

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

SATA GmbH & Co. KG,)	
)	
)	
Opposer and Petitioner,)	
)	Consolidated
v.)	Opposition No. 91210813 - 85712789
)	
Mike Ghorbani,)	Opposition No. 91217915
)	
Applicant and Registrant.)	Cancellation No. 92059849
_____)	

**OPPOSER/PETITIONER SATA GMBH & CO. KG'S
REPLACEMENT OF EXHIBITS 9 AND 57**

Opposer/Petitioner SATA GmbH & Co. KG, (SATA) hereby makes of record its replacement Exhibit 9 and 57 as specifically identified below.

Exhibit No.	Description	#	Reason for Replacement
Ex. 9	Email from MG Distributor to "Sergio" in response to trade show booth visit, containing statement "EURO-Designed in Germany".	MGD000416-417 Protective Order	Previously not submitted or identified as confidential
Ex. 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	MGD000105	"Design in Germany" text on gun illegible on previously submitted copy

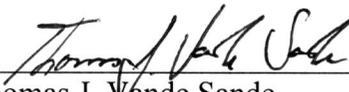


02-16-2016

Exhibit No.	Description	#	Reason for Replacement
	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 excellence.		

Hall & Vande Sande, LLC

Date: 2/11/16



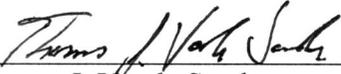
 Thomas J. Vande Sande
 Lucas T. Vande Sande
 Attorneys for Opposer
 10220 River Road, Suite 200
 Potomac, Maryland 20854
 Phone: (301) 983-2500

CERTIFICATE OF SERVICE

The undersigned, Thomas J. Vande Sande, attorney for Opposer/Petitioner hereby certifies that one (1) copy of the foregoing "OPPOSER/PETITIONER SATA GMBH & CO. KG'S REPLACEMENT OF EXHIBITS 9 AND 57" and those documents identified as Exhibits 9 and 57 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: 2/11/16



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

12/15/2014

MGD000416

Gmail - It was nice seeing you



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

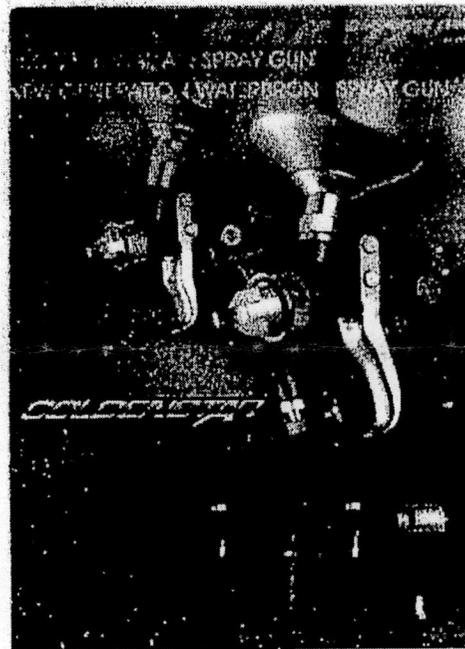
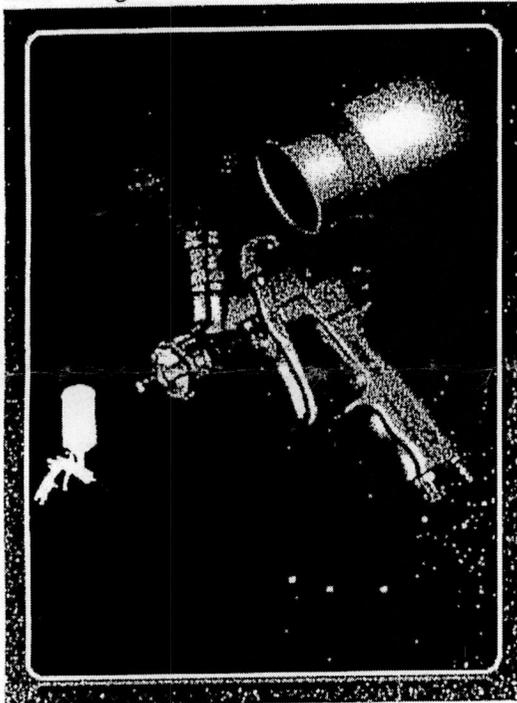
Thank you for visiting our booth at SEMA, your visit was very much appreciated and it was a pleasure to meet you.

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=08780e1b0a&view=pt&q=sata&qs=true&search=query&th=12c3d2584081069d&siml=12c3d2584081069d>

1/2

Exhibit 9

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	
	SATA™	IWATA™	EURO™	GOLDENSTAR™

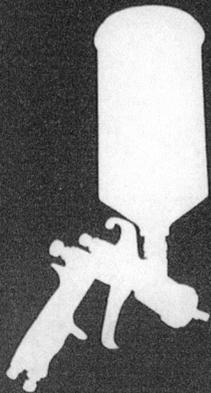
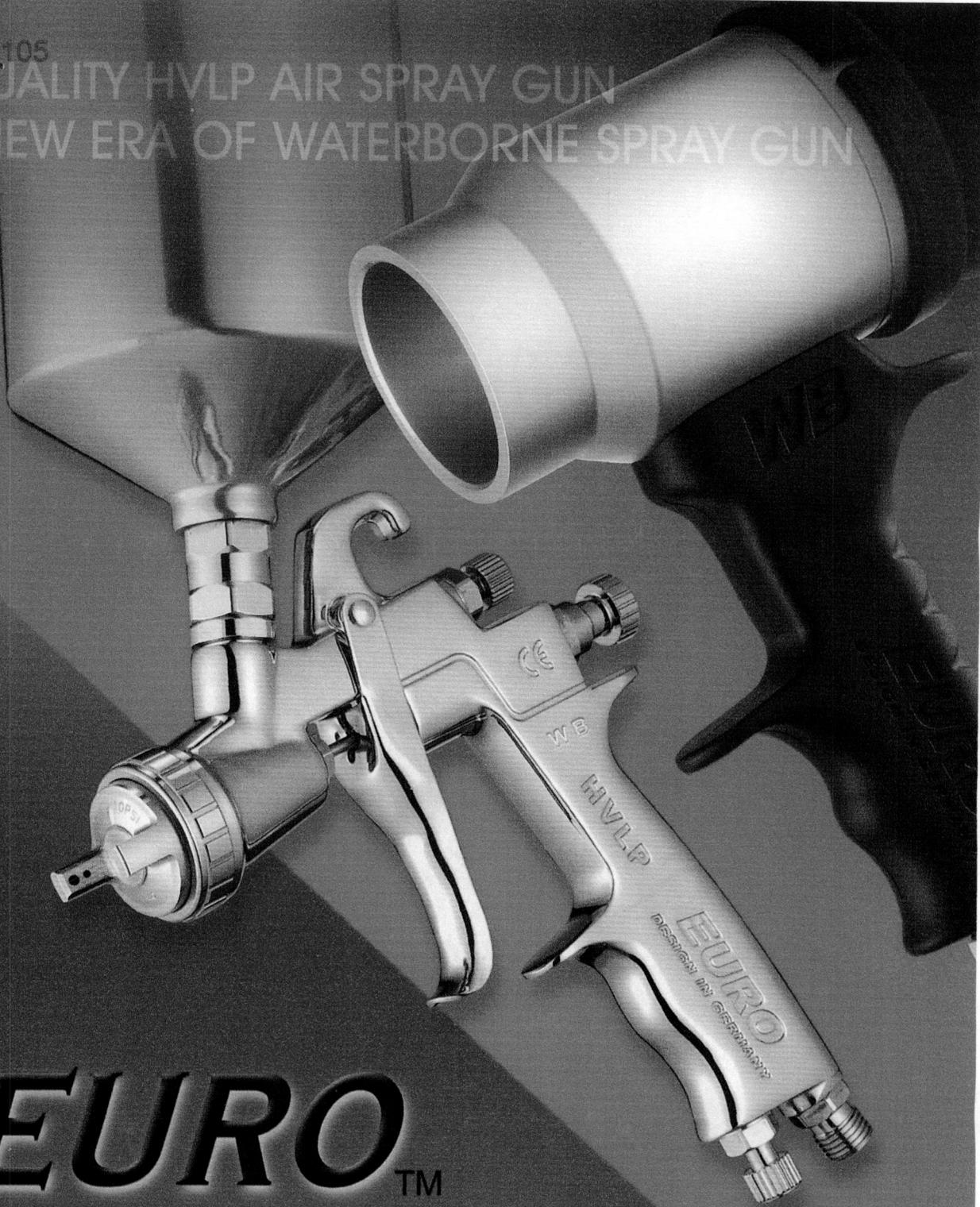
Please view our website at www.mgdistributor.com. For any additional questions please email us at mgdistributor@gmail.com or call our office at (213) 627-1011 or directly to my cell (310) 367-5166

We are looking forward to doing business with you!

Respectfully,
 Mike Ghorbani
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 711 E. 9th Pl., Unit B
 Los Angeles, CA 90021

MGD000105

HIGH QUALITY HVLP AIR SPRAY GUN
MEETS NEW ERA OF WATERBORNE SPRAY GUN



EURO™

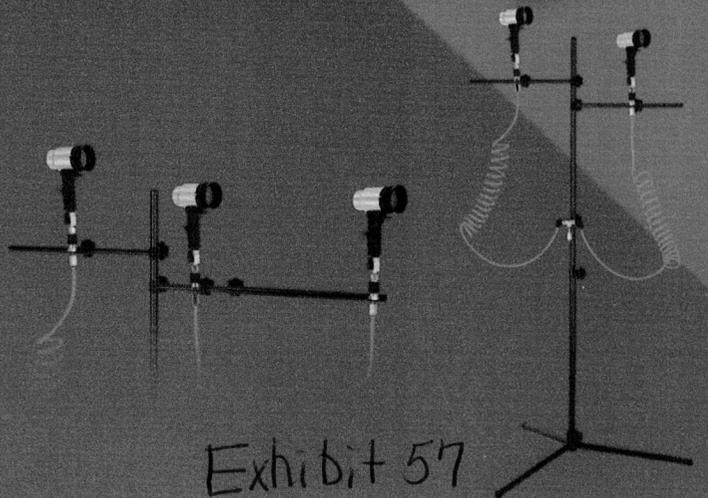


Exhibit 57