

ESTTA Tracking number: **ESTTA575582**

Filing date: **12/10/2013**

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

| | |
|--|--|
| Proceeding. | 91213470 |
| Applicant | Defendant Arctic Cat Inc. |
| Other Party | Plaintiff Sabertooth Motorcycles, LLC |
| Have the parties held their discovery conference as required under Trademark Rules 2.120(a)(1) and (a)(2)? | No |

Motion for Suspension in View of Civil Proceeding With Consent

The parties are engaged in a civil action which may have a bearing on this proceeding. Accordingly, Arctic Cat Inc. hereby requests suspension of this proceeding pending a final determination of the civil action. Trademark Rule 2.117.

Arctic Cat Inc. has secured the express consent of all other parties to this proceeding for the suspension and resetting of dates requested herein.

Arctic Cat Inc. has provided an e-mail address herewith for itself and for the opposing party so that any order on this motion may be issued electronically by the Board.

Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by Facsimile or email (by agreement only) on this date.

Respectfully submitted,

/Darren J. Jones/

Darren J. Jones

jones@lowegrahamjones.com, lmyers@fredlaw.com

ashley.ewald@gpmlaw.com

12/10/2013

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

ARCTIC CAT INC.,
a Minnesota corporation,

Civil Action 13-cv-146 MJD/LIB

Plaintiff,

v.

SABERTOOTH MOTOR GROUP, LLC,
a Delaware limited liability company, and
SABERTOOTH MOTORCYCLES, LLC,
a Delaware limited liability company,

Defendants.

AMENDED COMPLAINT AND JURY DEMAND

Pursuant to Fed. R. Civ. P. 15(a)(1)(B), Arctic Cat Inc. (“Arctic Cat”) for its Amended Complaint against Defendants Sabertooth Motor Group, LLC and Sabertooth Motorcycles, LLC (collectively, “Sabertooth”) states and alleges as follows:

THE PARTIES

1. Arctic Cat is a Minnesota corporation having a principal place of business at 505 North Highway 169, Suite 1000, Plymouth MN 55441. Arctic Cat designs, engineers, manufactures and markets snowmobiles, all-terrain vehicles (ATVs) and Side by Sides under the ARCTIC CAT brand name, as well as related parts, garments and accessories. Arctic Cat markets its off-road products through a network of independent dealers located throughout the contiguous United States and Canada, and through distributors representing dealers in Alaska, Europe, the Middle East, Asia and other

international markets. The ARCTIC CAT brand name is among the most widely recognized and respected names in the snowmobile, ATV and Side by Side industry.

2. On information and belief, Sabertooth Motor Group, LLC is a Delaware limited liability company with its principal place of business located at 1040 Commerce Boulevard North, Sarasota, Florida, 34243.

3. On information and belief, Sabertooth Motorcycles, LLC is a Delaware limited liability company with its principal place of business located at 151 Bob Ledford Drive, Greer, South Carolina, 29651. On information and belief, Sabertooth Motorcycles, LLC is a wholly-owned subsidiary of Sabertooth Motor Group, LLC.

JURISDICTION AND VENUE

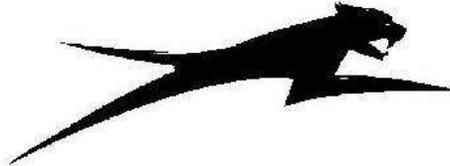
4. This is an action for a declaratory judgment and for trademark infringement, deceptive trade practices and unfair competition arising under the trademark laws of the United States, 15 U.S.C. § 1114 *et seq.*, 28, U.S.C. §§ 2201 and 2202, Minn. Stat. § 325D.44, and the common law. Arctic Cat also seeks cancellation of several trademark registrations owned by Sabertooth. This Court has the authority to order cancellation of Sabertooth's registrations under 15. U.S.C. § 1119.

5. The Court has jurisdiction under 28 U.S.C. § 1338 (a) and (b), and 1367. Venue is proper under 28 U.S.C. § 1391(b) and (c).

6. The Court has personal jurisdiction over Sabertooth because Sabertooth alleges that it regularly conducts business in the State of Minnesota, and Sabertooth's website indicates that it manufactures products in the Minneapolis area.

ARCTIC CAT’S TRADEMARK RIGHTS

7. Arctic Cat owns the logo below (hereafter “Arctic Cat Logo”), which Arctic Cat uses prominently with off-road power sports vehicles, equipment and related accessories.



8. Arctic Cat has continuously used its Arctic Cat Logo in commerce since at least 2006 and on October 3, 2007, filed U.S. Serial Number 77/295,648 with the United States Patent and Trademark Office (“USPTO”) seeking federal registration of the Arctic Cat Logo.

9. The registration of the Arctic Cat Logo has been delayed due to Opposition No. 91,198,066 that was filed by an unrelated third-party on January 5, 2011 and is still pending before the Trademark Trial and Appeal Board. The pending opposition proceeding only concerns the registration of the Arctic Cat Logo for use with clothing. The registration of the Arctic Cat Logo for use with all-terrain vehicles and parts is not subject to any pending opposition proceedings and should issue in due course.

10. Arctic Cat also owns many other cat-themed trademarks, including the following trademarks registered with the USPTO:

| Mark | Reg. No. | Reg. Date | Goods/Services |
|-------------|-----------------|------------------|-----------------------|
| ARCTIC CAT | 0,865,633 | March 4, 1969 | Snowmobiles and parts |

| Mark | Reg. No. | Reg. Date | Goods/Services |
|---|-----------|---------------|---|
|  | 2,293,113 | Nov. 16, 1999 | Four or six wheel all-terrain vehicles; motorized vehicles, namely, snowmobiles and parts, double or triple rider recreational jet boat, not including catamarans or catboats |
| ARCTIC CAT | 2,178,018 | Aug. 4, 1998 | Snowmobiles and parts; four or six wheel all-terrain vehicles |
| BEARCAT | 1,982,860 | May 2, 1995 | Motorized vehicles; namely snowmobiles and parts |
| THUNDERCAT | 1,762,029 | Mar. 30, 1993 | Motorized vehicles; namely, snowmobiles and parts |
| THUNDERCAT | 3,915,903 | Feb. 8, 2011 | All-terrain vehicles and parts |
| FIRECAT | 2,779,647 | Nov. 4, 2003 | Snowmobiles and parts |
| COUGAR | 1,661,623 | Oct. 22, 1991 | Snowmobiles and parts |
| CATMASTER | 1,828,332 | Mar. 29, 1994 | Educational services; namely, conducting seminars, workshops, and classes in the field of snowmobile repair and service |
| EL TIGRE | 1,643,544 | May 7, 1991 | Snowmobiles and parts |
|  | 1,789,501 | Aug. 24, 1993 | Clothing; namely, shirts, sweatshirts, T-shirts, jackets, pants and underwear |

| Mark | Reg. No. | Reg. Date | Goods/Services |
|-------------|-----------------|------------------|--|
| PROWLER | 1,548,214 | July 18, 1989 | Snowmobiles and parts |
| LYNX | 1,097,348 | July 25, 1978 | Snowmobiles and parts |
| CHEETAH | 1,010,674 | May 13, 1975 | Snowmobiles and parts |
| PANTHER | 0,890,813 | May 12, 1970 | Snowmobiles and parts |
| JAG | 1,166,432 | Aug. 25, 1981 | Snowmobiles and parts |
| TIGERSHARK | 1,742,252 | Dec. 22, 1992 | Single or double rider recreational jet boat |

11. Arctic Cat has been using cat-themed marks with off-road power sport vehicles since at least 1962, and has been using the Arctic Cat Logo since 2006. Arctic Cat began using the Arctic Cat Logo with ATVs in 2007 and has used the Arctic Cat Logo with Arctic Cat ATVS continuously since that time.

12. Arctic Cat has continuously and prominently used one or more cat-themed marks with all ATVs and Side by Sides manufactured and sold by Arctic Cat.

13. Because of its long-standing use of the ARCTIC CAT trademark, the Arctic Cat Logo, and other cat-themed trademarks, and the substantial investment Arctic Cat has made in its trademarks, people in the power sport vehicle industry associate the Arctic Cat Logo and other cat-themed trademarks with Arctic Cat.

INFRINGEMENT BY SABERTOOTH

14. Until recently, Sabertooth has been in the on-road motorcycle business. Off-road power sport vehicles, like those sold by Arctic Cat, and on-road motorcycles are distinct product categories.

15. Sabertooth recently began advertising an off-road ATV on its website, depicted below.



16. Sabertooth is promoting the ATV under the trademark MOUNTAIN LION with a logo that features a cat that resembles the head of the cat in the Arctic Cat Logo (hereafter, "MOUNTAIN LION Mark and Logo"). The below image shows close-up excerpts of the head of the Arctic Cat Logo on the left, and the MOUNTAIN LION Logo on the right.



17. On information and belief, the ATV Sabertooth is advertising and selling displays only the MOUNTAIN LION Mark and Logo, and does not display the SABERTOOTH trademark.

18. Sabertooth is improperly using the registered trademark symbol with the MOUNTAIN LION Mark and Logo even though the trademark is not registered with the USPTO.

19. Sabertooth owns U.S. Registration No. 3,576,038 for a cat head logo for use with on-road motorcycles only. Sabertooth's registration does not cover its use of the MOUNTAIN LION Mark and Logo with an off-road ATV.

20. Arctic Cat used the Arctic Cat Logo and other cat themed logos with ATVs, Side by Sides and other off-road power sport vehicles long before Sabertooth began using the MOUNTAIN LION Mark and Logo with an off-road vehicle.

21. Sabertooth's use of the MOUNTAIN LION Mark and Logo as described above is likely to cause confusion concerning the source, sponsorship or affiliation between Arctic Cat and Sabertooth.

22. Sabertooth's use of the MOUNTAIN LION Mark and Logo is without consent, permission or license by Arctic Cat.

23. Arctic Cat has been damaged by Sabertooth's actions in an amount to be proven at trial.

SABERTOOTH'S INFRINGEMENT ALLEGATIONS

24. On information and belief, Sabertooth is the owner of United States Trademark Registrations for the trademarks WILDCAT (U.S. Registration No. 3,490,382), SABERTOOTH MIDNIGHT WILDCAT (U.S. Registration No. 3,554,107), WILDCAT X (U.S. Registration No. 3,580,465), WILDCAT 427 (U.S. Registration No. 3,561,054), and WILDCAT 427X (U.S. Registration No. 3,950,962) for use with on-road "motorcycles" (the "Wildcat Registrations").

25. Sabertooth has alleged that Arctic Cat's use of the trademarks WILDCAT, WILDCAT 4, and WILDCAT X with Side by Side off-road vehicles infringes Sabertooth's trademark rights.

26. Arctic Cat denies that its use of the trademarks WILDCAT, WILDCAT 4, WILDCAT 650, WILDCAT 1000, and WILDCAT X (hereafter "WILDCAT Marks") with Side by Side off-road vehicles infringes Sabertooth's trademarks. On-road motorcycles and off-road power sport vehicles are distinct, non-competitive products, and Arctic Cat makes prominent use of the ARCTIC CAT trademark and the Arctic Cat Logo with the WILDCAT Marks.

27. Arctic Cat is aware of no occasion where a customer of Arctic Cat or Sabertooth has been legitimately confused by Arctic Cat's use of the WILDCAT Marks. Although Sabertooth claims that actual confusion has occurred, Sabertooth appears to have manufactured that evidence in attempt to support its unfounded allegations.

28. Arctic Cat has a long history of using the WILDCAT trademark, and used that mark in conjunction with Arctic Cat's "Wildcat" model snowmobiles, at least as early as the 1980's. In February 2011, Arctic Cat began using the WILDCAT trademark with Side by Side off-road vehicles, and Arctic Cat later expanded its use of the WILDCAT trademark to include WILDCAT 4, WILDCAT 650, WILDCAT 1000, and WILDCAT X. Sabertooth has presented no credible evidence of actual confusion in the nearly two years Arctic Cat has been using the WILDCAT Marks with Side by Side off-road vehicles.

SABERTOOTH'S TRADEMARK REGISTRATIONS

29. On December 27, 2005, a company called VX Unlimited, Inc. filed an intent-to-use application for the WILDCAT mark in U.S. Registration No. 3,490,382.

30. On May 2, 2007, a "new assignment" form was filed at the USPTO indicating that there was a "change of name" from VX Unlimited, Inc. to Sabertooth Motorcycles, LLC. No underlying written assignment of the application or WILDCAT mark was filed with the form document.

31. On information and belief, VX Unlimited, Inc. did not change its name to Sabertooth Motorcycles, LLC.

32. In addition, Sabertooth was formed on November 9, 2006, but VX Unlimited, Inc. continued to exist at that time and was not dissolved until March 30, 2009 – almost two years after the alleged "name change" occurred.

33. Without a transfer of VX Unlimited, Inc.'s business and goodwill associated with the WILDCAT mark to Sabertooth, there was no assignment of the trademark under 15 U.S.C. § 1060(a)(1).

34. Furthermore, 15 U.S.C. § 1060(a)(1) prevents any assignment of an intent-to-use application before the statement of use is filed, unless the assignment is to a successor to the business of the applicant.

35. There is no indication that Sabertooth is the successor to VX Unlimited, Inc. and the alleged "assignment" was recorded at the USPTO more than a year before Sabertooth filed a statement of use on June 18, 2008.

36. Accordingly, there is no valid assignment of the WILDCAT mark in U.S. Registration No. 3,490,382 from VX Unlimited, Inc. to Sabertooth.

37. Sabertooth filed used-based applications for the remaining Wildcat Registrations between June 24, 2008 and September 23, 2010.

38. On information and belief, there was no bona fide use of the marks in U.S. Registration Nos. 3,554,107 (SABERTOOTH MIDNIGHT WILDCAT); 3,580,465 (WILDCAT X); 3,561,054 (WILDCAT 427); and 3,950,962 (WILDCAT 427X) in commerce prior to the filing of the use-based applications.

39. In addition to its non-use of the marks at the time of filing, during prosecution of the Wildcat Registrations, Sabertooth knowingly made false, material misrepresentations with the intent to deceive the USPTO.

40. For each of the Wildcat Registrations except Registration No. 3,950,962 for WILDCAT 427X, the date of “first use” alleged by Sabertooth is December 1, 2005 with a first use “in commerce” date of February 1, 2006.

41. For Registration No. 3,950,962, the date of “first use” alleged by Sabertooth is February 1, 2006 with a first use “in commerce” date of March 1, 2006.

42. Sabertooth was not formed until November 9, 2006 – months after the alleged first use and first use in commerce dates alleged by Sabertooth in the Wildcat Registrations.

43. Sabertooth knew that it had not used the marks in the Wildcat Registrations in commerce on the dates identified in the Wildcat Registrations because the company did not exist at the time.

44. Sabertooth also knew that it had not manufactured, offered for sale, or sold any motorcycles in connection with the marks in the Wildcat Registrations on the alleged first use dates.

45. Sabertooth falsely represented its first use of the marks in the Wildcat Registrations with the intent to deceive the USPTO.

46. Sabertooth also knowingly submitted improper specimens as proof of use in commerce during prosecution of the Wildcat Registrations with the intent to deceive the USPTO.

47. On information and belief, the specimens submitted by Sabertooth were fabricated to allege actual use in commerce. The specimens themselves do not evidence any actual use in commerce as of the filing date of the Wildcat Registrations.

48. Sabertooth also owns U.S. Registration No. 3,576,038 for a cat head logo



)for use with “motorcycles.”

49. Sabertooth’s use of the marks in the Wildcat Registrations and U.S. Registration No. 3,576,038 in commerce, if any, has been extremely limited and sporadic.

50. On information and belief, Sabertooth did not sell any motorcycles for a period of at least three years.

51. Sabertooth also owns U.S. Registration No. 4,209,078 for the mark WILDCAT for use with “beer; bottled water; energy drinks; flavored bottled water; powders used in the preparation of isotonic sports drinks and sports beverages; soft drinks; soft drinks, namely, sodas; sports drinks; sports drinks, namely, energy drinks.”

52. On information and belief, Sabertooth has never used the WILDCAT mark in connection with the goods identified in U.S. Registration No. 4,209,078 even though it filed a use-based trademark application that alleged a “first use” date of December 15, 2005 and a first use “in commerce” date of March 1, 2006.

53. On information and belief, the specimen Sabertooth submitted during prosecution of U.S. Registration No. 4,209,078 was fabricated to allege actual use in commerce. The specimen itself does not evidence any actual use in commerce as of the filing date of U.S. Registration No. 4,209,078.

54. Thus, during prosecution of U.S. Registration No. 4,209,078, Sabertooth knowingly made false, material misrepresentations with the intent to deceive the USPTO.

55. Based on Sabertooth's non-use of the marks in its trademark registrations, fraudulent conduct before the USPTO, and failure to obtain a proper assignment of the WILDCAT mark in U.S. Registration No. 3,490,382, Arctic Cat filed a petition to cancel the Wildcat Registrations and U.S. Registration Nos. 4,209,078 and 3,576,038 with the Trademark Trial and Appeal Board.

56. The foregoing allegations are incorporated in the claims below.

COUNT ONE
Trademark Infringement Under the Lanham Act

57. Sabertooth's unauthorized use of the MOUNTAIN LION Mark and Logo in isolation without the SABERTOOTH trademark and in connection with an off-road ATV is likely to cause confusion as to the affiliation, connection, or association between Sabertooth and Arctic Cat.

58. Sabertooth's actions also misrepresent the origin of its goods and services because customers are likely to think that Sabertooth's goods and services originate with Arctic Cat or are somehow provided through Arctic Cat.

59. Sabertooth's use of the MOUNTAIN LION Mark and Logo infringes Arctic Cat's trademark rights under the Lanham Act.

60. Sabertooth acted deliberately and willfully in attempt to trade upon the goodwill associated with the Arctic Cat Logo and Arctic Cat's other cat-themed trademarks.

61. Sabertooth's conduct is causing, and will continue to cause, irreparable harm to Arctic Cat unless it is enjoined by this Court.

62. Arctic Cat has suffered damages as a result of Sabertooth's actions in an amount to be proven at trial.

COUNT TWO
Violation of Minnesota Uniform Deceptive Trade Practices Act

63. Sabertooth's use of the MOUNTAIN LION Mark and Logo in isolation without the SABERTOOTH trademark and in connection with an off-road ATV is likely to cause confusion or misunderstanding as to the source, sponsorship, approval, or certification of goods or services.

64. Sabertooth's conduct is also likely to cause confusion or misunderstanding as to any affiliation, connection, or association between Arctic Cat and Sabertooth.

65. Sabertooth's actions violate Minn. Stat. § 325D.44.

66. Sabertooth has willfully engaged in the above-described trade practices, knowing them to be deceptive.

67. As a result of Sabertooth's conduct, Arctic Cat is entitled to an injunction and attorneys' fees under Minn. Stat. § 325D.45.

COUNT THREE
Unfair Competition

68. Sabertooth's actions constitute unfair competition.

69. Arctic Cat has been damaged as a result of the defendant's unfair competition in an amount to be proven at trial.

COUNT FOUR
Declaratory Judgment

70. An actual case and controversy exists concerning Arctic Cat's use of the WILDCAT Marks with Side by Side off-road vehicles.

71. Sabertooth has alleged that Arctic Cat's use of the WILDCAT, WILDCAT 4 and WILDCAT X trademarks with Side by Side off-road vehicles infringes Sabertooth's alleged trademark rights.

72. Arctic Cat disputes that there is any infringement of any valid trademark owned by Sabertooth. Arctic Cat has been using the WILDCAT Marks with Side by Side off-road vehicles since 2011 without a single instance of bona fide confusion between Arctic Cat and Sabertooth.

73. This Court has jurisdiction over the dispute and the claim is ripe for adjudication.

74. Accordingly, Arctic Cat seeks a declaration of this Court that it is lawfully using the WILDCAT Marks with Side by Side off-road vehicles, and does not infringe Sabertooth's rights under federal or state law.

COUNT FIVE
Cancellation of U.S. Registration No. 3,490,382 Under 15 U.S.C. § 1060

75. The Court has the authority to order cancellation of U.S. Registration No. 3,490,382 for the trademark WILDCAT under 15 U.S.C. § 1119.

76. U.S. Registration No. 3,490,382 has been registered for less than five years and has not obtained incontestability under 15 U.S.C. § 1065.

77. Cancellation of U.S. Registration No. 3,490,382 for WILDCAT is warranted because there is no assignment of the underlying application or the business and goodwill associated with the mark to Sabertooth, and any attempt to assign the intent-to-use application to Sabertooth prior to the filing of the statement of use was improper and invalid under 15 U.S.C. § 1060(a)(1).

78. Accordingly, U.S. Registration No. 3,490,382 should be canceled.

COUNT SIX

Cancellation of U.S. Registration Nos. 3,554,107; 3,580,465; 3,561,054; 3,950,962; and 4,209,078 Due To Non-Use at the Time of Filing Use-Based Applications

79. The Court has the authority to order cancellation of U.S. Registration Nos. 3,554,107 (SASBERTOOTH MIDNIGHT WILDCAT); 3,580,465 (WILDCAT X); 3,561,054 (WILDCAT 427); 3,950,962 (WILDCAT 427X); and 4,209,078 (WILDCAT for beverages) under 15 U.S.C. § 1119.

80. The above marks have been registered for less than five years and have not obtained incontestability under 15 U.S.C. § 1065.

81. Cancellation of U.S. Registration Nos. 3,554,107; 3,580,465; 3,561,054; 3,950,962; and 4,209,078 is warranted because there was no bona fide use of the marks at the time Sabertooth filed its use-based applications.

82. Accordingly, U.S. Registration Nos. 3,554,107; 3,580,465; 3,561,054; 3,950,962; and 4,209,078 should be canceled.

COUNT SEVEN

**Cancellation of the Wildcat Registrations and
U.S. Registration No. 4,209,078 Due To Fraud**

83. The Court has the authority to order cancellation of the Wildcat Registrations and U.S. Registration No. 4,209,078 (WILDCAT for beverages) under 15 U.S.C. § 1119.

84. The Wildcat Registrations and U.S. Registration No. 4,209,078 have been registered for less than five years and have not obtained incontestability under 15 U.S.C. § 1065.

85. Cancellation of the Wildcat Registrations and U.S. Registration No. 4,209,078 is warranted because Sabertooth committed fraud during prosecution of the registrations by knowingly making false, material misrepresentations and submitting improper specimens with the intent to deceive the USPTO.

86. Accordingly, the Wildcat Registrations and U.S. Registration No. 4,209,078 should be canceled.

COUNT EIGHT

**Cancellation of the Wildcat Registrations and
U.S. Registration Nos. 3,576,038 and 4,209,078 Due to Abandonment**

87. The Court has the authority to order cancellation of the Wildcat Registrations, U.S. Registration No. 3,576,038 (cat head logo) and U.S. Registration No. 4,209,078 (WILDCAT for beverages) under 15 U.S.C. § 1119.

88. The Wildcat Registrations, U.S. Registration No. 3,576,038 and U.S. Registration No. 4,209,078 have been registered for less than five years and have not obtained incontestability under 15 U.S.C. § 1065.

89. Cancellation of the Wildcat Registrations and U.S. Registration Nos. 3,576,038 and 4,209,078 is warranted because Sabertooth abandoned the registered marks through non-use with the identified goods for at least three years.

90. Accordingly, the Wildcat Registrations and U.S. Registration Nos. 3,576,038 and 4,209,078 should be canceled.

JURY DEMAND

91. Arctic Cat demands a jury trial for all issues triable to a jury.

WHEREFORE, Arctic Cat asks the Court to:

1. Enter judgment against the defendants in favor of Arctic Cat, in an amount to be determined at trial;
2. Preliminarily and permanently enjoin Sabertooth from using the MOUNTAIN LION Mark and Logo in connection with an off-road ATV;
3. Declare that Arctic Cat's use of the WILDCAT Marks with Side by Side off-road vehicles does not and would not infringe any rights Sabertooth has under state or federal law;
4. Order cancellation of U.S. Registration Nos. 3,490,382 for WILDCAT, 3,554,107 for SABERTOOTH MIDNIGHT WILDCAT, 3,561,054 for WILDCAT 427, 3,576,038 for the cat head logo, 3,580,465 for WILDCAT X, 3,950,962 for WILDCAT 427X, and 4,209,078 for WILDCAT with beverages.
5. Award Arctic Cat the costs and attorneys' fees incurred in this action; and
6. Grant any other relief the Court deems just and equitable.

Dated: August 16, 2013

s/ Lora M. Friedemann

Lora M. Friedemann (#259615)

Laura Myers (#387116)

FREDRIKSON & BYRON, P.A.

200 South Sixth Street, Suite 4000

Minneapolis, Minnesota 55402-1425

(612) 492-7000 (tel.)

(612) 492-7077 (fax)

Attorneys for Arctic Cat Inc.

7196789