E. 9th Pl., Unit B  
Los Angeles, CA 90021

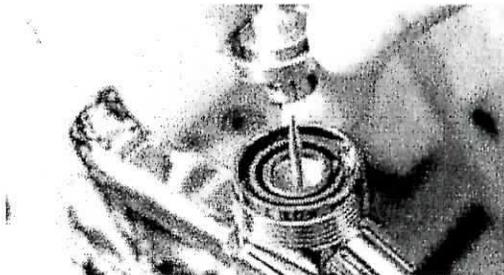


Without adapter – SATA RPS disposable cups fit directly on the SATAjet 4000 B and thus reduce weight as well as cleaning effort.

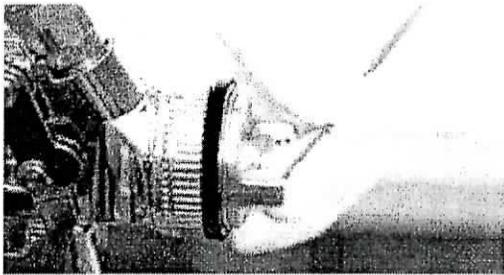
German Engineering –  
exceeding expectations:



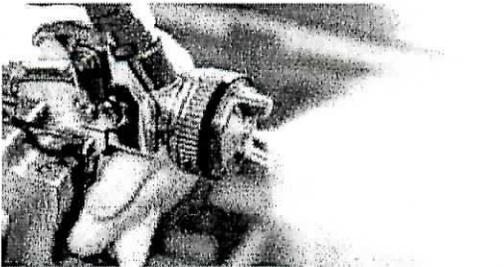
Quality assurance: SATA spray guns are exclusively developed and manufactured in Germany. Strict quality controls are in place to monitor each manufacturing process.



Final assembly: The high precision components are assembled with ultimate care.



Manual adjustment: Each nozzle set is manually "tuned" in order to ensure an optimum spray pattern.



100% spray pattern check: This results in a perfect spray pattern meeting highest quality expectations.

Exhibit 10

MGD000093



Thu Aug 02 01:35:33 CST 2012

RE: color box & stock-1000c.c. Alum. Cup

CONFIDENTIAL

TRADE SECRET

Dear Sherry,

I hope you are doing fine. I would like to order some items as following:

NO.	PART NO.	QUANTITY
1.	GOL-5004	300
2.	GOL-1105	50
3.	GOL-1111	300
4.	GOL-1114	300
5.	GOL-8014	40
6.	GOL-1014	150
7.	GOL-1017	80
8.	GOL-8012	40
9.	EUR-2213	160
10.	EUR-2214	140
11.	BOX EUR-200 BIG	10
12.	GOL-8000 # 18A	15 PART FROM 15 TO 21

I have already to you on the phone last night.

Please let me know that the new spray gun you have already sent me looks like which SATA series.

We have to change the brochure of 1000 & 8000 Series, because the pictures of the brochure are different from the box. For example in 8000 series the picture of spray gun with aluminum cup and the break down of the picture are with plastic cup. Also, for 1000 series the same thing. We would like to change spray gun break down to without cup in all of the brochures in my brand in the future.

Thank you.

Best R

Mike

MGD000542

Exhibit 11

To: [REDACTED]  
AT: [REDACTED]

CONFIDENTIAL

TRADE SECRET

Sent: Friday, August 03, 2012 12:08 AM

Subject: RE: RE: color box &amp; stock-1000c.c. Alum. Cup

Dear Sherry,

Thank you for your email. I would like to know how many manuals you have in the stock.

Please add the following to my order:

Gol-1105        50

Gol-2607 #31    10

Thank you.

Best R

Mike

**From:** [REDACTED]**Sent:** Thursday, August 02, 2012 3:14 AM**To:** MG Distributor**Subject:** Re:RE: color box & stock-1000c.c. Alum. Cup

Dear Mike ,

I'll take a business trip to Taipei tomorrow morning , will not be in the office.

But we'll prepare your order ASAP.

As for the Manual , when we finish it , we'll make new one as your quested .

Ous new SATA spray gun which looks like SATA 1000, NOT 3000 NOR 4000.

Best regards,

Sherry

MGD000541

====Original Message====

寄件者: MG Distributor &lt;mgdistributor@gmail.com&gt;

/ Affordable Hvlp Spary Guns

## AFFORDABLE HVLP SPRAY GUNS

Painting jobs can be quite tiresome, thus, one needs a reliable spray paint gun to aide one in the task. Moreover, the price should also be affordable, too, to the consumers' budget. Thus, one needs a high volume low-pressure (HVLP) spray paint gun. This is very useful for applying varnishes, lacquers, stains and paints of all kinds. The operating concept of the HVLP spray gun is that it is connected to a turbine motor that pushes a high volume of warm air under low pressure into the spray gun which derives its name. However, there are also other HVLP spray paint guns that work with an air compressor. There are also various sizes of HVLP spray guns, small spray guns are used for applying graphics to vehicles or touch up jobs while the standard sizes are used for painting the entire vehicles. Using HVLP spray paint gun is economical and environment-friendly since it reduces overspray and that the toxic chemicals of the paint goes down, thus, protecting the painter and its surroundings. Moreover, the amount of paint that one used in painting a vehicle goes down, which could save a lot of money on paint costs. The also never comprises the quality of the finish. In fact, auto shop painters use HVLP spray paint guns when refinishing cars.

One brand in the market which dominates in the manufacturing of HVLP spray guns and that is SATA. SATA spray guns are high-performance spray guns which is environment and economically friendly. It saves 0.30% of major amount of paint material in comparison to conventional high pressure spray guns. The SATA spray guns featured a patented air circulation principle which gives the spray gun the homogenous and soft spray fan. This allows fast work since this is due to the wide spray fan and high material flow rate. On the other hand, it provides finest atomization and a perfect finish due to its high air volume. Thus, giving a significantly higher savings on paint material since it is only 3 to 5 cents per paint job for the additional costs of compressed air compared to regular high pressure spray gun. It also guarantees the high, well-known SATA quality because the nozzle sets are 100% adjustable by hand, on all complete SATA spray guns as well as replacement of nozzle sets. The nozzle is made of brass not that of aluminum which ensures a long life time of durability. Lastly, it makes sure transfer efficiency that is above 65% required by VOC legislation. So, if you want to have an affordable and quality HVLP spray gun, make sure it's SATA.

Exhibit 14

Home/ Affordable Hvp Spray Guns

## AFFORDABLE HVLP SPRAY GUNS

Painting jobs can be quite tiresome, thus, one needs a reliable spray paint gun to aide one in the task. Moreover, the price should also be affordable, too, to the consumers' budget. Thus, one needs a high volume low-pressure (HVLP) spray paint gun. This is very useful for applying varnishes, lacquers, stains and paints of all kinds. The operating concept of the HVLP spray gun is that it is connected to a turbine motor that pushes a high volume of warm air under low pressure into the spray gun which derives its name. However, there are also other HVLP spray paint guns that work with an air compressor. There are also various sizes of HVLP spray guns, small spray guns are used for applying graphics to vehicles or touch up jobs while the standard sizes are used for painting the entire vehicles. Using HVLP spray paint gun is economical and environment-friendly since it reduces overspray and that the toxic chemicals of the paint goes down, thus, protecting the painter and its surroundings. Moreover, the amount of paint that one used in painting a vehicle goes down, which could save a lot of money on paint costs. The HVLP spray paint gun also never comprises the quality of the finish. In fact, auto shop painters use HVLP spray paint guns when refinishing cars.

One brand in the market which dominates in the manufacturing of HVLP spray guns and that is SATA. SATA spray guns are high-performance spray guns which is environment and economically friendly. It saves 0.30% of major amount of paint material in comparison to conventional high pressure spray guns. The SATA spray guns featured a patented air circulation principle which gives the spray gun the homogenous and soft spray fan. This allows fast work since this is due to the wide spray fan and high material flow rate. On the other hand, it provides finest atomization and a perfect finish due to its high air volume. Thus, giving a significantly higher savings on paint material since it is only 3 to 5 cents per paint job for the additional costs of compressed air compared to regular high pressure spray gun. It also guarantees the high, well-known SATA quality because the nozzle sets are 100% adjustable by hand, on all complete SATA spray guns as well as replacement of nozzle sets. The nozzle is made of brass not that of aluminum which ensures a long life time of durability. Lastly, it makes sure transfer efficiency that is above 65% required by VOC legislation. So, if you want to have an affordable and quality HVLP spray gun, make sure it's SATA.

S 0485

Exhibit 15



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## SATA Spray Equipment



The pinnacle of spray painting tools, SATA Spray Equipment pays special attention to producing tools that are on the cutting edge of science. Many of their guns are versatile, and can be used on many different applications to achieve a professional finish. Whether you are painting furniture, vehicles, or even boats, SATA Spray Equipment has the right spray gun for you. SATA also offers a wide range of professional accessories to go with their product, so you can be certain that you are getting the job done correctly the first time.

---

## SATAjet 4000 B HVLP Spray Guns

(Formerly SATAjet 3000 B HVLP)



**The NEW SATAjet 4000 B HVLP Digital, and Standard Gravity Feed Gun. "Super Saver"**

**Use For High Quality topcoat finishes in automotive or any other field of application.**

Perfect ergonomics, weight and superb finish results were the main focus of the SATAjet 4000 B with enhanced atomization, and a wider, softer fan pattern. Gun Controls are also improved with the new quarter turn fan adjustment, and bigger unobstructed fluid contris. SATAjet 4000 B HVLP are available from 1.0,1.1, 1.2, 1.3, 1.4, 1.5, 1.7, 1.9 and 2.2 mm Fluid Nozzles, as well as a WSB Fluid Nozzle (water solvent Borne). The NEW SATAjet 4000 B HVLP come with RPS disposable cup system in 0.3L, 0.6L and 0.9L. Standard Aluminum and Plastic cups are available.

**Technical Specifications:**

- **Weight- 1 lb 9 oz. (with cup)**
- **Operating Pressure- 29 psi**
- **Air Consumption- 15.2 cfm**
- **Spray Distance- 5 to 8.5"**
- **Gun Finish- high gloss chrome**

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## SATAjet 1000 B HVLP Spray Guns

(Replaces LM 2000 B HVLP)

**The SATAjet 1000 B HVLP Spray Gun is Available in a Gravity Fed, and Pressure Fed Version.**

**Use the SATAjet 1000 B HVLP for a multitude of applications including carpenter, painter, industrial sector, or general use by the home hobby handyman.**

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## The Company

### SATA

#### SATA sets the standard

for paint spray guns, compressed air filters and worker health protection.

The close cooperation with painters from various trades and industry as well as research and development departments and application technicians from the leading paint manufacturers allows SATA to produce superior products of the highest quality.

"SATA Quality" is a firm conviction for any painter: reliability, durability and ergonomics of their SATA products are not something to be questioned.

Together with capable distributors in Germany and abroad, SATA assures customer service worthy of being called that.

In Germany and many other countries, SATA is a leading spray gun manufacturer.

The success is an obligation to SATA. SATA employees and distribution network will always do their best to ensure painting will remain pain free.

- Number of employees: 250
- Annual turnover: 70 million Euros
- Export share: over 70 %
- Quality Assurance System: ISO 9001:2008

#### DAN-AM

Independent exclusive distributor for SATA products in the USA and Puerto Rico.

##### A history of the distributor

In 1976 the Jorgensen family emigrated from Denmark to the United States. Having considerable experience in the automotive refinish trade, Mr. Hans Jorgensen and his two sons Knud and Bent, embarked in an antique auto restoration business. After becoming established, the Jorgensen's started an import business they named Dan-Am Co. Several new products were tested on the market. Two of these products were a sprayable polyester body filler and a German spray gun to apply the product. Most every body shop within a 50-mile radius heard about these products through their local body shop association and wanted to try them. In a short time the entire SATA line was being marketed. The rest is history!

Dan-Am Co. began distribution of the SATA product line in 1980. From the beginning, the company set high goals with a focus on quality and service while developing a marketing strategy for long term growth. The high quality and performance of the SATA product line coupled with the requirements of modern paint technology have led to unprecedented success. Not only is SATA distributed to the automotive refinish market, it serves the industrial and woodworking trades as well. Eventually Dan-Am's expanding customer base made it necessary to move to larger quarters. A new modern 20,000 square foot facility was constructed and Dan-Am moved to their new location in August of 1997.

During the early eighties, the SATA trade name was relatively unknown to body shops in the U.S. Meanwhile, new paint systems were being introduced in the European market. These new basecoat/clearcoat systems required technical improvements to spray guns to achieve improved atomization and performance. The gravity spray gun that had been pioneered and produced by SATA since 1927 proved to be the answer.

The eighties brought many other technological changes and Dan-Am was ready to meet the challenge. The downdraft spray booth came into widespread use. At the same time, the new paint technology required cleaner air and the use of supplied air respirators. However, the most significant change involved a new type of spray application technology - the HVLP gun.

In those early years the introduction of innovative new products like HVLP and supplied air respirators were a tough sell. Painters and shop owners were reluctant to accept the new technology. But in the end the professional recognized that gravity guns and updated equipment made sense. Particularly with the introduction of new paint systems and HVLP mandates.

Dan-Am has continuously cultivated and nurtured an effective liaison between SATA, the paint manufacturers, the Dan-Am sales team and the marketplace. Dan-Am takes pride in distributing the best spray equipment money can buy along with its commitment to customer satisfaction and service.

Exhibit 18

S 0479

SATAjet® 100 B™



German Engineering

Spray Guns



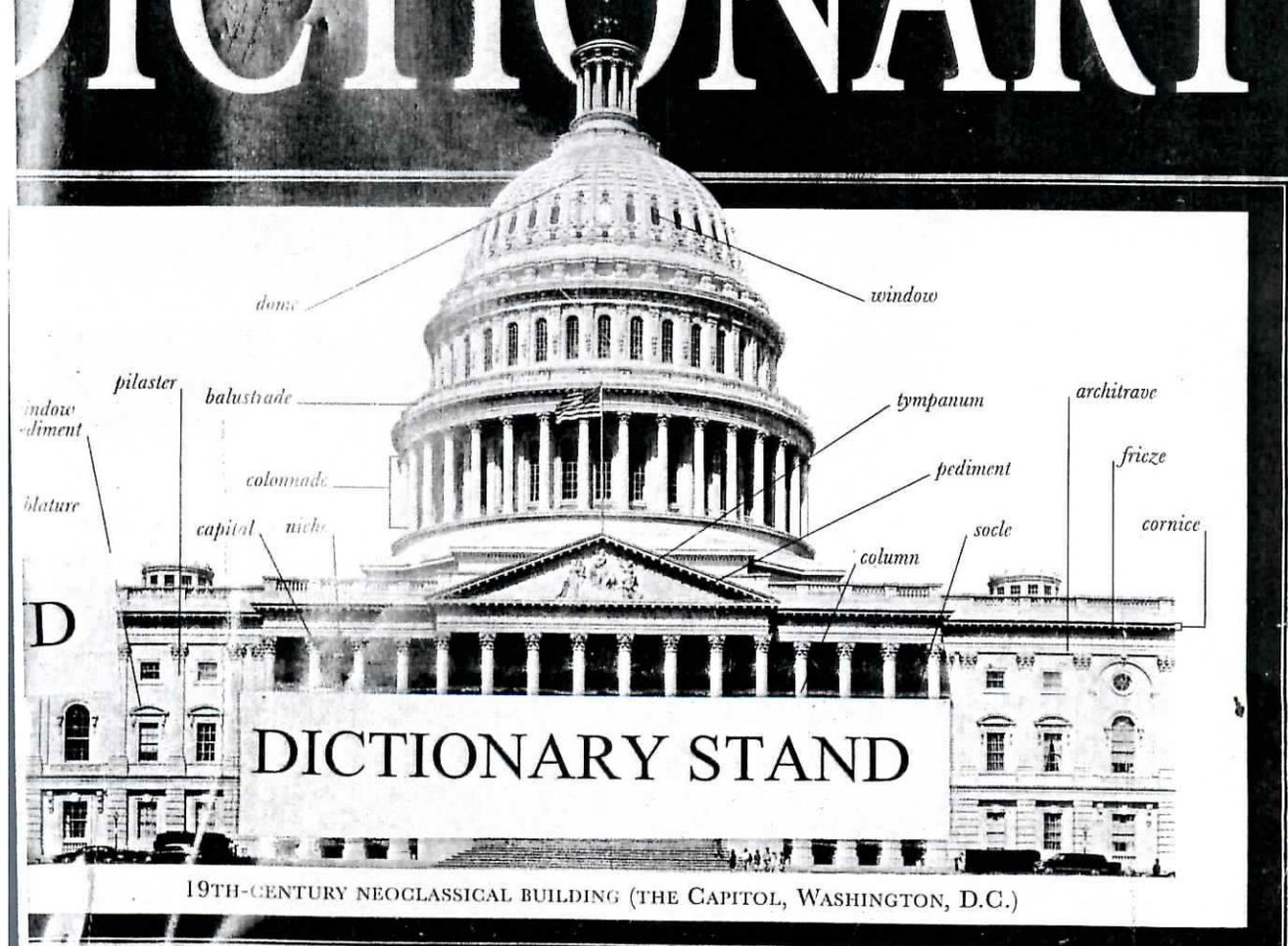
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- Primer spray guns with low overspray
- Minimal sanding effort
- Extremely smooth material application

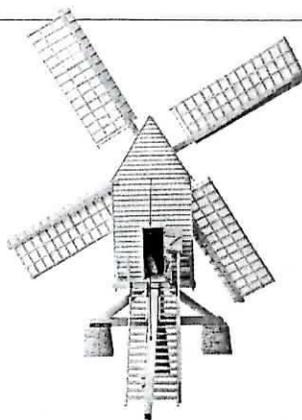
Exhibit 19

S 0018

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**eth-ane** /éthyán/ *n. Chem.* a gaseous hydrocarbon of the alkane series, occurring in natural gas.

**eth-a-nol** /éthánawl, -nól/ *n. Chem.* = ALCOHOL 1.

**eth-ene** /étheen/ *n. Chem.* = ETHYLENE.

**eth-er** /éethar/ *n.* 1 *Chem.* a colorless volatile organic liquid used as an anesthetic or solvent. Also called **diethyl ether**. 2 any of a class of organic compounds with a similar structure to this, having an oxygen joined to two alkyl, etc., groups. 3 a clear sky; the upper regions of air. 3 *hist.* a medium formerly assumed to permeate space. 4 a medium through which electromagnetic waves were formerly thought to be transmitted. □ **eth-er-ic** /eethérik/ *adj.*

**eth-er-eal** /ithéereál/ *adj.* 1 light; airy. 2 highly delicate, esp. in appearance. 3 heavenly; celestial. □ **eth-er-eal-ity** /-reeálee/ *n.* **eth-er-eal-ly** *adv.*

**E** **eth-ic** /éthik/ *n.* & *adj.* ● *n.* a set of moral principles (the Quaker ethic). ● *adj.* = ETHICAL.

**eth-i-cal** /éthikal/ *adj.* 1 relating to morals. 2 morally correct; honorable. 3 (of a medicine or drug) not advertised to the general public, and usu. available only on a doctor's prescription. □ **eth-i-cal-ity** /-kálee/ *n.* **eth-i-cal-ly** *adv.*

**eth-ics** /éthiks/ *n.pl.* (also treated as *sing.*) 1 the science of morals in human conduct. 2 a moral principle. 3 a set of these (medical ethics). □ **eth-i-cist** /éthisist/ *n.*

**Eth-i-op-i-an** /éethéópéan/ *n.* & *adj.* ● *n.* 1 a native or national of Ethiopia in NE Africa. 2 a person of Ethiopian descent. ● *adj.* of or relating to Ethiopia.

**eth-nic** /éthnik/ *adj.* & *n.* ● *adj.* 1 (of a social group) having a common national or cultural tradition. 2 (of clothes, etc.) resembling those of a non-European exotic people. 3 denoting origin by birth or descent rather than nationality (ethnic Turks). 4 relating to race or culture (ethnic group; ethnic origins). ● *n.* 1 a member of an (esp. minority) ethnic group. 2 (in *pl.*, usu. treated as *sing.*) = ETHNOLOGY. □ **eth-ni-cal-ly** *adv.* **eth-nic-ity** /-nisitee/ *n.*

**eth-nic cleans-ing** *n. euphem.* the practice of mass expulsion or killing of people from opposing ethnic or religious groups within a certain area.

**eth-nic** /éthnō/ *comb. form* ethnic; ethnological.

**eth-no-cent-ric** /éthnōséntrik/ *adj.* evaluating other races and cultures by criteria specific to one's own. □ **eth-no-cent-ric-ally** *adv.* **eth-no-cent-ric-ity** /-trísitee/ *n.* **eth-no-cent-rism** *n.*

**eth-no-graph-y** /éthnōgráfee/ *n.* the scientific description of races and cultures of mankind. □ **eth-nog-ra-pher** *n.* **eth-no-graph-ic** /-nāgráfik/ *adj.* **eth-no-graph-i-cal** *adj.*

**eth-nol-ogy** /éthnólájee/ *n.* the comparative scientific study of human peoples. □ **eth-no-log-ic** /-nólójik/ *adj.* **eth-no-log-i-cal** *adj.* **eth-nol-og-ist** *n.*

**eth-ol-ogy** /éthólájee/ *n.* 1 the science of animal behavior. 2 the science of character formation in human behavior. □ **eth-ol-og-i-cal** /éthólójikál/ *adj.* **eth-ol-og-ist** *n.*

**eth-os** /éethos/ *n.* the characteristic spirit or attitudes of a community, people, or system, or of a literary work, etc.

**ethyl** /éthil/ *n.* (attrib.) *Chem.* the univalent radical derived from ethane by removal of a hydrogen atom (ethyl alcohol).

**eth-y-lene** /éthileen/ *n. Chem.* a gaseous hydrocarbon of the alkene series, occurring in natural gas and used in the manufacture of polyethylene. Also called **ethene**.

**eth-y-lene gly-col** *n. Chem.* a colorless viscous hygroscopic liquid used as an antifreeze and in the manufacture of polyesters.

**eti-o-late** /éteeeláyt/ *v.tr.* 1 make (a plant) pale by excluding light. 2 give a sickly hue to (a person). □ **eti-o-la-tion** /-láyshn/ *n.*

**eti-ology** /éteeelójee/ *n.* 1 the assignment of a cause or reason. 2 the philosophy of causation. 3 *Med.* the science of the causes of disease. □ **eti-ologic** /-teeelójik/ *adj.* **eti-olog-i-cal** /-teeelójikál/ *adj.* **eti-olog-i-cal-ly** /-teeelójikálee/ *adv.*

**eti-quette** /éetiket, -kit/ *n.* 1 the conventional rules of social behavior. 2 a the customary behavior of members of a profession toward each other. b the unwritten code governing this (medical etiquette).

**E-trus-can** /itrúskn/ *adj.* & *n.* ● *adj.* of ancient Etruria in Italy. ● *n.* 1 a native of Etruria. 2 the language of Etruria.

**et seq.** *abbr.* (also *et seqq.*) and the following (pages, etc.).

**-ette** /et/ *suffix* forming nouns meaning: 1 small (kitchenette, cigarette). 2 imitation or substitute (leatherette, flannellette). 3 often *offens.* female (usherette, suffragette).

**é-tude** /áytyōd, -tyōd/ *n.* a short musical composition designed to improve the technique of the player.

**ety-mol-ogy** /étimólájee/ *n.* (*pl.* -ies) 1 a the sources of the formation of a word and the development of its meaning. b an account of these. 2 the branch of linguistic science concerned with etymologies. □ **ety-mol-og-i-cal** /-mólójikál/ *adj.* **ety-mol-og-i-cal-ly** *adv.* **ety-mol-og-ist** *n.*

**EU** *abbr.* European Union.

**Eu** *ymb. Chem.* the element europium.

**eu-** /yōd/ *comb. form* well; easily.

**eu-cal-yp-tus** /yōdókályptus/ *n.* (also **eu-cal-ypt**) (*pl.* **eucalypti** /-tí/ or **eucalyptuses** or **eucalypts**)

1 ▼ any tree of the genus *Eucalyptus*, native to Australasia, cultivated for its wood and for the oil from its leaves. 2 (in full **eucalyptus oil**) this oil used as an antiseptic, etc.

**Eu-char-ist** /yōdókárist/ *n.* 1 the Christian sacrament commemorating the Last Supper, in which bread and wine are consecrated and consumed. 2 the consecrated elements, esp. the bread (receive the Eucharist). □ **Eu-char-ist-ic** *adj.*

**eu-clid-e-an** /yōdókleeéan/ *adj.* (also **Eu-clid-e-an**) of or relating to Euclid, 3rd-c. bc. Alexandrian geometrician.

**eugen-ics** /yōdjéniks/ *n.pl.* (also treated as *sing.*) the science of improving the population by controlled breeding for desirable inherited characteristics. □ **eugen-ic** *adj.* **eugen-i-cal-ly** *adv.* **eugen-i-cist** /yōdjénisist/ *n.* **eugen-ist** /yōdjínist/ *n.*

**eukary-ote** /yōdókáreeōt/ *n.* (also **eu-car-y-ote**) *Biol.* an organism consisting of a cell or cells in which the genetic material is contained within a distinct nucleus (cf. **PROKARYOTE**). □ **eukary-otic** /-reeōtik/ *adj.*

**eu-lo-gize** /yōdólájtz/ *v.tr.* praise in speech or writing. □ **eu-lo-gist** /-jíst/ *n.* **eu-log-istic** *adj.* **eu-log-ist-i-cal-ly** *adv.*

**eu-lo-gy** /yōdólájee/ *n.* (*pl.* -ies) 1 a speech or writing in praise of a person. b an expression of praise. 2 a funeral oration in praise of a person.

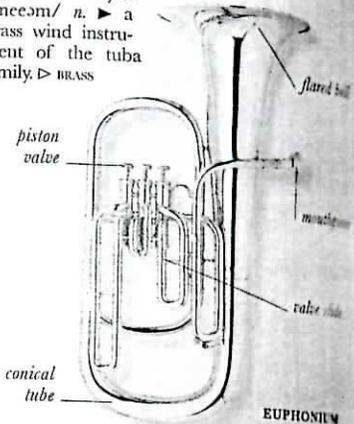
**eu-nuch** /yōdónák/ *n.* 1 a castrated man, esp. one formerly employed at an Oriental harem or court. 2 a person lacking effectiveness (political eunuch).

**eu-on-y-mus** /yōdōnínmas/ *n.* any tree of the genus *Enonymus*, e.g. the spindle tree.

**euphe-mism** /yōdólimizn/ *n.* 1 a mild or vague expression substituted for one thought to be too harsh or direct (e.g. *pass over for die*). 2 the use of such expressions. □ **euphe-mis-tic** *adj.* **euphe-mis-tic-al-ly** *adv.* **euphe-mize** *v.tr.* & *intr.*

**eu-pho-ni-ous** /yōdófónees/ *adj.* 1 sounding pleasant; harmonious. 2 concerning euphony. □ **eu-pho-ni-ous-ly** *adv.*

**eu-pho-ni-um** /yōdófóneem/ *n.* ▶ a brass wind instrument of the tuba family. ▷ **BRASS**



**eu-pho-ny** /yōdófónee/ *n.* (*pl.* -ies) 1 a pleasantness of sound, esp. of a word or phrase. b a pleasant sound. 2 the tendency to make a phonetic change for ease of pronunciation. □ **eu-pho-nic** /-fónik/ *adj.*

**eu-phor-bia** /yōdófáwrbeeá/ *n.* any plant of the genus *Euphorbia*, including spurge. ▷ **SUGARBEET**

**eu-pho-ri-a** /yōdófáwrreeá/ *n.* a feeling of well-being, esp. one based on overconfidence or overoptimism. □ **eu-pho-ric** /-fáwrík, -fór-/ *adj.* **eu-pho-ric-ally** *adv.*

**eu-pho-ri-ant** /yōdófáwrreent/ *adj.* & *n.* ● *adj.* inducing euphoria. ● *n.* a euphoriant drug.

**Eur-a-si-an** /yōdóráyzhn/ *adj.* & *n.* ● *adj.* 1 of many European and Asian parentage. 2 of Europe and Asia. ● *n.* a Eurasian person.

**Eur-a-tom** /yōdórátóm/ *n.* European Atomic Energy Community.

**eu-re-ka** /yōdóreeká/ *int.* & *n.* ● *int.* I have found it (announcing a discovery, etc.). ● *n.* the exultant cry of 'eureka'.

**eu-rhyth-mic** *var.* of **EURHYTHMIC**.

**eu-rhyth-mics** *var.* of **EURHYTHMICS**.

**Euro-** /yōdórod/ *comb. form* Europe; European.

**Euro-crat** /yōdórókrat/ *n.* usu. *derog.* a bureaucrat in the administration of the European Community.

**Euro-dol-lar** /yōdórdólár/ *n.* a dollar held in a bank in Europe.

**Euro-pe-an** /yōdórapéan/ *adj.* & *n.* ● *adj.* 1 of Europe. 2 a descended from natives of Europe. b originating in or characteristic of Europe. c a happening in or extending over Europe. d concerning Europe as a whole rather than its individual countries. 4 of or relating to the European Economic Community. ● *n.* 1 a native or inhabitant of Europe. b a person descended from natives of Europe. c a white person. 2 a person concerned with European matters. □ **Euro-pe-an-ism** *n.* **Euro-pe-an-ize** *v.tr.* & *intr.* **Euro-pe-an-ize** *n.*

**Euro-pe-an Com-mu-ni-ty** *n.* (also **European Economic Community**) an economic and political association of certain European countries with unit with internal free trade and common external tariffs.

**eu-ro-pi-um** /yōdórópeeem/ *n. Chem.* a soft, silvery metallic element of the lanthanide series, occurring naturally in small quantities. † **Symb.** **Eu**

**eu-ryth-mic** /yōdóritimik/ *adj.* (also **eu-ryth-mic**) of or in harmonious proportion (esp. of architecture).

**eu-ryth-mics** /yōdóritimiks/ *n.pl.* (also treated as *sing.*) (also **eu-rhyth-mics**) harmony of movement, esp. as developed with music and applied into a system of education.



**EUCALYPTUS:**  
MOUNT WELLINGTON  
PEPPERMINT  
(*Eucalyptus coccifera*)



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Exhibit 21

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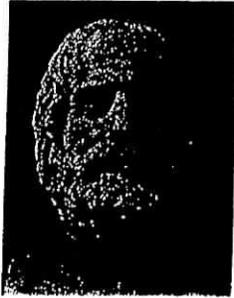
1. English language—Dictionaries

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**Euripides**  
marble bust

**eu•pep•să** (yōō-pēp'sē-ə, -shə) *n.* Good digestion. [Greek, from *eupēptos*, *eupēptic*. See **EUPÉPTIC**.]

**eu•pep•tic** (yōō-pēp'tik) *adj.* **1a.** Relating to or having good digestion. **b.** Conducive to digestion. **2.** Cheerful; happy. [From Greek *eupēptos*: *eu-*, *eu-* + *peptein*, to digest; see **pek**<sup>W</sup>- in Appendix I.] —**eu•pep•tic•al•ly** *adv.*

**eu•phe•mism** (yōō-fā-mīz'əm) *n.* The act or an example of substituting a mild, indirect, or vague term for one considered harsh, blunt, or offensive: "Euphemisms such as 'slumber room' . . . abound in the funeral business" (Jessica Mitford). [Greek *euphēmisimos*, from *euphēmisizein*, to use auspicious words, from *euphēmiā*, use of auspicious words: *eu-*, *eu-* + *phēmē*, speech; see **bhā**<sup>2</sup> in Appendix I.] —**eu•phe•mist** *n.* —**eu•phe•mis'tic** (-mīz'tik) *adj.* —**eu•phe•mis'tic•al•ly** *adv.*

**eu•phe•mize** (yōō-fā-mīz') *v.* -mized, -miz'ing, -miz'es —*tr.* To speak of or refer to by means of a euphemism. —*intr.* To use euphemisms. —**eu•phe•miz'er** *n.*

**eu•phen•ics** (yōō-fēn'fiks) *n.* (used with a *sing. verb*) The study or practice of phenotypic improvement of humans after birth. [Blend of **EU(GEN)ICS** and **PHEN(O)TYPE**.] —**eu•phen'ic** *adj.*

**eu•pho•ni•ous** (yōō-fō'nē-əs) *adj.* Pleasing or agreeable to the ear. —**eu•pho•ni•ous•ly** *adv.* —**eu•pho•ni•ous•ness** *n.*

**eu•pho•ni•um** (yōō-fō'nē-əm) *n.* A brass wind instrument similar to the tuba but having a somewhat higher pitch and a mellower sound. [From Greek *euphōnos*, sweet-voiced. See **EUPHONY**.]

**eu•pho•nize** (yōō-fā-nīz') *tr. v.* -nized, -niz'ing, -niz'es To make pleasing in sound.

**eu•pho•ny** (yōō-fō-nē) *n., pl. -nies* Agreeable sound, especially in the phonetic quality of words. [French *euphonie*, from Late Latin *euphōnia*, from Greek *euphōniā*, from *euphōnos*, sweet-voiced: *eu-*, *eu-* + *phōnē*, sound; see **bhā**<sup>2</sup> in Appendix I.] —**eu•phon'ic** (yōō-fōn'tik) *adj.* —**eu•phon'ic•al•ly** *adv.*

**eu•phor•bi•a** (yōō-fōr'bē-ə) *n.* A plant of the genus *Euphorbia*, which includes the spurges. [Middle English *euforbia*, from Latin *euphorbia*, after *Euphorbus*, first-century A.D. Greek physician.]

**eu•pho•ri•a** (yōō-fōr'tē-ə, -fōr't-) *n.* A feeling of great happiness or well-being. [New Latin, from Greek, from *euphoros*, healthy: *eu-*, *eu-* + *pherein*, to bear; see **bher**<sup>1</sup> in Appendix I.] —**eu•phor'ic** (-fōr'tik, -fōr't-) *adj.* —**eu•phor'ic•al•ly** *adv.*

**eu•pho•ri•ant** (yōō-fōr'tē-ənt, -fōr't-) *n.* A drug that tends to produce euphoria. —**eu•pho•ri•ant** *adj.*

**eu•pho•tic** (yōō-fōt'ik) *adj.* Of, relating to, or being the uppermost layer of a body of water that receives sufficient light for photosynthesis and the growth of green plants.

**Eu•phra•tes** (yōō-frā'tēz) A river of southwest Asia flowing about 2,735 km (1,700 mi) from central Turkey through Syria and into Iraq, where it joins the Tigris River to form the Shatt al Arab. Its waters were a major source of irrigation for civilizations of ancient Mesopotamia.

**Eu•phros•y•ne** (yōō-frōs'ə-nē) *n.* Greek Mythology One of the three Graces.

**eu•phu•ism** (yōō-fyōō-iz'əm) *n.* **1.** An affectedly elegant literary style of the late 16th and early 17th centuries, characterized by elaborate alliteration, antitheses, and similes. **2.** Affected elegance of language. [After *Euphuus*, a character in *Euphuus, the Anatomy of Wit and Euphuus and his England* by John Lyly, from Greek *euphuēs*, shapely: *eu-*, *eu-* + *phuēin*, to grow, bring forth; see **bheua** in Appendix I.] —**eu•phu'ist** *n.* —**eu•phu'is'tic**, **eu•phu'is'tic•al** *adj.* —**eu•phu'is'tic•al•ly** *adv.*

**eu•plas•tic** (yōō-plās'tik) *adj.* Readily transformed into tissue, as in the healing of a wound.

**eu•ploid** (yōō-ploid') *adj.* Having a chromosome number that is an exact multiple of the haploid number for the species. ♠ *n.* An organism having a euploid chromosome number. —**eu•plo'id•y** *n.*

**eu•pne•a** (yōōp-nē'ə) *n.* Normal, unlabored breathing. [New Latin, from Greek *eupnoia*, from *eupnoos*, breathing well: *eu-*, *eu-* + *pnēin*, to breathe; see **pneu**- in Appendix I.] —**eu•pne'ic** *adj.* —**eu•pne'ic•al•ly** *adv.*

**Eur.** *abbr.* 1. Europe 2. European

**Eur•a•sia** (yōō-rā'zhə) The land mass comprising the continents of Europe and Asia.

**Eur•a•sian** (yōō-rā'zhən) *adj.* **1.** Of or relating to Eurasia. **2.** Of mixed European and Asian descent. ♠ *n.* 1. A person of mixed European and Asian descent. 2. A native or inhabitant of Eurasia.

**Usage Note** *Eurasian* has been in use since the mid-19th century to refer to a person of mixed European and Asian birth. It was coined during the British rule over India and was long used primarily in designating a person born to a British father and an Indian mother. In a contemporary context *Eurasian* has a much wider application, denoting only that one parent is Asian and the other white—that is, either European or of European descent. • The geographic sense of *Eurasian* is quite distinct, referring to the extended landmass of Europe and Asia and especially to the large indeterminate region where the two continents join. Peoples indigenous to this region can also be termed *Eurasian*, creating a potential ambiguity when referring to an individual as opposed to a group or culture. If the ambiguity is not resolved by context, it may be necessary to use a phrase such as *a member of a Eurasian people* or *a person of European and Asian parentage* for clarity. See **Usage Note at Amerasian**.

**EURATOM** *abbr.* European Atomic Energy Community

**eu•re•ka** (yōō-rē'kə) *interj.* Used to express triumph upon finding or discovering something. [Greek *eurēzka*, I have found (it) (supposedly exclaimed by Archimedes upon discovering how to measure the volume

of an irregular solid and thereby determine the purity of a gold object first person *sing. perfect of heuriskein*, to find.)

**Eu•re•ka** (yōō-rē'kə) A city of northwest California on Humboldt Bay, an arm of the Pacific Ocean. Lumbering, fishing, and tourism important to its economy. Population: 27,025.

**eu•rhyth•mics** (yōō-rīth'miks) *n.* (used with a *sing. verb*) Varieties of eurythmics.

**eu•rhyth•my** (yōō-rīth'mē) *n.* Variant of eurythmy.

**Eu•rip'i•des** (yōō-rīp'i-dēz') 480?–406 B.C. Greek dramatist who ranks with Sophocles and Aeschylus as the greatest classical tragedian. He wrote more than 90 tragedies, although only 18, including *Medea*, *Hippolytus*, and *The Trojan Women*, survive in complete form. —**Eu•rip'i•de'an** *adj.*

**eu•ri•pus** (yōō-rī'pəs) *n., pl. -pi* (-pī') A sea channel characterized by turbulent and unpredictable currents. [Latin *euriplus*, from Greek *euriplus*: *eu-*, *eu-* + *rhipē*, rush (from *rhiptein*, to throw).]

**eu•ro** or **Eu•ro** (yōō-rō) *n., pl. -ros* or *-ro's* The basic unit of currency among participating European Union countries. Introduced in 1999 as an alternate denomination for noncash transactions, the euro scheduled to replace the existing national units in these countries in 2002. [After **EUROPE**.]

**Euro-** *pref.* Europe; European: **Eurocommunism**.

**Eu•ro•A•meri•can** (yōō-rō-ə-mēr'i-kan) *n.* A U.S. citizen or resident of European descent. ♠ *adj.* 1. Of or relating to Euro-American. 2. Of or relating to Europe and America.

**Eu•ro•bond** (yōō-rō-bōnd') *n.* A bond of a U.S. corporation issued in Europe.

**Eu•ro•cen•tric** (yōō-rō-sēn'trik) also **Eu•ro•po•cen•tric** (yōō-rō'pō-) *adj.* Centered or focused on Europe or European peoples, especially in relation to historical or cultural influence: "The . . . current rivalries of classical architecture cannot be dissociated from attempts in other fields to assert the preeminence of Eurocentric Western culture" (Hugh Honour). —**Eu•ro•cen'trism** *n.* —**Eu•ro•cen'trist** *adj.* & *n.*

**Eu•ro•com•mu•nism** (yōō-rō-kōm'myū-niz'm) *n.* The communism of certain western European Communist parties that support democratic political procedures and claim to be independent from the Soviet government. —**Eu•ro•com'mun'ist** *adj.* & *n.*

**Eu•ro•crat** (yōō-rō-krāt') *n.* An administrative official at the headquarters of the Common Market. —**Eu•ro•crat'ic** *adj.*

**Eu•ro•cur•ren•cy** (yōō-rō-kūr'on-sē, -kūr't-) *n., pl. -cies* Fund deposited in a bank when those funds are denominated in a currency differing from the bank's own domestic currency.

**Eu•ro•dol•lar** (yōō-rō-dōl'ər) *n.* A U.S. dollar on deposit with a bank abroad, especially in Europe.

**Eu•ro•mar•ket** (yōō-rō-mār'kit) *n.* 1. The money market in Europe. 2. The Common Market.

**Eu•ro•pa** (yōō-rō'pə) *n.* **1.** Greek Mythology A Phoenician prince, abducted to Crete by Zeus, who had assumed the form of a white bull and by him the mother of Minos, Rhadamanthus, and Sarpedon. **2.** One of the four brightest satellites of Jupiter and the sixth in distance from the planet. It was originally sighted by Galileo. [Latin *Eurōpa*, from Greek *Eurōpē*.]

**Eu•rope** (yōō-rō'p) The sixth-largest continent, extending west from the Dardanelles, Black Sea, and Ural Mountains. It is technically a vast peninsula of the Eurasian land mass.

**Eu•ro•pe•an** (yōō-rō-pē'an) *n.* **1.** A native or inhabitant of Europe. **2.** A person of European descent. ♠ *adj.* Of or relating to Europe or its peoples, languages, or cultures.

**European Community** or **European Communities** *Abbr.* **EC** An economic and political organization formed in 1967 from the consolidation of three western European treaty organizations, the European Economic Community, the European Coal and Steel Community, and the European Atomic Energy Community. Its members are the same as those of the European Economic Community.

**European corn borer** *n.* See **corn borer** (sense 1).

**European Economic Community** Informally the **Common Market**. *Abbr.* **EEC** An economic organization established in 1958 to reduce tariff barriers and promote trade among western European countries, including Belgium, Luxembourg, the Netherlands, France, Italy, and West Germany. The United Kingdom, Ireland, and Denmark joined in 1973, Greece in 1981, Spain and Portugal in 1986, and Austria, Finland, and Sweden in 1995.

**Eu•ro•pe•an•ism** (yōō-rō-pē'ə-nīz'm) *n.* Belief in or support of the economic or political unification of Europe. —**Eu•ro•pe'an'ist** *adj.* & *n.*

**Eu•ro•pe•an•ize** (yōō-rō-pē'ə-nīz') *tr. v.* -ized, -iz'ing, -iz'es To make European. —**Eu•ro•pe'an'i•za'tion** (-ə-nī-zā'shən) *n.*

**European oyster** *n.* An oyster (*Ostrea edulis*) having a round flat shell and a metallic taste, native to northern Europe and cultured primarily in the northwestern United States and Maine. Also called *flat oyster*.

**European plan** *n.* *Abbr.* **EP** A hotel plan in which the rates include only the charges for a room and not for meals.

**European Union** *Abbr.* **EU** An economic and political union established in 1993 after the ratification of the Maastricht Treaty by members of the European Community, which forms its core. In establishing the European Union, the treaty expanded the political scope of the European Community, especially in the area of foreign and security policy, and provided for the creation of a central European bank and the adoption of a common currency by the end of the 20th century.

**eu•ro•pi•um** (yōō-rō'pē-əm) *n.* **Symbol** **Eu** A silvery-white, soft, rare-earth element occurring in monazite and bastnaesite and used to

# Cook

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## Bravo *Euros of Hollywood*



### The Euros Explain American Holidays

You'll never guess which one allegedly involves guns and mirrors...

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A Guide to American Slang

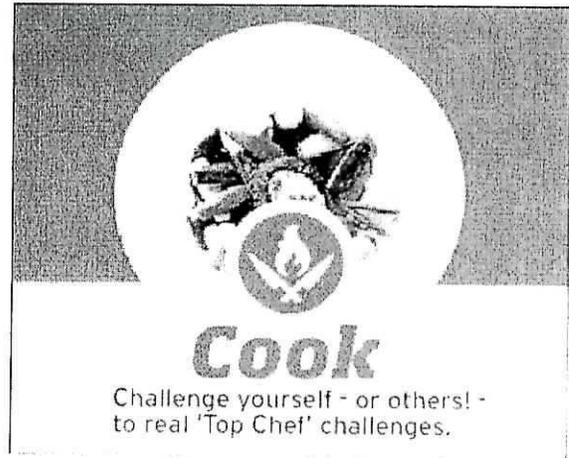
Exhibit 23

The Euros guess the meaning of common English phrases.

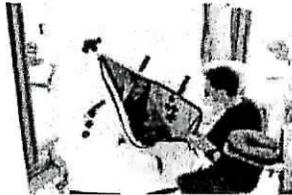
### The Euros' Most American Experience

The cast shares their thoughts on typically American things.

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### Bleona's Beauty Secrets



EXCLUSIVE

Join Bleona as she walks you through her extensive beauty regimen.

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### Euros of Hollywood Anywhere

## What's New



PREVIEW

### Massimo's High Stakes Tennis Match

S1/EP9. Massimo makes a very interesting wager on his tournament.

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PREVIEW

### Bleona's Looking for a Personal Assistant

S1/EP9: But her prospects aren't too good ...

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CAST BLOG

*"We all spent entirely too much time discussing false rumors."*

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by Isabel Adrian  
12/16/2014



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### Massimo Goes British

S1/EP8: Massimo learns he has to master a British accent for a new role



EXCLUSIVE

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### The Euros Explain American Holidays

Who knew Thanksgiving involved mirrors and guns?

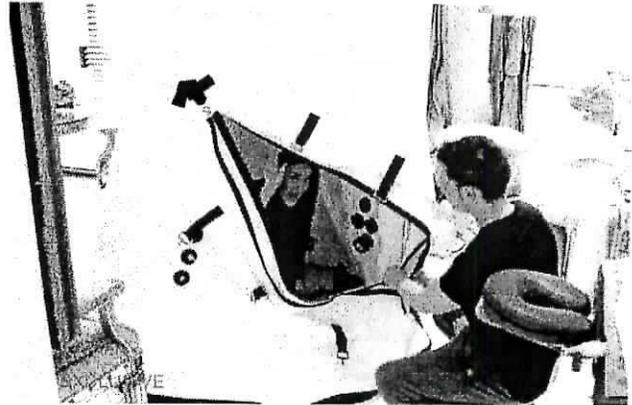


### A Guide to American Slang

The Euros guess the meaning of common English phrases.

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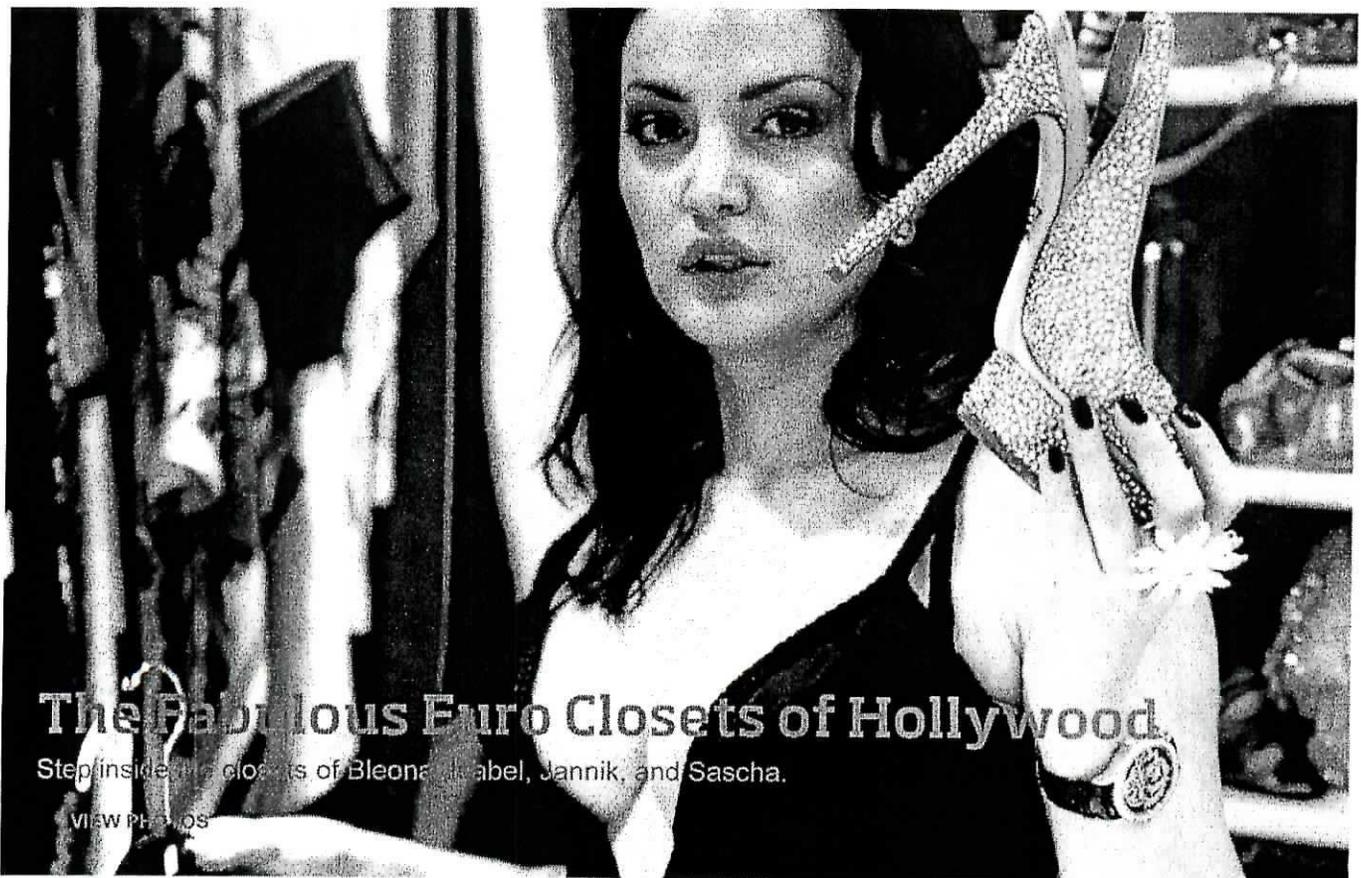


### Bleona's Beauty Tips: The Oxygen Tank

Join Bleona as she walks you through her extensive beauty regimen.

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## The Fabulous Euro Closets of Hollywood

Step inside the closets of Bleona, Jannik, and Sascha.

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## Meet the Euros!

Get to know the group that's hoping to make their mark on LA.

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## ***The Cast***



**Bleona**

@BLEONAQWORLD



**Fawni**

@FAWNI

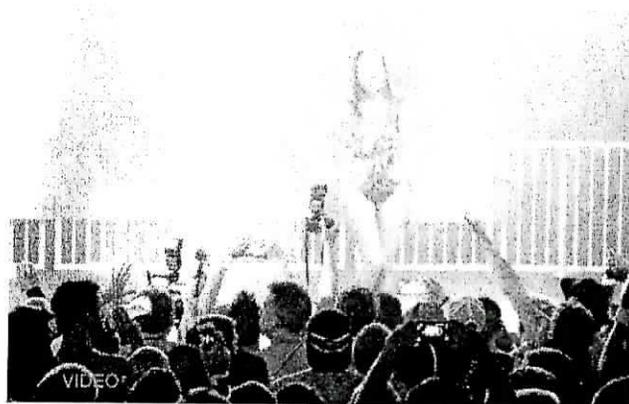
CAST BLOG

*"There's a very fine line between work and private life, and both parties have to understand and respect that."*

READ BLOG

by Jannik Olander

12/09/2014



### The Euros Take the White Party

S1/EP7: The group comes together for Bleona's big performance (complete with robots).

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VIDEO

### Is Isabel Lying?

S1/EP7: Jack calls out Isabel when she denies that her husband, Steve Angello, ever wore any of his Nialaya jewelry.

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VIDEO

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12/01/2014

### Massimo Shows Off His Choreography

S1/EP6: This Euro is a man of many talents.



VIDEO

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12/01/2014

### See Bleona's Shocking Body Suit

S1/EP6: Bleona has a very special ensemble in mind for her White Party performance ...



### Isabel's Not Sorry

S1/EP5: Sascha Gerecht airs his grievances with Isabel Adrian, but she's not having it.

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### Jannik and His Famous Friends

Check out Jannik Olander's A-list Nialaya clientele.

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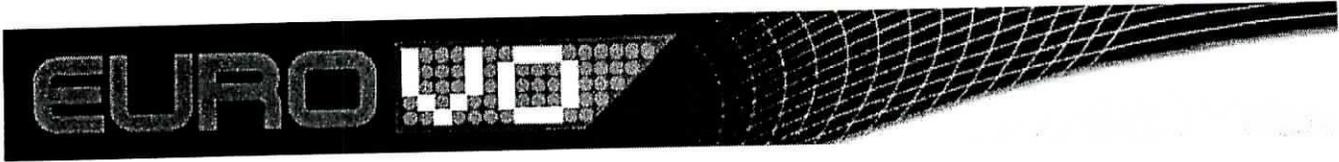
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The EURO-VO current project: [EuroVO-CoSADIE](#) Past projects: [VOTECH](#) [EuroVO-DCA](#) [EuroVO-AIDA](#) [EuroVO-ICE](#)

## The European Virtual Observatory EURO-VO

The Virtual Observatory is an international astronomical community-based initiative. It aims to allow global electronic access to the available astronomical data archives of space and ground-based observatories and other sky survey databases. **EURO-VO** aims at deploying an operational VO in Europe. It supports the utilization of VO tools and services by the scientific community, technology take-up and VO compliant resource provision, and building of the technical infrastructure.

The left menu provides links to information relevant to **Scientists, Data Centres, Software Developers and Educators**.

### News

- **ASTERICS project signed as a Horizon 2020 project to address the challenges of astronomy 'big data' in Europe.** [INSU News item](#), [ASTRON news](#)
- **Workshop on Virtual Observatory Tools and their Applications**, Krakow, Poland June 16-18, organized by HECOLS (Polish-French collaboration in astrophysics) and supported by Euro-VO CoSADIE
- **CoSADIE was invited to present 'Big Data in the Astronomical Community' at the 'Big Data & Open Data' workshop organised by the ERF-AISBL (European Association of European level Infrastructures Facilities) May 7-8, 2014**
- **May 2014 IVOA Newsletter now [available](#)**
- **Euro-VO coordinator Françoise Genova was invited to present the Astronomical Virtual Observatory at the Copernicus (European Earth Observation Programme) Big Data Workshop**, Brussels, March 13-14
- **Euro-VO CoSADIE project held its third Technology Forum** in Trieste, March 11-13, 2014 - Presentations available
- **Euro-VO Presented at EUDAT**: Garching, Germany, Feb 4, 2014
- [Older news items](#)

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Exhibit 24

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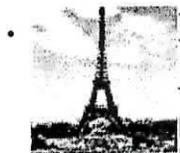


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**Host Cities**



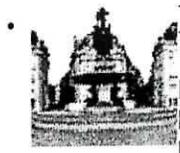
**Paris**

There can be few cities on the planet that can claim to have been at the centre of history as Paris, the City of Light, has and it still sets the global agenda for culture, cuisine, and fashion.  
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**Saint-Denis**

Saint-Denis has had several guises, from royal monastery to republican stronghold, and has emerged from tough times as a vibrant, youthful city over the past 30 years.  
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**Bordeaux**

Bordeaux is synonymous with its 2,000-year-old wine-making tradition that produces 800m bottles per year, but its unspoilt city centre and revamped quaysides also demand attention.  
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**Lens**

A rich seam of coal runs through Lens' past – even the football stadium was built by out-of-work miners – but the opening of a €150m art gallery on a former colliery boasts of a different future.  
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**Lille**



Right on the Belgian border, transport hub Lille is a cosmopolitan city with strong Flemish roots famed for its eventful thriving cultural scene, annual flea market and cafe culture.  
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## Lyon

The birthplace of cinema, Lyon would provide a fine backdrop to any movie, with its rolling hills, stunning panoramas, UNESCO status areas and rabbit-warren traboules.  
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## Marseille

France's oldest city, a transport and freight hub, can look back on over 2,500 years of history and there is now plenty to enjoy that marks the passage of time since then.  
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## Nice

France's second most popular tourist destination after Paris, Nice is renowned for its balmy climate and art-inspiring setting between the Mediterranean coast and mountains.  
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## Saint-Etienne

Saint-Etienne was once inextricably linked with coal mining and industry, but this city of parks and gardens has gained renown for its visual arts and design in recent years.  
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## Toulouse

Known as 'la Ville Rose' (the Pink City) on account of the terracotta bricks used in many of its buildings, Toulouse is a vibrant, elegant area voted France's most desirable place to live.  
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## Euro PM2015 Congress & Exhibition

Europe's annual powder metallurgy congress and exhibition, organised and sponsored by the European Powder Metallurgy Association, will return to France in 2015, when Euro PM2015 will be held at Reims Congress Centre, a city renowned for its history as the Coronation City of France, the location of 3 UNESCO World Heritage Sites and of course champagne.

The combination of a world class technical programme and state-of-the art exhibition will provide the ideal networking opportunity for suppliers, producers and end-users.

The programme of plenary and keynote addresses, oral and poster presentations and special interest seminars will focus on:

- Additive Manufacturing
- Hard Materials and Diamond Tools
- Hot Isostatic Pressing
- New Materials and Applications
- PM Structural Parts
- Powder Injection Moulding

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Exhibit 26

Alongside the technical sessions the Euro PM2015 Exhibition will be an excellent opportunity for international suppliers to the PM industry to network with new and existing customers from the powder metallurgy and associated sectors.

If you supply the Powder Metallurgy Industry with products and services in Europe, the Euro PM2015 Exhibition is the one event you need to attend.

The Euro PM2015 Congress & Exhibition will attract many key PM industry decision makers who may be your next customer.

- **Euro PM2015 Registration**  
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Information about exhibiting at Euro PM2015 (/pdfs/45-euro-pm2015-exhibition-package-1/file)

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\*\*\*Authors & Referees: Final Manuscripts for #EuroPM2015 approval deadline is tomorrow\*\*\*  
Shrewsbury, England, United Kingdom

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Mr Velard from @universitereims talks about what #EuroPM2015 has to offer and what attendees can expect from Reims  
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## TENNIS

### WTA BAD GASTEIN - 1st Round (/TENNIS/WTA-BAD-GASTEIN/2015/STANDING.SHTML)

	D.Allertová	3	5
	C.Witthöft	6	5

[\(/tennis/wta-bad-gastein/2015/denisa-allertova-carina-witthoft\\_mtc794674/live.shtml\)](/tennis/wta-bad-gastein/2015/denisa-allertova-carina-witthoft_mtc794674/live.shtml)

	K.Siniaková	4	4
	D.Kovinic	6	6

[\(/tennis/wta-bad-gastein/2015/katerina-siniakova-danka-kovinic\\_mtc794675/live.shtml\)](/tennis/wta-bad-gastein/2015/katerina-siniakova-danka-kovinic_mtc794675/live.shtml)

	AL.Friedsam	6	4	A
	K.Koukalová	1	0	

[\(/tennis/wta-bad-gastein/2015/anna-lena-friedsam-klara-koukalova\\_mtc794677/live.shtml\)](/tennis/wta-bad-gastein/2015/anna-lena-friedsam-klara-koukalova_mtc794677/live.shtml)

Exhibit 27

**ATP BASTAD - 1st Round (/TENNIS/ATP-BASTAD/2015/STANDING.SHTML)**



C.Lindell

6 3 6

J.Souza

2 6 4

[\(/tennis/atp-bastad/2015/christian-lindell-joao-souza\\_mtc794607/live.shtml\)](/tennis/atp-bastad/2015/christian-lindell-joao-souza_mtc794607/live.shtml)



M.Eriksson

6<sup>4</sup> 3

B.Paire

7<sup>7</sup> 6

[\(/tennis/atp-bastad/2015/markus-eriksson-benoit-paire\\_mtc794615/live.shtml\)](/tennis/atp-bastad/2015/markus-eriksson-benoit-paire_mtc794615/live.shtml)



J.Mónaco

[\(/tennis/atp-bastad/2015/juan-monaco\\_mtc794609/live.shtml\)](/tennis/atp-bastad/2015/juan-monaco_mtc794609/live.shtml)



T.Robredo

[\(/tennis/atp-bastad/2015/tommy-robredo\\_mtc794613/live.shtml\)](/tennis/atp-bastad/2015/tommy-robredo_mtc794613/live.shtml)



D.Goffin

[\(/tennis/atp-bastad/2015/david-goffin\\_mtc794614/live.shtml\)](/tennis/atp-bastad/2015/david-goffin_mtc794614/live.shtml)



P.Cuevas

[\(/tennis/atp-bastad/2015/pablo-cuevas\\_mtc794632/live.shtml\)](/tennis/atp-bastad/2015/pablo-cuevas_mtc794632/live.shtml)

**ATP BOGOTA - 1st Round (/TENNIS/ATP-BOGOTA/2015/STANDING.SHTML)**



A.Mannarino

[\(/tennis/atp-bogota/2015/adrian-mannarino\\_mtc794560/live.shtml\)](/tennis/atp-bogota/2015/adrian-mannarino_mtc794560/live.shtml)



V.Estrella

[\(/tennis/atp-bogota/2015/victor-estrella\\_mtc794582/live.shtml\)](/tennis/atp-bogota/2015/victor-estrella_mtc794582/live.shtml)



B.Tomic

[\(/tennis/atp-bogota/2015/bernard-tomic\\_mtc794586/live.shtml\)](/tennis/atp-bogota/2015/bernard-tomic_mtc794586/live.shtml)

 I.Karlovic

[\(/tennis/atp-bogota/2015/ivo-karlovic\\_mtc794587/live.shtml\)](/tennis/atp-bogota/2015/ivo-karlovic_mtc794587/live.shtml)

 R.Štěpánek

 E.Roger-Vasselin

[\(/tennis/atp-bogota/2015/radek-stepanek-edouard-roger-vasselin\\_mtc794558/live.shtml\)](/tennis/atp-bogota/2015/radek-stepanek-edouard-roger-vasselin_mtc794558/live.shtml)

 Y.Sugita

 N.Barrientos

[\(/tennis/atp-bogota/2015/yuichi-sugita-nicolas-barrientos\\_mtc794581/live.shtml\)](/tennis/atp-bogota/2015/yuichi-sugita-nicolas-barrientos_mtc794581/live.shtml)

**WTA ISTANBUL - 1st Round (/TENNIS/WTA-ISTANBUL/2015/STANDING.SHTML)**

Y.Shvedova	7	3	4
B.Jovanovski	5	6	6

[\(/tennis/wta-istanbul/2015/yaroslava-shvedova-bojana-jovanovski\\_mtc794700/live.shtml\)](/tennis/wta-istanbul/2015/yaroslava-shvedova-bojana-jovanovski_mtc794700/live.shtml)

M.Rybáriková	6	6	
E.Svitolina	1	3	

[\(/tennis/wta-istanbul/2015/magdalena-rybarikova-elina-svitolina\\_mtc794705/live.shtml\)](/tennis/wta-istanbul/2015/magdalena-rybarikova-elina-svitolina_mtc794705/live.shtml)

L.Tsurenko	7 <sup>1</sup>	3	6
D.Gavrilova	6 <sup>2</sup>	6	3

[\(/tennis/wta-istanbul/2015/lesia-tsurenko-daria-gavrilova\\_mtc794725/live.shtml\)](/tennis/wta-istanbul/2015/lesia-tsurenko-daria-gavrilova_mtc794725/live.shtml)

A.Pavlyuchenkova	2	1	
R.Vinci	6	6	

[\(/tennis/wta-istanbul/2015/anastasia-pavlyuchenkova-roberta-vinci\\_mtc794702/live.shtml\)](/tennis/wta-istanbul/2015/anastasia-pavlyuchenkova-roberta-vinci_mtc794702/live.shtml)

## ATP UMAG - 1st Round (/TENNIS/ATP-UMAG/2015/STANDING.SHTML)

M.Delic

0

A.Bedene

2

[\(/tennis/atp-umag/2015/mate-delic-aljaz-bedene\\_mtc794519/live.shtml\)](/tennis/atp-umag/2015/mate-delic-aljaz-bedene_mtc794519/live.shtml)

F.Fognini

J.Veselý

[\(/tennis/atp-umag/2015/fabio-fognini-jiri-vesely\\_mtc794536/live.shtml\)](/tennis/atp-umag/2015/fabio-fognini-jiri-vesely_mtc794536/live.shtml)

A.Seppi

[\(/tennis/atp-umag/2015/andreas-seppi\\_mtc794517/live.shtml\)](/tennis/atp-umag/2015/andreas-seppi_mtc794517/live.shtml)

R.Bautista

[\(/tennis/atp-umag/2015/roberto-bautista\\_mtc794521/live.shtml\)](/tennis/atp-umag/2015/roberto-bautista_mtc794521/live.shtml)

G.Monfils

[\(/tennis/atp-umag/2015/gael-monfils\\_mtc794522/live.shtml\)](/tennis/atp-umag/2015/gael-monfils_mtc794522/live.shtml)

D.Thiem

[\(/tennis/atp-umag/2015/dominic-thiem\\_mtc794540/live.shtml\)](/tennis/atp-umag/2015/dominic-thiem_mtc794540/live.shtml)

## **FOOTBALL**

### ALLSVENSKAN - Day 16 (/FOOTBALL/ALLSVENSKAN/CALENDAR-RESULT.SHTML)

Djurgårdens IF

19:00

Atvidabergs FF

[\(/football/allsvenskan/2015/djurgardens-if-atvidabergs-ff\\_mtc762916/live.shtml\)](/football/allsvenskan/2015/djurgardens-if-atvidabergs-ff_mtc762916/live.shtml)

BK Häcken

19:05

Hammarby IF

[\(/football/allsvenskan/2015/bk-hacken-hammarby-if\\_mtc762894/live.shtml\)](/football/allsvenskan/2015/bk-hacken-hammarby-if_mtc762894/live.shtml)

**A. LE COQ PREMIUM LIIGA - Day 19 (/FOOTBALL/MEISTRILIIGA/CALENDAR-RESULT.SHTML)**

Football

Tennis      Kalev Sillamäe      0 0      Pärnu Linnameeskond

[\(/football/a-le-coq-premium-liiga/2015/kalev-sillamae-parnu-linnameeskond\\_mtc759256/live.shtml\)](/football/a-le-coq-premium-liiga/2015/kalev-sillamae-parnu-linnameeskond_mtc759256/live.shtml)

Kalju Nõmme      0 0      Tulevik Viljandi

[\(/football/a-le-coq-premium-liiga/2015/kalju-nomme-tulevik-viljandi\\_mtc759257/live.shtml\)](/football/a-le-coq-premium-liiga/2015/kalju-nomme-tulevik-viljandi_mtc759257/live.shtml)

Flora Tallinn      20:00      Paide Linnameeskond

[\(/football/a-le-coq-premium-liiga/2015/flora-tallinn-paide-linnameeskond\\_mtc759255/live.shtml\)](/football/a-le-coq-premium-liiga/2015/flora-tallinn-paide-linnameeskond_mtc759255/live.shtml)**PEPSI-DEILDIN - Day 12 (/FOOTBALL/PEPSI-DEILDIN/CALENDAR-RESULT.SHTML)**

Breiðablik      21:15      Fylkir

[\(/football/pepsi-deildin/2015/breiablik-fylkir\\_mtc760962/live.shtml\)](/football/pepsi-deildin/2015/breiablik-fylkir_mtc760962/live.shtml)

Leiknir      22:00      Valur

[\(/football/pepsi-deildin/2015/leiknir-valur\\_mtc760964/live.shtml\)](/football/pepsi-deildin/2015/leiknir-valur_mtc760964/live.shtml)**DIVISION DE HONOR - Day 3 (/FOOTBALL/DIVISION-DE-HONOR/CALENDAR-RESULT.SHTML)**

Libertad      2 5      Sportivo Luqueño

[\(/football/division-de-honor-1/2015/libertad-sportivo-luqueno\\_mtc775253/live.shtml\)](/football/division-de-honor-1/2015/libertad-sportivo-luqueno_mtc775253/live.shtml)**CHINESE SUPER LEAGUE - Day 20 (/FOOTBALL/CHINESE-SUPER-LEAGUE/CALENDAR-RESULT.SHTML)**

Beijing Guo'an      0 0      Shanghai SIPG

[\(/football/chinese-super-league/2015/beijing-guo-an-shanghai-sipg\\_mtc764878/live.shtml\)](/football/chinese-super-league/2015/beijing-guo-an-shanghai-sipg_mtc764878/live.shtml)

**ALKA SUPERLIGA - Day 1 (/FOOTBALL/SUPERLIGAEN/CALENDAR-RESULT.SHTML)**

AaB 19:00 Esbjerg FB

[\(/football/alka-superliga/2015-2016/aab-esbjerg-fb\\_mtc783847/live.shtml\)](/football/alka-superliga/2015-2016/aab-esbjerg-fb_mtc783847/live.shtml)

**FRIENDLY MATCH - July (/FOOTBALL/CLUBS-FRIENDLIES/CALENDAR-RESULT.SHTML)**

Adelaide United 0 2 Liverpool

[\(/football/friendly-match/2015/adelaide-united-liverpool\\_mtc799125/live.shtml\)](/football/friendly-match/2015/adelaide-united-liverpool_mtc799125/live.shtml)

**EKSTRAKLASA - Regular (/FOOTBALL/EKSTRAKLASA/CALENDAR-RESULT.SHTML)**

Piast Gliwice 0 0 Termalica Bruk-Bet

[\(/football/ekstraklasa/2015-2016/piast-gliwice-termalica-bruk-bet\\_mtc778632/live.shtml\)](/football/ekstraklasa/2015-2016/piast-gliwice-termalica-bruk-bet_mtc778632/live.shtml)

**LIGA MOVISTAR - Day 2 (/FOOTBALL/PRIMERA-DIVISION-4/CALENDAR-RESULT.SHTML)**

Zamora FC 4 1 Tucanes de Amazonas

[\(/football/liga-movistar/2015/zamora-fc-tucanes-de-amazonas\\_mtc792092/live.shtml\)](/football/liga-movistar/2015/zamora-fc-tucanes-de-amazonas_mtc792092/live.shtml)

**MAXTV PRVA LIGA - Day 2 (/FOOTBALL/MAXTV-PRVA-LIGA/CALENDAR-RESULT.SHTML)**

Lokomotiva Zagreb 20:00 Istra 1961

[\(/football/maxtv-prva-liga/2015-2016/lokomotiva-zagreb-istra-1961\\_mtc785535/live.shtml\)](/football/maxtv-prva-liga/2015-2016/lokomotiva-zagreb-istra-1961_mtc785535/live.shtml)

**PRIMERA A - Day 17 (/FOOTBALL/PRIMERA-A/CALENDAR-RESULT.SHTML)**

Gimnasia (La Plata) 20:15 Godoy Cruz

[\(/football/primera-a/2015/gimnasia-la-plata-godoy-cruz\\_mtc756436/live.shtml\)](/football/primera-a/2015/gimnasia-la-plata-godoy-cruz_mtc756436/live.shtml)

Temperley                      0   1                      Independiente

[\(/football/primera-a/2015/temperley-independiente\\_mtc756445/live.shtml\)](/football/primera-a/2015/temperley-independiente_mtc756445/live.shtml)

### **ROMANIAN LIGA I - Day 2 (/FOOTBALL/ROMANIAN-LIGA-I/CALENDAR-RESULT.SHTML)**

FC Botosani                      20:00                      FC Viitorul Constanta

[\(/football/romanian-liga-i/2015-2016/fc-botosani-fc-viitorul-constantia\\_mtc787650/live.shtml\)](/football/romanian-liga-i/2015-2016/fc-botosani-fc-viitorul-constantia_mtc787650/live.shtml)

### **RUSSIAN FIRST DIVISION - Day 3 (/FOOTBALL/RUSSIAN-FIRST-DIVISION/CALENDAR-RESULT.SHTML)**

Yenisey Krasnoyarsk                      1   1                      Baltika Kaliningrad

[\(/football/russian-first-division/2015-2016/yenisey-krasnoyarsk-baltika-kaliningrad\\_mtc783618/live.shtml\)](/football/russian-first-division/2015-2016/yenisey-krasnoyarsk-baltika-kaliningrad_mtc783618/live.shtml)

### **RUSSIAN PREMIER LEAGUE - Day 1 (/FOOTBALL/RUSSIAN-PREMIER-LEAGUE/CALENDAR-RESULT.SHTML)**

Kuban Krasnodar                      19:00                      Ural Yekaterinenburg

[\(/football/russian-premier-league/2015-2016/kuban-krasnodar-ural-yekaterinenburg\\_mtc784958/live.shtml\)](/football/russian-premier-league/2015-2016/kuban-krasnodar-ural-yekaterinenburg_mtc784958/live.shtml)

Amkar Perm                      0   1                      FK Krasnodar

[\(/football/russian-premier-league/2015-2016/amkar-perm-fk-krasnodar\\_mtc784955/live.shtml\)](/football/russian-premier-league/2015-2016/amkar-perm-fk-krasnodar_mtc784955/live.shtml)

## **CYCLING**

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## **Vidal on brink of Bayern move as Juventus confirm exit wish** **(/football/serie-a/2015-2016/arturo-vidal-wants-to-leave-juventus\_sto4827867/story.shtml)**

By [Eurosport UK \(/eurosport-uk\\_aut1035/author.shtml\)](http://eurosport-uk_aut1035/author.shtml) • 1 hour ago



[http://video.eurosport.com/football/transfers/2015-2016/euro-papers-real-madrid-reject-karim-benzema-interested-in-signing-for-arsenal\\_vid381330/video.shtml](http://video.eurosport.com/football/transfers/2015-2016/euro-papers-real-madrid-reject-karim-benzema-interested-in-signing-for-arsenal_vid381330/video.shtml)

TRANSFERS

**[▶ Euro Papers: Karim Benzema interested in signing for Arsenal](#)**  
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*By Eurosport • 3 hours ago*

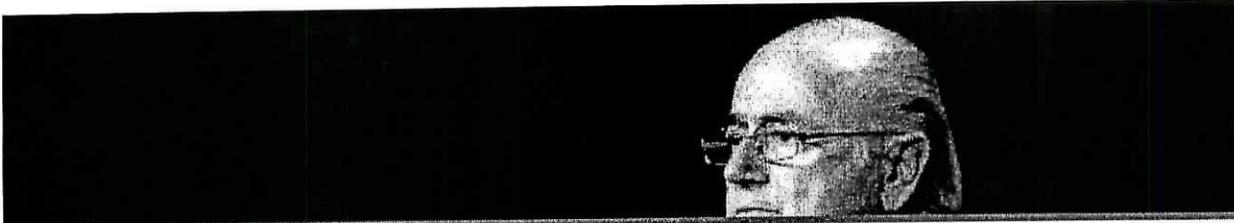
[http://video.eurosport.com/football/premier-league/2015-2016/paris-saint-germain-set-to-complete-signing-of-spurs-midfielder-benjamin-stambouli\\_sto4827577/story.shtml](http://video.eurosport.com/football/premier-league/2015-2016/paris-saint-germain-set-to-complete-signing-of-spurs-midfielder-benjamin-stambouli_sto4827577/story.shtml)

PREMIER LEAGUE

**[PSG set to complete signing of Spurs midfielder Benjamin Stambouli](#)** ([/football/premier-league/2015-2016/paris-saint-germain-set-to-complete-signing-of-spurs-midfielder-benjamin-stambouli\\_sto4827577/story.shtml](/football/premier-league/2015-2016/paris-saint-germain-set-to-complete-signing-of-spurs-midfielder-benjamin-stambouli_sto4827577/story.shtml))

*By [Desmond Kane](/desmond-kane_aut734/author.shtml) • 4 hours ago*

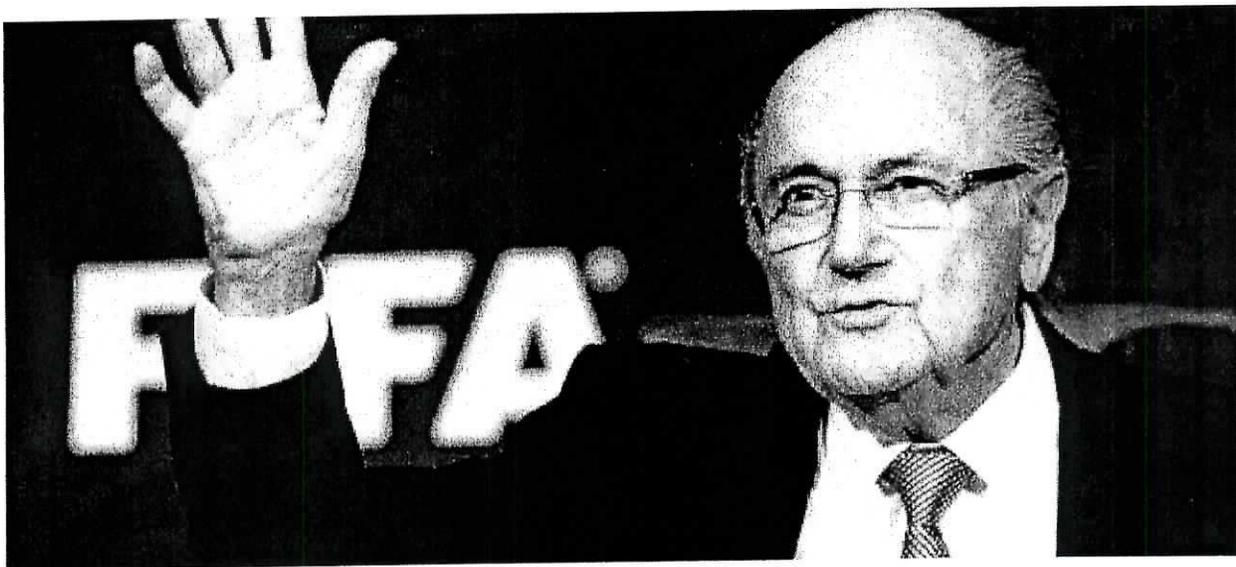




[\(/football/fifa-presidential-election-to-be-held-on-february-26\\_sto4827795/story.shtml\)](#)

## **FIFA presidential election to be held on February 26 (/football/fifa-presidential-election-to-be-held-on-february-26\_sto4827795/story.shtml)**

*By Reuters • 2 hours ago*



[SERIE A \(/football/serie-a/2011-2012/sepp-blatter-there-will-be-a-new-fifa-president\\_sto4827921/story.shtml\)](#)

## **Blatter: There will be a new FIFA president (/football/serie-a/2011-2012/sepp-blatter-there-will-be-a-new-fifa-president\_sto4827921/story.shtml)**

By [Maxwell Ward \(/maxwell-ward\\_aut1674/author.shtml\)](/maxwell-ward_aut1674/author.shtml) • 31 minutes ago



~~TOUR-DE-FRANCE~~  
[/cycling/tour-de-france/2015/ruben-plaza-denies-peter-sagan-again-on-dramatic-day-in-gap\\_sto4827949/story.shtml](/cycling/tour-de-france/2015/ruben-plaza-denies-peter-sagan-again-on-dramatic-day-in-gap_sto4827949/story.shtml)

## **Ruben Plaza denies Peter Sagan yet again on dramatic day in Gap (/cycling/tour-de-france/2015/ruben-plaza-denies-**

# [peter-sagan-again-on-dramatic-day-in-gap\\_sto4827949/story.shtml](#)

By Eurosport • 1 minute ago

TOUR DE FRANCE

# [Sky woes continue after heavy Geraint Thomas crash \(/cycling/tour-de-france/2015/sky-woes-continue-after-heavy-geraint-thomas-crash\\_sto4827996/story](#)

By Maxwell Ward ([/maxwell-ward\\_aut1674/author.shtml](#)) via Reuters • 1 minute ago

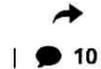
[\(/cycling/tour-de-france/2015/sky-woes-continue-after-heavy-geraint-thomas-crash\\_sto4827996/story.shtml\)](#)



**FOOTBALL**  
[\(/football/michel-platini-set-to-stand-for-fifa-presidency-in-february-election\\_sto4827541/story.shtml\)](/football/michel-platini-set-to-stand-for-fifa-presidency-in-february-election_sto4827541/story.shtml)

## **Platini set to stand for FIFA presidency (/football/michel-platini-set-to-stand-for-fifa-presidency-in-february-election\_sto4827541/story.shtml)**

*By PA Sport • 2 hours ago*



**FOOTBALL**  
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## **Sepp Blatter showered in cash by FIFA gatecrasher (/football/comedian-lee-nelson-**

## gatecrashes-fifa-hq-covers-sepp-blatter-in-money\_sto4827740/story.shtml

By [Tom Adams \(/tom-adams aut978/author.shtml\)](#) • 38 minutes ago



~~[TRANSFERS \(/football/transfers/2015-2016/transfer-round-up\\_sto4827960/story.shtml\)](#)~~

## Mirallas, De Gea, Bamford: 6 transfer rumours you missed today (/football/transfers/2015-2016/transfer-round-up\_sto4827960/story.shtml)

By [Eurosport UK \(/eurosport-uk aut1035/author.shtml\)](#) • 5 minutes ago

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- 18:05 [Sky woes continue after heavy Geraint Thomas crash \(/cycling/tour-de-france/2015/sky-woes-continue-after-heavy-geraint-thomas-crash\\_sto4827996/story.shtml\)](/cycling/tour-de-france/2015/sky-woes-continue-after-heavy-geraint-thomas-crash_sto4827996/story.shtml)
- 18:01 [Roo to play in Ferguson testimonial \(/football/roo-to-play-in-ferguson-testimonial\\_sto4827992/story.shtml\)](/football/roo-to-play-in-ferguson-testimonial_sto4827992/story.shtml)
- 17:59 [Roo to play in Ferguson testimonial \(/football/premier-league/2015-2016/roo-to-play-in-ferguson-testimonial\\_sto4827994/story.shtml\)](/football/premier-league/2015-2016/roo-to-play-in-ferguson-testimonial_sto4827994/story.shtml)
- 17:51 [Bodul makes United move \(/football/bodul-makes-united-move\\_sto4827961/story.shtml\)](/football/bodul-makes-united-move_sto4827961/story.shtml)
- 17:51 [Mirallas, De Gea, Bamford: 6 transfer rumours you missed today \(/football/transfers/2015-2016/transfer-round-up\\_sto4827960/story.shtml\)](/football/transfers/2015-2016/transfer-round-up_sto4827960/story.shtml)
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- 17:45 [FIA retire Jules Bianchi's #17 race number \(/formula-1/fia-retire-](/formula-1/fia-retire-jules-bianchi-17-race-number_sto4827982/story.shtml)

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Exhibit 29

S 0581

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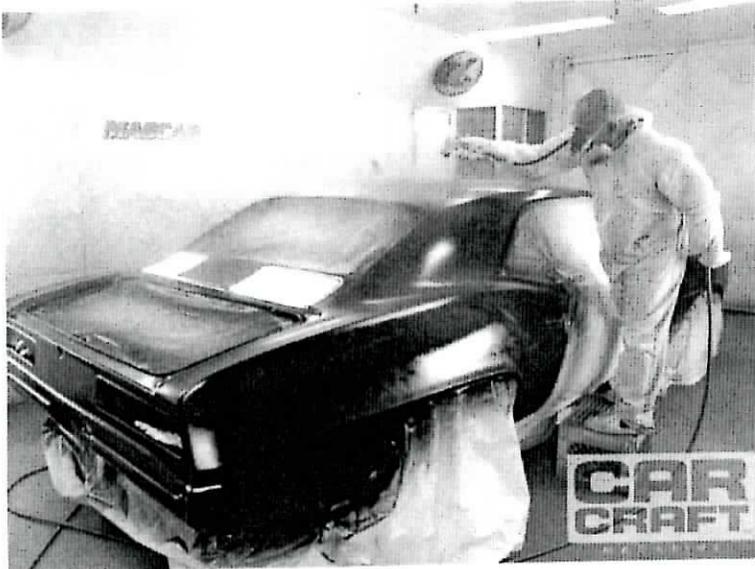
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Home - Tech Articles - Paint Sprayer Comparison - Spray Gun Shootout

## Paint Sprayer Comparison - Spray Gun Shootout

By John McGann, Photography by John McGann

Car Craft, May 16, 2011 [Recommend](#) [Tweet](#) 0 [+1](#) 1 [Print](#)



A press release from Summit Racing sparked the idea for this article. We ran the release in our Feb. '11 issue with the headline, A Spray Gun for \$32.95? After we asked the Summit guys if it was a typo, we began thinking about why some guns cost \$32 (or less at some warehouse stores) while others cost more than \$800? And which price point is the best for the enthusiast who may paint a couple of cars a year? We hope to answer those questions here.

### The Scene

We phoned Kenny Maisano, owner of Mascar Autobody & Paint in Costa Mesa, California, to see if he'd help us throw a spray gun party. We'd provide the consumer-level guns, he'd provide a couple of examples from Sata, along with something to spray, and reps from Iwata would bring their latest and greatest. Maybe he reads our email, because when we arrived, he had a '69 Camaro in his booth prepped and ready for paint. The Camaro Craft hate mail can continue for yet another month. Believe it or not, the Camaro was in for a mundane insurance repair rather than a high-end restoration. The timing just worked out well for us.

### Top Shelf

Price Range: \$500 and up  
SATAjet 4000  
Iwata Supernova

As the crème de la crème of the spray gun world, these are the big dogs. SATA is a German company that has been making top-quality spray guns for decades. Maisano's guys use SATA guns for primer and basecoats, so he had a cabinet full of them. In addition, SATA rep Wayne Morrison brought out the newest offering, the SATAjet 4000 B. With a retail price of more than \$800, this isn't a spray gun for the faint of heart, or faint of bank account, for that matter. It has all the latest bells and whistles, not the least of which is its built-in digital pressure regulator. No more guessing at the accuracy of an add-on cheater regulator.

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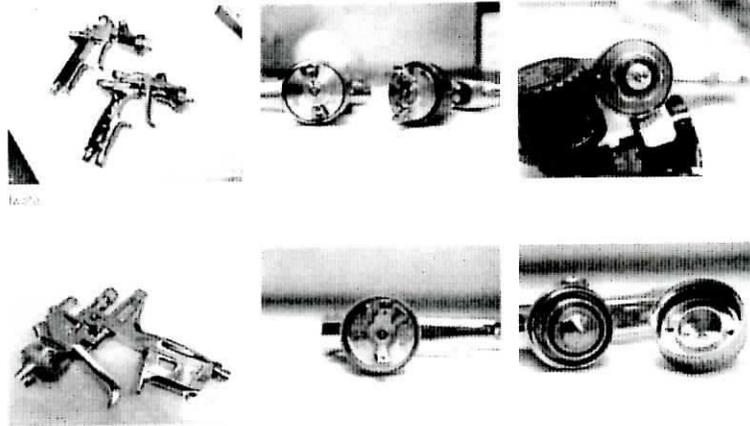
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17.01.2014

Anest Iwata is a Japanese company that has been around for more than 80 years. The company is well known for its high-quality airbrushes and industrial spray applicators, but lately it has been making inroads in the automotive refinishing market with new, fullsize spray guns. Many pro painters use them for spraying clearcoats, including Maisano's shop, whose guys like the LPH400 for clearcoats. Iwata West Coast reps John Pentecost and Craig Flagtvet brought out a new LPH400 and their brand-new LS400 Supernova. Priced slightly less than the SATA, the Supernova retails for about \$734, but it looks like it should cost more. Styled by Pinninfarina, the Italian design company responsible for some of Ferrari's most beautiful cars, the Supernova looks like no other spray gun out there. It is more than a pretty face, however, as its functional features are on par with the SATA.

#### What Your Money Buys

In short: efficiency, consistency, and comfort. These guns are designed for the guy who paints one or more cars a day, five days a week. He has a spray gun in his hand more often than not. It has to be lightweight and ergonomic so as to not strain the hand of the user. It has to be extremely efficient at getting paint from the nozzle to the car with as little overspray as possible, because every molecule of overspray is money wasted, and paint is very expensive, especially if you're using several gallons per day. Finally, it must deliver the same spray pattern every time the painter pulls the trigger. In a high volume shop, you don't have time or material to waste fiddling with the gun in between each coat of paint. Nor do you want customer come-backs. The paint has to go on right the first time.



SATA

1 | 2 | 3 | > View Full Article



By John McGann

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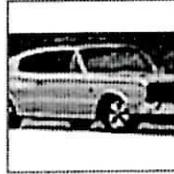
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Sata Spray Guns - Product Review

## Sata Spray Guns - Product Review

The Spray Gun Of The Future Is In Hand Today

By Saul Vargas

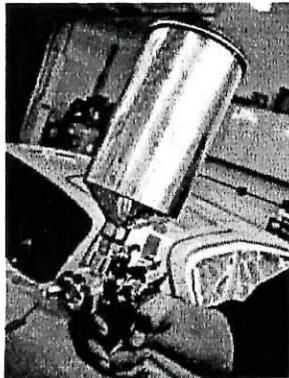
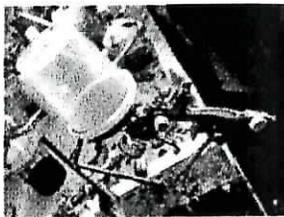
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Strict environmental concerns in more and more countries restrict or prohibit the use of conventional high-pressure paint guns. As a result, HVLP or RP spray guns are the technology of the future. Both technologies offer significant advantages. SATA's HVLP (high-volume, low-pressure) spray guns are distinguished by high-transfer efficiency that saves large quantities of expensive paint material.

SATA's RP (reduced pressure) spray guns feature optimized high pressure. Their transfer efficiency is only slightly lower than HVLP spray guns and they provide an easy change from conventional high-pressure spray guns to more efficient spray guns. They conform to current safety regulations as well as convey the "high-pressure feeling" to the painter.

We tried out the SATA HVLP Jetstream and MiniJet during a recent tech with paint pro Danny of D&D Designs. Danny had nothing but compliments for the German-made guns. "The fan coverage was excellent, especially for the flake after using a 2.5 tip," he told us. "The MiniJet, with the quick release cups, was good for small panels and pattern work." The guns' chrome-plated bodies makes them easy to clean, and the chrome is wear resistant.

SATA HVLP spray guns are easily recognizable by the green air cap ring and the RP spray guns by the blue ring. It doesn't matter which technology you choose. With SATA, you can be assured that you have a first-class tool in your hand. They also guarantee their guns with a three-year warranty, so grab a SATA spray gun and start spraying today.



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31 Zahlen, Statistiken und Follower

Nov 7th, 03, 04:13 PM

#2

sevt chevella  
Senior Tech

Join Date: May 2003  
Location: Overland Park, KS burb of KC  
Posts: 253

To me SATA is the only way to go!! I just dont care for sharpe guns, dont feel right in my hand.

Its hard to pick ONE gun to spray every type of product as each product takes a different setup to spray. For clear SATA RP 1.3 tip, the thing ROCKS [img]graemlins/thumbsup.gif[/img] Not a HVLP gun due to the higher pressure at the cap but has the transfer rate of one, its friggin SWEET. For basecoat I prefer the Sata 2000 1.4tip my personal gun, have a NR95 1.4 tip at work also a great gun. Primer guns also like the NR95, have the LM2000 1.7 tip for my personal primer gun its nice but not awesome.

Also Sata makes guns with a digital air pressure gauge, this is a nice feature which allows you to remove the air regular at the gun and control the pressure at the wall mounted regular. Nice for space limited areas.

But if I had to buy only one [img]graemlins/angry.gif[/img] gun to spray all products Id get the Sata jet 2000 tip 1.4 digital, great alround gun.

One thing to remember with Sata guns is that they are air happy, most use in the neighborhood of 14-16cfm. So you got to have the **VOLUME** (cfm) of air or the thing will spray like those 29.99 harbor freight specials.

Iwata(sp?) spray guns have a new gun out that Ive heard rave reviews about, has my finger twitching to try one, but cant recall the part number ☹

Check out this site for Sata guns...Eric  
<http://www.autobodydepot.net>

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70 chevella SS455 not a typo its a  
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Project pictures

Code

Nov 7th, 03, 04:32 PM

#3

shoddy F-body  
Senior Tech

Join Date: Jun 2003  
Location: Pocono Mountains Pa.  
Posts: 2,430

Chris

S 0492

<http://www.camaros.net/forums/showthread.php?t=12743>

17.01.2014

I have a Sata RP with a 1.3 tip. I use it everyday and i love it.Paid \$300 new off Ebay,its about \$400 Retail.Second choice is a Walcom GEO FX 92 or FX 97.Sweet guns.They are like no other gun.Its a little slower gun but it atomizes the material so fine it almost dances out of the gun and floats to the panel. Well maybe not, but it sprays pretty freakin sweet. I would try out as many guns as you can. before you buy.

[68 convertible resto](#)

Quote

Nov 7th, 03, 04:35 PM

#4

[ifishaholic](#)  
Tech Team

Join Date: Dec 2002  
Location: Kent, WA, USA  
Posts: 35

I'm currently in my last quarter of a collision repair program at a community college and my instructor who has been in the business for 30 years likes Sata first, then [iwata](#).

Quote

May 21st, 09, 04:37 PM

#5

[markqlo](#)

Join Date: May 2009  
Location: oregon  
Posts: 4

mark

**Re: The best spray gun...**

Quote:

Originally Posted by [sevt\\_chevelle](#)

*To me SATA is the only way to go!! I just dont care for sharpe guns, dont feel right in my hand.*

*Its hard to pick ONE gun to spray every type of product as each product takes a different setup to spray. For dear SATA RP 1.3 tip, the thing ROCKS  Not a HVLP gun due to the higher pressure at the cap but has the transfer rate of one, its friggin SWEET. For [basecoat](#) I prefer the Sata 2000 1.4tip my personal gun, have a [NR05](#) 1.4 tip at work also a great gun. Primer guns also like the [NR05](#), have the LM2000 1.7 tip for my personal primer gun its nice but not awesome.*

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*One thing to remember with Sata guns is that they are air happy, most use in the neighborhood of 14-16cfm. So you got to have the **VOLUME** (cfm) of air or the thing will spray like those 29.99 harbor freight specials.*

*Iwata(sp?) spray guns have a new gun out that Ive heard rave reviews about, has my finger twitching to try one, but cant recall the part number*

*Check out this site for Sata guns...Eric*

*<http://www.autobodydepot.net>*

For base coat i found sata nr 2000 1.4 works real well ,nice paint droplets good for blendig color.

As for clear coat the best atomising gun is [iwata](#) LPH 400 1.4. I found sata does not atomise clear coats as well.

Quote

May 21st, 09, 04:41 PM

#6

[markqlo](#)

Join Date: May 2009  
Location: oregon  
Posts: 4

mark

**Re: The best spray gun...**

S 0493

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## Gravity spray guns

### Are these suitable for the small shop, or is there a better choice? September 25, 2002

#### Question

I often receive inquiries from smaller wood shops looking to purchase a gravity style spray gun for their shop. The first question I ask is whether this will be their primary spray gun.

Gravity guns are recommended all the time in postings, which is why I'm addressing the forum on this subject. In the almost twenty years I've been in the woodworking industry I've worked in a lot of different shop environments and I can not think of many situations where I would recommend a gravity gun as a shop's primary spray system. It wouldn't hurt to have an open conversation addressing the different systems available to help shop owners make the correct choice as to which system best fits their needs.

Gravity guns were designed by the European auto body aftermarket. The benefits of the gravity gun are:

1. Easy cleaning, allowing for quick, easy color changes. In the auto body shop they may be spraying a blue bumper one minute and a red hood the next.
2. Complete atomization. A gravity gun will spray the entire product to the last drop and a bottom feed will not pick up the last bit of paint. Automotive paints are very expensive.

The biggest downside for the cabinet or furniture shop is having the cup on top, making it hard to spray inside a cabinet and/or around and through a chair.

#### Forum Responses

*From contributor D:*

As the leading proponent of gravity feed guns on this forum I present the following justification for my position.

S 0515

## Preliminary givens:

1) We are in fact talking about a small shop. This, by my definition, is a shop that sprays finishes less than two hours per day when averaged over a week. Obviously, the nature of cabinet and furniture building is that, before you need to finish something, you must first manufacture it. So a small shop would be one that first makes something and then needs to finish it. This is not a continuous production line scenario.

2) If you are in a production situation, a Kremlin Airmix (or equivalent Air Assisted Airless system) is the only way to go. It puts out a lot of material quickly, at low overspray and with fantastic transfer efficiency. Since you just basically put a hose into a can, clean up and catalyzed finishes are less of a hassle than with pressure pot systems, which I consider annoying.

3) I'm biased. Before I started playing with furniture finishing I painted cars, a field in which, as you correctly stated, gravity feed completely rules. I started in auto body with a Binks 7 and then got my first SATA 90 (quite possibly the best high pressure automotive spray gun ever invented), which opened my eyes to the advantages of gravity feed. I went on from there to the SATA nR95 HVLP and now the Nr2000 and RP. Once you see what a SATA can do, it's hard to go back. Spraying silver metallic mica paints on a Mercedes Benz is somewhat more challenging than spraying C-V on a pine door. This I can tell you from direct experience.

## Why gravity feed rules:

1) Gravity guns are much better balanced than siphon cup guns. Therefore, they give far less arm fatigue.

2) Clean up is easier than any other system. A big deal if you are using the gun in the manner that I do when finishing, for example, a home entertainment system.

a. Dye stain. (clean gun, 2 oz of lacquer thinner, takes about a minute)

b. Wiping stain. (clean gun, 2 oz of lacquer thinner, another minute)

c. Conversion varnish with maybe two or three refills (clean gun, 2 oz of Xylene, another minute)

This same schedule would require three pressure pot systems or gallons of solvent and about 30 minutes to do the same thing.

3) With catalyzed finishes you can mix up only what you need when you need it. In fact, the plastic cups of many gravity guns are graduated so that you can mix in the catalyst right in the cup and then start spraying. There is no corrosion or gelling in the gun as there can be in pressure pot systems if you don't service them immediately. For polyester or acrylic urethane, this is a fantastic advantage.

4) Refilling the gun takes seconds using a filling station. Place the gun on one of the three hooks. Take off the lid, pour the paint through the strainer in the loop above the gun, put the lid back on and keep on shooting. The entire refilling process takes less than a minute and that's if I go slowly.

Kremlin:

Pro: Duel trigger allows air to be dispensed (without fluid) with the first stage of the trigger squeeze.

Astro:

Con: Single stage (fluid only) trigger squeeze.

Pro: Spray pattern and fluid adjustment allows for spot through full fan spray pattern and full control of fluid amount dispensed from gun.

PS - I finally made the change to Duravar last week and am really learning to appreciate the quality and benefits of the easy clean Astro HVLP.

*From contributor D:*

I hate to tell you this, but the ASTRO does have a two stage trigger. It's just that it is so smooth (just like the SATA from which it is copied) that you can't feel when the secondary pull, the pull that pulls the needle back and starts the fluid flow, occurs. If you partially depress the trigger you will only get compressed air and no fluid. After a little practice you'll be able to tell how far to pull.

*From contributor V:*

I guess I am used to the positive stop of the Kremlin, before the fluid flow stage. I'll give it a try to see if I can find it. "Smooth" you say... boy, it must be. I would define the stop on the Kremlin as smooth, but definitely noticeable. The stop on my Astros must be so smooth as to be easily bypassed, at best. Then again, the sensitivity of my hands isn't what they used to be.

It is very smooth and not really a stop, more a half pull of the trigger. Great gun, just waiting for my next run of cabinets to give it the real test!

*The comments below were added after this Forum discussion was archived as a Knowledge Base article ([add your comment](#)).*

*Comment from contributor A:*

I'd like to comment on reducing the strain on your wrist, which a number of posts alluded to. If you can spray without having to carry all your material in a cup either over or under the gun, your wrist and shoulder will appreciate it over the long run. Those of you who spend more than a few minutes at a time spraying know the muscle tension and consequent strain you experience. This also contributes to carpal tunnel syndrome. Get rid of the weight of the material and use a lightweight gun for the easiest time in your finishing experience.



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1,4

SATAjet 100 B F HVLP



HVLP



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Parattement approprié:

Car: apprêt



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Mehrwegbecher  
SATAjet 100 B F HVLP nozzle 1,4 0,6 l QCC reusable plastic  
cup  
SATAjet 100 B F HVLP, buse 1,4, godet QCC réutilisable en  
plastique 0,6 l



S 0547



1,4

SATAjet 100 B F RP



RP



153460

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Car: Filler

Cart: appret



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1,0

SATJet 1000 B RP



RP



151233

Art. Nr. - Art. No. - Rfz.

SATJet 1000 B RP Düse 1,0 0,75 l QCC Alu-Mehrwegbecher  
SATJet 1000 B RP nozzle 1.0 0.75 l QCC reusable  
aluminium cup  
SATJet 1000 B RP, buse 1,0, godet QCC réutilisable en  
aluminium 0,75 l

MADE FABRIQUE  
IN GERMANY



4 027533 123644

Hervorragend geeignet: Holzlasur  
Holz: Lasur, Beizen; Boot: Holztafel, Boot  
Perfectly suitable: Wood Glaze  
Wood: Glaze, Stain; Boat: Parfaitement approprié: vernis bois, glacis bois



Gut geeignet: Ind.: Klarlack, Basis/Uni, Reparatur; Holz: Klarlack; Boot: Klarlack, Bunt/Uni, Holzklarlack, Effektlack  
Well suited: Ind.: Clearcoat, Base/Single; St., Repair; Wood: Clearcoat; Boat: Clearcoat, Single Stage, Wood Clearcoat, Effect Paint  
Bien approprié: Ind.: vernis, base/brill., dir., réparation; Bois: vernis, réparation; Bois: vernis, brillant dir., vernis bois, effet



Info - Contenu - Contenido - Contenido - 1 - 1 - Contenu



THE LOWEST OVERSPRAY YOU CAN BUY



YOUR 1 STOP SHOP FOR PAINT GUNS AND SUPPLIES!

PREMIUM PROFESSIONAL SERIES GUNS



Iwata Spray Guns the Best of Japan

Iwata Master Kit



HARMONY  
**和和**

THE LOW OVERSPRAY COMPANY



Spray Gun World brings you only the best spray guns around the world. Iwata is the number one spray gun in the world in the hi-end finishing market. Iwata is Japan's answer to German spray guns and USA CAT spray guns. Competing directly with the most elite spray guns in the world, considers the Iwata spray guns one of the best choices for the serious professional sprayers - one of the best spray guns in the world. Precision engineering, Japanese low tolerance levels, high quality and emphasis on manufacturing detail. You will not find a better spray gun anywhere. One of the pioneers of LVLP Iwata spray guns have very low air consumption.

COMPARE LPH400LV & SUPERNOVA & Hybrid

<p><b>FLAGSHIP LVLP LPH400LV KITS</b> SUPER LOW (7-9 CFM)</p>   <p><b>SGW:</b> <b>Top Choice</b> <b>Iwata LPH-AUTO DREAM MASTER KIT</b></p> <p>Don't have enough? See also Lower Cost: <u>Version.</u></p>	<p><b>SUPER NOVA DREAM HVLP</b> 9-14 CFM</p> <p><b>Automotive SuperNova Gold Base / Silver Clear Gun</b> SGW: we recommend for motorcycles, Serious DIY, Hi-End Show Cars</p> <p><b>SUPER NOVA</b> <u>Standard 1.3 / 1.4 (9-11 CFM)</u></p> <p><u>New! Silver &amp; Gold Together</u></p> <p><b>HYBRID</b> <b>HVLP COMPLIANCE WITH CONVENTIONAL SPEED!</b></p> <p><u>New! BodyShop Speed Demon Hybrid HYBRID RP Technology 1.3 / 1.4 (10-13.5CFM)</u></p> <p>We recommend for Body Shops and All Overs, Larger Vehicles</p> <p>Same Perfect Spray Quality and Super Low Double Atomization Overspray as LVLP Series - Now featuring, larger threading for fast part changes, ergonomic design by the Top University of Pavia,</p>	<p><b>VALUE LINE - AIR GUNSA</b></p> <p>Air Gunsa Deluxe Master Finishing Kits</p> <p><u>Automotive / Wood / Industrial</u></p> <p><b>GUN ONLY</b></p> <table border="1"> <tr><td></td><td><u>1.3</u></td></tr> <tr><td></td><td><u>1.5</u></td></tr> <tr><td></td><td><u>1.8</u></td></tr> </table>		<u>1.3</u>		<u>1.5</u>		<u>1.8</u>
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5 S 05 3

Exhibit 36

LPH400LV



**Flagship LPH400LV** - Arguably the best clear coat gun in the world.

New Master Kits!  
1.3 / 1.4 / 1.6 / 1.8

**Lowest Cost SGW PPS** 

Arguably the #1 Clear Coat Gun on the market. Same or Superior Finish as German Guns but with up to 15% less overspray and material savings -

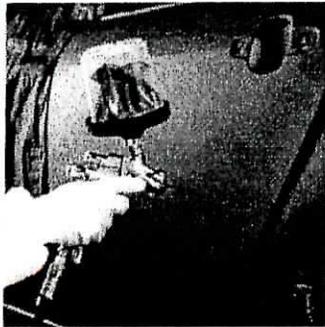
**Patented Double Atomization.**

Definitely, one of the finest LVLP spray guns on the market from the pioneer of LVLP Spray Guns. Known throughout industry - the Lexus of the Spray Gun World. Low CFM 7-9 CFM.

**New! LOWEST COST TO GET INTO AN IWATA**



**Disposable Cups Iwata - No more cleanup**



LVLP - LPH400LVX / LVB

**400B Purple Specialty Base Gun Metallics only**

1.3 / 1.4

Purple Air Cap Only for 400 Series Gun

Super Fine Control Trigger on BOTH air and Fluid. And a very even super smooth fan pattern see flyer.

Flyer

S 0554

Finest Primers  
on the Market  
**Lowest Cost**  
**SGW Set**

**Iwata Mini Spray Guns**

**LPH50 / LPH80 / LPH100 / W100G**  
**Mini HVLP Gun**



Fantastic mini spray guns Click gun for greater selection (super low CFM 1-2).

**W400LV Compliant Reduced Pressure LP Hi-Tech Compliant**  
8-10 CFM

**Super Fast Clear Spray Gun** - Same Speed as the Hy-Brid SuperNova but uses 3CFM Less Air and loses an 1" on the fan.



**The Superior Iwata Reduced Pressure Beats its German Counterpart!**

**This is the Finest Reduced Pressure gun on the market. Compare to German Reduced Pressure Spray Guns. Japans Flagship W400LV Compliant Reduced Pressure Spray Gun - Featuring exceptional lower overspray via LVLP Hybrid technology - increased speed and improved control over.**

1.2 / 1.3 / 1.4 / 1.6 / 1.8

SprayGunWorld: Our opinion the New W400LV from Japan is Superior to German Spray Guns and at a lower price point on both the gun and supplies - Japan's precision engineering gives speed and control with the the finest Reduced Pressure on the market. The newest technology Reduced Pressure Hi-Tech Compliant spray gun with added Patented Iwata LVLP technology. The best balanced benefits of speed and superior finish quality all in one.

**PRESSURE FEED SPRAY GUNS**

LVLP - LPH200 LV	W101P Reduced Pressure Hi-Tech Pressure Feed
 <p><b>Flagship LPH200 LVP</b> <u>.8 (call), 1.0, 1.2</u></p> <p>One of the finest LVLP spray guns on the market from the pioneer of LVLP Spray Guns. Known throughout industry -the Lexus of the Spray Gun World. Low CFM 9 -13 CFM.</p> <hr/>  <p><b>LPH50 / LPH80 / W100G Mini HVLP Gun</b> Can be used as pressure feed gun also (has 360 deg Swivel inlet). Super Low 1-2 CFM</p>	 <p><b>Flagship Low CFM Compact Spray Gun W101P</b> <u>.8, 1.0, 1.3</u></p> <p>The newest reduced pressure technology. (replaces W100P) SprayGunWorld: Top Choice for Woodworkers.</p>
	 <p><b>Iwata Pressure Pot</b> <u>Famous. Blue. Pressure. Pot</u></p> <p>The Finest "Traditional Tall" pressure pot on the market.</p>

S 0556



# DEVILBISS

The Right Way To Finish™



Ask@SprayGunWorld.com

Rule 6H Rule 40 EPA and State Spray Gun Compliance Rules and Regulations HVLP



## DeVilbiss UK Tekna Series



**Hi, TEK**

TEKNA™ Spray Guns - Made in Europe for North America's Best Automotive Painters.

**TEKNA**

### Tekna's answer to Top German Spray Guns

Built to compete with German Spray Guns. The European Tekna by Devilbiss UK is a superior spray gun with the latest Transtech Technology. This provides the finest atomization even better than HVLP, but with full compliance with HVLP Regulations. \* [see approval letter](#).

SGW: We suggest the 7E7 Transtech Aircap it is the best atomizing head of any of the Tekna aircaps. It is the aircap that Devilbiss focuses their new Teknas on.

NOTE: 1.2, 1.3 is most popular choice. Transtech delivers more material than HVLP so the gun acts more like a 1.3, 1.4 HVLP even though the tip sizes are a little smaller.

### Amazing Features:

- Waterborne compatible
- Precision matched nozzle and needle
- Ergonomic - Reduced Fatigue
- Easy trigger pull
- Lightweight



Inlet Pressure: 16-30 PSI  
1.1-2.0 BAR  
(Max 22 PSI for HVLP compliant areas)

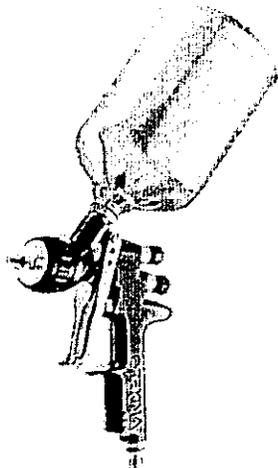
Air Flow: 9-13 CFM  
255-368 LPM

For new Profile See [Here](#)

## TEKNA Copper

by DeVilbiss

\*All Teknas are the same except the finish on them



### SGW SUPER SET

<p>Tekna 1.2, 1.3 TIP SETS INCLUDED</p> <p> More Info</p>	<p>2 GUNS Tekna w/ Primer Set</p> <p> More Info</p>
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Exhibit 37

S 0574



**DEVILBISS**

The Right Way To Finish

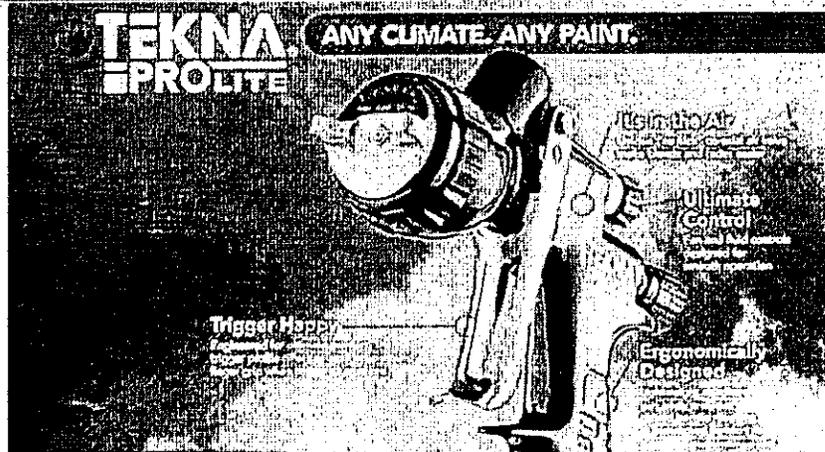


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Rule 6H Rule 40 EPA and State Spray Gun Compliance Rules and Regulations HVLP



The Best Gun Devilbiss UK has ever Made



**Any Climate.**

- Optimized performance in climates varying from hot and humid to cold and dry
- Three air caps developed using advanced fluid dynamics technology for excellent atomization
- Packaged as a solution with multiple components allowing the painter to adapt to changing environments.

**Any Paint.**

- Excellent for solvent-based coatings and a must for waterborne
- Fully protected outside and inside for high corrosion resistance — gun coating has non-stick properties
- High transfer efficiency for material savings



Tekna's answer to Top German Spray Guns

SGW: Many of our customers like the Transtech aircap over a German SA\* & Spray Gun

Tekna ProLite: 3 Aircap / 2 Tip Set Complete System

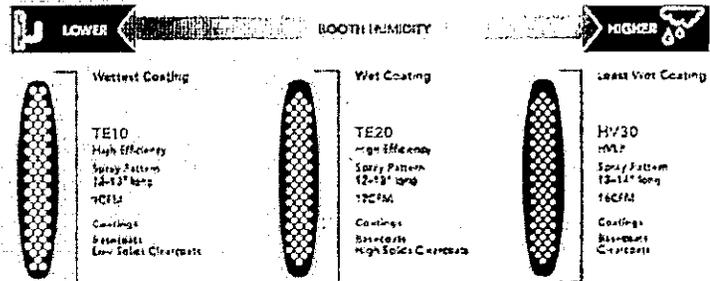
Base / Clear/ Single Stage 3 Aircap System Tailor ed to every Automotive Dream

SGW: TE20 with 1.3 setup is the proper setup for Clears, you have to have this. / HV30 for Waterbase base coats / TE10 for standard solvet and water base basecoats.

For Traditional Painters, We recommend TE10 for base/TE20 for clear.

**Air Cap Selection Guide**

Droplet size and coating need



Amazing Features:

- Any Climate.

Exhibit 38

S 0565

**Most Famous Top of the line JGA / GTI / Plus Technology**



**GTI PLUS JGA**  
Lowest CFM Plus  
New! JGA Plus Pressure Feed

More Info  
**SALE**

**New! Industrial Compact Spray Guns / Automotive Clear - Waterbase Blue CVI**

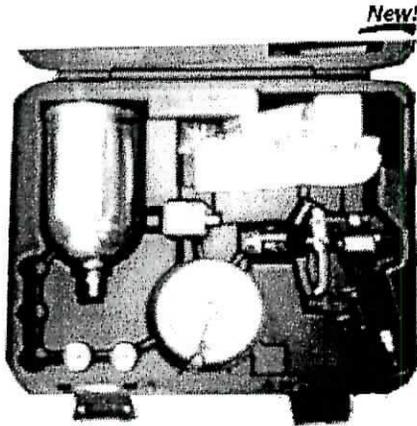


**New!**  
EXCLUSIVE OFFERS NEW ALL-  
IN-ONE  
& INDUSTRIAL GRAVITY FEED  
POWERFUL 10-14CFM

**Compact BLUE SYSTEM BY DEVILBISS CVI**

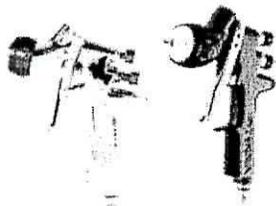
More Info  
**SALE**

**New! Automotive Autobody Tekna - Super HVLP**



**TEKNA PRO LITE**  
SGW: The Best Tekna Yet  
PRO LITE Base/Clear System

More Info



**Hi, TEK**  
TEKNA Spray Guns - Made in Europe for  
North America's Best Automotive Painters.  
**TEKNA**

More Info

**New! SRI Pro Mini Compact Spray Guns & Kits**



**BLUE SYSTEM BY DEVILBISS SRI & SRI PRO MINI GUNS (AKA Compact Mini)**

More Info

**And Many More please drop us a line...**



Finishing Brands

A CARLISLE COMPANY

**DEVILBISS**

THE RIGHT WAY TO FINISH

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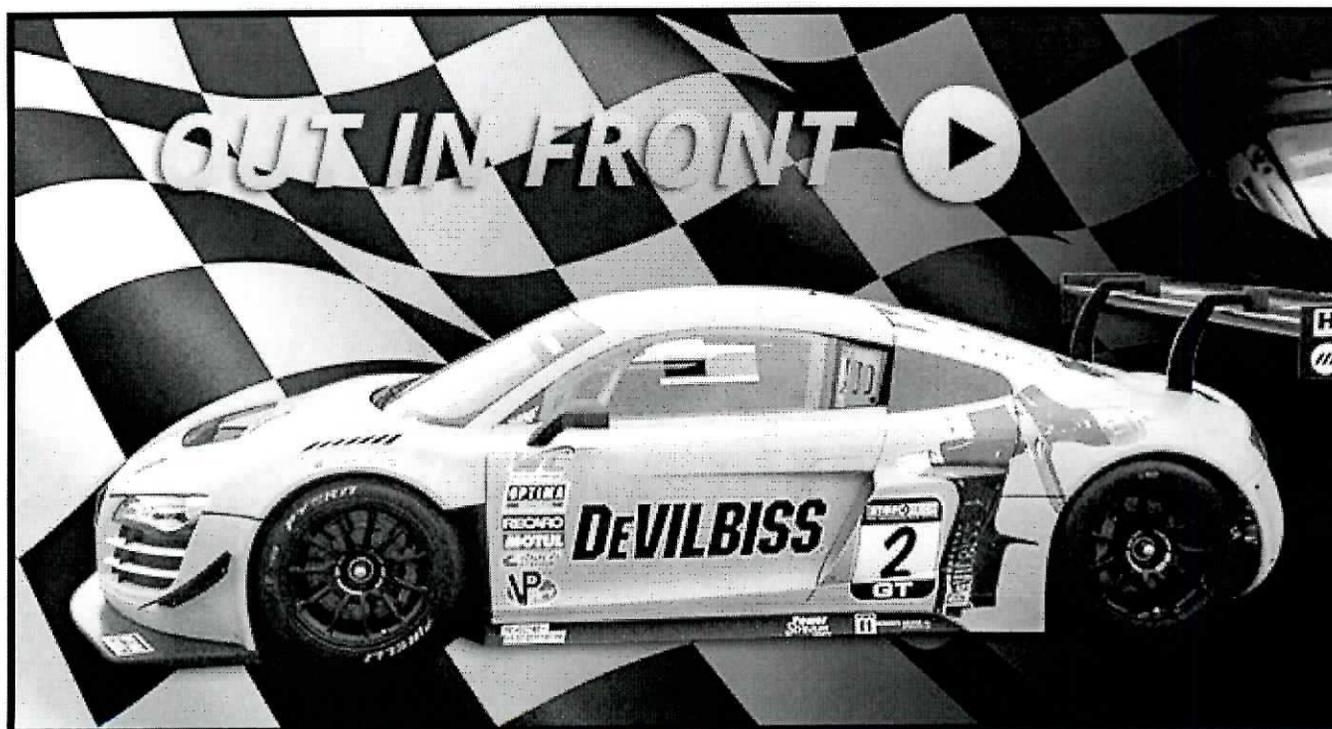
Normal Spray Guns

Accessories

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1 2 3 4 5

Exhibit 40

## NEWS

Woodshop News - Apply that Finishing Touch ...[Read More](#)

Ask us about how our Automated Finishing Systems can greatly improve your productivity, lower costs, decrease waste & improve VOC/HAP. ...[Read More](#)

Introducing the all new DeVilbiss FinishLine FLG4 Spray Gun ...[Read More](#)

## TRENDING TOPICS

[Compact Automatic Guns](#)

[DeKups](#)

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[FAQ's](#)

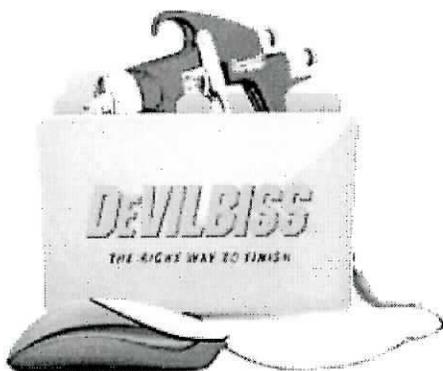
[Compact HVLP & SG-2 Outfit](#)

[FRC-650](#)

[Tanks & Fluid Handling](#)

[Air Control Equipment](#)

## REGISTER EQUIPMENT



[CLICK HERE TO FILL OUT FORM](#)

## FINISHING CONNECTION

[finishingbrands.com](http://finishingbrands.com)

[binks.com](http://binks.com)

[bgk.com](http://bgk.com)

[ransburg.com](http://ransburg.com)

[gapptec.com](http://gapptec.com)

# Welcome to DeVilbiss Solutions



## INTRODUCING THE ALL NEW DEVIBLISS FINISHLINE FLG4 SPRAY GUN!

The FinishLine spray guns received a renovation. The result is the FLG4.

Stainless steel needles and fluid nozzles and brass air caps are durable and reliable while DeKups disposable paint cups make clean up easy.

... [CLICK HERE FOR MORE INFORMATION](#)



## FREE SUBSCRIPTION

Sign up today for Finishing News - get tech tips, helpful product info on DeVilbiss paint spray equipment

and the latest promotions and money-saving offers. This offer is good only in the U.S. and Canada.

... [CLICK HERE FOR DETAILS](#)



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Glendale Heights, IL 60139

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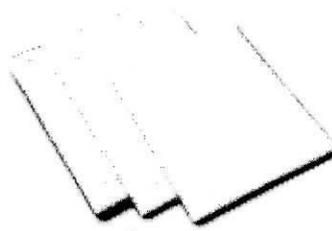
### 2014 Virtual Catalog

BRASS BRASS

2014 and on at home



### Product Warranty



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A CARLISLE COMPANY



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- Plastic
- Ceramics
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FREE 2015 Year Planner available

Binks Launch the DX70 Pump Range

Binks launch the Ram Units range

Binks introduces the MX30/42 42:1 pump

DeVilbiss introduce the Pro Lite E Ceramic Spray Gun

Binks introduce the DX200 diaphragm pump

DeVilbiss introduce the GTI Pro Lite Spray Gun

Binks launch the AG-363 Automatic AAA Spray Gun

Binks launch the MX Lite pump outfits

DeVilbiss launch the AG-360 Automatic Range



We are pleased to announce the introduction of the AG-360 Automatic Spray Gun Range

Further Details



### Finishing Solutions for the Global Market

Finishing Brands - Europe, based in Bournemouth, England, Dietzenbach, Germany and Valencia, France manufacture all types of Industrial Spray Finishing Equipment and accessories. Incorporating the world leading brands of Binks DeVilbiss Ransburg produce "cutting edge" high technology Spray Finishing equipment for the supply and application of all sprayed materials for all major manufacturing industries and Markets. Binks DeVilbiss Ransburg have been manufacturing spray equipment for all of your finishing requirements for over 100 years.

**REGISTER WITH US**  
Register your new product here and become a member of our Finishing club

Finishing Brands UK Ltd  
Ringwood Road, Bournemouth  
Dorset BH11 9LH UK  
+44 (0)1202 571111  
E. Contact form

Spray Guns - low pressure Spray Guns - mid/high pressure Auto Spray Guns - low pressure Auto Spray Guns - mid/high pressure Pressure Feed Tanks/Cups Paint Pumps - low pressure Paint Pumps - mid and high pressure Electrostatic Spray Guns 2k Fluid Equipment FRP Guns & Systems Air Filter Regulators Respiratory Protection Accessories Consumables Air/Fluid Hose and Connectors Fluid Handling Agitators Spares Spray Booth Filter Paper

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Exhibit 41



**AUTOMOTIVE SECTION**  
**Ask@SprayGunWorld.com**

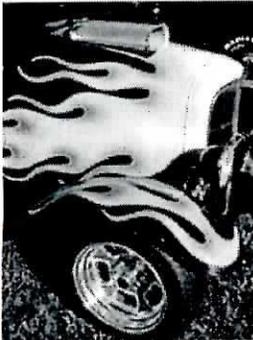


YOUR 1 STOP SHOP FOR PAINT GUNS AND SUPPLIES!

DeVilbiss Sharpe Binks CAT Astro



**PLEASE NOTE: YOU ARE NOW AT OUR AUTOMOTIVE SITE [SPRAYGUNWORLD.com](http://spraygunworld.com).**



Our HVLP, Reduced Pressure Complaint and Conventional Guns are all professional grade designed for fine-finishing. You will find them at your Mercedes Benz, Porsche, BMW, Cadillac etc. body shops...

**What our professional guns are designed to do:** Our guns are designed to spray a flawless finish like you would expect from any top rated \$3,000-\$5,000+ paint job or show car. Remember you are spraying with the same guns professionals use. In fact, since many body shops make their painters purchase their own guns, you may be spraying with a better gun than your local body shop is using on your \$3,000 paint job. By shopping with us and using good equipment you are assured the best results on the market today. We have even had painters using single stage Omni paint and created a mirror finish **WITHOUT BUFFING**.

Now that's amazing! After understanding the quality of the guns we sell, we have also had people purchase guns and "give them" to the painter who is painting their car.

**Why not buy from my local store?** The guns we recommend are standards in the automotive industry. Some of the paint gun companies we sell have been in the painting business for over **100 years**. Every gun we sell is professional quality that can be used to get a job in the automotive industry. We bring these top rated guns to you at wholesale prices. A local store will not be able to match our prices as they most likely purchase their guns at the same price we are selling them **direct to the public**. A local store may attempt to question our pricing or try to sell you a copy or no name brand, however we do not recommend these as quality varies tremendously with these products. We deal in the automotive industry and we know what we are doing! Take heart in our recommendations, have fun choosing a gun, and you will be satisfied.

**Just for fun, Please take a look at our**

## *Dream Guns*

### ① PRESSURE SETUP:

Not needed, Rarely used in the automotive industry.

### ② GRAVITY FEED:

Today almost all Automotive painters use gravity guns. They provide better atomization than suction feed and are easy to use and clean up. We have several suggestions below.

### ② SUCTION FEED:

Old timers still use these guns and variations on these guns. There are traditional guns here along with newer guns with improved transfer efficiency. Take a look at our "Old Timers" Section - [HERE](#)

## ① GRAVITY FEED

**We have many great guns, you will get an excellent result out of any gun we sell, however, these stand out just a bit.**

< \$100 Range

Exhibit 42



**Recommended\* Advanced Design 3 gun set** - Designed to spray both primer and base/clear/single stage paints for under \$100.00 These guns are good enough for a professional body shop but have been brought to you at a price point equal to most lower grade hobby guns at Sears, Harbor, and your local home improvement store. They have Low air consumption and stainless steel needle and tip. They are a great bargain and we recommend them for any serious hobbyist or beginning professional. **SGW:** *Great inexpensive starter set. Professional quality at an affordable price. Our entry level choice for Professionals and serious hobbyists. Much better than the guns purchased at Sears and Home Depot.*



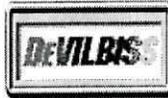
**Recommended\* Sharpe Finex** - This new line by Sharpe Blows the market away by entering with an excellent gun at a very low price point. The quality of the guns are excellent and the spray quality is good enough for a professional. They are a great bargain and we recommend them for any serious hobbyist or beginning professional. **SprayGunWorld:** *Great inexpensive starter set. Professional quality at an affordable price. If your local store is carrying these you may purchase them here and save.*

**\$100 Range**



**Recommended\* Astro HVLP QUL and EVO** Low air consumption and stainless steel needle and tip. Great for waterbornes and lacquers and enamels. **SprayGunWorld:** *The finest professional Low Cost Set on the Market. Professional quality at an affordable price. Our First entry level choice for Professional Woodworkers and autobody workers. Superior performance. Compares with guns costing \$300.00 or more. Purchase the QUL 103 for Clears, the QUL105 for Single Stage and Thick Clears, and QUL 107 or 109 for primer. Can Purchase Tips Separately.*

Check out our Low Cost [DREAM Setup](#) from Astro

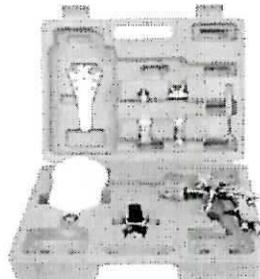


**Recommended\* Devilbiss Finishline III** - Classic DeVilbiss Finish at an economical price. This Third generation gun, precision engineered, produces a well-atomized, uniform spray pattern with accurate, repeatable settings. Tip sets are all made in the USA by Sharpe, Gun washer safe. **SprayGunWorld:** *Our First Choice for the serious hobbyist. Comes with all you need to get started, from gun hook, regulator and tips. We like the versatility of having an all in one package with multiple tips. We also like the famous DeVilbiss Finish. Recommend keeping Gun clean for long life. This is a great gun. Comes with 1.8 Tips. For Single Colors and Waterbornes 1.8 tip for thicker enamels and Lacquers. 2.2 Latex Tip Available.*

**\$200 Range**



**Recommended\* DeVilbiss GFG 670 High Efficiency Spray Gun**- This is a professional gun with the same ratings are HVLP guns. It is a high solids clearcoat gun of choice - precision-engineered #410 air cap lays out a smooth, high gloss finish. DeVilbiss quality creates a gun with a higher transfer efficiency - Greater than 65% transfer (comparable to the German Spray (Reduced Pressure)). Includes three tips, which eliminates guesswork, and is Waterborne Compatible. **SprayGunWorld:** *You will not find a better gun at this price point. Our no compromise student set for under \$250 complete. This is our favorite auto boat marine and woodworking gun for the professional or serious Hobbyist. Don't let its (Reduced Pressure) status fool you. This gun lays down a superior even finish with little overspray.*



**Hidden Gem! Asturo WB HVLP** - Premium waterbased performance and quality. Tested by major paint manufacturers. Stainless Steel created to handle waterborne materials. **SprayGunWorld:** *One of the best spray guns sets on the market. Tested by PPG Paints Sprays as well as \$700 German Spray Guns according to test by leading auto paint manufacturer.*



**Hidden Gem! CAT Techline** - For the autobody profession on a budget. What you get is amazing. True USA tips, needles, and air caps, multiple setups for base and clear with a design that compares with the best guns on the market? Yes, this hidden gem sprays as well as German Spray Guns at 1/3 the price.

Hard to believe but true. **SprayGunWorld:** *How do they do it? They put the same tip sets that Lexus uses in their factories into an economy gun handle. Now that's one neat trick. Or a 1 tip gun set for a superior low cost base gun get a 1.3.*



**Asturo ECO SX K1 and Perfection Automotive** - Premium performance and quality. Excellent results with all materials. Specially created to handle waterborne materials.  
**SprayGunWorld:** *Great Spray Gun kit. 1.0 waterbase 1.3 base 1.4 clear or the New perfection. You can't beat the price!*

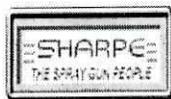
**\$300+ Range TOP OF THE LINE**



**Hidden Gem! Recommend #1 for Autobody Production\* New! CPR Cat Pack. 2 Guns in one! The finest USA HVLP and Finest R-P on the market combined in one gun!** The best traditional USA HVLP gun we carry. Warm soft spray pattern, ALL USA made, Lifetime warranty, old fashioned customer service. Good Tech support. Better spray than the German Spray 2000 series. Little more working working speed and material delivery than the German Spray . and lower operating costs i.e. Tip sets are \$68.00. Repair kits \$22.00.



**Recommend #1\* Iwata Dream Setup Lowest Overspray you can buy -** Beats the Germans hands down! You will not find a better Dream Gun system on the market for a lower price! Guaranteed. Premium performance and quality. Excellent results with all materials including waterbornes. Special base cap perfect of hard to spray metallic's and pearls. **SprayGunWorld:** *Great Spray Gun - many prefer this gun over the German Spray line.*



**Recommend #2 \* Sharpe Razor CG and HVLP Most Versatile and Low Price -** What you have been looking for. Great USA quality at a terrific price. Featuring both the HVLP and (Reduced Pressure) spray guns with digitalReg regulators. Premium performance and quality. Excellent results with all materials including waterbornes. **SprayGunWorld:** *Great USA quality. Gun converts to all technologies including the new Metallic and LVLP guns.*



**Recommend #1 for people with low CFM\* The Lowest CFM "Green" spray guns. Asturo ECO K1 and ECO HVLP AND NEW Perfection Line:** The best spray guns from Italy. The best spraying guns for people with smaller air compressors. Great even if you have a lot of air.



**Recommend #2\* DeVilbiss CVi Name brand performance in a lightweight gun.** New Transtech technology produces some of the finest clears on the market. Complete with both HVLP and Transtech air caps for great versatility. *A great clear gun. We like the Transtech technology. A fine USA alternative to the German Spray (Reduced Pressure).*



**Recommend\* 900L LVLP Spray Gun Featuring on the fly fan control** Considered by many to be the Best European Spray Gun. Used in elite body shops on fancy German Cars. The 900L is an award winner and beats its cousin the German Spray 3000 in a competition. **SprayGunWorld:** *Wow! German engineering and production at its finest. German Spray 's competitor in Germany. It's the BMW vs Mercedes.*

**Why a MiniGun?**

- I need a 1/4" to 5 1/2" Variable Fan Pattern
- I only have a small compressor i.e.- Most of these guns will work on as little as 1 hp
- 2 CFM Compressor
- I am doing smaller parts or spot jobs or more detailed art work
- I want to get my gun into small spaces

**Top Recommend Hidden Gem! Asturo WB All Stainless Steel Master Kit** Multiple Tip Sets. 1.5 for primer, .8 for base, 1.2 for clear. Lower Air requirements. Superior finish. Variable fan control, fluid



adjustment and built-in air micrometer Inlet pressure. Super mini diaphragm regulator. **SprayGunWorld:** *You cannot find a better mini gun period at this price or almost any price. We consider this gun to be equal in finish quality to the German Spray Mini Jet 4 and Iwata LPH 80.*



**Recommend\* CAT MiniSprayJet Multiple Tip Sets.** 1.2 for primer, .8 for base, 1.0 for clear. Lower Air requirements. Superior finish. Fan control, fluid adjustment and built-in air micrometer Inlet pressure. **SprayGunWorld:** *You cannot find a better mini kit at this price.*



**Recommend\* DeVilbiss SRI630GW** 1.0 Lower Air requirements. Superior finish. Variable fan control, fluid adjustment and built-in air micrometer Inlet pressure with digitalRegulator controls in the DigitalRegulator version. **SprayGunWorld:** *Wow! What a gun. If you are looking for a mini gun with a 5" fan pattern look no further. See the Astro version 4020 for a cheaper alternative.*



**Recommend\* IWATA LPH 80** Lower Air requirements as little as 1.8cfm. Superior finish with extra low overspray. Variable fan control, fluid adjustment and built-in air micrometer Inlet pressure with DigitalRegulator controls in the DigitalRegulator version. **SprayGunWorld:** *Wow! What a gun. If you are looking for a mini gun with a 5" fan pattern look no further.*



**Recommend\* Astro 4020** A fair alternative to the German MiniSprayjet. Modeled after the German MiniSprayJet II. The Astro provides an excellent spray gun with superior finish. Variable fan control, fluid adjustment. **SprayGunWorld:** *A great spray gun for those on a budget.*

## 2 What Tip Size?

**Once you choose a gun, Make sure you get the correct tip(s)**

*Recommendations are to be used as a starting point reference and are not an absolute application for all refinish material brands. They are not meant to imply that any given air cap/fluid tip combination can not be used to successfully spray any given refinish material. Technique and personal preference must also be considered.*

### GENERAL RULE

*(1.2 or 1.3) - New Waterbase base coats tend to take a slightly smaller tip size. - So if you only afford 1 gun get a 1.3 HVLP or 1.2 or 1.3 (Reduced Pressure) Spray Gun*

*(1.3 or 1.4) - As a general Rule the most important gun is your Finishing Gun - So if you only afford 1 gun get a 1.3 or 1.4 HVLP or 1.3 (Reduced Pressure) Spray Gun*

*(1.6-2.2) - If you can afford another tip set or gun for priming (we recommend using a different gun) a 1.7-2.0 HVLP or 1.6-2.0 (Reduced Pressure) Gun or Conventional Gun. Quality is not as important for priming guns as you will be buffing and sanding. Some inexpensive Priming Guns.*

### MORE SPECIFIC

Please contact your paint manufacturer for recommendations. You are using an HVLP Gravity Feed Gun  
*If you want a more exact match, Generally, go smaller for Clears Urethanes (1.2-1.4) and larger still for primer*

*surfaces (1.5-2.0).  
We recommend the DeVilbiss Guns because they generally come with multiple tips to handle all your finer  
refinishing needs.*

<b>Generic Chart</b>		HVLP Gravity 	Compliant Gravity 	Pressure Feed 
<b>Primer Surfacer (Thick)</b>	Fluid Tip Size	1.6mm 1.8mm* 2.0mm	1.6mm 1.8mm* 2.0mm	1.0mm - 1.4mm
<b>Primers and Sealers</b>	Fluid Tip Size	1.4mm 1.5mm 1.6mm* 1.8mm	1.4mm 1.5mm 1.6mm* 1.7mm 1.8mm	1.0mm - 1.4mm
<b>Single Stage Urethanes and Polyurethane</b>	Fluid Tip Size	1.4mm* 1.5mm 1.6mm*	1.4mm* 1.6mm*	0.8mm - 1.4mm
<b>Base Coats</b>	Fluid Tip Size	1.3mm* 1.4mm* 1.6mm	1.2mm* 1.3mm* 1.4mm* 1.6mm	0.8mm - 1.4mm
<b>Clears</b>	Fluid Tip Size	1.3mm 1.4mm* 1.5mm 1.6mm	1.2mm 1.3mm 1.4mm 1.6mm	0.8mm^ 1.0mm*
<b>Hi-Solid Clears</b>	Fluid Tip Size	1.2mm 1.3mm* 1.4mm*	1.2mm* 1.3mm*	0.8mm^ 1.0mm*
<b>Lacquers and Enamels &gt;20 sec Zahn #2</b>	Fluid Tip Size	1.4mm 1.5mm 1.6mm*	1.4mm* 1.6mm*	1.0mm - 1.4mm

**Our Recommendations**

Motorcycles: We recommend the European Water/Solvent Based All Stainless Steel Mini Spray Jet 1.0SR.

### 3 AIR FILTERS

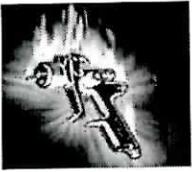
We have a large selection of filters for your spray gun starting for less than \$10.00

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SprayGunWorld



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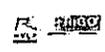
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Supplier of: Paint spray guns and accessories | Air compressors - Tools and accessories | Varnishing equipment | spray guns for painting | car paint spray guns (+)



Olegio Olona - ITALY

### AUTOLACKIERUNG BRINKMANN GMBH



Supplier of: Lacquering - steels and metals | car paint spray guns

Preetz - GERMANY

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Searches that target: Paint spray guns and accessories

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...repair tools Fast Hover Tools products include paint spray guns and their accessories, air tools, body shop equipment, paint consumables, air fittings polythene seat car covers, Paint mixing cups,...

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Supplier of: Tools, pneumatic | painting tool | auto repair tool

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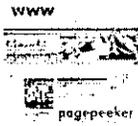
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car paint spray guns | length of its experience in the furnishings market, KREMLIN REXSON offers solutions for all manual or automatic finishing processes on furniture: application of varnishes, lacquers, waxes,...

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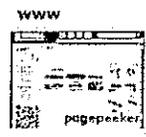
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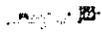
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**PULSAR DI ANGELINI GIUSEPPE**

Supplier of: Paint spray guns and accessories | spray guns for painting

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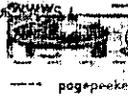


Saint Nazaire - FRANCE

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Chemicar Europe NV designs, develops, manufactures and distributes non-paint consumables and equipment for the professional body shop and car paint in general. Based in Antwerp, Belgium, and... [Find out more](#)

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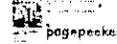
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Supplier of: Paint spray guns and accessories | dual component paint spray guns | mono component paint spray guns | tanker paint spray gun | car frame paint spray gun

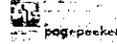
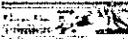
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### KREMLIN REXSON ENERGIES RENOUVELABLES



Renewable energies market specialist KREMLIN REXSON offers impregnation, bonding, protection and finishing solutions for wind turbines and solar panels, as well as greasing solutions for moving parts...

www



Supplier of: Paint spray guns and accessories | paint spray gun import-export | paint spray gun import-export renewable energies | manufacturer of paint spray guns for wind turbines | manufacturer of paint spray guns for solar panels

Stains - FRANCE

### KREMLIN REXSON ÉQUIPEMENTS DE BATIMENTS ET TRAVAUX PUBLICS



KREMLIN REXSON is renowned for protection, finishes, bonding and waterproofness for buildings and public works. We provide spray paint solutions for outside components, cable fitting solutions for...

www



Supplier of: Paint spray guns and accessories | paint spray guns for building and public works | mono component paint spray guns | airless high pressure electrostatic paint spray gun | supplier of airless paint spray guns

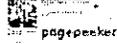
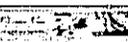
Stains - FRANCE

### KREMLIN REXSON AMEUBLEMENT, CUISINES & SALLE DE BAINS



On the strength of its experience in the furnishings market, KREMLIN REXSON offers solutions for all manual or automatic finishing processes on furniture: application of varnishes, lacquers, waxes,...

www



Supplier of: Paint spray guns and accessories | pumps and paint spray guns for furniture | spray guns for applying paint on furniture | supplier of spray guns for paint application | manufacturer of paint spray guns for furniture

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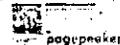
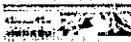
KREMLIN ROXSON BLASTIQUE INTERIEUR ET EXTERIEUR  
AUTOMOBILE



With vast experience in the protection of interior and exterior car plastics, we manufacture multilayer body colour spray process solutions (primer, base 1& 2, varnish on ABS parts), varnish spray...

Supplier of: Paint spray guns and accessories | paint spray gun import-export | airless high pressure electrostatic paint spray gun | airless paint spray guns | paint spray technology [-]

www



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Stains - FRANCE

DP AIRLESS PAINT SPRAYER CO., LTD



DP AIRLESS PAINT SPRAYER CO., LTD is professional manufacturer and supplier for airless paint sprayer, airless painting equipment, gasoline / petrol engine powered road line striper machine , air-operated double diaphragm pump etc. the kit including the airless...

Supplier of: Paint spray guns and accessories | Industrial sprayers for surface treatment | airless paint sprayers | airless pumps

Ningbo - CHINA

1 2 3 4 5 6 7 8

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spray guns for painting

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Ask@SprayGunWorld.com  
Rule 6H Rule 40 EPA and State Spray Gun Compliance Rules and Regulations HVLP

Hi-End Spray Guns from SPAIN



Fully supported Spray Guns from SPAIN by SagolaUSA.  
Bests German competition in performance and price.



The American Importer of SAGOLA spray equipment. Sagola has their main factory in the north of Spain near the French border. Sagola has been a world leader in quality spray equipment for over 60 years. In the USA we are located in Fraser Michigan. We have sales agents and dealers throughout North America, professional spray equipment from one of the worlds leading companies. We offer HVLP, EPA compliant, conventional, airless, and air-assisted airless spray equipment in all price and quality ranges for the professional painter.

Automotive Spray Guns

View Info

4500 Extreme Series: Same Quality level of German Sat\* guns at 30% less money and 40% less on parts and maintainace. Includes Both Base / Clear Aircaps for the most complete Body Shop Gun Sets on the market

Speed Flagship LTX Clear



Super Speed and Atomization with world class manufacturing - the best from Europe.

Industrial Spray Guns

View Info

Superior Speed and some of the finest construction available in a spray gun.

WoodSpray Guns

View Info

Superior Finish with controlled overspray levels. Waterbase models with super low overspray.

Speed Flagship LTX Color



Amazing Feature

Speed Power Danel

- Super Speed Fast Large Fan Pattern
- Hi-End Quality Stainless Steel for Long Life

Sagola USA

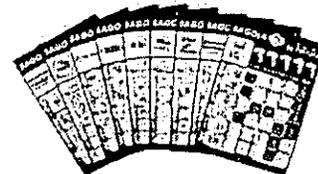


Exhibit 44

S 0576



# Optima

**Top German Spray Gun Backed by a top USA Company MotorGuard Corp.**



YOUR 1 STOP SHOP FOR PAINT GUNS AND SUPPLIES!

PREMIUM PROFESSIONAL SPRAY GUNS



## LVLP

## Optima Euro 900 Series

**GERMAN GUNS  
New Trifinity Series  
Europe's Elite Spray Gun Series**

Lowest Air Consumption  
Lowest Overspray  
Finest Finish

# Trifinity 1100



# Optima

## Dream Guns

**The Best Money can Buy**

# RATED #1

**Meet the German "BMW" of Spray Equipment  
Europe's Elite Spray Gun Series Euro 900L  
Rated #1 in finish quality over all top spray guns including LVLP, HVLP, and Reduced Pressure guns.\* The German Made Optima.**

- Extensive design and testing resulted in the ULTIMATE in LVLP spray technology. The 900 series provides exceptional finish quality at low air volume and atomizing pressure. Featuring an ultra-wide, uniform spray pattern and is light-weight and balanced.

\*Competition featured in a Professional Trade Magazine names the German Made Optima spray gun as Best Clear gun or market today! The 900L came in 1st place over all guns and and 1st place

in finish quality. The German Optima beat its German competitors.

We carry the fully line of Optima Spray Guns  
See Optima Catalog

Trifinity Series  
AUTO/BOAT/PLANE  
Europe's Top of the Line

*Trifinity*  
1100

*Dream Guns*

More Info 

The finest base/clear automotive spray gun you can purchase.

**Best Value Professional HVLP**  
**Europe's Best Value 500 Series HVLP**

500 Series HVLP

Don't be fooled by the price. You cannot get a German engineered and designed gun at this price point anywhere. This "No-Compromise" gun can be configured for any topcoat finish. Stainless Steel Needles and Tips. Best Value HVLP gun. For the ultimate economic application of today's finishes. Stainless steel needle

LOW CFM  
#1 LVLP WOOD AUTO / BOAT / INDUSTRIAL

Europe's Top of the Line  
900 Series LVLP Finishing Guns



For less expensive LVLP guns see Astro LVLP the EVO

spray gun and other lvlp guns

*Dream Guns*

One of the finest base/clear automotive spray gun sets you can purchase.

BMW & LEXUS GUNS TOGETHER  
IN 2 GUN PACKAGE  
Optima 900LVLP Premium Set

**Automotive AUTO Elite Finest LVLP Deluxe Kit Best LVLP Money can buy**

*German Optima beats its German competitor the Optima Euro LVLP series of spray guns.\**  
Aluminum Cup

Pro-Auto 1 Gun Special w/ extra tip  
(Base 1.3 / Clear 1.4) Combo

**Wood Elite Finest LVLP Deluxe Kit Best LVLP Money can buy**

*Wood - featuring best LVLP on the market. Extremely low overspray and very low air requirements 6CFM@40psi.*  
Aluminum Cup

Pro-Wood Special w/ extra tip  
(1.5 thinner materials / 1.8

S 0579

and nozzle. Wide full-wet spray pattern. Fully professional German engineering and construction.

thicker materials)  
Combo

### Pressure Feed

#### Series Pressure Feed HVLP

*Series Pressure* HVLP



Professional HVLP Gun. Patented nozzle, perfectly matched to the fluid nozzle, provides uniform atomization throughout the wide spray pattern. Stainless steel needle and nozzle. Full-wet pattern with minimal overspray. Built-in air regulation.

### Accessories



SprayGunWorld



S 0580



**Finest Low Air Spray Guns on the Market  
#1 Italian Spray Gun Company  
Ask@SprayGunWorld.com**

**SPECIAL PRICED PRODUCT  
PAGES!**

WB WATERBASE / SOLVENT ALL STAINLESS STEEL



# WB ALL STAINLESS STEEL

**Premium Stainless Steel Low Air Spray Gun  
LVLP Technology in an HVLP Spray Gun  
5-6 CFM@40 (3 CFM for Mini Gun)**



SGW: "Just got through using it. You are right. It is a great gun! Thanks for your input." - Customer

"I had received this spray gun. I had laid primer with it. It really has a good spray pattern. It sprays way better than the (gun) that I have been using... Thank you..." Customer

"Just had to write and thank you for your recommendation of this Asturo WB.

You were right on on every point. You get a good gun... No need whatsoever to go to any kind of class. The good guns show you what you need to know. The atomization is terrific especially at such a low psi. Thanks again." Customer

After purchasing a 2nd WB - "Thanks for the great website and info... Always helpful to make a decision... By the way, the AOM WB I purchased is awesome, easy to clean, use and handle..." Customer

**TOP RECOMMENDATION COMPARES  
IN FINISH QUALITY TO \$600  
GERMAN AND \$500 JAPANESE GUNS  
Superior 3 Year Warranty**

**Amazing Features:** Everything you need to get started Spraying in 1 package  
Super Fine Spray comparable to the Iwata at 1/2 the price  
Super Low CFM - CFM  
Stainless Steel Fluid Fittings and Passages (even Fluid Filters are Stainless Steel)  
Nylon Waterbased / Solvent Based cup with Stainless Steel Fittings Great for Both Waterbase and Solvent Based Material  
Small Footprint (size of gun) and Small Regulator (full size only)  
Fully Supported with wide range of tip sets  
Rebuild Kit included in package (full size)  
Great for both Solvent and Waterbased Material

**FULL SIZE**

**MINI GUN**

Exhibit 46

S 0585



**The Low Air Standard**  
**#1 European Spray Gun Company**  
**Over 75 Years Specializing in Low Air**  
**Consumption Spray Equipment 5CFM**

YOUR 1 STOP SHOP FOR PAINT GUNS AND SUPPLIES!

PREMIUM PROFESSIONAL SPRAY GUNS



**Over 75 Years Asturo Italy's #1 Spray Company**



**The Low Air Standard.**

**Asturo Search**

WILL MY PARTS BE AVAILABLE? Yes, we carry the Full Asturo Line including Tips and Rebuild Kits. Please call or email us if you do not see the model you are looking for Ask@SprayGunWorld.com . Please note: these is a 15% restocking fee for AOM returns.

**MASTER SEARCH**

GO!

Enter Part #'s- word(s)- partial word(s) with wildcards (\*) and/or phrase(s) enclosed in quotes.

**PRESSURE SETUP**

*Suction Too*



**R Series - II**

**R-200 VALUE LINE SHOP SERIES**  
**SUPER LOW AIR Pressure Feed HVLP**  
**5 CFM @30 (4.5 CFM@40)**

**SprayGunWorld: Great Woodworking Low Air System.**

  
**More Info**  
**Pressure & Suction**

Exhibit 47

Spray Guns



Contact | FAQ | My Account  
your cart is empty



Search

Home » Wood Finishing » Spray Guns

- Paint Sprayers
  - Professional Sprayers
  - Residential Sprayers
  - Graco Magnum Sprayers
  - Paint Sprayer Accessories
  - Replacement Spray Tips
  - Replacement Filters
  - Airless Spray Guns
  - HVLP Spray Guns
  - Hose
  - Paint Sprayer Replacement Parts
  - HVLP Paint Sprayers
  - HVLP Parts / Accessories
- Wood Finishing
  - HVLP Systems
  - Spray Guns
  - Air Assisted Airless
  - Hose
- Athletic Field Marking
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- Spray Gun Accessories
- Spray Adhesive
- Aircraft Painting
- Pressure Pots
  - Pressure Pot Accessories
- Air Compressors
- Automatic Spray Guns
- Agriculture / Pest Sprayers
- Spray Tan
- Paint Sprayer Reviews, Tips & Advice
- Specials
- Customer Testimonials



## 85 Years of Excellence!

Asturo - Europe's #1 Spray Gun! Asturo fine finish spray guns provide you with the highest level of Italian craftsmanship at the lowest cost of ownership. Asturo spray guns require the least amount of CFM, making them the perfect choice for the home woodcrafter. Asturo's unmatched spray quality and long lasting durability make them the perfect choice for even the highest production shops.



JET K-591SQ 1 Qt SilverAero HVLP Spray Gun



Spray Gun 1 Qt Cup YW Lid Assembly  
\$24.00



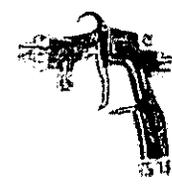
JET K-591G SilverAero Gravity HVLP Spray Gun



JET K-591S SilverAero HVLP Spray Gun  
\$109.00



Asturo R100 Mini Hyla Spray Gun  
\$139.00



Asturo R200 Pressure Feed HVLP Spray Gun  
\$122.00

Exhibit 48

S 0600

Back To  
Spray Gun  
Industry



ALL GUNS ARE NEW!

No rebuilds or 2nds

Why our prices are so low? <

**GRAVITY FEED SPRAY**

ECO / K1



SUPER LOW CFM  
ECO SX / K1

WB Series  
R Series  
G Series

HVLP/ (Reduced  
Pressure) Here >>>

Conventional >>>

**SUCTION FEED SPRAY**

ECO / K1



R Series  
G Series  
X Series

Click Here >>>

**PRESSURE FEED SPRAY**

ECO / K1



R Series  
G Series  
X Series

Click Here >>>

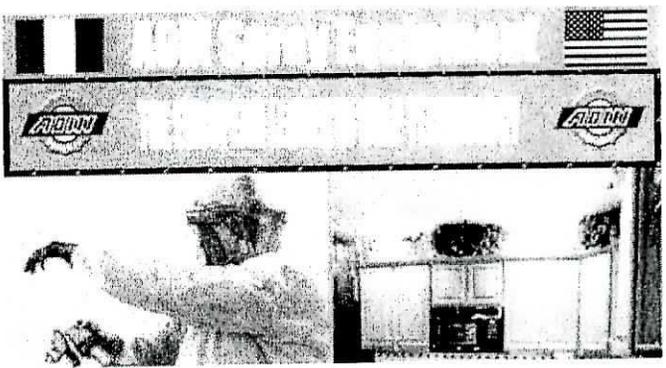
**Automatics**

ECO & K1 Automatics  
Industrial



Click Here >>>

Air Assisted Airless



■ Asturo AOM ■ CAT ■ DeVilbiss ■ Sharpe ■ Binks ■ Astro



The No. 1 European Spray Gun Company over 85 Years old. Since 1925, Asturo AOM has been one of Europe's top industrial leaders. Fully supported in the US and Canada with old fashioned Customer Service and Support.

**MASTER SEARCH**

Specializing in Energy Efficient Low CFM Air Consumption Spray Equipment Asturo AOM of Italy is the leader in Professional Industrial Green Low Air Spray Guns. No compromise in finish quality - a feat not achieved by competitors when lower CFM or PSI is placed on the gun. Save Energy and Costs, Run multiple guns or be portable with Asturo AOM Equipment.



We carry the entire line of Asturo Guns, Pumps and Accessories. View [Asturo AOM Catalog](#) and type in Part Numbers Below:

Search Entire AOM Catalog Here:



Enter Part #'s- word(s)- partial word(s) with wildcards (\*) and/or phrase(s) enclosed in quotes.

**AOM OFFERS SUPER LOW CFM OFFERING FOR SMALLER COMPRESSORS**



ECO & K1 Industrial Line Rugged performance for harsh environments - All Stainless Steel

More Info >>>



The WB - Waterbase Line Featuring the most versatile Mini Gun on the Market

More Info >>>

Exhibit 49

S 0607



**The Best Hi-End European Spray Equipment**

**INDUSTRIAL**

**Technical Help on Ani Spray Guns:  
800-533-6254**

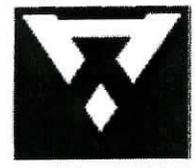


**YOUR 1 STOP SHOP FOR PAINT GUNS AND SUPPLIES!**

PREMIUM PROFESSIONAL SPRAY GUNS



**European Hi-End Spray Equipment**



**The Best Hi-End European Spray Equipment**

*318 Grade Stainless Steel Industrial Strength*

**Technical Help on Ani Spray Guns: 800-533-6254**

**Ani Search**

WILL MY PARTS BE AVAILABLE? Yes, we carry the Full Ani Line including Tips and Rebuild Kits. Please call or email us if you do not see the model you are looking for Ask@SprayGunWorld.com . Please note: these is a 15% restocking fee for Ani returns.

**MASTER SEARCH**

GO!

Enter Part #'s- word(s)- partial word(s) with wildcards (\*) and/or phrase(s) enclosed in quotes.



**What is a Green Spray Gun**

**THE BOTTOM LINE**

Hi Operating Costs hurts your bottom line. Get control of your monthly bills by going green with engery efficient spray equipment. Asturo is number 1 in Europe and since its inception has focused on energy efficient equipment. Europe with its high costs of energy and desire to be a global



▶ 4:05 ⏪ ⏩ 🗄️ blip

Exhibit 50

S 0569

warming leader forces its manufacturers to focus on green technology energy efficient equipment. (i.e. during the recent gas increases some Europeans were paying between \$8-\$11 per gallon). Here in the US we benefit by utilizing tools created with a European bent - a different focus of the Europeans allow us Americans to lower our operating costs without sacrificing finish quality.

**SAVE ENERGY COSTS**

AniSpray guns and Automatics consume between 4-9 CFM on average. Most other manufacturers guns consume between 11-18CFM. Translated, your compressor consumes over 100% less energy to produce the same results. You may have figured your energy bill is simply high. However, do not overlook your compressor air consumption. Listen to how hard your compressor works when using spray equipment and you can easily see the cost savings you can incur.

---

## GRAVITY FEED

*Pressure & Suction Feed Below*

---

**PROFESSIONAL Hi-END**  
*Hi-End 318 Grade Stainless Steel*  
*Industrial Strength*



---

## PRESSURE SETUP

*Suction Too*

---

**PROFESSIONAL Hi-END**  
*Hi-End 318 Grade Stainless Steel*  
*Industrial Strength*



S 0570



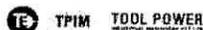
Buy, Sell & Hire Machinery Online

Home > Woodworking Machinery > Paint, Spray & Glue > Spray Guns

# New Gav Paint, Spray & Glue for sale - Gav putty gun 2.5mm, pot, European Quality+++++

1279 North Road, Huntingdale, VIC

Watch this Compare Print



Contact the seller

**03 8609 6019**

When prompted, enter

**ID-CODE: 41791**

50 Views



View full size photos (3)



Price: **\$71 AUD (\$78 GST Inclusive)**  
 Confirm with seller if any additional fees or charges apply  
[Get a Finance Quote](#)

Condition: New  
 Type of Sale: On Sale  
 No. in Stock: 1  
 Year: Not specified  
 Make: Gav  
 Subcategory: Spray Guns  
 Sellers stock ID: G2.5

### NewGav Paint, Spray & Glue:

The GAV model putty spray gun will spray various types of paints and is ideal for spraying cars, house, steel, timber, concrete, glue etc, etc.. Please read some benefits of this excellent value for money item and if more information is required than do not hesitate to contact me.

- ? BRAND = GAV
- ? CONDITION = Brand new
- ? WARRANTY = 6 months
- ? NOZZLE = 2.5mm
- ? POT SIZE = 500ml
- ? TAX INVOICE = Yes
- ? EUROPEAN QUALITY = MADE IN ITALY
- ? INCLUDED = All as seen in picture

Conditions of sale

Exhibit S1

S 0551

[Read more](#)

More from this seller (221 listings online)



Seller: **Tool Power Industrial Machinery**  
Locations: **1279 North Road**  
**Huntingdale, VIC**  
Member Since: **May 2012**  
Adverts Online: **221 (View all)**  
[toolpowerindustrialmachinery.machines4u.com.au](http://toolpowerindustrialmachinery.machines4u.com.au)

Contact the seller

**03 8609 6019** When prompted, enter **ID-CODE:41791**

You may be interested in:



**Hichem 3260G4**

Painting systems  
New | \$49



**Not Specified Gema**

Spray Guns  
Used | \$1,540



**Not Specified spray booth**

Spray booths  
Used | \$6,050



**Panel Beaters Spray Booth/Oven**

Spray booths  
Used | \$12,000



**Splitfire DIESEL HEATER**

Accessories  
Used | \$2,000



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S 0552

- **High Performance HVLP Spray Guns**
- **Backed by Motor Guard Corporation**

Optima Spray Guns, and the world renowned line of exquisite spray equipment, is now available from Motor Guard. Optima is a state-of-the-art, leading edge, technology-driven line of world class spray guns. Precise manufacturing with computer controlled machining centers insures each and every gun delivers the same precision output for optimum fluid transfer.

From primer to base coat to color to clear, the Optima Spray Products supply the ideal gun to fit every refinish application. Used exclusively in the premier body shops of Europe, the HVLP series products are the high performance spray guns with the Optima Finishing Technology, for maximum performance and user friendly features. The atomizing air reaches sonic velocity in the gun, causing a high volume, low pressure effect; resulting in excellent atomization and finish.

---

Exhibit 52

S 0612

8/13/2014

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### Zhejiang Ousen Machinery Co., Ltd.

Spray Gun, Gasoline Engine, Water Pump manufacturers / suppliers in China, offering High Pressure Europe Style Spray Gun D-L4, Knapsack & Backpack Power Sprayer (OS-850), Water Pump & Power Sprayer (OS-16S1/N) and so on.

Gold Member Since 2009

Audited Supplier

Home Product About Contact Company Show

Home > Product > Spray Gun > High Pressure cleaning Gun > High Pressure Europe Style Spray Gun D-L4

Multi-Language



### High Pressure Europe Style Spray Gun D-L4

Price: US \$17.0 / Piece Get Latest Price  
Trade Terms: FOB, CFR, CIF, EXW  
Payment Terms: L/C, T/T  
Price Valid Time: From Feb 02, 2015 To Apr 01, 2015

Contact Now

Leave a message. Add to Inquiry Basket

Enlarge Image

Like this product? Add to Product Favorites Share

#### You Might Also Like



High Pressure Spray Gun



High Pressure Spray Gun



High Pressure Spray Gun

Exhibit 53

**Supplier Profile**

 Zhejiang Ousen Machinery Co., Ltd.

Audited Supplier

Zhejiang, China

**Business Type:** Manufacturer

**Main Products:** Gasoline Engine, Water Pump, Power Sprayer, Garden Sprayer, Hose, Pump, High Pressure Washer, Knapsack Sprayer, Washing Machine, Engine

**OEM/ODM Service:** Yes

**Product Details**

**Basic Info.**

Model NO.: D-L4

Application: Hardware Spraying Equipment, Wood Spraying Equipment, Plastic Spraying Equipment, Porcelain Spraying Equipment

Certification: CE

Condition: New

Type: Electrostatic Spraying Equipment

Coating: Powder

Method Type: Manual

Export Markets: Global

**Additional Info.**

Packing: 10pieces Per Carton

Origin: Taizhou, China

Standard: CE

HS Code: 84242000

Search Products



**Product Groups**

Power Sprayer

Knapsack Sprayer

Gasoline Engine

Water Pump

Garden Machinery

High Pressure Washer

Manual Sprayer

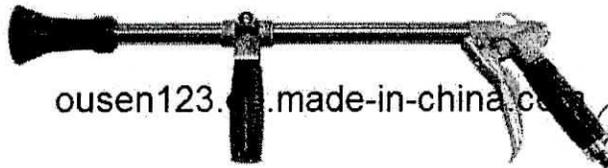
Spray Hose

Spray Gun

Spare Parts

**Product Description**

**Europe style spray gun D-L4**



We are professional Spray Gun factory and supplier in China. We can produce Spray Gun according to your requirements. More types of Spray Gun wanted, please contact us right now!

Send your inquiry directly to this supplier



Miss Amy Gan  
International Sales  
Representative

\* From: Enter your email address

To: Miss Amy Gan

\* Message: We suggest you detail your product requirements and company information here.

Enter between 20 to 4,000 characters.

Send

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- High Quality Spray Gun
- Gema Spray Gun Parts
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- Powder Coating Gun
- Spray On Gun Coating
- Casting Spray Gun
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- Paint Sprayer
- Hvlp Paint Spray Gun
- Oem Spray Gun Parts

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3 **Sharpe** - With some of the newest HVLP Technology in the market, highly recommended by Spray Gun World, and over 85 years of experience - Sharpe HVLP Spray Guns brings USA quality to you at a great price. You can pay more, but you will not beat Sharpe HVLP Spray Guns known quality. A company dedicated to customers in the USA.

4 **Binks** - Another industry standard spray gun. Binks HVLP spray guns are a favored alternative to DeVilbiss and Binks reputation is well known in the industry.

5 **Astro Pneumatic (professional)** - We searched far and wide for the best Professional Quality HVLP spray equipment for those on a shoe string budget. Modeled after Top German HVLP spray guns Astro Guns provide a amazing spray at about 70% less cost. This is NOT your standard "knock off" gun. Quality varies considerably among the manufacturers of imported spray guns. We offer Astro Pneumatic because they bring you professional high quality spray guns comparable with the finest spray guns on the market. Out of 40 manufactures we considered, we chose Astro as the company which produces the finest and most consistent quality of imported spray guns. Do not let the price fool you, these guns are much better than those found at Sears, Porter and Harbor.

6 **Optima** - Finest German HVLP & LVLP Spray Guns in the world. Ranked number one based on the latest competition of elite HVLP spray guns of the world.

7 **Asturo/Ani (Italy)** - Green Spray Guns Italy's finest industrial HVLP spray gun company. Since 1925, Asturo has lead the way in spray gun design in Europe. Featuring some of the lowest CFM HVLP spray guns that still produce some of the finest finishes on the market.

---

8 **Titan Hobby Line / Advanced Design Line** - We searched for the best entry level professional and serious hobbyist HVLP spray equipment. These guns are priced at the level of most home improvement stores, yet provide a higher quality spray pattern for a more discerning professional. Complete gun sets for under \$100.00.



SprayGunWorld



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Exhibit 54

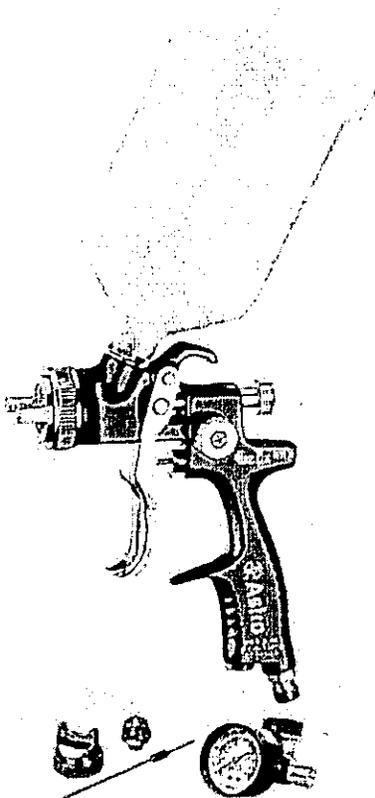
S 0606

8/13/2014

YOUR #1 STOP  
SHOP FOR SPRAY  
GUN  
INFORMATION



**EVERYTHING**  
HVLP & HTE SETUPS



Compatible with solvent  
& waterborne paints

Introducing the Complete Euro Pro Gun Line

HVLP & HTE Nozzle Sets (1.3, 1.5 or 1.3, 1.7 or 1.3 1.9 most common setups)  
SGW SETUP: We use the 1.3 with the 1.5 HVLP aircap for superior base coat handling. A trick of the trade.

1.3 Standard Automotive Base/Clear/Single Stage

1.5 Thin sealers / thicker single stage

1.7 Standard Primers

1.9 Fast Body Shop / Heavier Primers

Hi-End European Design with quality manufacturing at an unbelievable price point.

**FEATURES:**

**DURABLE & LIGHTWEIGHT**

- Forged body provides longer tool life
- Anodized body for corrosion protection
- Internal coated passages
- Stainless steel needle and fluid tip
- Slick finish for faster & easier cleaning
- Lightweight: 325 grams (0.7 Lbs)

**HIGH EFFICIENCY**

- Unique pattern designed for great coverage, optimal overlapping
- Low overspray (bounce back)
- Great transfer efficiency
- Superior atomization
- Innovative, advanced HVLP technology

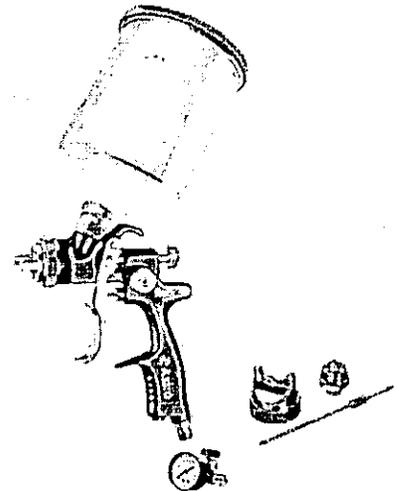
**QUICK THREAD TECHNOLOGY**

- 1 Turn to lock/unlock the air cap
- 3 Turns to lock/unlock the fluid tip
- Wide threads for easy cleaning
- M16\*P1.5 female thread fluid joint
- Compatible with most traditional and disposable cup systems

**SMOOTH OPERATION**

- Soft trigger pull to reduce fatigue
  - Precise lubricated adjustment knobs for better control
  - Innovative CNC machining to avoid the need for gaskets behind the fluid tip
- Certification - we hand test each gun before we put it in your shipping box.

Euro PRO HVLP & HTE Gun



Euro HTE (Reduced Pressure)  
\$248.00

ON SPECIAL FREE SHIPPING  
CONTINENTAL US! Starting at  
\$180.00

**\*Includes:**

- HVLP & HTE Nozzle Sets Spray Gun - aircaps are marked but work with all tip sizes.

- Ergonomic Design
- Regulator
- Plastic or Aluminum Cup

Choose Nozzle Size & Cup\*

Select Nozzle Size

buy now!

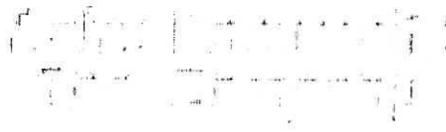


Add .75 Aluminum Cup -  
Must be purchased with  
Euro Pro Spray Gun  
Limit 1 per Gun  
SUPER SALE: w/  
Purchase of this GUN:  
\$18.00 Cup Only

buy now!

Exhibit 55

S 0589



**Finest Professional Imported Guns on the Market**  
**Ask@SprayGunWorld.com**

YOUR 1 STOP SHOP FOR PAINT GUNS AND SUPPLIES!

ASTRO PNEUMATIC SPRAY EQUIPMENT



**HVLP Guns**

Astro Pneumatic spray guns are the finest imported spray guns on the market. Do not be fooled by their low price. The spray quality of these guns compare with \$200-\$300 plus guns by USA manufacturers. Why the difference?

ALL GUNS ARE NEW! NO REBUILTS

**HVLP**  
**Top of the Line**  
**Euro Pro HVLP & HTE (Reduced Pressure)**



HVLP & HTE (Reduced Pressure)

**EURO PRO IN STOCK! The New Professional - The EURO PRO Hi-End HVLP Gravity Feed Gun Spray Gun.** We have had many wood and auto workers claim it sprays as good as their \$600.00 European Spray guns.

*Note: You will not find a better gun at this price point, period... Highest quality guns in the US in class. Your direct price means you get a quality much higher than comparably priced Porter, Ingersoll, Harbor, and other hobby lines available locally - except the Astro Pneumatic is a professional gun. This is not the same as hobby guns found at do it yourself stores- Astro Pneumatic guns are used by professionals in industry all over the world.*

**The only low cost gun with no gaskets! Precision CNC Parts**

**HVLP / HTE EURO**



**Euro Pro HVLP**  
 New! On Sale  
more info



**Euro Pro HTE (Reduced Pressure)**  
**.6 Liter Aluminum Cup**

**LVLP & Conventional Guns**

- 1) Stainless Steel
- 2) Hi-End CNC Machining No Gaskets! full metal on metal contact without plastic seals found in most lower priced guns.
- 2) Less Parts
- 3) Full Chrome Polish
- 4) Consistent Quality construction - NOT made in China.
- 5) Fully Supported Parts.

Yes, They are that good and our prices are that low.

**LVLP**  
**Astro's Top of the Line Low Air**

What's the Difference with HVLP?

*Note: You will not find a better gun at this price point, period... Highest quality guns in the US in class. Great Choice for shops and individuals concerned with overspray - An amazing finish that requires a smaller compressor and has super low overspray - Astro Pneumatic guns are used by professionals in industry all over the world.*

**The only low cost gun with no gaskets! Precision CNC Parts**

**EVO-LVLP**

<b>EVO4014</b> for Auto (1.4mm) <small>more info</small>	<b>EVO4018</b> for Wood (1.8mm) <small>more info</small>
--	--



**EVO COMBO KITS**

Auto Combos

**Auto**

*Secure Guns*

Wood Combos

**Wood Working**

**Professional Setup - At the lowest price**

Exhibit 56

S 0592

New! On Sale  
more info

**EURO COMBO KITS**



**Wood Working**

**Combos**  
 BOTH Euro Pro HTE & HVLP

More Info

**Auto**



*Stream Guns*

More Info

**AUTO / Boat / Plane /  
 Wood Combos**

*Stream Guns*

More Info

Astro Pneumatic's Quantum professional spray gun. Modeled after European spray guns, these guns bring you a professional quality finish at a lower price. Fast working speed & wide fan pattern Anodized gun body. Extra Tips Available. Use 1.3 for Hi Solid Clears, Stains, Woodworking, 1.5 for Automotive Medium Solids Colors & Clears Wood Working Waterborne, 1.7 for Wood Working Enamels and Lacquers and 1.9 for Surface Primers or thick Lacquers & Enamels

**New EURO HVT1 Mini**  
 The only Low cost Drop Forged Mini  
 Hi-End .8, 1.0, 1.2



**New! Gun Only**  
more info

**Deluxe Kit**

**SALE**

more info

**Siphon Feed HVLP**



**Siphon Feed "Devilbiss JGA Type"  
 HVLP Gun**

*1.8 Tip 4003-18*

Modeled after the Devilbiss JGA Series Spray Guns. This Astro model gives you

**possible for a  
 professional setup.  
 Low CFM Base/Clear  
 Set**  
 PT# APQ-EVO-V

**\*2 GUN PRO  
 Base / Clear**

**2 GUN STUDENT  
 (Base/Clear) /  
 Primer**

**3 GUN PRO  
 Complete Base /  
 Clear / Primer**

**HOT**

**1 Gun Combo  
 both 1.4 & 1.8  
 Setups  
 EVO 4014-18**

More Info

**CONVENTIONAL GUNS**

**Gravity Conventional**

**Star Gravity Feed Gun**

.6 Liter Plastic Cup  
 1.4 QUL114 / 2.0 QUL120

.6 Liter Aluminum Cup  
 1.4 QUL114A / 2.0 QUL120A

S 0593

MSD0000105

HIGH QUALITY HVLP AIR SPRAY GUN  
MEETS NEW ERA OF WATERBORNE SPRAY GUN



**EURO**

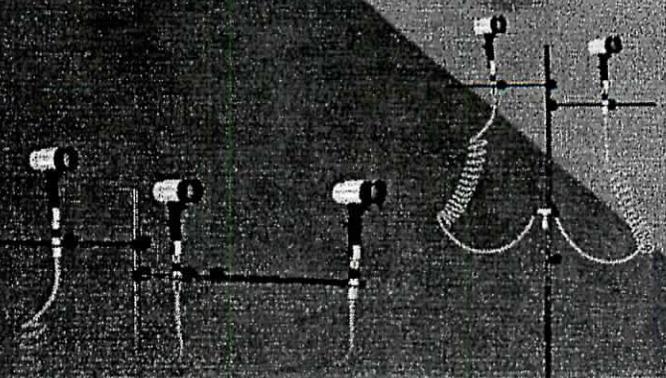


Exhibit 57

12/16/2014

MGD000445

Gmail - SEMA SHOW CONFIRMATION: EURO SPRAY TECHNOLOGY



MG DISTRIBUTOR <mgdistributor@gmail.com>

## SEMA SHOW CONFIRMATION: EURO SPRAY TECHNOLOGY

1 message

**SEMA Show** <semashow@sema.org>  
To: mgdistributor@gmail.com

Wed, Apr 25, 2012 at 9:48 AM

Thank you for submitting your 2012 SEMA Show Exhibit Space Rental Agreement.

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The Priority Exhibit Space Selection will be held May 30, 2012 through June 22, 2012. Your company's show contact will be sent an e-mail with your space selection date and time on or about May 25, 2012, provided your deposit has been received. If you have any questions in the meantime, please email salesmgr@convexx.com or call 702/450-7662, ext. 120.

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Org ID #: 0023200940

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Booth1 Type: Linear  
Booth1 SQ Feet: 200  
Booth1 Rate: \$19.95  
Booth1 Island: \$0.00  
Booth1 Subtotal: \$3,990.00  
Booth1 Preferred Section: CollisionRepairRefinishing

Booth2 Depth:  
Booth2 Width:  
Booth2 Type:  
Booth2 SQ Feet:  
Booth2 Rate:  
Booth2 Island:  
Booth2 Subtotal:  
Booth2 Preferred Section:

Booth3 Depth:  
Booth3 Width:  
Booth3 Type:  
Booth3 SQ Feet:  
Booth3 Rate:  
Booth3 Island:  
Booth3 Subtotal:  
Booth3 Preferred Section:  
Attorney Eyes Only

Exhibit 58

Highly Confidential

Trade Secret



## U.S. Relations With Taiwan

BUREAU OF EAST ASIAN AND PACIFIC AFFAIRS  
**Fact Sheet**  
 February 12, 2014

More information about Taiwan is available on the [Taiwan Page](#) and from other Department of State publications and other sources listed at the end of this fact sheet.

### U.S.-TAIWAN RELATIONS

The United States and Taiwan enjoy a robust unofficial relationship. The 1979 U.S.-P.R.C. Joint Communiqué switched diplomatic recognition from Taipei to Beijing. In the Joint Communiqué, the United States recognized the Government of the People's Republic of China as the sole legal government of China, acknowledging the Chinese position that there is but one China and Taiwan is part of China. The Joint Communiqué also stated that the people of the United States will maintain cultural, commercial, and other unofficial relations with the people on Taiwan. The American Institute in Taiwan (AIT) is responsible for implementing U.S. policy toward Taiwan.

The United States does not support Taiwan independence. Maintaining strong, unofficial relations with Taiwan is a major U.S. goal, in line with the U.S. desire to further peace and stability in Asia. The 1979 Taiwan Relations Act provides the legal basis for the unofficial relationship between the United States and Taiwan, and enshrines the U.S. commitment to assist Taiwan in maintaining its defensive capability. The United States insists on the peaceful resolution of cross-Strait differences, opposes unilateral changes to the status quo by either side, and encourages dialogue to help advance such an outcome.

#### U.S. Assistance to Taiwan

U.S. development assistance to Taiwan in the 1950s and 1960s helped Taiwan create the prosperous economy it enjoys today. Currently, the United States provides no development assistance to Taiwan.

#### Economic Relations

The United States has maintained and enhanced its commercial ties with Taiwan since 1979. Taiwan is the United States' 11th largest trading partner, and the United States is Taiwan's largest foreign investor. Taiwan enjoys Export-Import Bank financing, Overseas Private Investment Corporation guarantees, normal trade relations status, and ready access to U.S. markets. AIT has been engaged in a series of trade discussions that have focused on protection of intellectual property rights and market access for U.S. goods and services. The United States has a trade and investment framework agreement with Taiwan under the auspices of AIT and the Taipei Economic and Cultural Representative Office in the United States.

#### Taiwan's Membership in International Organizations

The United States supports Taiwan's membership in international organizations that do not require statehood as a condition of membership and encourages Taiwan's meaningful participation in international organizations where its membership is not possible. Taiwan and the United States belong to a number of the same international organizations, including the World Trade Organization, the Asia-Pacific Economic Cooperation forum, and the Asian Development Bank.

#### Foreign Representation

The United States maintains unofficial relations with the people on Taiwan through the American Institute in Taiwan, a private nonprofit corporation, which performs citizen and consular services similar to those at diplomatic posts. The Director of AIT is Christopher J. Marut. Other principal officials are listed on AIT's site.

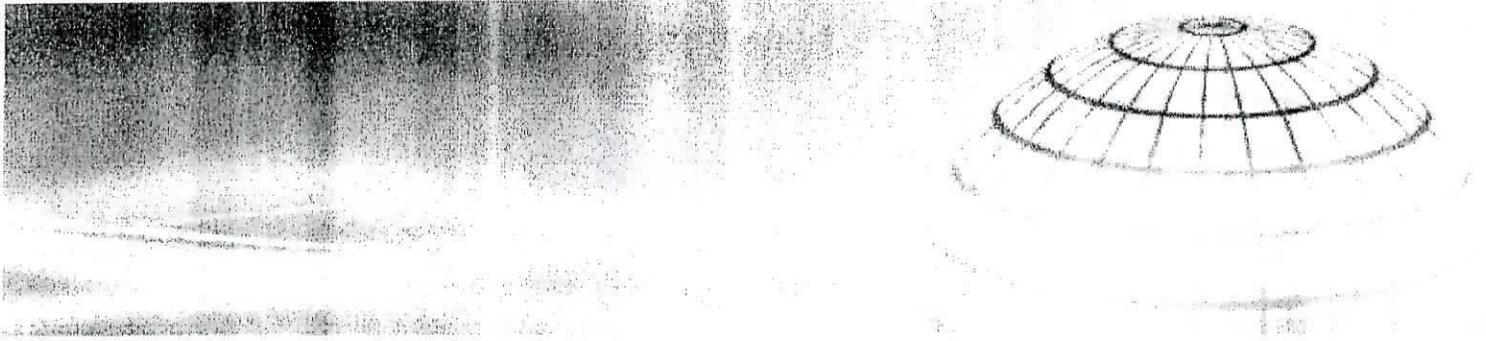
Taiwan maintains the Taipei Economic and Cultural Representative Office in the United States at 4201 Wisconsin Avenue, NW, Washington, DC 20016 (tel. 202-895-1800).

More information about Taiwan is available from the Department of State and other sources, some of which are listed here:

- Department of State Taiwan Page
- CIA World Factbook Taiwan Page
- History of U.S. Relations With Taiwan (see China)
- Human Rights Reports
- International Religious Freedom Reports
- Trafficking in Persons Reports
- Narcotics Control Reports
- Investment Climate Statements
- Office of the U.S. Trade Representative Countries Page
- U.S. Census Bureau Foreign Trade Statistics
- Export.gov International Offices Page
- Travel and Business Information

Exhibit 63

# Fact Sheets Protecting a Trademark



Fact Sheets Home

## Counterfeiting

Fact Sheets Review in Progress

### 1. What is counterfeiting?

Counterfeiting is the practice of manufacturing goods, often of inferior quality, and selling them under a brand name without the brand owner's authorization. Generally, counterfeit goods are sold under a trademark that is identical to or substantially indistinguishable from the brand owner's trademark for the same goods, without the approval or oversight of the trademark owner. Many well-known brands, spanning various industries, are victims of counterfeiting. Counterfeiting can be distinguished from traditional trademark infringement or passing off, which involves the use of confusingly similar trademarks or service marks on or in association with similar—as opposed to fake—products or services. The manufacturing of counterfeits is most prevalent in developing countries with a strong, inexpensive manufacturing capability, including many nations throughout Asia (such as China and Taiwan), although counterfeit goods are sold around the globe. Counterfeits are manufactured to a lesser degree in developed countries.

### 2. Is counterfeiting illegal?

Yes. Counterfeiting is illegal. In most countries, counterfeiting is punishable by criminal laws as well as civil laws, with penalties ranging from injunctions to damages to imprisonment. Put simply, counterfeiting is theft.

### 3. Where are counterfeits sold?

Counterfeits can be found in street vendor stalls as well as legitimate-looking stores. In recent years, many stores selling counterfeits have become increasingly well organized and established so as to imitate a store selling legitimate products. Furthermore, counterfeits are now increasingly sold online creating more opportunities to dupe consumers into thinking they are buying genuine goods at discounted prices. While some websites openly market fake goods, others pass off their goods as genuine by displaying pictures of the genuine item. It is only after the consumer has received their purchase that they realize they have been tricked into buying a counterfeit.

### 4. What types of products are counterfeited?

Anything that can be made can be counterfeited. Counterfeit goods include not only clothing, jewelry, purses, CDs, and DVDs, but also baby formula, medications, cigarettes, electronic equipment and parts, airplane and automobile parts, and toys.

Exhibit 64

### 5. Does counterfeiting cause any damage?

Yes. Although some believe counterfeiting is a victimless crime, it has many far-reaching consequences. To begin with, depending

In addition, counterfeiting damages brand owners' reputations and lowers consumer confidence in the affected brands. Counterfeiting also damages brand owners and retailers selling legitimate products by causing missed sales opportunities and actual job losses by manufacturers and retailers. Consumer confidence and the value of branding may suffer when purchasers discover that the product they bought, believing that it was being sold under a recognized brand, is in fact not authentic. Damages do not stop with brand owners and consumers because counterfeiting also deprives national economies of customs duties and tax revenues.

Counterfeiting may also be linked to organized crime or criminal activity, which may pose serious threats to the health and safety of consumers, economies and national security.

## 6. How do I avoid counterfeit products?

The best way to avoid purchasing counterfeit products is to deal only with reputable retailers that are officially authorized by the brand owner. Also keep in mind that if a price seems too good to be true, it probably is.

## 7. As a business owner, how do I keep my products from being counterfeited?

Brand owners can take various legal, technological, and business steps to prevent or at least minimize counterfeiting. This includes not only registering your trademarks in jurisdictions where you sell product, but also in jurisdictions where your products are manufactured; recording your trademarks with customs offices; maintaining watching services; creating anti-counterfeiting positions within your company; and monitoring online websites closely in light of the significant and growing number of websites engaged in the "business" of counterfeiting. Brand owners should also work closely with legitimate online and brick-and-mortar retailers to prevent inadvertent sales of counterfeit products. Once counterfeiting has become a problem for your company, consult with counsel regarding strategies to confront the issue. Depending upon the territory involved, you may be able to conduct raids in collaboration with local authorities, seize fake products or domain names (that direct consumers to offending websites), work with customs agents to prevent import or export of the counterfeit goods, or file civil and/or criminal actions against the perpetrator.

# Additional INTA Resources

Topic Portal: Anticounterfeiting

 **Best Practices for Addressing the Sale of Counterfeits on the Internet**

Please give us your feedback on whether this fact sheet was helpful or if you have suggestions for other fact sheet topics.

Home / News & Features / News

# Taiwan Authorities Seize 30,000 Bottles of Allegedly Counterfeit Wine

**Prosecutors accuse importer of rebottling Chilean bulk wine as Bordeaux; CEO denies charges**

*Suzanne Mustacich*

Posted: March 27, 2015



Join WineSpectator.com!

Taiwanese authorities raided the factory of a well-known New Taipei wine importer on March 19, seizing more than 30,000 bottles of allegedly counterfeit wine as well as printing equipment they say was used to replicate legitimate wine labels. Investigators from a multi-agency squad have accused Tequila Development Company and its CEO Ted Lin of importing cheap bulk wine from Chile and Spain, then bottling, labeling and selling it as expensive French wine.

Lin was brought in for a pretrial hearing with fraud prosecutors, then released on bail. He denies the charges. Tequila Development Company is a well-established importer that has been trading since 1989.

The team of investigators from Taiwan's Investigation Bureau and prosecutors from New Taipei, the island's largest city, were acting on a tip that Lin was dealing in fake French wine. In a photo published by Taiwanese media, the confiscated wines are in Bordeaux bottles with château-style labels.

Records seized by the authorities allegedly show that the wines cost roughly \$2 a bottle. The importer then peddled them for \$22 a bottle. Since 2010, prosecutors say, the firm sold more than 440,000 bottles of fake wine for an illicit profit of \$3.2 million.

To maintain a mask of legitimacy, prosecutors allege, the importer also ordered bottled, premium wines from France. It then used its in-house printing facility to replicate the labels. This type of sophisticated scam has been uncovered in mainland China by seasoned counterfeits investigator Nick Bartman. He explained to *Wine Spectator* that legitimate imports provide counterfeiters with authentic paperwork that can be copied and reused.

The seized wine was taken to the labs of the Taiwan Tobacco and Liquor Corporation for

Exhibit 65

analysis. Investigators say the contents differed significantly from the authentic wines.

According to the Taiwanese state news agency, one of the companies allegedly targeted by the fraudsters was Maison Bouey, a négociant in Bordeaux. When *Wine Spectator* contacted Maison Bouey executives, they were unaware of the investigation.

This is not Taiwan's first wine or liquor scandal. Both single-malt Scotch and Canadian icewine producers battle against counterfeits in the market. Rice wine and sorghum-based liquors are also favored targets for forgers. In 2010, police raided a sophisticated operation that was forging recently adopted anti-counterfeiting labels.

### More on Wine Fraud:

Wednesday, June 3, 2015

Massive Wine Fraud Sting Nets Prominent Canadian Industry Figures

Thursday, April 30, 2015

Kurt Russell Celebrates Julia Child with his GoGi Wines

Thursday, April 23, 2015

Jolie-Pitt Rosé Suffers the Sincerest Form of Flattery

Wednesday, April 15, 2015

Wine Counterfeiter Rudy Kurniawan Appeals Conviction

Tuesday, February 24, 2015

How Serious Is China About Fighting Fake Wine Sales Online?

[More from Wine Fraud](#)

### More News:

Friday, July 10, 2015

Wine Country Travel Watch: Napa Valley

Wednesday, July 8, 2015

New Zealand's Yealands Wine Group Sells Majority Share for \$60 Million

Tuesday, July 7, 2015

Burgundy and Champagne Vineyards Are Officially Cultural Treasures

Monday, July 6, 2015

Eight Restaurants Earn New Grand Awards in 2015

Thursday, July 2, 2015

Drought Plagues Winemakers in Northern Chile

[See all from News](#)

## Would you like to comment? Want to join or start a discussion?

Become a [WineSpectator.com](#) member and you can!

To protect the quality of our conversations, only members may submit comments. Member benefits include access to more than 315,000 reviews in our Wine Ratings Search; a first look at ratings in our Insider, Advance and Tasting Highlights; Value Wines; the Personal Wine List/My Cellar tool, hundreds of wine-friendly recipes and more.

Register Login

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MOVIES & TV VIDEO GAMES WEIRD WORLD HISTORY SCIENCE TECH MUSIC WRITE FOR US

VIRAL NOW



The 13 Most Insane Things Happening Right Now (9/15)



5 Unbelievable Ways Rich Assholes Get To Cheat Through Life



8 Iconic Characters That Were Originally Insane

Home Weird World The 5 Most Insane Examples of Chinese Counterfeiting

# The 5 Most Insane Examples of Chinese Counterfeiting

By Cezary Jan Strusiewicz · March 19, 2012 · 1,284,462 views



Whenever you hear about counterfeit merchandise, you almost always think about China. It's not completely undeserved -- the country does have a history of churning out tons of fake DVDs, electronics, designer clothing and everything else you can and can't imagine.

Why? Because they're really, really good at it. The amount of work and creativity the Chinese underworld puts into their fakes is so damn impressive that you have to wonder why they'd ever need to steal other people's ideas. These are the people who have faked ...

## #5. Entire Companies



When Chinese counterfeiters decide to set up a series of knockoff store chains, they don't mess around trying to be subtle. Check out this strangely familiar retailer in Kunming, China:

Choosing to "Like" Cracked has no side effects, so what's the worst that could happen?



Viral on Cracked

See More



1,859,126 Views

## 9 Disney Fan Drawings That Will Murder Your Childhood Joy

By Mark Hill



986,493 Views

## 7 Celebrities With Weird-Ass Pre-Fame Lives

By Aaron Short

03

Cracked.com on Facebook

Exhibit 66



birdabroad

Everything at this Apple Store is 30 percent cheaper than the one down the street because *capitalism*.

They have the Apple logo, the displays and even blue-T-shirt-clad staff members sporting that classic Apple smug grin.



birdabroad

Ha, that awkward 45-degree angle. Classic.

The illusion was so perfect that even the employees thought the place was legit. Let's say that again: Even though it's a complete knockoff, all the employees completely believed they were working for Apple.

Chinese officials have so far found a total of 22 fake Apple stores operating across the country. Hell, at least when somebody opened a chain of fake Ikea stores, they had the courtesy to reverse the color scheme:



### Abstinence-Only Sex Ed

By Robert Evans, Anna Riesling



### 6 Things You Won't Believe Are More Legal Than Marijuana

By Robert Evans

4,289,069 views



### 6 Insane Video Game Fan Theories (That Make Total Sense)

By Matt Machmuller, Matthew Moffitt

2,215,122 views



### 5 Things I Learned as the Internet's Most Hated Person

By Zoe Quinn

1,666,247 views



### 5 Stupid Bets That Changed the World

By Eddie Rodriguez

1,162,607 views



### 8 Ridiculous Products for Sale on Amazon (For One Penny)

By Seanbaby

1,104,784 views



### 7 Things You Should Know About Marvel's Phase 3



### 12 'Harry Potter' Secrets You Didn't Know J.K. Rowling Revealed

Cracked.com on Facebook

Choosing to "Like" Cracked has no side effects, so what's the worst that could happen?

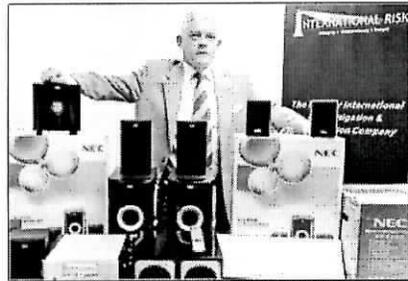


reuters

The food in their cafe was 40 percent lead, making it markedly more delicious than the real thing.

But both of those pale in comparison with the scope of the counterfeiting operation that targeted the Japanese electronics giant NEC.

In 2004, NEC got word that some counterfeit computer products with their logo on them were coming out of China. Big surprise, right? But when they had someone investigate it further, instead of a single rogue factory they discovered a massive, multinational operation counterfeiting ... well, all of NEC.



nytimes

Which one do we sue? Which one do we sue?

Someone in China actually created an entire parallel NEC enterprise with business cards, R&D commissions, detailed production plans and even warranties all bearing the NEC mark.



This fake NEC also had a network of over 50(!) factories across China and Taiwan producing existing NEC goods and totally new products like MP3 players and entertainment systems ... for which the evil-twin NEC was receiving "royalties." Some of their products were even found in stores of major retailers.

Choosing to "Like" Cracked has no side effects, so what's the worst that could happen?



### 10 Awful Actors Who Actually Nailed Big Roles



### 16 Disney Stars as Real Women



### 16 Overlooked Movie Facts That Will Change Everything

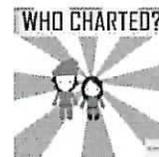


### The Cracked Podcast



Why The Old Disney Classics Aren't As Wholesome As You Think  
With Cracked Staff  
GO LISTEN

### Recommended Podcasts



9/11/15 TWO CHARTED 188  
With Howard Kremer  
Kulap Vilaysack  
GO LISTEN

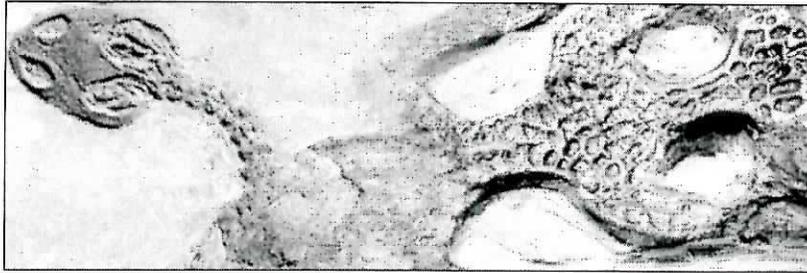


Minisode 118.5  
With Paul Scheer Jason Mantzoukas June Diane Raphael  
GO LISTEN

Cracked.com on Facebook

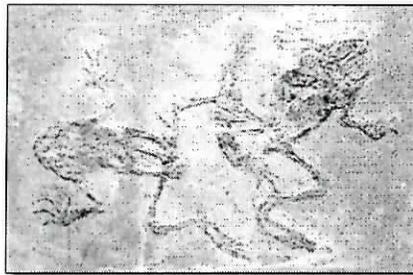
But here's the craziest part: The real NEC guys admitted that those "original fakes" were actually of a pretty good quality, which was probably like being told that some guy stole your identity and then used it to win the Biggest Penis World Championship.

### #4. Prehistoric Fossils



Dinosaur bones are valuable, for obvious reasons -- besides being a finite resource, they're also difficult to find, being buried deep underground and all. What if you could simply skip the entire "discover it and clean it off and assemble it together" process that makes archaeology so tedious and skip right to the "make money from tourists" part? Leave it to industrious Chinese counterfeiters to find a way.

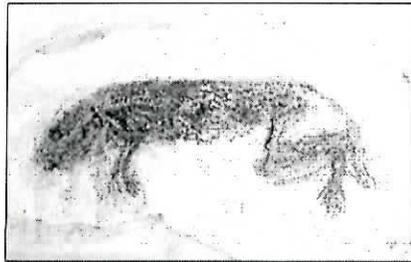
In the 1970s, the Chinese fossil market exploded, with dino-bits being dug up and sold all over the country. When the supply dried up, someone suggested, "Why don't we just make some more?"



paleodirect

Really, the difference between a million years and 10 minutes is where you put the decimal point.

And thus, today China is one of the biggest suppliers of fake fossils on the planet. Why bother? Well, here's a fake rat fossil made from a calcified fish. It sold on eBay for over \$3,000:



paleodirect

We don't even buy HDMI cables from Chinese retailers.

They can be made in a number of ways, including building skeletons out of chicken/frog bones or plaster and rock, to more authentic fakes made by mixing existing fossils into completely new animals, and sometimes even crushing them into a paste and sculpting new bones. Examples range from fake pterosaur fossils ...

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With Scott Aukerman

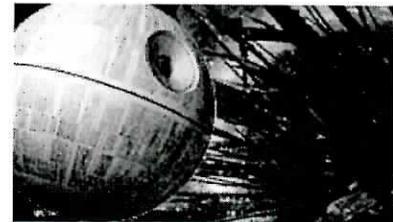


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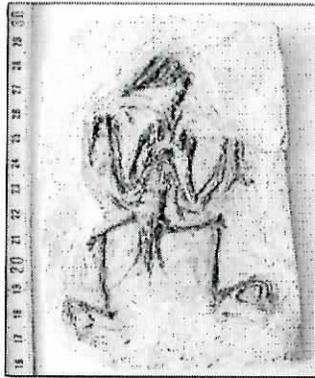
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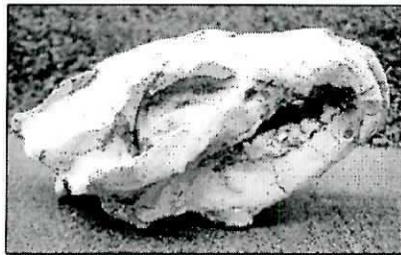
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Scientists speculate he was delicious with hoisin sauce.

... to fake saber-tooth tiger heads made from modified dog skulls:



paleodirect

The problem is so persistent that some Chinese scientists are claiming that judging modern fossil collections on their authenticity is just "unrealistic." We wonder if the same thing will eventually happen for ...

### #3. IDs for Underage Kids



bangordailynews

There's been a lot of talk lately about China taking away American jobs, but the one profession we've always assumed would forever stay within U.S. borders is the proud tradition of making fake IDs for underage kids wanting to get shitfaced. That is no longer the case.



businessinsider

Choosing to "Like" Cracked has no side effects, so what's the worst that could happen?  
Because you don't need an ID for melh.

Cracked.com on Facebook

Since 2010, police have been finding insanely high-quality fake driver's licenses and other IDs on underage drinkers all across the country. The fakes were so sophisticated, in fact, that they could fool not only bouncers and law enforcement officers, but also some bar-code readers. And they all originated from one company in Nanjing, China.

It works like this: You email the company your physical description, your picture and other information you want on the ID. Then you pay them \$300 (or \$75 if you order more than 20). Finally, you receive your ID in the mail, hidden in the sole of cheap-ass shoes.



arlingtoncardinal

Which will prevent you from getting into most clubs, no matter how many ID cards you throw at people.

Fortunately, most of the fake IDs can be identified immediately with advanced scanning, so they don't really pose a problem to national security or anything. Still, that doesn't mean they have no negative consequences; studies have shown that underage people are more prone to binge drinking than legal adults, which can often have lethal results. And what about Steve from Dorm B?! How is he supposed to pay for that new laminating machine and his *WoW* subscription with China taking away all of his business?



drewgstephens

"Well, I guess it's back to the gold farmi -- awww, damn it."

But before you breathe too much of a sigh of relief about national security, there's the issue of ...

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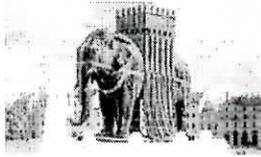
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Business

# German firms fear China technology theft

By Stephen Evans  
BBC News, Berlin

8 February 2011 Business



Chinese shoppers are too attractive for Western firms to make them shy away from China

Exhibit 67

## What's a bright, ambitious Western company to do?

China is where the customers are - and where the customers are increasingly going to be.

But China, too, is perceived to be the country where technology mysteriously transfers from in-coming companies with know-how to companies which want to know how.

That, at least, is the pervasive view of influential German business leaders.

Artur Fischer, for example, is the head of the Berlin stock-exchange who got his fingers burnt in China.

"We gave them our description of the product we wanted - all the photographs, everything we used in order to to sell it over here in Germany" he says, recalling how a company he was involved with started making components in China.

"We asked them to manufacture it. They did that, but after half a year very, proudly they came back to us and showed us their own product, which they intended to sell in Germany.

"And it was a copy-cat of what we did, so they copied all our material. They took our photographs. They took our descriptions. Everything."

### Different culture

Mr Fischer was particularly amazed at one aspect.

"The interesting thing is that they had no bad conscience about it," he says.

## Global Economy

**Is China heading for a crash?**

**German economic strength: The secrets of success**

**Financial glossary: A-C**

**What is a rating agency?**

**It is very difficult to take a copy-cat to a court in China because the cases of copying**

"They openly told us what they were doing, not even understanding that this was not something that we gave to them so they could use it to compete with us."

**products from western countries is actually conduct that the government supports**

Jens Zumblick, Sales director, Berliner Seilfabrik

So what does he think was going on?

"The culture is different," he says.

"They made money by delivering things to us, and the next step in their growth curve was that they decided to compete with us. For them, it was normal business."

### Valid patents

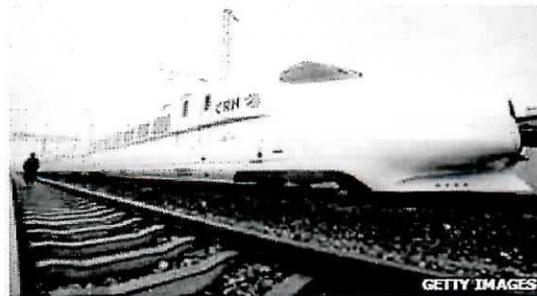
Or take the case of Berliner Seilfabrik, which makes rope climbing equipment for children's playgrounds.

It might seem a low-tech, simple product, but actually it demands a lot of research and investment.

Because safety is crucial - and one bad accident with a child could destroy the company - Berlin Seilfabrik spends much effort on getting materials right and researching the size of gaps in the nets to minimise danger.

"We would love to sell our products into China like everywhere else in the world," says sales director Jens Zumblick.

"Only, in the past we've experienced cases where our products were being copied a lot. Chinese companies turned up at trade shows with products looking like ours. There's a lot of knowledge in this product and you can give all that away only by selling one product into China."



Chinese companies quickly learnt how to make high-speed trains

Mr Zumblick says that even though Berliner Seilfabrik has patents that are valid in China, the company finds it difficult to enforce them.

"It is very difficult to take a copy-cat to a court in China because the cases of copying products from western countries is actually conduct that the government supports," he says.

## British legal system

The Chinese government denies that it condones copying, but it is sensitive to the perception.

It has just opened a trade office for Hong Kong in Berlin - the first in Europe, indicating the importance it attaches to its relationship with Germany.

Stephen Wong, the director of the office, says he recognises that it is a "popular concern".

**If the Western world is taking even more technology to them, then in a few years they are a competitor**

Dieter Burmester

His pitch to German businesses is that they should use Hong Kong's legal system as the basis for an entry into the rest of China.

Hong Kong has a different legal system, created by Britain, and he said its lawyers were adept at negotiating deals.

## Quick learners

Mr Wong is a lawyer specialising in intellectual property rights who trained at the London School of Economics.

He says that Western companies could do deals so that they brought their know-how and got access to the Chinese market, but the technology was then transferred to a Chinese company, for a price or after a set period like 10 or 20 years.

But German firms remain unconvinced.

Many of them cite the case of Siemens, which introduced the high-speed train to China only to find that subsequent extensions of the system were done by Chinese companies that had learnt or developed the technology very quickly.

## Trade secrets

Western companies have different strategies to keep their know-how known only to themselves and not to potential Chinese competitors.

Dieter Burmester created a company that makes very expensive, high quality hi-fi systems, each set of amplifiers and speakers costing hundreds of thousands of dollars.

He sells to China's new rich, but he will not build components there because that would reveal too much of his trade secrets.

**Normally you don't want to do business [with China], but can you afford not to?**

Artur Fischer, Head of the Berlin stock exchange

"If the Western world is taking even more technology to them, then in a few years they are a competitor," he says.

## China's emergence

Germany and China are arguably the world's two really successful exporters.

In 2009, China overtook Germany and now has a trade surplus with it.

Up to now, their needs and skills have meshed.

China has mass-produced everyday goods and Germany has manufactured high-technology products.

But increasingly China is moving up the scale and needs the technology.

China is moving into Germany's markets.

## Vital market

So what should an ambitious Western company do? Should it shun China and seek money elsewhere?

Mr Fischer of the Berlin stock exchange thinks no company can ignore China.

"Normally you don't want to do business [with China], but can you afford not to?" he asks.

"I think 'no'. China has such a huge population that the demand cannot go ignored. The growth there is of such a magnitude that you have to participate, because if you don't your competitor will.

"So you need to factor in that you will lose knowledge. You will lose some of the things you have invested in - and you have to factor that into your prices".

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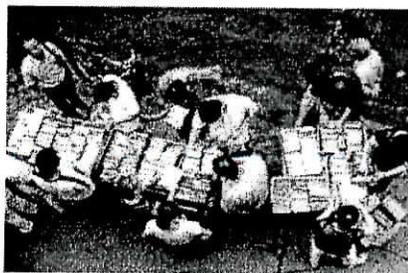
# In China, Why Piracy Is Here To Stay

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Cheap knock-offs is sort of a thing in China. They call it the *shanzhai* — imitation and piracy of name brands, be it Gears of War for PlayStation or the latest Adobe Photoshop.

In China, said Tom Doctoroff, author of the book "What Chinese Want" and a China marketing guru at J. Walter Thompson, managing a fake Apple store, or any kind of fake this or that, is heralded as good ole fashion entrepreneurship.

"When it comes to innovation, the Chinese won't deliver," he told me in a phone interview back in mid-May. "China is the total flip-side of the U.S. Piracy goes back to the China world view that individual rights don't matter. The courts have never evolved to protect innovative individuals. There is still very much the ethos that economic growth has to be managed, so individual and intellectual property, where the spoils go to one entity or one person, is not a cultural value," he said.



Why China piracy is here to stay.

IP protection will always be an uphill struggle in China and for companies doing business there. And that's mainly because of the fact that individual rights remain a theoretical notion at best. Chinese civilization exists courtesy

Exhibit 68

S 0905

of a top down structure. Even the education system mitigates against broad-based embrace of IP protection. Until IP infringement is seen as an immediate threat to economic success, or advanced as a vital state interest, few will really care whether Windows 8 is a knock-off, or if the X Box 360 sold in Shanghai is being hacked to allow for a pirated version of 2K Sports NBA Basketball.

Microsoft ran its anti-piracy ad in China when it launched Windows 7 to counter the bad habit. In the ad, two young Chinese techies are seated at a desk. The guy who paid full price is being heralded by his thumbs-up boss as a good worker. His bamboo plant is growing tall and green in a pot on his desk. His trash can is clean, save for maybe one piece of paper. Behind him is the guy using the pirated version of the software. And man does he look down. A big X on his screen, head in his hands. Boss pointing a finger at him, trash can full of paper, power cords tangled up all over the place, and wilted flowers on his desk to add to his miserable work life.

Yet, many Chinese think illegal software is the smart choice because it's cheaper. Computer sales people have incentive to reinforce this perception because they can increase sales margins by replacing genuine with copies instead.

Wei Quing, head of Microsoft's Windows business group in China, told Doctoroff in his book that the company was trying to "create a new religion, a new standard of civility in China. It will take a long time."

Research suggests that preliminary efforts have helped increase preference for the genuine, but not enough to make a serious dent in the pirated versions of the same goods. The government of China knows that current copyright infringements cannot be legally justified under the World Trade Organization, but it is unable or maybe even unwilling to confront the problem.

That's software. It gets even more flagrant with filmed entertainment. Pirated Hollywood (and Chinese) films are sold on the cheap on street corners across the country, not to mention inside smaller, private shopping centers.

Government censorship polices further complicate matters because they increase the demand for contraband content. Even if the Communist Party liberalizes distribution restrictions, per WTO regulations, censors will sanction only a narrow range of content in legal channels, both online and in actual stores. This begs the question of Chinese censorship and what is and is not allowed, Doctoroff said. In his book, he writes:

“As in dynastic times, anything inconsistent with the government's role of promoting a harmonious society will be prohibited. Notably, groups must never seek to become alternative centers of authority and challenge the party, and explicit or extramarital sexuality is always banned. The latter is driven by both the sensitivities of a generally conservative population and the government's patriarchal responsibility to protect the moral standing of the masses.”



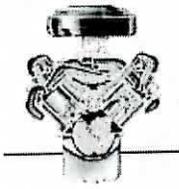
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**Paint and Body Q&A** Bodyshop tips, tricks, Q&A in here.

Thread Tools	
09-22-08, 12:59PM	#1
<p><b>Zedo</b> Strato-Streak</p>  <p>Join Date: Apr 2006 Location: USA Posts: 3,975 <a href="#">Zedos Gallery</a></p>	<p><b>Made in USA paint spray guns- to hell with the Chinese crap</b></p> <p>For all you painters out there, here is a great source of new spray guns made in USA- also high end made in Europe guns- and you can't beat the prices the place is called <a href="http://www.spraygunworld.com">www.spraygunworld.com</a></p> <p>Binks #7 \$269 <a href="http://www.spraygunworld.com/product...%207%20Gun.htm">http://www.spraygunworld.com/product...%207%20Gun.htm</a></p> <p><a href="http://search.cartserver.com/search/...IN-6100-1808-9">http://search.cartserver.com/search/...IN-6100-1808-9</a></p> <p>Astro "Binks #7" knockoff \$34 way better than Harbor Freight/Chinese crap <a href="http://search.cartserver.com/search/...keywords=AS7SP">http://search.cartserver.com/search/...keywords=AS7SP</a></p> <p>CAT gravity feed conventional- patterned after high-end Sata Jet 90 - cost is \$272 <a href="http://www.spraygunworld.com/product...guar%20300.htm">http://www.spraygunworld.com/product...guar%20300.htm</a> <a href="http://search.cartserver.com/search/...words=CATJ300C">http://search.cartserver.com/search/...words=CATJ300C</a></p> <p>Sharpe 775- \$128 <a href="http://search.cartserver.com/search/...ywords=SHP6835">http://search.cartserver.com/search/...ywords=SHP6835</a></p>

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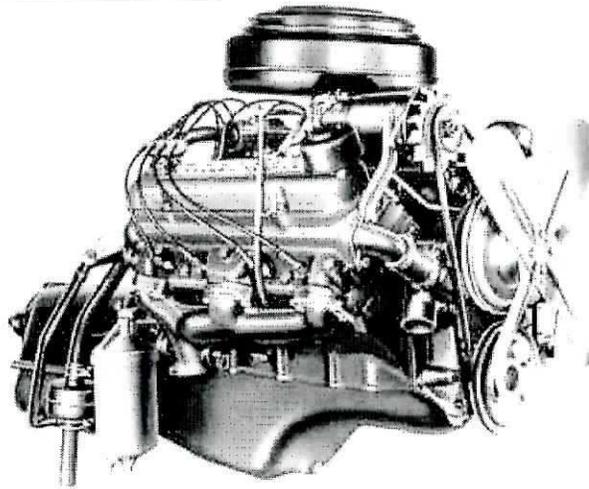
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Exhibit 69

The Sharpe gun is basically an updated model 75, it will spray the modern BC/CC/SS paints



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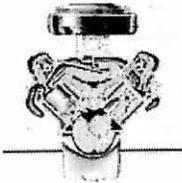
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#2

**Zedo**

Strato-Streak

For the life of the V8 engine  
Pontiac Strato-Streak



Join Date: Apr 2006  
Location: USA  
Posts: 3,975  
[Zedos Gallery](#)

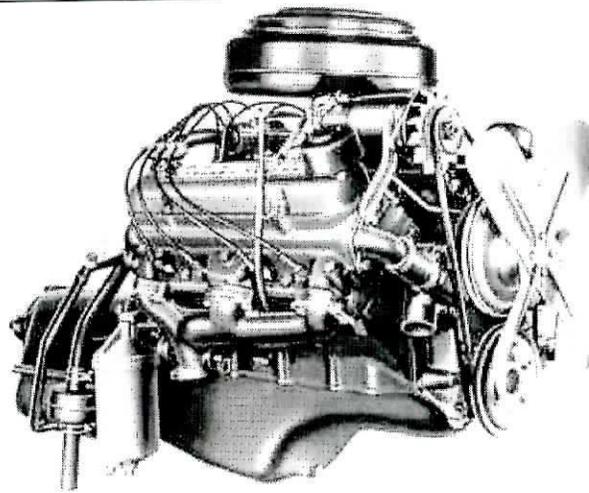
their website says the guns they sell are Made in USA- Europe- Japan- Italy

??

<http://www.spraygunworld.com/>

look down left side of page on link

the HF/Chinese guns available at local tool discount store, are not Astro/Sharpe/Binks/Sata/Devilbuss name brands, there is a difference in quality for sure



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09-23-08, 03:23PM

### 68 Silverbird

Registered User



There's a filter at the bottom of the paint cup that gets clogged or disintegrates on the cheap guns and keeps the paint from flowing. I removed mine and it works great now.

68' Firebird 9.59@140, 6.08 @ 113 in the 1/8th, 1.30 60', 8.97@148 with a little N2O  
467,Kre dports,stock suspension with a 4.10 gear and 29.5/10.5 tire

Join Date: May 2008  
Location: Lake Mary,FL  
Posts: 66  
[68 Silverbirds Gallery](#)



09-28-08, 09:26AM

### Zedo

Strato-Streak

Quote:

Originally Posted by **Fireball**  
They make one of those HF guns with a 1.4 tip and another with a 1.5 tip. I have both new in the box.



Join Date: Apr 2006  
Location: USA  
Posts: 3,975  
[Zedos Gallery](#)

that's a very small tip size compared to a conventional Binks, Sharpe, Devilbiss, etc. siphon feed gun

recently I bought (5) more spray guns for only \$21, for entire lot, all siphon feed conventionals, here's what I got:

Binks #7 w/1.8 tip made in USA

Binks #7 made in USA under license by Sanborn (the big USA compressor company)- with stainless fluid passages and stainless spray head, 1.8 tip- this gun is no longer available new, but accepts all Binks parts- the only difference is a slightly better handle than a Binks

Taiwan knock-off of a Sharpe model 75 with 1.8 tip

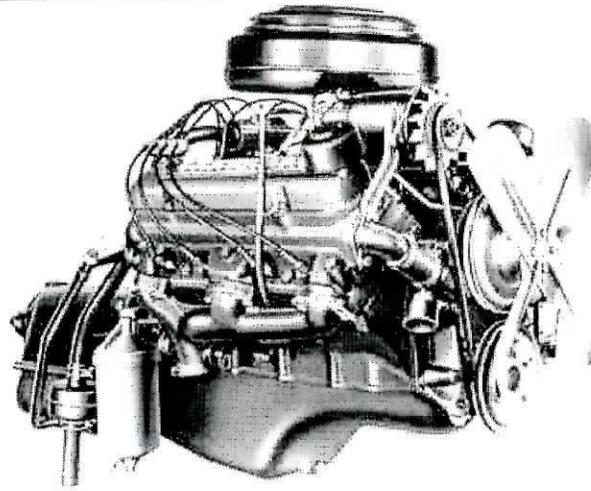
Japan knock-off of a Devilbiss, with 2.0 tip- this gun has teflon seals and looks like it was only used once

Campbell Hausfeld DH5200 general purpose siphon/pressure bleeder/nonbleeder gun- this one is convertible for use with large/small compressors, thick/thin paint, and pressure/siphon feed. It has an internal passageway that leads down to cup, to pressurize cup and push paint out. It will accept both internal and external mix air caps. It is the only one with a 1.4 tip- it will spray anything from lacquer/enamels to thick latex, primers, sealers.

The Binks design guns with throw a 13" pattern with an 36SK cap, gets the job done very quickly- paint half a hood or half the roof in only a few passes, then move to other side of car. With the HVLP the painter has to overlap more often, and move in closer, and make more passes. HVLP is for someone who's not in a hurry, and not worried about production speed.

There are new "compliant" guns out now that offer faster production speed like an conventional Binks does, are legal to use in EPA controlled areas, but they are pricey. A "good" compliant gun costs \$300-500. Basically I got these guns for \$4.20 each- can't beat that deal. A new Binks Model 7 costs \$289 today.

The spray gun market, like all other markets, is now saturated and flooded with cheap HVLP gravity guns- now one can buy a used high-end Binks or Sata Jet 90 gun for dirt cheap.



JFK, 911, & beyond 2015 unfortunate truth  
<https://www.youtube.com/watch?v=t0bOm5c43js>

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[https://www.youtube.com/watch?v=sFvT...ion\\_1186259707](https://www.youtube.com/watch?v=sFvT...ion_1186259707)

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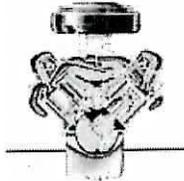
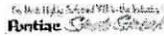


09-28-08, 09:41AM

#5

### Zedo

Strato-Streak



Join Date: Apr 2006

Location: USA

Posts: 3,975

[Zedos Gallery](#)

Quote:

Originally Posted by **Fireball**  
*I used the made in the USA Sharpe gun for primer, it had a 2.2 tip, that gun also started slowing down after using it a few times. I don't know what you want for quality if you can use the \$10.00 gun to paint a car. You can toss the gun and it still painted the car using a \$10.00 gun. Go to a body shop where they keep the guns at and you will most likely see a big pile of used guns with different name brands on them. Those are the broken down guns,*

Fireball, the guns you see in a big pile at body shops are not "broken down" guns- the conventional siphon feed and gravity feed guns have been outlawed by the EPA for emissions purposes- if a body shop even has one hanging from a nail in their paint booth, they can get a \$1500 fine from EPA. All modern guns in many areas must be "compliant" and HVLP

If you buy a good Sharpe or Binks gun, and clean it carefully, it won't "break down"- my Sharpe 75 has the same needle/fluid tip in it for 26 years now. Still sprays like new. You have to remove cap, fluid tip, and needle- soak those parts in thinner- and use a pipe brush/thinner to clean the main paint passage and tube, that comes up

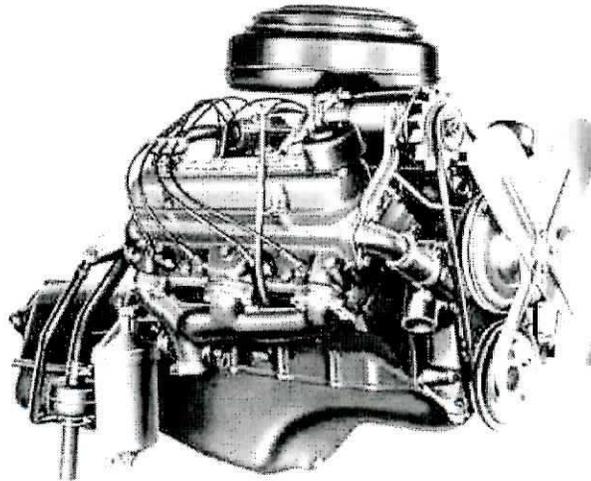
from cup and then turns 90 degrees to fluid tip.

The worst thing to do is after a paint job to clean a gun, is to loosen the cap, put a rag over the nozzle, and shake the gun with thinner in the cup and pull trigger. Yes, it drives thinner/paint material backwards back into cup- but it also drives a paint/thinner mixture back into the fluid tip air jets, coating the inside of them, and partially blocking them- it also drives paint back up into the fan needle/adjustment area, and I've found dried paint all the way back into the handle where main air passage and air valve is.

The best way to clean a spray gun: immediately after painting the car, remove the nozzle, fluid tip, and needle and drop them in a container of thinner- scrub it clean with a brush, then blow it out with air. Then CAREFULLY use a pipe brush to clean the main paint pipe and passage up from cup and out to fluid tip area. This is the only area where the paint gets into, and the rest of gun will be perfectly clean.

All the paint gun mfrgs. at one time, had directions stating to load gun with thinner, shake paint gun with air cap loose, and put rag over nozzle, and pull trigger to clean it. That's the worst thing you can do actually. I used to clean guns that way, until I took them apart and saw what was happening. It blows paint back into other parts of the gun and clogs it. That's why they "slow down"- the air passages start getting blocked up.

You also need pipe cleaners to clean all the small passages in fluid tip assembly, not just middle large paint passage, but the air passages around it too. Catalyzed urethanes or epoxies in a gun harden up really bad. Also old lead based paint, is even harder to get off than urethane. Lead paint is nasty stuff- it has to be scrubbed off aluminum parts with a wire brush- modern strippers won't even touch it !



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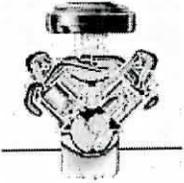
09-28-08, 09:14AM

#6

### Zedo

Strato-Streak

The Hot Body Foundry  
**Pontiac** *Street Rodder*

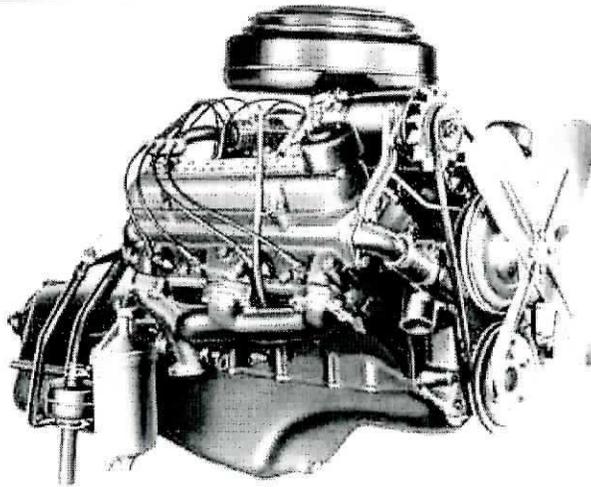


Join Date: Apr 2006  
Location: USA  
Posts: 3,975  
[Zedos Gallery](#)

Quote:

Originally Posted by **Fireball**  
*I don't care what the website says about the HF guns. I know what to expect, I have used them. I can take pictures of all that stuff including the Sharpe gun that messed up on me and the seal kit to fix it that is still in the unopened package.*

The cheap guns will work of course- they just won't last as long. The metallurgy in the made in USA guns is superior, the needles/tips/nozzles won't wear out as easily. The main issue is, clean them.



JFK, 911, & beyond 2015 unfortunate truth  
<https://www.youtube.com/watch?v=t0bOm5c43js>

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09-28-08, 09:47AM

#7

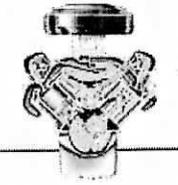
### Zedo

Strato-Streak

Quote:

Originally Posted by **Fireball**  
<http://www.chevelles.com/forums/showthread.php?t=241188>

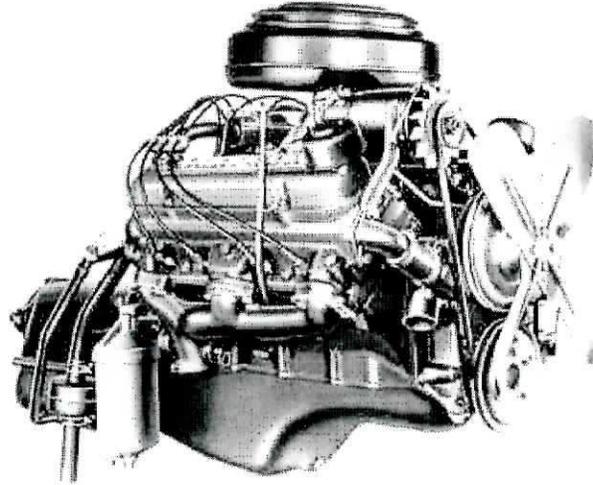
The Hot Rods Forum™ is the Internet's  
**Pontiac Strato-Streak**



Join Date: Apr 2006  
Location: USA  
Posts: 3,975  
[Zedos Gallery](#)

when a spray gun leaks out of the fluid tip when loaded, it needs a new needle and/or fluid tip. It's worn out, or was damaged by someone trying to clean it

I've only seen ONE gun have that problem in my life, it was a cheap Craftsman gun. Most times it's because the owner cleaned the gun with a drill bit, wire, or torch tip cleaner- and gouged the needle/seat seal in the tip. so then it leaks paint and won't shut off when trigger is released.



JFK, 911, & beyond 2015 unfortunate truth  
<https://www.youtube.com/watch?v=t0bOm5c43js>

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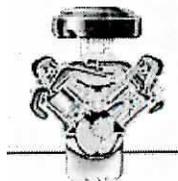
09-28-08, 09:50AM

#8

**Zedo**

Strato-Streak

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**Pontiac Strato-Streak**

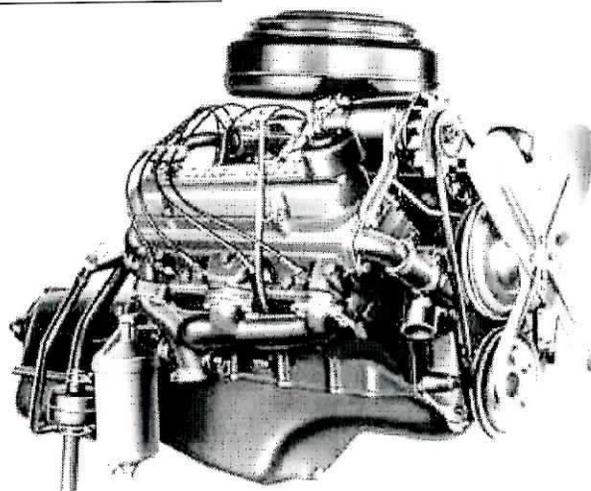


Join Date: Apr 2006  
Location: USA  
Posts: 3,975  
[Zedos Gallery](#)

Quote:

Originally Posted by **Fireball**  
*If you want a Hot Rod black paint job, you can go to a John Deere dealer and buy a gallon of paint for less than \$30.00 and use the \$10.00 gun to spray it. You can also buy industrial paint at Lowes and they can mix it in any of the house colors they have in that brand of paint.*

I have 2 gallons of free synthetic enamel brand new Dupont paint, that my wife got from work for free when she worked at MK Rail in personnel dept. They used it to repaint diesel locomotive bodies. I'm going to add flattener to it. The car is going to sit outside anyway, so who cares. I'm not putting a \$5000 urethane BC/CC job on a car that's sitting outside with 1 foot of snow and leaves on it.



JFK, 911, & beyond 2015 unfortunate truth  
<https://www.youtube.com/watch?v=t0bOm5c43js>

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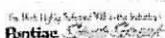
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09-28-08, 09:55AM #9

### Zedo

Strato-Streak



Join Date: Apr 2006  
Location: USA  
Posts: 3,975  
[Zedos Gallery](#)

Quote:

Originally Posted by **Fireball**  
*The only reason I even know those cheap Chinese guns work is because I had trouble with the Sharpe gun. I thought I was getting a made in the USA gun. I could not get the Sharpe gun to put on the clear right. When you are in a middle of a paint job you don't want trouble. I figured I had nothing to lose by using the \$10.00 gun. That's when I found out it put on the metallic perfect and you could get the clear to flow with it.*

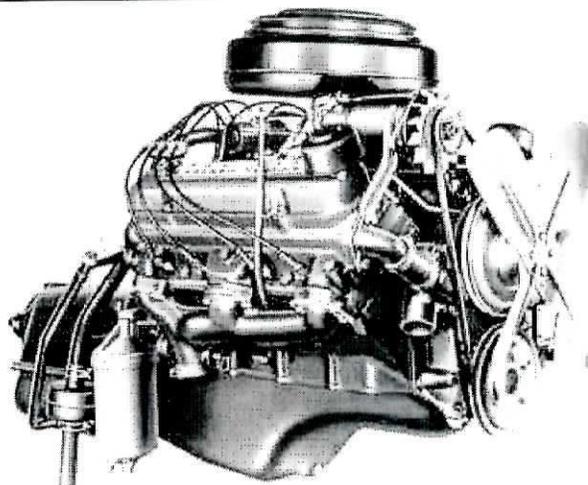
base coat is easy to spray, clear coat is tricky

If you're going to spray clear with a conventional spray gun, you have to put the largest tip/needle set on it you can find- and the fastest/best atomizing air cap nozzle. The new clear paints are "high solids" to reduce emissions, and the gun can't suck it out of the cup fast enough. Using more air pressure helps, but then there's too much overspray and it goes on dry. Use a larger tip, and move in closer, experiment with air pressure settings. It will flow. I would not even attempt to spray any paint job with anything less than a 1.8 tip. They use those small tips for emissions purposes.

Also, use slower thinner, or even use a paint retarder to slow it down even more and let it flow out- usually the reason it won't flow is, it's drying too fast- or the gun is not

atomizing it- or the air pressure is too high/low.

It will flow with a retarder in it, believe me. I painted lacquer with retarder and it was flowing like enamel- I barely had to even buff it- it buffed right out to a shine with one compounding.. That's how GM used to paint lacquer cars, they laid it on really wet and it flowed, then they baked it and it flowed even more.



JFK, 911, & beyond 2015 unfortunate truth  
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10-06-08, 05:02AM

# 10

### Poison heart

Registered User



Join Date: Jun 2006  
Location: San Marcos, Tx

Posts: 424

[Poison hearts Gallery](#)

I use an Ingersol Rand gun. I think it was about 120 at tractor supply. Worked good on my firewall and inner fenders.

Robert Lewis  
1959 Buick Electra 4 Door Sedan  
1959 Pontiac Star Chief 4 Door Hard Top  
1976 W200 Dodge Power Wagon 383/ 727 4x4

<http://www.pontiac-59.com/>



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