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

Proceeding	91215049
Party	Defendant Hammer Brand LLC dba Wolf Brand Scooters
Correspondence Address	SHANNON MCCUE HAHN LOESER & PARKS LLP ONE GOJO PLAZA, SUITE 300 AKRON, OH 44311 UNITED STATES trademarks@hahnlaw.com, bareese@hahnlaw.com, smccue@hahnlaw.com, bclark@hahnlaw.com, mcsoulsby@hahnlaw.com, rbabbitt@babbitt-lawfirm.com
Submission	Motion for Summary Judgment
Filer's Name	Shannon V. McCue
Filer's e-mail	smccue@hahnlaw.com, trademarks@hahnlaw.com, mcsoulsby@hahnlaw.com
Signature	/s/ Shannon V. McCue
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Attachments	Applicant's Motion for Summary Judgment.pdf(64689 bytes) Ex. AA - 001 2014.02.22 Alliance Powersports Notice of Opposition.PDF(25745 bytes) Ex. AB - Opposer's Response to Applicant's First Set of Interrogatories.pdf(233102 bytes) Ex. AC - Opposer's Response to Applicant'a First Requests for Production .pdf(157553 bytes) Ex. AD - Declaration of Alejandro Salamanca.pdf(2914469 bytes) Ex. AE - Declaration of Brian Finch.pdf(870133 bytes) Ex. AF - Opposer's Responses to First Set of Admissions.PDF(2103852 bytes) Ex. AG - Exhibit 35 Gene Chang 1.pdf(810070 bytes) Ex. AH - Opposer's Response to Applicant's Second Admission-Wolf.pdf(139726 bytes) Ex. AI - Exhibit 41 Gene Chang 2.pdf(2052013 bytes) Ex. AJ - Exhibit 42 Michele Stanley.pdf(626232 bytes) Ex. AK - Exhibit 43 customer receipt and manual.pdf(961294 bytes) Ex. AL - Exhibit 19 Wolf Gallery.pdf(268093 bytes) Ex. AM Gallery - Wolf Classic 150 _ SYM USA - Distributed by Alliance Powersports.pdf(2135745 bytes) Ex. AN - Exhibit 4 Wolf Ad.pdf(1872918 bytes) Ex. AO - Exhibit 5.pdf(1931669 bytes) Ex. AP - Exhibit 14 Brochure.pdf(785123 bytes) Ex. AQ - Wolf Brochure Metadata.pdf(437586 bytes) Ex. AR - Exhibit 1 Lance Facebook.pdf(455409 bytes) Ex. AS - Exhibit 2 Adventure Rider.pdf(676255 bytes) Ex. AT- Exhibit 3 2Stroke Buzz.pdf(142188 bytes) Ex. AU - Exhibit 6 Twin Cities.pdf(379044 bytes) Ex. AV - Exhibit 8 scootsafely.pdf(220695 bytes) Ex. AW - Exhibit 9 product review.pdf(458891 bytes) Ex. AX - Exhibit 10 .pdf(186096 bytes) Ex. AY - Exhibit 11.pdf(3256408 bytes) Ex. AZ - Exhibit 12.pdf(780328 bytes) Ex. BA - Exhibit 13.pdf(1054741 bytes) Ex. BB - Exhibit 7 powersports.pdf(229779 bytes) Ex. BC - Exhibit 16 youtube.pdf(443930 bytes) Ex. BD - Exhibit 17 google.pdf(169939 bytes)

	<p>Ex. BE - wolf scooter - Google Search.pdf(293324 bytes) Ex. BF - Exhibit 18 youtube.pdf(501970 bytes) Ex. BG - Filed Under Seal cover sheet.pdf(5798 bytes) Ex. BH - Exhibit 33 logo photos.pdf(2568632 bytes) Ex. BI - Filed Under Seal cover sheet.pdf(5795 bytes) Ex. BJ - Opposer's Sept 2014 Appointment statement from SYM.pdf(362841 bytes) Ex. BK - Opposer's Amended Responses to Second Set of Discovery.pdf(1844935 bytes) Ex. BL - Exhibit 21 Applicant's facebook.pdf(642510 bytes) Ex. BM - Exhibit 22 powersports 2013.09.25.pdf(211023 bytes) Ex. BN - Exhibit 23 new scooters 4less.pdf(293083 bytes) Ex. BO - Exhibit 24 Applicant's twitter.pdf(1465923 bytes)</p>
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

ALLIANCE POWER SPORTS, INC.,)
)
) Opposition No. 91215049
)
) In the matter of :
v.)
) U.S. Application Serial No. 86/037,963
HAMMER BRAND, LLC.)
)
) Filing Date: August 14, 2013
)
) Applicant.)
) MARK: WOLF

APPLICANT’S MOTION FOR SUMMARY JUDGMENT

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Applicant Hammer Brand, LLC (“Applicant”) respectfully moves the Trademark Trial and Appeal Board for an order granting it summary judgment and thereby dismissing Opposer Alliance Power Sports, Inc.’s (“Opposer”) opposition against United States Trademark Application Serial No. 86/037,963 for the mark “WOLF” (“Applicant’s Mark), which was filed by Applicant on August 14, 2013.

As demonstrated in the following motion and attached exhibits, summary judgment is proper because there are no genuine issues of material fact as to Applicant’s superior rights because Opposer has not used its mark in such a way that the use can be recognized as use in commerce under Section 45 of the Lanham Act to support its claim that it has pre-existing rights in and to the WOLF mark. Further, Opposer has not alleged a proper claim of fraud. Therefore, Opposer has failed to plead any cause of action on the merits or claim on which relief can be granted, and alternatively lacks standing to oppose Applicant’s Mark.

Applicant is accordingly entitled to judgment as a matter of law.

MEMORANDUM IN SUPPORT OF APPLICANT'S
MOTION FOR SUMMARY JUDGMENT

I.) INTRODUCTION

Applicant Hammer Brand, LLC respectfully submits this memorandum in support of its Motion for Summary Judgment. Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Applicant seeks summary judgment that, based upon evidence submitted by Opposer, and as a matter of law, this opposition against Applicant's Mark filed on August 14, 2013, must be dismissed.

Opposer filed this opposition against Applicant's Mark alleging that Opposer adopted "WOLF" as a trademark before Applicant's filing date and date of first use, and that registration of Applicant's Mark is likely to cause confusion. Opposer also alleged fraud in Applicant's procurement of its sought trademark registration. Opposer's responses to Applicant's discovery requests demonstrate, however, that Opposer did not begin using Wolf as a trademark in accordance with the Lanham Act until after Applicant's filing date, and Opposer has no proof of fraud by Applicant. Opposer's answers to interrogatories and production of documents demonstrate that Opposer had no use of Wolf as required by the Lanham Act before Applicant filed its application to register the WOLF mark. Indeed, Opposer admits that the photographs of the product submitted as specimens to its application for a trademark registration, filed one month after Applicant's application, were doctored to add an image of the word "Wolf" where none existed on the actual product.

In its pleadings and production, Opposer has failed to produce one iota of evidence that any WOLF mark was, at any time prior to Applicant's priority date, subject to any *bona fide* use in commerce on Opposer's goods. Because no use in commerce exists before filing of the application for Applicant's Mark, Opposer has failed to show prior use and cannot present any

cause of action on the merits. Opposer's failure to show any recognized use of the Wolf mark alternatively demonstrates that Opposer lacks standing to bring the present opposition. The Opposer also fails to properly allege key elements of their fraud accusations, and thus cannot prevail on that claim.

In contrast, Applicant made appropriate use of the mark by placing it on its scooter product at least as early as April 2013 and diligently filed a trademark application shortly thereafter in August 2013.

The facts are not in genuine dispute. Opposer has not offered any proof and cannot offer any proof that it used the mark WOLF on its product or packaging before the priority date of Applicant's application. Opposer relies on references on its Facebook page and in magazine articles produced by third parties to suggest that it used the mark WOLF in connection with a product display. While Applicant does not dispute the fact that Opposer has produced copies of the Facebook page and magazine articles, the legal significance of these facts *i.e.* whether there has been use in accordance with the Lanham Act may be properly decided by the Board as a matter of law. Since Opposer failed to establish appropriate use of Wolf as a trademark before the priority date of Applicant's application, Applicant seeks summary judgment that Applicant has superior rights in the Wolf mark as of its priority date and dismissal of the subject Opposition.

II.) BACKGROUND

On August 14, 2013, Applicant filed United States Trademark Application Serial No. 86/037,963 for WOLF used in connection with motor scooters, motorized scooters, and motorized scooters and structural parts therefor. Later, on November 27, 2013, Opposer filed United States Trademark Application Serial No. 86/130,449 for WOLF used in connection with

scooters (“Opposer’s Mark”). Alleging use at least as early as August 2011, Opposer filed the Notice of Opposition on February 22, 2014, asserting that registration of Applicant’s Mark would create a likelihood of confusion and that Opposer was the priority user of WOLF in scooter commerce. Exhibit AA.

To determine priority of use in commerce, Applicant inquired about products or services with which Opposer used Opposer’s Mark in the United States, the manner and location of Opposer’s Mark on any products, and the period of time during which Opposer’s Mark was used for each of such products or services. Exhibit AB (Opposer’s Responses to Applicant’s First Set of Interrogatories, Interrogatory 3 and Response). Further, Applicant requested that Opposer identify the date of the first sale, first offer for sale, first product announcement, and first advertisement, and the date of any other use in the ordinary course of trade, for the products on which Opposer’s Mark was used as identified in Opposer’s Response to Interrogatory 3. Exhibit AB (Interrogatory 4 and Response). Additionally, Applicant urged Opposer to produce all documents, things, and electronically stored information related to or supporting Opposer’s allegation in paragraph 1 of the Notice of Opposition that Opposer has been and is now using Opposer’s Mark since at least 2011 in connection with the sale of scooters. Exhibit AC (Opposer’s First Set of Responses to Applicant’s Requests for Production, Request for Production 1 and Response).

In response, Opposer alleged use based upon various Internet forums, articles, reviews, and advertisements, as well as Opposer’s own Facebook® page. *Id.* However, none of these alleged uses demonstrate use of the Wolf mark on the product or packaging in accordance with the trademark law, or in any way support Opposer’s timeline of supposed use in commerce. Opposer has not provided any evidence that supports its contention that Opposer used in

commerce (as required by Section 45 of the Lanham Act) any WOLF mark before Applicant's filing date.

Opposer has also failed to plead, and subsequently support, its allegations of fraud against the Applicant. As a result, the record created by Opposer does not support any of its theories of relief.

III.) LEGAL AUTHORITY

(A) Standard for Summary Judgment

Summary judgment is appropriate when the pleadings and other evidence “show that there is no genuine issue as to any material fact and that the moving party is entitled to summary judgment as a matter of law.” Fed. R. Civ. P. 56; *Celotex Corp. v. Catrett*, 477 U.S. 317, 322-23 (1986); *Ethicon Endo-Surgery, Inc. v. United States Surgical Corp.*, 149 F.3d 1309, 1315 (Fed. Cir. 1998). Summary judgment is a tool to promote judicial economy and streamline trials. *See EMI Group North Am., Inc. v. Intel Corp.*, 157 F.3d 887, 891 (Fed. Cir. 1998); *Celotex*, 477 U.S. at 323-24. “Where the party moving for summary judgment does not bear the burden of proof at trial, it may show that no genuine issue of material fact exists by demonstrating that there is an absence of evidence to support the non-moving party's case.” *Travelers Indem. Co. v. Walker & Zanger, Inc.*, 221 F.Supp. 2d 1224, 1229 (S.D. Cal. 2002) (quoting *Celotex*, 477 U.S. at 325).

(B) Standard for Use in Commerce on Goods

For purposes of the Lanham Act, a mark shall be deemed to be in use in commerce on goods when it is placed in any manner on the goods or their containers or the displays associated therewith or on the tags or labels affixed thereto – or, if the nature of the goods makes such placement impracticable, then on documents associated with the goods or their sale – and the

goods are sold or transported in commerce. Section 45 of the Lanham Act, 15 U.S.C. § 1127 (2014). Marking associated documents is not an alternative, but only for use with products which are truly impracticable to mark, such as gas, grain, or loose chemicals which are transported in bulk by third parties. *See, e.g., In re Settec, Inc.*, 80 USPQ2d 1185 (TTAB 2006). The sale or transport must be bona fide use in the ordinary course of trade, and not made merely to reserve a right in a mark. 15 U.S.C. §1127.

(C) Proving Priority of Use

To maintain an opposition, it is not sufficient that the opposer merely used the mark in commerce at some time or place. In addition to meeting other statutory requirements, an opposer's asserted use or filing date must have priority over Applicant's filing date and/or first use by earlier occurrence in time. *See* 15 U.S.C. § 1052(d).

To establish priority, an opposer cannot simply assume a registration will be accepted for a purported date of first use, but must establish the date of first use with competent evidence. TMBP § 704.04(2). A plaintiff may rely on their un-issued application for purposes of priority, but only to establish priority to the filing date of said application, and no earlier. *Truescents LLC v. Ride Skin Care LLC*, 81 USPQ2d 1334, 1339 (TTAB 2006). Demonstrating earlier priority requires affirmative establishment of use in connection with its goods prior to the filing date of any unregistered application. *Giersch v. Scripps Networks Inc.*, 90 USPQ2d 1020, 1023 (TTAB 2009).

To these ends, “[t]he allegation of a date of use of a mark made in the application or registration is not evidence in the proceeding on behalf of the applicant or registrant and the specimen in the application or registration, without more, is not evidence on behalf of the applicant or registrant.” TMBP § 704.04(2) (*quoting Allied Mills, Inc. v. Kal Kan Foods, Inc.*,

203 USPQ 390, 396 n.10 (TTAB 1979) (“an application is not evidence of anything on behalf of applicant except that it was filed”).

Priority is an appropriate ground for early dismissal of an opposition. Judgment can be rendered on the pleadings alone as to priority, even where priority is not asserted as an affirmative defense, because priority is a required element of a petitioner’s claim under 15 U.S.C. § 1052. *Media Online Inc. v. El Clasificado Inc.*, 88 USPQ2d 1285, 1287 (TTAB 2008). Priority is thus not only an essential element of a claim alleging likelihood of confusion for a petitioner, but also an affirmative defense to such claim for a respondent. *Id.*

(D) Common Law Rights

Where an opposer relies on common law rights to establish priority, “the decision as to priority is made in accordance with the preponderance of the evidence.” *Hydro-Dynamics Inc. v. George Putnam & Company Inc.*, 811 F.2d 1470, 1 USPQ2d 1772 (Fed. Cir. 1987). Common law rights must be proved with evidence to corroborate alleged use in commerce. *ShutEmDown Sports, Inc. v. Lacy*, 2012 TTAB LEXIS 44, 102 U.S.P.Q.2d (BNA) 1036 (TTAB 2012). Further, in weighing evidence, it is noted that responses in discovery are not without evidentiary value, but generally are viewed as “self-serving.” *General Electric Co. v. Graham Magnetics Inc.*, 197 USPQ 690, 692 n.5 (TTAB 1977) (citing *Grace & Co. v. City of Los Angeles*, 278 F.2d 771, 776 (9th Cir. 1960) and *Beecham Inc. v. Helene Curtis Industries, Inc.*, 189 USPQ 647 (TTAB 1976)). This has been interpreted to bar consideration of a supposed user’s use of marks on social media, online stores, domain names, and self-prepared reports of use where no supporting documentation is provided. *Binge Responsibly, LLC v. Power Hour LLC*, Opposition

No. 91195461 (TTAB 2012) (not precedential).¹ Acceptable evidence must prove, as of the purported date, several conclusions.

Mark on Product. The marking technique and location – on the product itself, its packaging, displays associated with the product, and tags or labels *affixed to* the product – goes to the heart of trademark law. “A trademark is a symbol (word, name, device or combination thereof) adopted and used by a merchant to identify his goods and distinguish them from articles produced by others.” *Blue Bell, Inc. v. Farah Manufacturing Company, Inc.*, 508 F.2d 1260; 1975 U.S. App. LEXIS 15892; 185 U.S.P.Q. 1, 10 (CA 5, 1975) (citations omitted). “The primary, perhaps singular purpose of a trademark is to provide a means for the consumer to separate or distinguish one manufacturer's goods from those of another.” *Id* at 11. This requires “that the claimant market goods with the affixed designation.” *Digicom, Inc., v. Digicon, Inc.*, 328 F. Supp. 631; 1971 U.S. Dist. LEXIS 13168; 171 U.S.P.Q. 283 (S.D. Tex. 1971).

Bona Fide Use in Commerce. Proving goods were marked as of an alleged priority date still fails to prove all of prior use. Showing marked products is only of limited probative value without evidence of their use in commerce. *Top Tobacco, L.P. v. North Atlantic Operating Co., Inc.*, 101 USPQ2d 1163 (TTAB 2011). In this regard, “[t]he statute requires not only the display of the mark in the sale or advertising of services but also the rendition of those services in order to constitute use of the service mark in commerce.” *Intermed Commc’ns, Inc. v. Chaney*, 197 USPQ 501, 507-08 (TTAB 1977). *See also, Blue Bell, supra* at 10 (advertising alone without goods bearing the mark insufficient to establish common law trademark rights).

Changed or Multiple Marks. Where additional marks are affixed to existing products previously branded with other logos, use in commerce should be viewed skeptically. “[C]ourts

¹ In accordance with the United States Patent and Trademark Office Official Gazette Notices of 23 January 2007: “A decision designated as not precedential is not binding upon the TTAB but may be cited for whatever persuasive value it might have.”

have recognized that the usefulness of a mark derives not only from its capacity to identify a certain manufacturer, but also from its ability to differentiate between different classes of goods produced by a single manufacturer.” *Blue Bell, supra* at 16 (citations omitted). Thus, the “attachment of a secondary label to an older line of goods manifests a bad faith attempt to reserve a mark” rather than demonstrating its use in commerce. *Id.*

Mark Visible in Commerce. The interface of marking and use in commerce is the requirement that the marks be open to serve the distinguishing purposes of trademark law. In this regard, the mark must be affixed in an “open” manner to satisfy the identifying and distinguishing purpose of trademarks. *Sterling Drug, Inc. v. Knoll A. G. Chemische Fabriken*, 159 U.S.P.Q. 628, 631 (TTAB 1968). Courts should look for evidence showing “*use in a way sufficiently public to identify or distinguish the marked goods in an appropriate segment of the public mind as those of the adopter of the mark.*” *Id.* citing *New England Duplicating Co. v. Mendes*, 190 F.2d 415, 418 (1st Cir. 1951) (emphasis original). The Board more recently interpreted *Blue Bell* as requiring “an element of public awareness of the use.” *Health Food Associates, Inc. v. Naturalife Vite Laboratoriesm Inc.*, 2005 TTAB LEXIS 409 (TTAB 2005). Thus, if a mark is not visible to the buying public, an argument that it is used in commerce is lacking.

Thus, one claiming priority must prove, by preponderance of the evidence, that their goods openly bore the mark at issue, and that the goods openly bearing the mark were actually in commerce, on the date of alleged priority.

(E) Failure to Prove Cause of Action on the Merits

[I]n order to state a claim upon which relief can be granted, a hypothetical pleading of likelihood of confusion must be coupled with a pleading of one or more grounds for opposition or

cancellation, such as, that defendant's mark has been abandoned; that plaintiff has priority of use [...]; etc.

TBMP § 309.03(c). Where an opposer has no means of proving priority, no claim upon which relief can be granted exists. If an opposer “has no evidence of record on which can meet his burden of proof as plaintiff,” dismissal is warranted. *Melwani v. Allegiance Corp.*, 97 USPQ2d (BNA) 1537, 1543 (TTAB 2010).

(F) Failure to Prove Standing

Standing is a threshold issue that must be proved in every *inter partes* case. *Lipton Industries, Inc. v. Ralston Purina Co.*, 670 F.2d 1024 (CCPA 1982). “The facts regarding standing [...] must be affirmatively proved. Accordingly, [plaintiff] is not entitled to standing solely because of the allegations in its petition.” *Id* at 1028. To establish standing, petitioner must show both “a real interest” in the proceedings as well as a “reasonable” basis for its belief of damage. *See Ritchie v. Simpson*, 170 F.3d 1092, 50 USPQ2d 1023, 1025 (Fed. Cir. 1999).

“It is incumbent upon opposer to establish his standing, in the absence of an admission or stipulation from applicant.” *Melwani v. Allegiance Corporation*, 97 USPQd at 1542 (*quoting Lipton* at 1024, 188). In lieu of such an admission or stipulation, there must be record evidence establishing the opposer’s standing, or the opposition will be dismissed. *Melwani*, 97 USPQ2d. at 1543. *See also Abraham’s Seed v. John One Ten*, 1 USPQ2d 1230 (TTAB 1986) (dismissing cancellation proceeding on the pleadings for want of standing by failing to corroborate allegations with evidence).

Standing is predicated upon priority of use. TBMP § 309.03(c) (requiring that a plaintiff prove priority as an element of standing for an opposition and to triumph on a theory of likelihood of confusion). Therefore, where no priority of use is affirmatively proven, an opposer lacks standing.

(G) Standard for Fraud

To establish fraud on the Patent and Trademark Office, clear and convincing evidence must be offered to prove not only that an applicant knowingly made a false material representation to the Office, but that the applicant had an intent to deceive the Office. *In re Bose Corp.*, 580 F.3d 1240, 91 USPQ2d 1938 (Fed. Cir 2009). Even if mistakes exist in an application, misunderstanding or inadvertent errors without a willful intent to deceive will not prove fraud. *Id.*

IV.) APPLICATION OF AUTHORITY TO FACTS OF OPPOSITION

(A) Opposer cannot show use in commerce before Applicant's filing.

As set forth in Section 45 of the Lanham Act, in order for Opposer's Mark to be deemed as being used in commerce, it must be placed on the goods or their containers, the displays associated therewith, tags or labels affixed thereto, or, if the nature of Opposer's goods makes such placement impracticable, then on documents associated with the goods or their sale. 15 U.S.C. § 1127. Anything less fails to serve the purposes of trademark as set forth in, *e.g.*, *Blue Bell*. It is indisputably practicable to place the marks on scooters in light of Opposer's inclusion of the "SYM" mark on its scooter and its container, as well as the later inclusion of Opposer's Mark (after Applicant's filing date and/or prior use). Therefore, Opposer cannot rely on the presence of Opposer's Mark on documents associated with the goods or their sale for purposes of showing use in commerce, and must provide evidence of scooters physically bearing Opposer's Mark.

Whenever Opposer began applying Opposer's Mark to their scooters and/or containers, the goods must still have been sold or transported in commerce to satisfy § 1127. *Id.* Because Opposer's application filing date is later than Applicant's filing date, Opposer must prove

superior common law rights by preponderance of specific, competent evidence. *See, e.g., Hydro-Dynamics, supra*. However, outside of the specimen submitted with the Application for Opposer's Mark, few of Opposer's exhibits show Opposer's Mark at all, and none show Opposer's Mark used in such a manner as to comply with establishing prior use in accordance with Section 45 of the Lanham Act. Therefore, Opposer cannot show use in commerce of Opposer's Mark before the filing date of November 27, 2013. *See Truescents, supra*.

Specifically, Applicant's First Request for Production (sent to Opposer May 5, 2014) sought, "All documents, things, and electronically stored information related to or supporting Opposer's allegation in paragraph 1 of the Notice of Opposition that Opposer has been and is now using the mark "WOLF" since at least 2011 in connection with the sale of scooters." Exhibit AC. In response, Opposer through first (June 4, 2014) and amended (July 14, 2014) responses provided thirty three (33) exhibits purporting to show how Opposer has used Opposer's Mark since at least 2011. *Id.* Opposer supplemented these responses (October 28, 2014) to include images of Opposer's manuals. However, none of the evidence submitted by Opposer shows Opposer's Mark being used in a manner that satisfies the use in commerce requirements of Section 45 of the Lanham Act. In fact, none of Opposer's exhibits or details in the pleadings in any way corroborate Opposer's alleged prior use, and many of the Opposer's responses actually discredit the position that Opposer's Mark was ever applied to the scooters prior to Applicant's Answer filed on April 3, 2014. This corresponds with Applicant's own investigation, in which the scooter model at issue was located in dealerships without Opposer's Mark. Exhibits AD and AE (pictures from dealerships carrying Opposer's Classic 150 taken after institution of this proceeding and supporting declarations).

Opposer's Admission of Non-Use and Timing of Marking. Opposer's only concrete date is the filing date of its application. Opposer effectively admits its specimens before the Patent and Trademark Office to be fraudulent. Exhibit AF. Opposer attempts to defuse this by providing a self-serving statement from its CEO stating these were accidentally-used "decal placement' photos" and that he was not at the time aware that fraudulent specimens had been submitted. Exhibit AG. Without proving up its application, Opposer establishes no date of use whatsoever.

The location in the specimens aroused suspicion because a WOLF mark is depicted on the side of a scooter, as opposed to on the gas tank, where Opposer maintains its products are marked in commerce. However, the gas tank marking did not occur until well after Applicant's filing date, no earlier than "late October 2013" when Opposer contacted its manufacturer to begin applying a WOLF sticker to the top of its gas tanks. Exhibit AB (Opposer's response to Applicant's interrogatory 35).

The side marking and gas tank marking variants are the only two configurations produced bearing any WOLF mark. But Opposer admits that photos of the first configuration were altered to provide specimens to the Patent and Trademark Office on its trademark filing date, and there is no evidence that any scooter was marked as shown in these fabricated images. The second configuration was not ordered until late October 2013, months after Applicant's filing priority. This recent labeling, if it is occurring, is not a clearer use of a mark, but a bad faith attempt to re-label an older line of goods to reserve a mark as rejected in *Blue Bell*. In fact, Applicant's own investigation of Opposer's retail outlets in two states demonstrates that even now, Opposer does not apply the Wolf marks to its product. Exhibits AD and AE. Therefore, Opposer has no

evidence of the WOLF mark in use on its products or packaging before Applicant's trademark application.

The Classic 150 Manuals do not Establish Prior Use. Opposer attempts to divert attention from this fact by qualifying its admission that there are no products or packaging bearing the Wolf mark, arguing that owner's manuals having the word Wolf thereon are "attached" to the product. Exhibit AH. Opposer produced photos of SYM Classic 150 operator's manuals including the word "Wolf" along with self-serving statements from Gene Chang and a SYM dealer. Exhibits AI, AJ, and AK. The manuals are not dated and contain no indicia that they existed before Applicant's filing date or that they were attached to the Classic 150 product. While Applicant has serious doubts as to the authenticity of this evidence, that issue is irrelevant, as the manuals do not establish prior use in commerce.

As discussed above, the core of trademark law is identifying and distinguishing products. *See Blue Bell; Sterling Drug; and Health Food Associates, supra.* Therefore, proper marking in commerce must be open such that purchasers are aware of branding while shopping. This is the motivation behind requiring marking of the product itself, as well as associated materials clearly visible to the buying public (*e.g.*, containers for the product, displays with the product, tags or labels *affixed to* the product). As noted above, it is not disputed that marking the scooter is practicable, and therefore manuals including a mark does not suffice to establish use in commerce. Moreover, manuals which come with a product after purchase do not identify the product to the buying public. They are read, if ever, by parties who have already completed a purchase, and are not used to identify the make or model of the goods openly to the buying public. Therefore, even if the manuals were provided with Classic 150 products before

Applicant's filing date, the presence of a WOLF logo on manuals, and only manuals, cannot establish prior use on behalf of Opposer.

Opposer's Marketing and Advertisements are Ineffective to Establish Prior Use.

Advertisements cannot be relied upon to show use in commerce, and advertisements without proof of having rendered the goods or services are not probative to establishing priority or common law rights. *See, e.g., Intermed; and Blue Bell, supra.* Without use of goods in commerce visibly bearing the mark to distinguish the goods, advertisements including the mark are at best an attempt to improperly reserve the mark. *See, e.g., Blue Bell* at 10. The undisputed fact that Opposer has produced no proof of prior use other than such advertisements dictates that Opposer cannot meet its burden of demonstrating priority. Even if advertisements were acceptable proof of use in commerce, the content of Opposer's advertising materials neither corroborates their alleged dates nor shows use of Opposer's Mark in accordance with Section 45 of the Lanham Act.

Opposer produced as their Exhibit 19 on June 4, 2014 a printout of Opposer's website showing various views of the product in question. Exhibit AL. As indicated in Opposer's responses to Interrogatories, Opposer sells exclusively through dealerships. Exhibit AB (Opposer's Response to Applicant's interrogatory 18). Opposer's web site does not and cannot function to facilitate sales. Regardless, the un-dated gallery contains several images of Opposer's product prominently featuring SYM and Classic 150 marks, but no WOLF mark. After Opposer provided responses to Applicant's discovery requests, this gallery, available at http://www.alliancepowersports.com/models/wolf_gallery.html, was updated to show two images featuring Opposer's scooter with a WOLF sticker (last visited October 3, 2014). Exhibit AM.

Thus, not only does Opposer's web gallery fail to establish prior use in commerce, but it also clearly shows by its recent updates Opposer's after-the-fact efforts to grapple away Applicant's Mark.

Opposer also points to two advertisements (Opposer's Exhibits 4 and 5) to show that Opposer has been and is using the mark "WOLF" since at least 2011 in connection with the sale of scooters. However, the two advertisements appear to be a duplicate of the same, single image. Exhibits AN and AO. Opposer alleges that the first advertisement occurred in Café Racer in December 2011-November 2012, and that the second occurred in Motorcycle Magazine in January 2012-October 2012. In the ads, no visible date or material indicating a presence in either magazine is provided. While the text "Wolf Classic" is included, Opposer's Mark does not appear on the scooter (or its container, the displays associated therewith, or the tags or labels affixed thereto) as required to show use under the law. Rather, it simply appears in the language of the advertisement. *Id.*

Opposer also provides their product brochure. Exhibit AP (Opposer's Exhibit 14). However, in its responses to Applicant's First Requests for Production, Opposer expressly acknowledges the date of this brochure to be March 1, 2014, which roughly accords with the metadata of Opposer's digital brochure from their website indicating a creation date of March 26, 2014 (7 months after Applicant's filing date). Exhibit AQ. This document, thus, fails to prove prior use.

Social Media Posts Offered by Opposer do not Provide Evidence of Prior Use.

Opposer submits several printouts of websites in support of its claims of prior use. As a preliminary matter, definitive evidence proving dates, rather than vague allegations and informal Internet references, must be used to corroborate alleged use in commerce. *See ShutEmDown,*

supra. Discovery responses are self-serving (*General Electric, supra*), and alleged evidence arising from informal channels such as social media or online stores is ineffective to prove use where no competent supporting documentation accompanies an Opposer's claims. *Binge Responsibly, supra*. Thus, any purported showing of prior use based on these exhibits is inapposite. Moreover, much if not all of the online media postings occur after Applicant's priority date. While for purposes of summary judgment, Applicant is assuming the dates asserted by Opposer in its discovery responses are accurate, Applicant does not concede any alleged date as verified given the poor quality and questionable content of even documents dated after Applicant's priority.

Turning to the documents, Opposer's Exhibit 1 is referred to as "Facebook – Lance Powersports January 2011-present." Exhibit AR. Looking past the confusion as to whether Opposer Alliance has any legal connection to "Lance Powersports," much less the impact of this moniker on the consumer's recognition of Alliance as a source, the submission does not show any postings earlier than May 21, 2014. *Id.* Although the Facebook® page shows that Lance Powersports announced the "SYM WOLF 150CC – Cafe Racer style" on May 23, 2014, the picture associated with the announcement does not show Opposer's Mark used in a manner that would qualify as use in commerce. Therefore, even if this picture pre-dated the filing date of the application for Applicant's Mark, Opposer cannot rely upon such to show use in commerce of Opposer's Mark because it is not used in connection with the goods or their containers, the displays associated therewith, or the tags or labels affixed thereto as required by Section 45 of the Lanham Act. Thus, this evidence submitted by Opposer does not show proper use in commerce of Opposer's Mark.

Continuing, Opposer's Exhibit 2 is referred to as "Forum – Adventure Rider August 29, 2011". Exhibit AS. Pictures of a SYM scooter can be seen in the entries on August 29, 2011 at 9:38 PM, November 9, 2011 at 11:11 PM, and December 7, 2011 at 8:35 PM. *Id.* However, none of the pictures show Opposer's Mark being used on the goods or their containers, the displays associated therewith, or the tags or labels affixed thereto as required by Section 45 of the Lanham Act. *Id.* While multiple views of the scooter are provided by the individuals posting to this forum, Opposer's Mark does not appear in a manner that would satisfy the use in commerce requirement of Section 45 of the Lanham Act. *Id.* Put simply, again, there is no evidence that the mark ever appeared on the goods themselves prior to institution of the present opposition.

Exhibit AS also contradicts Opposer's pleadings – the first content of the unverified web forum is user text stating that the "word is" (*e.g.*, "rumor has it") that the bikes will be imported into the US "a couple of weeks" after the end of August 2011 (*Id.*), which is not only pure speculation by an anonymous web user but also contradictory to Opposer's alleged first use that month. Thus, this evidence submitted by Opposer does not show proper use in commerce of any WOLF mark, and actually contradicts Opposer's pleaded position.

Opposer's Exhibit 3 is referred to as "Newsfeed – 2 Stroke Buzz August 31, 2011". Exhibit AT. This article, titled "Alliance's SYM Lineup Grows, Wolf Coming Soon" (asserted to have published August 31, 2011), does not show any WOLF mark used on the goods or their containers, the displays associated therewith, or the tags or labels affixed thereto. Therefore, Opposer's Mark does not appear in this article in such a way that would satisfy the use in commerce requirement of Section 45 of the Lanham Act.

Opposer additionally produced seven (7) reviews purporting to demonstrate use of WOLF in connection with the sale of scooters. Opposer's Exhibit 6 is a review from April 2012 in Twin Cities Rider that depicts Opposer's scooter at a variety of angles. Exhibit AU. This submission also shows the container in which Opposer's scooter arrives (the image labeled "In the Carton"). *Id.* Despite providing multiple views of Opposer's scooter and its container, Opposer's Mark does not appear on the scooter or container, the displays associated therewith, or the tags or labels affixed thereto.

Similarly, Opposer's Exhibit 8 is a review from April 2, 2012 on www.scootsafely.com which shows a plethora of views of Opposer's scooter. Exhibit AV. In spite of the variety of pictures, none show Opposer's Mark on the bike or its container, on the displays associated therewith, or on the tags or labels affixed thereto. *Id.* In fact, Opposer's Mark does not appear anywhere in the review of Exhibit 8, which instead refers to the bike as the "Sym Classic 150" scooter. *Id.* Further, while Opposer alleges the review of Exhibit 9 be dated April 30, 2012 on www.scooterfile.com, no date is visible on the review. This submission also shows Opposer's scooter but does not include Opposer's Mark on the scooter or its container, the displays associated therewith, or the tags or labels affixed thereto. Exhibit AW.

In Exhibit 10, a review from May 16, 2012 on www.motorcycle-usa.com continues the trend of bikes (and/or their containers, displays, tags, labels, *et cetera*) without Opposer's Mark. Exhibit AX. The same can be said of Opposer's Exhibits 11-13, which provide images of Opposer's motor scooter from a multitude of other angles but still do not show Opposer's Mark on the scooter or its container, the displays associated therewith, or the tags or labels affixed thereto. Exhibits AY, AZ, and BA. Further, there are no dates on Opposer's Exhibits 12 and 13 that would assist in the determination of the publication of the exhibits. *Id.*

Opposer also produced an online article (Opposer's Exhibit 7) alleged to demonstrate prior use of Opposer's Mark. Exhibit BB. This article, appearing at powersportsbusiness.com on April 2, 2012 includes a picture of Opposer's scooter, but not Opposer's Mark on the goods or their containers, the displays associated therewith, or the tags or labels affixed thereto.

Internet Exhibits 16-18 are of no greater value. Opposer's Exhibit 16 a partial, barely-legible printout of a partially-loaded YouTube® page that does nothing to show date or use in commerce. Exhibit BC. Opposer's Exhibit 17 is a Google® search for "WOLF Classic" which not only fails to establish any prior use in commerce, but actually undercuts Opposer's pleaded fame inasmuch as Opposer's products comprise only three of the ten results shown, with seven owed to a cabinet maker of a similar name. Exhibit BD. (In contrast, a search for "Wolf Scooter" returns the first ten-out-of-ten hits for Applicant. Exhibit BE.) Exhibit 18 is printout of a YouTube search, which curiously seems to include videos from overseas which are obviously irrelevant to U.S. Trademark practice. Exhibit BF.

Other Failures in Opposer's Evidence. The failure to produce competent evidence showing use in commerce before Opposer's application continues through Opposer's entire production. Commercially Sensitive Exhibits 30 and 31 (Exhibit BG), provided after entry of the Protective Order, provide a list of sales reports including the word "wolf" repeatedly. However, as discussed above, self-prepared reports are of limited probative value, and these internal accountings in no way prove that products bearing Opposer's mark were involved in these sales. *See, e.g., General Electric Co.; and Binge Responsibly, LLC, supra.*

On September 28, 2014, Opposer produced several other Commercially Sensitive documents of equal irrelevance. One document shows un-dated photos of the SYM assembly line for Opposer's product depicting application of a sticker bearing Opposer's Mark. The

brochure of Exhibit 14 is provided in duplicate. Opposer's Exhibit 33 shows the sticker applied to two different colors of Opposer's product. Even where Opposer's Mark can be seen affixed to the product, no date is provided. (The photos of Opposer's Exhibit 33 appear to have been taken with a Nikon® D3100 on June 25, 2014 according to the files' metadata.) Exhibit BH. Without any means of authenticating these as of any date before Applicant's filing and/or first use, these photos are meaningless.

Other troubling inconsistencies cast doubt on any theory advanced by Opposer. Opposer's stated position, a 2012 contract, and a 2014 appointment letter conflict as to when Opposer began distributing SYM products. Exhibits AA, BI, and BJ. Opposer has changed their position on the fraudulent specimen, first asserting it was provided by SYM in its responses to Applicant's First Interrogatories, then stating they were prepared by Opposer's design firm and provided to a paralegal at Opposer's representative. Exhibits AB and BK. The specimen is admitted to be fraudulent. Exhibit AG. In sworn statements, Opposer states that the SYM Classic 150 has not changed since September 2011, but expressly acknowledged instructions to modify marking of this model to include a WOLF mark on the gas tank in October 2013. Exhibits AI and AB.

In total, Opposer's responses and exhibits fail to establish any question as to their non-use. Several are discussed above, and those not discussed are cumulative and no more probative – few are dated, few show Opposer's Mark, and none so much as suggest both the mark and a date of use to establish required elements of Opposer's claims pursuant to Section 45 of the Lanham Act. These results are at this time comprehensive. Indeed, Opposer's responses to the third request for admissions confirms that there is no use on the products or packaging that predates Applicant's filing date, and further confirms that it has no additional responsive

documents demonstrating such use. Exhibit AH. On review of all such documents, things, and electronically stored information, it is clear no prior use existed.

Undisputable conclusion as to priority. Opposer's assertions of prior use are therefore unsubstantiated, and no case for Opposer's prior use exists in the record. Opposer is at best attempting to justify after-the-fact, token use to squat on a mark rightfully secured by Applicant. The evidence submitted by Opposer, representing *all* documents that could prove priority as confirmed by Opposer's response to Applicant's requests for production, does not show proper use in commerce of Opposer's Mark.

Prior use by the respondent is an affirmative defense, and fatal to Opposer's case. Further, as discussed below, failing to show prior use impacts other grounds on which the Board may grant dismissal.

(B) There is no genuine issue of material fact that any claim under 2(d) fails.

Because Opposer has failed to provide any evidence verifying a date of use in commerce of goods bearing Opposer's Mark, Opposer's earliest priority in this opposition (assuming the fraudulent specimen can be cured) is the filing date in November 2013, more than three months after Applicant's filing. Without establishing prior use, Opposer has failed to state a claim on which relief can be granted, and/or lacks standing to maintain this opposition.

(C) There is no genuine issue of material fact in question as to lack of fraud.

In addition to its failed allegation of prior use, Opposer accused Applicant of fraud in prosecuting the opposed Application. Opposer's allegation of fraud is a boilerplate accusation bereft of any merit. Opposer's pleadings merely submit unsupported "information and belief [that] Applicant did not use Applicant's Mark in commerce in connection with the goods covered by the Application," and that Applicant therefore submitted a fraudulent declaration. Exhibit

AA. In its First Set of Requests for Production, Applicant requested “All documents, things, and electronically stored information related to or supporting Opposer’s allegations of fraud contained in the Notice of Opposition.” Exhibit AC. In response, Opposer provided printouts from social media and a news article noting that Applicant had changed its name to “Wolf” from “Gorilla Motor Works.” Exhibits BL, BM, BN, and BO. However, in all instances, the production indicated that the name change was complete, and Opposer at no point provided any evidence of non-use of WOLF before or during Applicant’s business name change.

More importantly, while Applicant categorically rejects this allegation, the issue of the content of the application file or Applicant’s business activities need not be reached. As noted, *Bose* requires that a claim of fraud set forth not only the presence of incorrect information in an application file, but also facts proving specific intent to deceive the Patent and Trademark Office. Opposer has at no time clearly alleged such intent, and deficiently pleads only its erroneous hope for fraudulent data. Without attempting to establish intent to deceive, Opposer’s case for fraud lacks at least one essential element required for Opposer to prevail, and cannot be maintained.

Because the record, including all evidence supporting allegation of fraud as submitted by the Opposer, includes no evidence of non-use or deceptive intent, summary judgment in Applicant’s favor on this issue is appropriate.

V. CONCLUSION

Even accepting Opposer’s evidence, there is not a genuine issue of fact material to the legal question of whether Opposer established prior use in compliance with the requirements of Section 45 of the Lanham Act. Opposer has not produced any evidence in which Opposer’s Mark appears on the goods or their containers, the displays associated therewith, or the tags or labels affixed thereto. Despite the numerous pictures of multiple angles and viewpoints of

Opposer's scooter, Opposer's Mark does not once appear in dated evidence in a manner that would satisfy the use in commerce requirements of Section 45 of the Lanham Act. As discussed, Opposer's fraud pleading is also fatally deficient. Therefore, because there is no genuine issue of material fact relating to the use in commerce of Opposer's Mark nor has Opposer pled a proper claim of fraud, Applicant respectfully moves the Trademark Trial and Appeal Board for an order granting its summary judgment and thereby dismissing Opposer's present opposition of Applicant's Mark.

Dated: December 17, 2014

Respectfully submitted,

/Shannon V. McCue/

Shannon V. McCue
smccue@hahnlaw.com
Hahn Loeser & Parks LLP
One GOJO Plaza, Suite 300
Akron, Ohio 44311
(330) 864-5550 (voice)
(330) 864-7986 (fax)
trademarks@hahnlaw.com

Ross Babbitt
rbabbitt@babbitt-lawfirm.com
1382 W. 9th Street, Suite 220
Cleveland, Ohio 44113

Attorneys for Applicant
Hammer Brand LLC

ESTTA Tracking number: **ESTTA588770**

Filing date: **02/22/2014**

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

Notice of Opposition

Notice is hereby given that the following party opposes registration of the indicated application.

Opposer Information

Name	Alliance Powersports Inc.
Granted to Date of previous extension	02/26/2014
Address	3788 Milliken Ave.Unit D Mira Loma, CA 91752 UNITED STATES

Attorney information	JungJin Lee Lee, Lee & Associates, P.C. 2531 Jackson Rd.Ste 234 Ann Arbor, MI 48103 UNITED STATES jj@llapc.com
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Applicant Information

Application No	86037963	Publication date	10/29/2013
Opposition Filing Date	02/22/2014	Opposition Period Ends	02/26/2014
Applicant	Hammer Brand LLC Suite A Clearwater, FL 33762 FL		

Goods/Services Affected by Opposition

Class 012. First Use: 2013/04/01 First Use In Commerce: 2013/04/01 All goods and services in the class are opposed, namely: Motor scooters; Motorized scooters; Motorized scooters and structural parts therefor

Grounds for Opposition

Priority and likelihood of confusion	Trademark Act section 2(d)
<i>Torres v. Cantine Torresella S.r.l.Fraud</i>	808 F.2d 46, 1 USPQ2d 1483 (Fed. Cir. 1986)

Mark Cited by Opposer as Basis for Opposition

U.S. Application No.	86130449	Application Date	11/27/2013
Registration Date	NONE	Foreign Priority Date	NONE
Word Mark	WOLF		

Design Mark	WOLF
Description of Mark	NONE
Goods/Services	Class 012. First use: First Use: 2011/08/00 First Use In Commerce: 2011/08/00 Scooters

Attachments	86130449#TMSN.jpeg(bytes) NoticeOppositionWolf.FINAL.pdf(325770 bytes)
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Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Signature	/jjl/
Name	JungJin Lee
Date	02/22/2014

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

ALLIANCE POWER SPORTS, INC.,)

 Opposer,) Opposition No. 91215049

v.) Serial No. 85608003

HAMMER BRAND, LLC.)

 Applicant.) Mark: WOLF

OPPOSER’S FIRST SET OF RESPONSES TO
APPLICANT’S FIRST SET OF INTERROGATORIES

Interrogatory 1. Identify each person having information regarding Opposer’s applications to register the mark WOLF in the United States, including but not limited to U.S. Trademark Appln. No. 86/130,449.

Response:

Gene Chang
3788 Milliken Ave Unit D
Mira Loma, CA 91752

Interrogatory 2. Describe the present organizational structure of Opposer as it relates to the marketing, promotion, and sale of WOLF products or services, and identify: (a) each person who occupies or has occupied any executive or managerial position or has been an officer,

director, partner, shareholder, or owner within this organization or a predecessor since 2011, and (b) the period of time during which each such person held each such position.

Response:

Mr. Gene Chang
CEO 2011-Present
CFO 2011-Present
Secretary 2011- Present

Interrogatory 3. Identify all products or services in connection with which Opposer uses, has used or plans to use the mark WOLF in the United States, the manner and location of the mark on any products, and the period of time during which the WOLF mark was used for each of such products or services.

Response: Opposer has used the WOLF mark in connection with its SYM Wolf Classic 150 Motorcycle continuously since August 2011 and intends to continue to use the WOLF mark in connection with the SYM Wolf Classic 150.

Interrogatory 4. Identify the date of the first sale, first offer for sale, first product announcement, and first advertisement, and the date of any other use in the ordinary course of trade, for the products on which the WOLF mark was used as identified above.

Response: On August 12, 2011, Opposer announced that the SYM Wolf Classic 150 would be coming soon. August 22, 2011 Opposer officially announced the SYM Wolf Classic 150 on their Facebook page. September 1, 2011, Opposer announced that the SYM Wolf Classic 150 had been approved under California CARB. September 15, 2011, Opposer Announced that the SYM Wolf Classic 150 had arrived at port. September 20, 2011, Opposer announced that the SYM Wolf Classic 150 had cleared customs. September 23, 2011, Opposer announced that the SYM Wolf Classic 150 had been delivered to the first dealer, NoHo Scooters 5144 Vineland Ave. North Hollywood, CA 91601. Opposer sold their first motorcycle using the WOLF mark in August 23, 2011

Interrogatory 5. Describe Opposer's knowledge of the use of the mark WOLF by Applicant in the United States, and how Opposer learned of such knowledge.

Response: Opposer became aware of Applicant's use of the WOLF mark after an email from Justin Jackrel, President of Bintelli, notifying Opposer of Applicant's Trademark Application. (See Exhibit 20)

Interrogatory 6. Describe all events relevant to this opposition occurring between Opposer's knowledge of the use of the mark WOLF by Applicant and filing of Opposer's Notice of Opposition, and the party or parties responsible for the business decision to file Opposer's Notice of Opposition.

Response: Objection is made to Interrogatory 6, as it seeks attorney work product. Opposer CEO Mr. Gene Chang made the decision to seek legal assistance after being notified of Applicant's Trademark Application, Opposer was using, and had been using, the WOLF mark in the motor scooter small displacement market since 2011. Opposer filed the Notice of Opposition on the belief that they would be damaged by the registration of Applicant's Mark.

Interrogatory 7. Describe the origin of the WOLF mark in relation to Opposer's personnel, business, and products.

Response: The WOLF mark originated with Opposer's manufacturer SYM which began using the mark in the 1970's. Opposer became the official distributor of SYM in April 2011 and began distributing the SYM Wolf Classic 150 to dealers in August 2011.

Interrogatory 8. Describe when and why Opposer decided to file and prosecute its federal trademark application for the mark WOLF in the United States, and identify each person who was involved in that decision and/or the filing of the application.

Response: Objection is made to Interrogatory 8, as it seeks attorney work product. Opposer filed their trademark application to register the WOLF mark which it had been using in commerce continuously since August 2011 on November 27, 2013. Opposer CEO Gene Chang signed Opposer's trademark application on behalf of Alliance Powersports, Inc.

Interrogatory 9. Identify each publication in which Opposer's products or services offered in connection with the mark WOLF have been advertised in the United States, along with dates of each advertisement, and all persons employed by or affiliated with Opposer with knowledge of such advertising.

Response: Opposer provides a list of each publication to in which Opposer's goods were advertised or appeared in connection with the WOLF mark.

Facebook – Lance Powersports January 2011-present
Forum – Adventure Rider August 29, 2011
Newsfeed - 2 Stroke Buzz August 31, 2011
Ad – Café Racer December 2011-November 2012
Ad – Motorcycle Magazine January 2012 – October 2012
Article - Power Sports Business April 2, 2012
Review – www.scootsafley.com April 12, 2012
Review – www.scooterfile.com April 30, 2012
Review – www.motorcycle-usa.com May 16, 2012
Review – Café Racer June/July 2012 Issue
Review – www.morotcyclistonline.com February 6, 2013
Review – www.motorcycleclassics.com July 26, 2013
Brochure – SymWolf Classic 150 – Official Tour Bike of Andrew Dost March 1, 2014

Interrogatory 10. Identify all assignments, licenses or other transfers of rights in the mark WOLF granted by or to Opposer, and all persons with knowledge of such assignments, licenses or other transfers of rights.

Response: Opposer has made no assignment, license or transfer of its rights in the WOLF mark.

Interrogatory 11. Identify each expert that Opposer expects to call as a witness in this proceeding and state the subject matter on which each expert is expected to testify.

Response: Opposer has not consulted with any experts as potential witnesses in this proceeding.

Interrogatory 12. Identify and describe in detail any formal or informal objections by third parties to Opposer's use of the mark WOLF, and all persons with knowledge of any such objections.

Response: Opposer is unaware of any formal or informal objections by third parties to Opposer's use of the WOLF mark.

Interrogatory 13. State whether Opposer performed any trademark searches for the mark WOLF prior to or after filing the federal trademark application for the mark WOLF.

Response: Opposer performed an online search on the USPTO website, but did not print a copy of that search.

Interrogatory 14. Identify whether Opposer sought or received an opinion of counsel regarding the Opposition or the WOLF marks. If so, state the dates of all such opinions, the source of each opinion, and the names of the persons who received copies of such opinions.

Response: Objection is made to Interrogatory 14 as it seeks information subject to attorney client privilege and attorney work product.

Interrogatory 15. Provide a detailed description of the product(s) on which the WOLF mark is applied including a description of where the WOLF mark appears on the product(s) or packaging.

Response: The WOLF mark is used in connection with Opposer's SYM WOLF Classic 150 motorcycle. The WOLF mark is displayed in all promotional and advertising material in connection with the goods, and is displayed on the gas tank of the motorcycle.

Interrogatory 16. Identify all persons with knowledge relating to Opposer's belief that it is the owner of the mark WOLF and that no other entity or person has a right to use the mark WOLF, as stated in the declarations executed by Opposer relating to U.S. Trademark Appln. No. 86/130,449.

Response:

Gene Chang
3788 Milliken Ave Unit D
Mira Loma, CA 91752

Interrogatory 17. State whether Opposer has knowledge of relevant use of the mark WOLF by any party other than Applicant and Opposer.

Response: Opposer has no knowledge of the use of the WOLF mark by any party other than the Applicant.

Interrogatory 18. Identify all products and services currently offered by Alliance Powersports Inc. in the United States, and describe the channels of trade through which the products and services are distributed.

Response: Alliance Powersports, Inc. sells its motor scooters, and associated replacement parts, through dealerships throughout the United States. Alliance Powersports, Inc. currently offers the following models:

Citycom 300i
RV 200 Evo
HD 200 Evo
Sym Wolf Classic 150
Fiddle II 125
Symba 100
Mio 50
Jet 50 Evo

Interrogatory 19. Identify each person who provided information or documents for responses to these Interrogatories and Applicant's First Request for Production of Documents and Things, served concurrently with these Interrogatories.

Response:

Gene Chang
3788 Milliken Ave Unit D
Mira Loma, CA 91752

Interrogatory 20. With the exception of the information requested in these Interrogatories, state all facts that support Opposer's Notice of Opposition, and identify all persons with knowledge relating to such facts.

Response: Opposer began using the WOLF mark for motor scooters in commerce in August 2011. Opposer has used the WOLF mark continuously since August 2011 in connection with the goods. Opposer became the United States distributor of SYM in April 2011. Opposer CEO Gene Chang has been the CEO of Alliance Powersports, Inc. since August 27, 2009 and is the person with knowledge supporting Opposer's Notice of Opposition.

Interrogatory 21. State the dates of creation of and modification of Opposer's Internet website(s) and identify the persons and entities responsible for the creation, modification, and maintenance of Opposer's internet website.

Response: Opposer's launched a demo version of their website on July 8, 2011. Additional updates were made to the site on September 29, 2011, October 11, 2011, and November 17, 2011. The site has remained active since November 17, 2011 with content updates regarding Opposer's goods, media coverage, reviews and marketing being made on a periodic basis.

Interrogatory 22. Identify all uses of the mark WOLF present on Opposer's internet website(s) and the date(s) on which such uses were made available through Opposer's internet website(s).

Response: Opposer has used the WOLF mark continuously since September 2011 on its website. The WOLF mark appears in relation to Opposer's SYM Wolf Classic 150 model listing, and within the reviews and media coverage page on Opposer's website.

Interrogatory 23. Identify any past or present litigation that Opposer has been involved in that relates to the services offered in connection with the WOLF trademark, including but not limited to any lawsuits involving Alliance Powersports Inc.

Response: Opposer is not presently, nor has it been involved in the past, in any litigation relating to the services offered in connection with the WOLF trademark.

Interrogatory 24. Identify representative customers for Opposer, along with the geographic locations of each, from 2011 through the present, and list the value in sales to each representative customer.

Response: Opposer's representative customers are men and women from the ages of 16 to 65, approximately 50% of Opposer's customers are women. Opposer sells its goods through dealerships, Opposer has agreements with dealerships in every region of the United States and at least one in the majority of the states.

Opposer does not record the specific breakdown on each sale as to male or female and age. The response is a general average consensus from what dealers report to Opposer. Opposer sells wholesale in bulk to dealers who sell the goods to the end user. Opposer does not receive every detail on Dealership sales as each dealership is independently owned and operated.

Opposer will provide a list of the names of its dealerships upon entry of a Protective Order in this proceeding.

Interrogatory 25. Specifically identify any and all goods or services offered by Opposer in connection with the mark WOLF, including any goods, services and/or features that Opposer believes will be offered in the future in connection with the mark WOLF.

Response: Opposer offers the SYM Wolf Classic 150 under the WOLF mark. Opposer has used the WOLF mark for the SYM Wolf Classic 150 since 2011, and intends to continue their use of the mark for this model in the future. Opposer has no present intent to add additional models or services under the WOLF mark other than in relation to their present use for the SYM Wolf Classic 150.

Interrogatory 26. Identify each state and/or geographic region in which Opposer has sold goods bearing the mark WOLF.

Response: Opposer has sold its SYM Wolf Classic 150 model to consumers from every state in the US. Opposer's dealership network includes 80 dealers in 34 states.

Opposer will provide the geographic distribution of goods sold upon entry of a Protective Order in this proceeding.

Interrogatory 27. Identify the consumers who purchase Opposer's goods or services offered in connection with the mark WOLF.

Response: Opposer's typical consumers are men and women between the ages of 16 and 65 looking for a small motorcycle or scooter that is light and easy to handle.

Interrogatory 28. Identify the monthly sales of Opposer's goods offered in connection with the mark WOLF from 2011 through present.

Response: Opposer will provide a list of sales by month upon entry of a Protective Order in this proceeding. Opposer has sold at least two units per month since August 2011, with a total of 581 units sold through March 2014.

Interrogatory 29. Identify the trade channels through which Opposer's goods or services are advertised, including the names of trade shows where Opposer attends and markets and/or sells its products, and all other means of sales and advertising used by Opposer or its affiliates or distributors in marketing and selling goods/services under the WOLF mark.

Response: Opposer markets its goods on their website, alliancepowersports.com, and their Facebook page "Lance Powersports." Opposer also provides marketing materials to its authorized dealers. Opposer provides the following list of tradeshow, trade publications and other means of sales and advertising used by Opposer:

Trade shows: Dealer Expo (Annual exposition)
Trade publications: Dealer News Magazine, Powersports Business Magazine (See Exhibits 7)
Model Brochure: Sym Wolf Classic 150 – Official Tour Bike of Andrew Dost (See Exhibit 14)
Motorcycle Publications: Café Racer Magazine, Motorcycle Classics Magazine (See Exhibit 4 & 5)
Youtube Video: <https://www.youtube.com/watch?v=3ujkfHqcDvg>
Online Review: <http://www.motorcycle-usa.com/17/13104/motorcycle-article/2012-sym-wolf-classic-150-review.aspx> (See Exhibit 10)
<http://www.scooterfile.com/scooter-reviews/sf-first-ride-sym-wolf-classic-150/> (See Exhibit 9)
http://www.motorcyclistonline.com/features/122_1301_sym_wolf_classic_150/ (See Exhibit 12)
<http://www.twincitiesrider.com/symwolf012.htm> (See Exhibit 6)
<http://www.motorcycleclassics.com/classic-japanese-motorcycles/sym-wolf-classic-150-zmbz13jazbea.aspx#axzz33cMphJWq> (See Exhibit 13)

Interrogatory 30. Identify the names of any advertising or marketing agencies Opposer has engaged to market goods or services offered in connection with the mark WOLF, or any of Opposer's employees or independent contractors involved in the advertising or marketing of goods or services offered in connection with the mark WOLF.

Response: Opposer has not engaged a marketing agency to market its goods in connection with the WOLF mark.

Interrogatory 31. Identify the names and geographic locations of other businesses to which Opposer or any of its affiliates or distributors markets and/or sells goods and/or services under the mark WOLF.

Response: Opposer provides a list of states and the number of dealerships in each state that retail the SYM Wolf Classic 150:

Alaska (1), Alabama (1), Arizona (3), California (16), Colorado(1), Connecticut (2), Delaware (1), Florida (9), Georgia (1), Iowa (1), Idaho (1), Illinois (4), Kentucky (1), Louisiana (1), Massachusetts (1), Maryland (1), Minnesota (1), Missouri (2), Montana (1), North Carolina (3), New Hampshire (1), New Jersey (1), Nevada (1), New York (2), Ohio (2), Oregon (2), Pennsylvania (3), Rhode Island (1), South Carolina (1), Tennessee (1), Texas (7), Utah (3), Washington (1), Wisconsin (2).

Opposer will provide a complete list of the names of its dealerships upon entry of a Protective Order in this proceeding.

Interrogatory 32. Identify whether the mark WOLF is an acronym, or has any special meaning to Opposer or within Opposer's business, and if yes, identify what the meaning is.

Response: Opposer is the authorized SYM distributor for the United States. SYM has been manufacturing goods under the SYM mark since the 1970's. Opposer became the authorized United States SYM distributor in April 2011.

Interrogatory 33. Indicate the classes of consumers to which Opposer or any of its affiliates or distributors markets and/or sells goods and services, for example, whether Opposer markets and/or sells its goods directly to dealerships, or whether Opposer markets and sells its goods directly to individual end users.

Response: Opposer sells its goods to dealerships who sell the goods directly to individual end users.

Interrogatory 34. Indicate the annual amount of money that Opposer has spent on advertising its goods and services under the mark WOLF for each year since 2011.

Response: Opposer will provide a detail of advertising expenses by year upon entry of a Protective Order in this proceeding. Opposer has spent within the range of \$7,000-\$77,000 annually on advertising

Interrogatory 35. Indicate Opposer's gross sales (in dollars) for goods and services sold under the mark WOLF for each year from 2011 through the present, and from those amounts, indicate the percent of Opposer's gross sales attributable to dealer sales.

Response: Opposer will provide a list of gross sales and the percentage of sales attributable to dealer sales upon entry of a Protective Order in this proceeding. Opposer's gross annual sales for goods and service sold under the WOLF mark range from \$100,000 to \$580,000.

Interrogatory 36. Indicate Opposer's gross sales (in dollars) for goods and services not sold under the mark WOLF for each year from 2011 through the present, and from those amounts, indicate the percent of Opposer's gross sales attributable to dealer sales.

Response: Opposer will provide a breakdown of annual gross sales for goods not sold under the mark and the percentage of sales attributed to dealer sales upon entry of a Protective Order in this proceeding. Opposer's gross annual sales for goods and services not sold under the wolf mark range from \$800,000 to \$2,000,000.

Interrogatory 37. Identify any periods of time longer than one month since 2011 during which no goods bearing the mark WOLF were sold by Opposer.

Response: Opposer will provide a list of sales by month upon entry of a Protective Order in this proceeding. Opposer has sold at least two units per month since August 2011, with a total of 581 units sold through March 2014.

Interrogatory 38. Identify any goods offered or developed by Opposer substantially similar to products bearing the mark WOLF which do not bear the mark WOLF.

Response: Opposer has not offered or developed products not bearing the WOLF mark which are substantially similar to the goods bearing the WOLF mark.

Interrogatory 39. Identify any goods offered or developed by Opposer bearing the mark WOLF which were previously offered without the mark WOLF.

Response: Opposer has not offered or developed any goods bearing the WOLF mark which is previously offered without the WOLF mark

Interrogatory 40. Identify the character (*e.g.*, decal, paint) and application technique (*e.g.*, machineapplied, hand-applied) of the mark WOLF on Opposer's goods, and any differences in this character or technique in comparison to other markings on Opposer's other products.

Response: The WOLF mark is applied to Opposer's SYM Wolf Classic 150 as a sticker affixed to the gas tank near the seat.

Interrogatory 41. Identify the source of the specimen submitted in connection with Opposer's trademark application for the mark WOLF.

Response: The specimen submitted in connection with Opposer's trademark application was supplied by SYM, Opposer's manufacturer.

Interrogatory 42. Identify any communications or records relating to Road Rat Motors, LLC or its principal Justin Jackrel.

Response: Opposer is unaware of any communications between Opposer and Road Rat Motors, LLC. Opposer received an email from Justin Jackrel, President of Bintelli, on October 8, 2013 informing Opposer of Applicant's trademark application. (See Exhibit 20)

Interrogatory 43. Identify any communications or records relating to Bintelli LLC.

Response: Opposer received an email from Justin Jackrel, President of Bintelli, on October 8, 2013 informing Opposer of Applicant's trademark application. (See Exhibit 20)

Interrogatory 44. Identify the first date that you learned of Applicant's trademark application for the mark WOLF and the mechanism in which you learned of such application.

Response: Opposer first learned of Applicant's mark on October 8, 2013.

Interrogatory 45. Identify any documents relating or referring to Hammer Brand LLC.

Response: Objection is made to Interrogatory 45 as it seeks attorney work product. Opposer does not have documents relating or referring to Hammer Brand, LLC.

Interrogatory 46. Identify any joint defense or common interest privilege preservation agreements between Opposer, Road Rat LLC or Bintelli LLC.

Response: Opposer has not entered into any joint defense or common interest privilege preservation agreements with Road Rat, LLC or Bintelli, LLC.

Interrogatory 47. Identify any agreements relating to the mark WOLF or the Opposition.

Response: Opposer is unaware of any agreements relating to the WOLF mark or the Opposition.

Interrogatory 48. Identify the first time that Opposer learned of Applicant's intent to use the WOLF mark.

Response: Opposer learned of Applicant's use of the mark on October 8, 2013.

Interrogatory 49. Identify any conversations to which Opposer was a party discussing the use or non-use of the WOLF mark by Opposer or the right of any party including but not limited to the Applicant to use the WOLF mark.

Response: Objection is made to Interrogatory 49 as it seeks attorney work product. Opposer has not discussed Opposer's use of non-use of the WOLF mark or the right of any party, other than the Opposer, to use the WOLF mark. Opposer has not discussed the use, non-use or right of any party to use the WOLF mark with Applicant.

Dated: June 4, 2014

Respectfully submitted,
/Erin C. Kunzelman/

Erin C. Kunzelman
Lee, Lee & Associates, P.C.
2531 Jackson Road, Suite 234
Ann Arbor, MI 48103
Tel: 866-400-2507
Fax: 800-689-7978
erin@llapc.com
jj@llapc.com
Attorneys for Opposer
Alliance Power Sports, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing OPPOSER'S FIRST SET OF RESPONSES TO APPLICANT'S FIRST SET OF INTERROGATORIES was served upon counsel for Opposer on this 4th day of June, 2014 by first class mail and e-mail to:

[SHANNON MCCUE](#)

HAHN LOESER & PARKS LLP

200 PUBLIC SQUARE, SUITE 2800

CLEVELAND, OH 44114

UNITED STATES

trademarks@hahnlaw.com, bareese@hahnlaw.com, smccue@hahnlaw.com, bclark@hahnlaw.com

Date: June 4, 2014

/ Erin C. Kunzelman /

Erin C. Kunzelman

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

ALLIANCE POWER SPORTS, INC.,)

 Opposer,) Opposition No. 91215049

v.) Serial No. 85608003

HAMMER BRAND, LLC.) Mark: WOLF

 Applicant.)

OPPOSER’S FIRST SET OF RESPONSES TO
APPLICANT’S REQUESTS FOR PRODUCTION

1. All documents, things, and electronically stored information related to or supporting Opposer’s allegation in paragraph 1 of the Notice of Opposition that Opposer has been and is now using the mark “WOLF” since at least 2011 in connection with the sale of scooters.

RESPONSE: In response to Request for Production 1, Opposer provides the following exhibits:

- Exhibit 1 - Facebook – Lance Powersports January 2011-present
- Exhibit 2 - Forum – Adventure Rider August 29, 2011
- Exhibit 3 - Newsfeed - 2 Stroke Buzz August 31, 2011
- Exhibit 4 - Ad – Café Racer December 2011-November 2012
- Exhibit 5 - Ad – Motorcycle Magazine January 2012 – October 2012
- Exhibit 6 - Review – Twin Cities Rider – April 2012
- Exhibit 7 - Article - Power Sports Business April 2, 2012
- Exhibit 8 - Review – www.scootsafley.com April 12, 2012
- Exhibit 9 - Review – www.scooterfile.com April 30, 2012
- Exhibit 10 - Review – www.motorcycle-usa.com May 16, 2012

Exhibit 11 - Review – Café Racer June/July 2012 Issue
Exhibit 12 - Review – www.morotcyclistonline.com February 6, 2013
Exhibit 13 - Review – www.motorcycleclassics.com July 26, 2013
Exhibit 14 - Brochure – SymWolf Classic 150 – Official Tour Bike of
Andrew Dost March 1, 2014

Opposer will provide additional documentation of sales, marketing expenses and geographic distribution of goods sold within thirty (30) days of the entry of a Protective Order in this proceeding.

2. All documents, things, and electronically stored information related to or supporting Opposer's allegation in paragraph 2 of the Notice of Opposition that Opposer common law rights in the mark "WOLF" covering scooters.

RESPONSE: In response to Request for Production 2, Opposer provides the following exhibits:

Exhibit 1 - Facebook – Lance Powersports January 2011-present
Exhibit 2 - Forum – Adventure Rider August 29, 2011
Exhibit 3 - Newsfeed - 2 Stroke Buzz August 31, 2011
Exhibit 4 - Ad – Café Racer December 2011-November 2012
Exhibit 5 - Ad – Motorcycle Magazine January 2012 – October 2012
Exhibit 6 - Review – Twin Cities Rider – April 2012
Exhibit 7 - Article - Power Sports Business April 2, 2012
Exhibit 8 - Review – www.scootsafley.com April 12, 2012
Exhibit 9 - Review – www.scooterfile.com April 30, 2012
Exhibit 10 - Review – www.motorcycle-usa.com May 16, 2012
Exhibit 11 - Review – Café Racer June/July 2012 Issue
Exhibit 12 - Review – www.morotcyclistonline.com February 6, 2013
Exhibit 13 - Review – www.motorcycleclassics.com July 26, 2013
Exhibit 14 - Brochure – SymWolf Classic 150 – Official Tour Bike of
Andrew Dost March 1, 2014

Opposer will provide additional documentation of sales, marketing expenses and geographic distribution of goods sold within thirty (30) days of the entry of a Protective Order in this proceeding.

3. All documents, things, and electronically stored information that relate to the geographical scope of Opposer's alleged common law rights including but not limited to representative advertisements, sales invoices, purchase orders, customer lists and shipping information for products bearing the WOLF mark.

RESPONSE: In response to Request for Production 3, Opposer provides the following exhibits:

Exhibit 1 - Facebook – Lance Powersports January 2011-present

Exhibit 2 - Forum – Adventure Rider August 29, 2011
Exhibit 3 - Newsfeed - 2 Stroke Buzz August 31, 2011
Exhibit 4 - Ad – Café Racer December 2011-November 2012
Exhibit 5 - Ad – Motorcycle Magazine January 2012 – October 2012
Exhibit 6 - Review – Twin Cities Rider – April 2012
Exhibit 7 - Article - Power Sports Business April 2, 2012
Exhibit 8 - Review – www.scootsafley.com April 12, 2012
Exhibit 9 - Review – www.scooterfile.com April 30, 2012
Exhibit 10 - Review – www.motorcycle-usa.com May 16, 2012
Exhibit 11 - Review – Café Racer June/July 2012 Issue
Exhibit 12 - Review – www.morotcyclistonline.com February 6, 2013
Exhibit 13 - Review – www.motorcycleclassics.com July 26, 2013
Exhibit 14 - Brochure – SymWolf Classic 150 – Official Tour Bike of Andrew Dost March 1, 2014

Opposer will provide additional documentation of sales, marketing expenses and geographic distribution of goods sold within thirty (30) days of the entry of a Protective Order in this proceeding.

4. All documents, things, and electronically stored information that relate to Opposer’s decision, planning, and applications to register the mark “WOLF” with the U.S. Patent and Trademark Office.

RESPONSE: Opposer objects to Request for Production 4 as it seeks attorney work product. Opposer provides a copy of their Trademark Application U.S. Serial No. 86/130,449. (See Exhibit 15)

5. All documents, things, and electronically stored information related to or supporting Opposer’s allegations in paragraph 5 of the Notice of Opposition.

RESPONSE: Opposer provides printouts from several forums, and commentaries regarding the extensive good will and consumer recognition of Opposer’s Mark.

Exhibit 2 - Forum – Adventure Rider August 29, 2011
Exhibit 3 - Newsfeed - 2 Stroke Buzz August 31, 2011
Exhibit 6 - Review – Twin Cities Rider – April 2012
Exhibit 8 - Review – www.scootsafley.com April 12, 2012
Exhibit 9 - Review – www.scooterfile.com April 30, 2012
Exhibit 10 - Review – www.motorcycle-usa.com May 16, 2012
Exhibit 11 - Review – Café Racer June/July 2012 Issue
Exhibit 12 - Review – www.morotcyclistonline.com February 6, 2013
Exhibit 13 - Review – www.motorcycleclassics.com July 26, 2013
Exhibit 16 – Comments – YouTube - <http://www.youtube.com/watch?v=3ujkfHqcDvg>
Exhibit 17 – Google Search “Wolf Classic”
Exhibit 18 – Search for SYM Wolf – Youtube - http://www.youtube.com/results?search_query=SYM+Wolf

6. All documents, things, and electronically stored information related to or supporting Opposer's allegations in paragraph 6 of the Notice of Opposition.

RESPONSE: Opposer provides printouts of forums, reviews, commentary and articles regarding their SYM Wolf Classic 150.

Exhibit 1 - Facebook – Lance Powersports January 2011-present

Exhibit 2 - Forum – Adventure Rider August 29, 2011

Exhibit 3 - Newsfeed - 2 Stroke Buzz August 31, 2011

Exhibit 6 - Review – Twin Cities Rider – April 2012

Exhibit 7 - Article - Power Sports Business April 2, 2012

Exhibit 8 - Review – www.scootsafley.com April 12, 2012

Exhibit 9 - Review – www.scooterfile.com April 30, 2012

Exhibit 10 - Review – www.motorcycle-usa.com May 16, 2012

Exhibit 11 - Review – Café Racer June/July 2012 Issue

Exhibit 12 - Review – www.morotcyclistonline.com February 6, 2013

Exhibit 13 - Review – www.motorcycleclassics.com July 26, 2013

Exhibit 16 – Comments – YouTube -

<http://www.youtube.com/watch?v=3ujkfHqcDvg>

Exhibit 17 – Google Search “Wolf Classic”

Exhibit 18 – Search for SYM Wolf – Youtube -

http://www.youtube.com/results?search_query=SYM+Wolf

7. Representative samples of Opposer's products as listed in International Class 12 of U.S. Application No. 86/130,449, namely, scooters, including the dates each was sold in the United States, from 2011 through the present.

RESPONSE: Opposer provides its marketing brochure for the SYM Wolf Classic 150 and photos of Opposer's SYM Wolf Classic 150. (See Exhibits 14 and 19).

Opposer will provide additional documentation of models and dates sold within thirty (30) days of the entry of a Protective Order in this proceeding.

8. A full list of products and descriptions of all scooters produced or sold by Opposer from 2006 through the present.

RESPONSE: Opposer will provide documentation of models produced and dates sold within thirty (30) days of the entry of a Protective Order in this proceeding.

9. All documents, things, and electronically stored information identifying the channels of trade through which Opposer offers its products and services in the United States.

RESPONSE: Opposer will provide documentation identifying the channels of trade through which Opposer offers its products and services within thirty (30) days of the entry of a Protective Order in this proceeding.

10. All documents, things, and electronically stored information that identify customers who have purchased Opposer's products bearing the WOLF mark in the United States.

RESPONSE: Opposer will provide documentation of demographics of consumers within thirty (30) days of the entry of a Protective Order in this proceeding.

11. All documents, things, and electronically stored information that relate to Opposer's past, present or future marketing plans for its products or services that bear the mark "WOLF".

RESPONSE: Opposer provides a copy of its present marketing brochure for the SYM Wolf Classic and copies of past advertisements for the SYM Wolf Classic. (See Exhibit 4, 5, and 14). Opposer will provide documentation of past, present and future marketing plans for its products or service within thirty (30) days of the entry of a Protective Order in this proceeding.

12. All documents, things, and electronically stored information that relate to or constitute any assignment, license, or other transfer of interest to or from Opposer of any right in the mark "WOLF".

RESPONSE: Opposer has no documents at this time. Opposer reserves the right to amend its response if other documents become available during the pendency of this proceeding.

13. All documents, things, and electronically stored information that relate to or constitute any formal or informal trademark searches or investigations that relate to the mark "WOLF" as defined above.

RESPONSE: Opposer ran a search on the USPTO website, but did not print the results of that search. Opposer reserves the right to amend its response if other documents become available during the pendency of this proceeding.

14. All documents, things, and electronically stored information that relate to Opposer's knowledge of Applicant's trademark applications and/or registrations for the mark WOLF, including Applicant's use of the mark WOLF in connection with the goods identified in U.S. Application No. 86/037,963.

RESPONSE: Opposer provides a copy of an email sent by Jason Jackrel, President of Bintelli. (See Exhibit 20).

15. All documents, things, and electronically stored information related to or supporting Opposer's allegations of fraud contained in the Notice of Opposition.

RESPONSE: Opposer provides printouts from Applicant's Facebook, Powersports Business Article from September 25, 2013, <http://www.newscooters4less.com/gainesville-scooters/gorilla-motor-works-scooters.html>, and Applicant's Twitter page. (See Exhibits 21-24).

16. All documents, things, and electronically stored information related to or supporting Opposer's allegation that Applicant was not using the mark WOLF in connection with scooters at the time of filing and during the pendency of its U.S. trademark application for the mark WOLF.

RESPONSE: Opposer provides printouts from Applicant's Facebook, Powersports Business Article from September 25, 2013, <http://www.newscooters4less.com/gainesville-scooters/gorilla-motor-works-scooters.html>, and Applicant's Twitter page. (See Exhibits 21-24).

17. All documents, things, and electronically stored information that relate to how Opposer's knowledge of Applicant's intent to use the mark WOLF in connection with scooters, trademark applications and/or registrations for the mark WOLF was developed.

RESPONSE: Opposer provides an email from Jason Jackrel, printouts from Applicant's Facebook, Powersports Business Article from September 25, 2013, <http://www.newscooters4less.com/gainesville-scooters/gorilla-motor-works-scooters.html>, and Applicant's Twitter page. (See Exhibits 20-24).

18. All documents, things, and electronically stored information that relate to or evidence any statement made by any employee or officer of Opposer indicating that it was not using the mark WOLF from 2011 through present.

RESPONSE: Opposer has no documents at this time. Opposer reserves the right to amend its response if other documents become available during the pendency of this proceeding.

19. All documents, things, and electronically stored information that relate to or evidence any interruptions in Opposer's use of the mark WOLF.

RESPONSE: Opposer has no documents at this time. Opposer reserves the right to amend its response if other documents become available during the pendency of this proceeding.

20. All documents, things, and electronically stored information referring or relating to or constituting any formal or informal market studies, consumer surveys, focus groups or other studies that relate to the mark "WOLF"

RESPONSE: Opposer has no documents at this time. Opposer reserves the right to amend its response if other documents become available during the pendency of this proceeding.

21. All documents, things, and electronically stored information that refer or relate to any objections, litigation, proceedings or disputes relating to Opposer's use of or application to register the mark "WOLF," excluding the present opposition proceedings.

RESPONSE: Opposer has no documents at this time. Opposer reserves the right to amend its response if other documents become available during the pendency of this proceeding.

22. All documents, things, and electronically stored information referring or relating to present or former third party use of any name, mark or term comprised in whole or in part of the word “WOLF” or any variation thereof.

RESPONSE: Opposer has no documents at this time. Opposer reserves the right to amend its response if other documents become available during the pendency of this proceeding.

23. All documents, things, and electronically stored information referring to or relating to Opposer’s U.S. trademark registration for the mark “WOLF,” including but not limited to documents relating to Opposer’s decision to file the applications in the U.S.

RESPONSE: Opposer objects to Request for Production 23 as it seeks information subject to attorney client privilege and attorney work product. Opposer provides a copy of their Trademark Application US Serial No. 86/130,449. (See Exhibit 15).

24. All documents, things, and electronically stored information comprising, referring or relating to any executed or proposed agreements or contracts or to the consideration of proposed agreements or contracts relating to the “WOLF” mark.

RESPONSE: Opposer has no documents at this time. Opposer reserves the right to amend its response if other documents become available during the pendency of this proceeding.

25. All documents, things, and electronically stored information relating to Opposer’s actions to enforce the mark “WOLF” in the United States.

RESPONSE: Opposer has no documents at this time. Opposer reserves the right to amend its response if other documents become available during the pendency of this proceeding.

26. All documents, things, and electronically stored information relating to any instances of actual confusion between the Opposer’s WOLF mark and the Applicant’s WOLF mark.

RESPONSE: Opposer has no documents at this time. Opposer reserves the right to amend its response if other documents become available during the pendency of this proceeding.

27. Documents sufficient to show Opposer’s advertising expenditures for the WOLF mark for every year from the first date Opposer used the WOLF mark through present.

RESPONSE: Opposer will provide documentation of advertising expenditures within thirty (30) days of the entry of a Protective Order in this proceeding.

28. Documents sufficient to show the ownership, organization and structure of Opposer and any parent, sister, or subsidiary companies, including but not limited to organization charts and

documents identifying officers, directors, and persons involved in the management of Alliance Powersports Inc.

REPOSNE: Opposer will provide documentation of their organizational structure within thirty (30) days of the entry of a Protective Order in this proceeding. Opposer provides a printout from Opposer's manufacturer's website showing Opposer as the U.S. distributor for SYM, Opposer further provides a copy of their California Secretary of State Statement of Information. (See Exhibits 25 and 26).

29. Documents, things, and electronically stored information sufficient to demonstrate Opposer's advertisement for and sale of in the United States all of the products and services identified in U.S. Trademark Application No. 86/130,449 on a continuous basis from 2011 through the present.

RESPONSE: In response to Request for Production 2, Opposer provides the following exhibits:

- Exhibit 1 - Facebook – Lance Powersports January 2011-present
- Exhibit 2 - Forum – Adventure Rider August 29, 2011
- Exhibit 3 - Newsfeed - 2 Stroke Buzz August 31, 2011
- Exhibit 4 - Ad – Café Racer December 2011-November 2012
- Exhibit 5 - Ad – Motorcycle Magazine January 2012 – October 2012
- Exhibit 6 - Review – Twin Cities Rider – April 2012
- Exhibit 7 - Article - Power Sports Business April 2, 2012
- Exhibit 8 - Review – www.scootsafley.com April 12, 2012
- Exhibit 9 - Review – www.scooterfile.com April 30, 2012
- Exhibit 10 - Review – www.motorcycle-usa.com May 16, 2012
- Exhibit 11 - Review – Café Racer June/July 2012 Issue
- Exhibit 12 - Review – www.morotcyclistonline.com February 6, 2013
- Exhibit 13 - Review – www.motorcycleclassics.com July 26, 2013
- Exhibit 14 - Brochure – SymWolf Classic 150 – Official Tour Bike of Andrew Dost March 1, 2014

Opposer will provide additional documentation of sales, marketing expenses and geographic distribution of goods sold within thirty (30) days of the entry of a Protective Order in this proceeding.

30. Documents, things, and electronically stored information demonstrating any relationship between Opposer and Sym, Inc.

REPOSNE: Opposer will provide documentation of its relationship with SYM within thirty (30) days of the entry of a Protective Order in this proceeding. Opposer provides a printout from Opposer's manufacturer's website showing Opposer as the U.S. distributor for SYM. (See Exhibit 25).

31. Documents, things, and electronically stored information between Opposer and Sym relating to the WOLF mark.

RESPONSE: Opposer will provide documentation of any information between Opposer and SYM relating to the WOLF mark within thirty (30) days of the entry of a Protective Order in this proceeding.

32. Documents, things, and electronically stored information between Opposer and any other party relating to the WOLF mark.

RESPONSE: Opposer has no documents at this time. Opposer reserves the right to amend its response if other documents become available during the pendency of this proceeding.

33. Documents, things, and electronically stored information between Opposer and any other party relating to the Applicant.

RESPONSE: Opposer objects to Request for Production 33 as it seeks information subject to attorney client privilege and attorney work product. Opposer provides a copy of an email sent by Jason Jackrel, President of Bintelli. (See Exhibit 20).

34. Documents, things, and electronically stored information between Opposer and any other party relating to the present opposition.

RESPONSE: Opposer objects to Request for Production 33 as it seeks information subject to attorney client privilege and attorney work product. Opposer provides a copy of an email sent by Jason Jackrel, President of Bintelli. (See Exhibit 20).

35. All documents, things, and electronically stored information relating to Road Rat Motors, LLC.

RESPONSE: Opposer has no documents at this time. Opposer reserves the right to amend its response if other documents become available during the pendency of this proceeding.

36. All documents, things, and electronically stored information relating to Bintelli, LLC.

RESPONSE: Opposer provides a copy of an email sent by Jason Jackrel, President of Bintelli. (See Exhibit 20).

37. All documents, things, and electronically stored information relating to Justin Jackrel.

RESPONSE: Opposer provides a copy of an email sent by Jason Jackrel, President of Bintelli. (See Exhibit 20).

38. Any joint defense or common interest privilege preservation agreements between Opposer, Road Rat LLC, or Bintelli, LLC.

RESPONSE: Opposer has no documents at this time. Opposer reserves the right to amend its response if other documents become available during the pendency of this proceeding.

39. All documents, things, and electronically stored information relating to any past or present litigation that Opposer has been involved in that relates to the goods offered in connection with the "WOLF" trademark, including but not limited to any lawsuits involving Alliance Powersports Inc.

RESPONSE: Opposer has no documents at this time. Opposer reserves the right to amend its response if other documents become available during the pendency of this proceeding.

40. All documents, things, and electronically stored information relating to Opposer's use of the "WOLF" trademark that identify the relevant consumers or categories of relevant consumers, the geographic locations of those consumers, along with the number of relevant consumers in each category, and in each geographic location.

RESPONSE: Opposer will provide documentation of their relevant consumers or categories of relevant consumers, the geographic locations or those customers, along with the number of relevant consumers in each category, and each geographic location within thirty (30) days of the entry of a Protective Order in this proceeding.

41. Documents, things, and electronically stored information sufficient to identify the average price of each good and service sold by Opposer under the mark "WOLF"

RESPONSE: Opposer will provide documentation of sufficient to identify the average price of each good and service sold by Opposer under the mark "WOLF" within thirty (30) days of the entry of a Protective Order in this proceeding.

42. To the extent not covered by the above Requests, all documents that relate to or were relied upon for any of Opposer's answers to Applicant's First Set of Interrogatories.

RESPONSE: Opposer has no additional documents that relate to Opposer's responses to Applicant's First Set of Interrogatories. Opposer reserves the right to amend its response if other documents become available during the pendency of this proceeding.

43. To the extent not covered by the above Requests, all documents that support any of Opposer's contentions in Notice of Opposition, or upon which Opposer intends to rely in the present opposition proceeding.

RESPONSE: Opposer intends to rely on Exhibits 1-26, and additional documentation which Opposer will provide within thirty (30) days of the entry of a Protective Order in this

proceeding. Opposer reserves the right to amend its response if other documents become available during the pendency of this proceeding.

44. To the extent not covered by the above Requests, all documents that otherwise relate to the present opposition proceeding.

RESPONSE: Opposer has no additional documents that relate to the present opposition proceeding other than those documents that will be provided within thirty (30) days of the entry of the entry of a Protective Order in this proceeding. Opposer reserves the right to amend its response if other documents become available during the pendency of this proceeding.

45. All documents that Opposer relied upon in making the allegations contained in Opposer's Notice of Opposition.

RESPONSE: Opposer has no documents, other than those previously provided which it relied upon in making the allegations contained in Opposer's Notice of Opposition. Opposer reserves the right to amend its response if other documents become available during the pendency of this proceeding.

Dated: June 4, 2014

Respectfully submitted,

/Erin C. Kunzelman/

Erin C. Kunzelman
Lee, Lee & Associates, P.C.
2531 Jackson Road, Suite 234
Ann Arbor, MI 48103
Tel: 866-400-2507
Fax: 800-689-7978
erin@llapc.com
jj@llapc.com
Attorneys for Opposer
Alliance Power Sports, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing OPPOSER'S FIRST SET OF RESPONSES TO APPLICANT'S FIRST REQUESTS FOR PRODUCTION was served upon counsel for Opposer on this 4th day of June, 2014 by first class mail and e-mail to:

SHANNON MCCUE
HAHN LOESER & PARKS LLP
200 PUBLIC SQUARE, SUITE 2800
CLEVELAND, OH 44114
UNITED STATES
trademarks@hahnlaw.com, bareese@hahnlaw.com, smccue@hahnlaw.com, bclark@hahnlaw.com
By Electronic Mail.
By Priority First Class Mail

Date: June 4, 2014

/ Erin C. Kunzelman /
Erin C. Kunzelman

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

ALLIANCE POWER SPORTS, INC.,)	
)	Opposition No. 91215049
Opposer,)	
)	In the matter of :
v.)	
)	U.S. Application Serial No. 86/037,963
HAMMER BRAND, LLC.)	
)	Filing Date: August 14, 2013
Applicant.)	
)	MARK: WOLF

DECLARATION OF ALEJANDRO SALAMANCA

I, Alejandro Salamanca, an employee of HAMMER BRAND, LLC (“Applicant”) and an adult over twenty-one years of age and of sound mind and body, declare as follows:

1. I make this declaration based on my first-hand knowledge.
2. In August 2014, I traveled to Tropical Scooters, which is an Alliance Motor Sports dealer, and which is located at 11610 Seminole Boulevard in Largo, Florida, to view the SYM CLASSIC 150 scooter offered for sale at that location. While there, I viewed the SYM CLASSIC 150 scooter appearing at the dealership, and I took photographs to memorialize the appearance of the SYM CLASSIC 150 scooter as I saw it at Tropical Scooters that day. The photographs are representative of all SYM CLASSIC 150 scooters at the dealership that I saw that day. True and correct copies of these photos are attached hereto as **Attachment A**, **Attachment B**, and **Attachment C**.

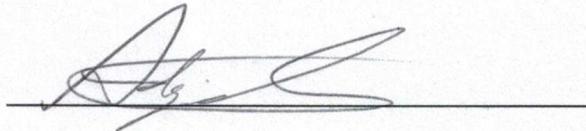
[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

EXHIBIT AD

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

Executed at Wolf Brand Scooters

On 11/25/14

A handwritten signature in black ink, appearing to read 'Alejandro Salamanca', is written over a horizontal line. The signature is stylized and cursive.

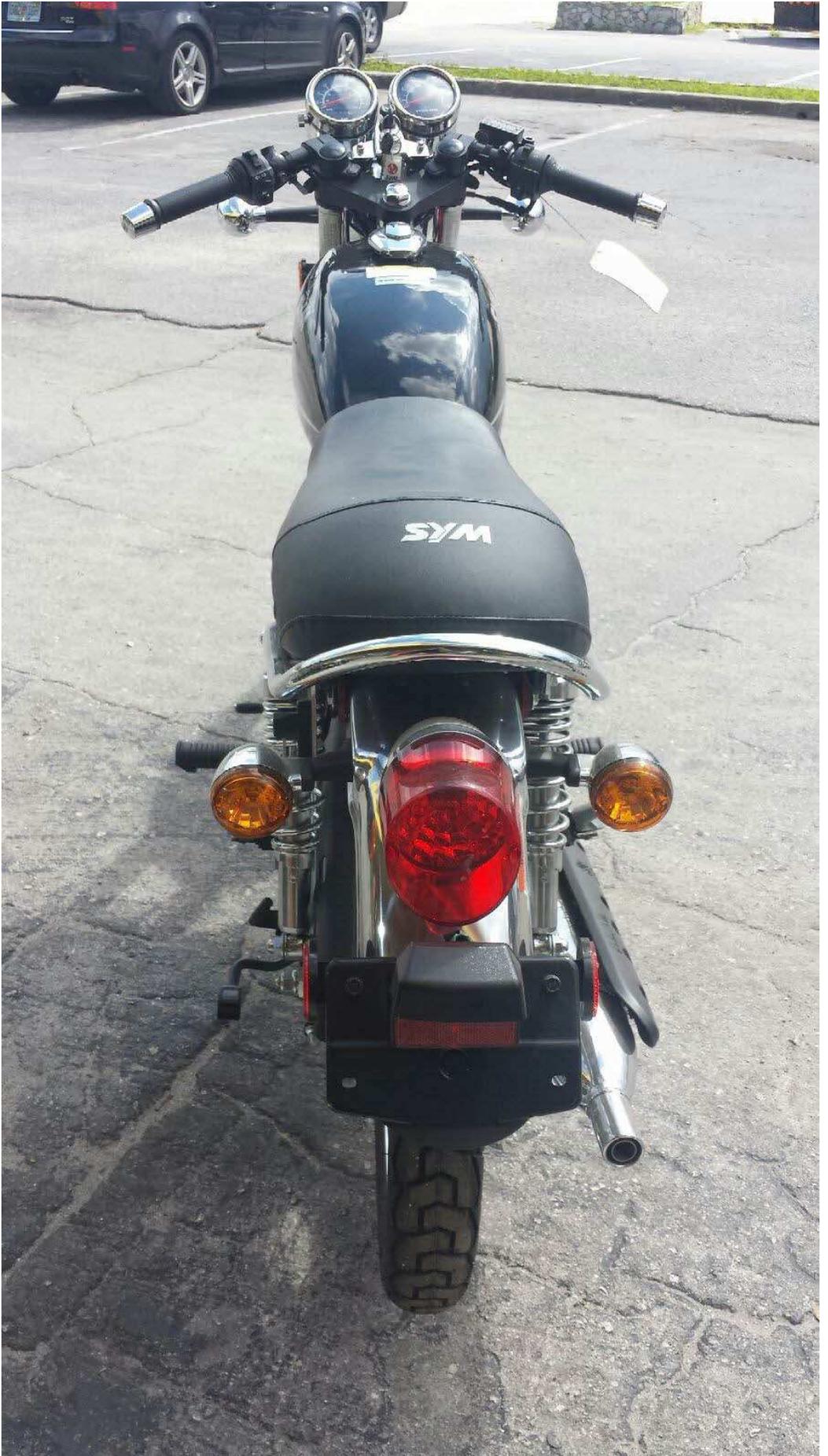
Alejandro Salamanca



HAM 000200



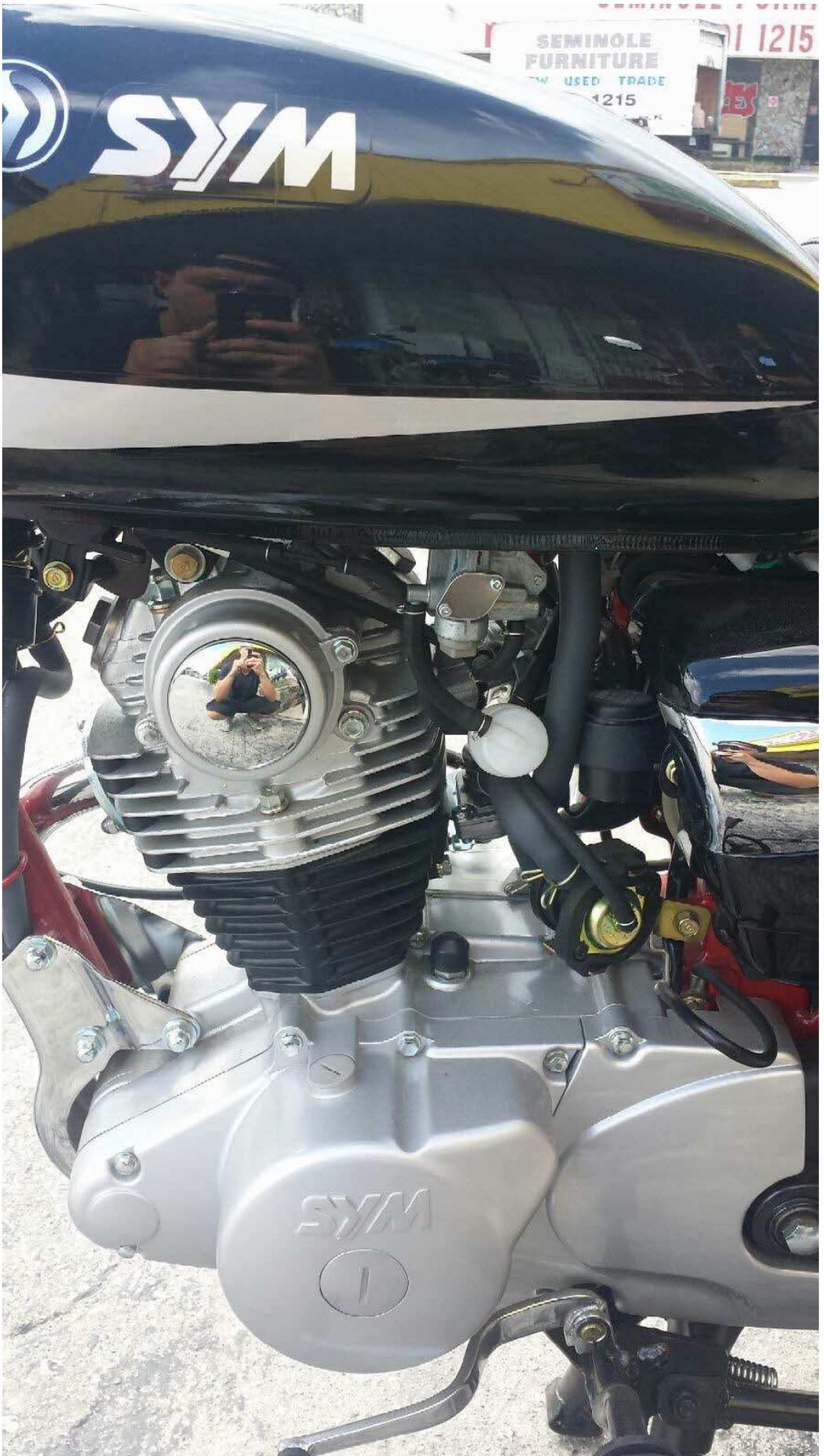
HAM 000201



HAM 000202



HAM 000203



HAM 000204



HAM 000205

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

ALLIANCE POWER SPORTS, INC.,)
) Opposition No. 91215049
 Opposer,)
) In the matter of :
 v.)
) U.S. Application SerialNo. 86/037,963
 HAMMER BRAND, LLC.)
) Filing Date: August 14, 2013
 Applicant.)
) MARK: WOLF

DECLARATION OF BRIAN V. FINCH

I, Brian V. Finch, an employee of Hahn Loeser & Parks, LLP, and an adult over twenty-one years of age and of sound mind and body, declare as follows:

1. I make this declaration based on my first-hand knowledge.
2. In August 2014, I traveled to Capital City Scooters, which is an Alliance Motor Sports dealer, and which is located at 2509 Summit Street in Columbus, OH, to view the SYM CLASSIC 150 scooter offered for sale at that location. While there, I viewed the SYM CLASSIC 150 scooter appearing at the dealership, and I took photographs to memorialize the appearance of the SYM CLASSIC 150 scooter as I saw it at Capital City Scooters that day. The photographs are representative of all SYM CLASSIC 150 scooters at the dealership that I saw that day. True and correct copies of these photos are attached hereto as **Attachment A, Attachment B, Attachment C, and Attachment D.**

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

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

Executed at Capital University Law School

On December 16, 2014



Brian Finch



HAM 000196



HAM 000197



HAM 000198



HAM 000199

6. Opposer objects to the Requests to the extent that they seek information that calls for a legal conclusion.
7. Opposer objects to the Requests to the extent that they require Opposer to seek information from parties over whom Opposer possesses neither control nor ability to control.
8. Opposer objects to any Requests that pose a hypothetical and/or are based upon facts that have not been established.
9. These Responses are based upon information presently available. Opposer expressly reserves its right to supplement these Responses as more information becomes available to it.
10. Opposer's specific Responses and Objections to the individual requests shall be deemed to incorporate, and shall not be deemed a waiver of, these General Objections.

OBJECTIONS AND RESPONSES REQUESTS FOR ADMISSION

1. The scooters which were the subject of the photographs used as specimens before the Trademark Office in the trademark application for Opposer's WOLF mark did not bear any physical WOLF mark at the time the photos were taken.

RESPONSE: Admit.

2. The WOLF marks shown in Opposer's specimens supporting its trademark application for Opposer's WOLF mark were added through image editing software to the specimens submitted to the Trademark Office in the trademark application for Opposer's WOLF mark, such addition having occurred before submission of the specimens to the Trademark Office but after the corresponding photographs were taken of the scooters which were the subject of the photographs used as specimens before the Trademark Office in the trademark application for Opposer's WOLF mark.

RESPONSE: Admit in part, deny in whole. Opposer has provided as Exhibit 35, the Sworn Declaration of Gene Chang that at the time the photos, which were used as the specimen of use, were submitted to the USPTO, he was unaware that they were altered photographs.

3. Opposer was not marking the Wolf Classic 150 scooter with Opposer's WOLF mark as shown in its specimens to the Trademark Office in the trademark application for Opposer's WOLF mark prior to institution of this Opposition.

RESPONSE: Denied.

Dated: October 13, 2014

Respectfully submitted,

/Erin C. Bray/

Erin C. Bray, Esq.
Lee, Lee & Associates, P.C.
2531 Jackson Road, Suite 234
Ann Arbor, MI 48103
Tel: 866-400-2507
Fax: 800-689-7978
erin@llapc.com
jj@llapc.com
Attorneys for Opposer
Alliance Power Sports, Inc.

VERIFICATION

I verify that the foregoing interrogatory answers to Opposer's First Requests for Admission are true and correct on information and belief.

GENE CHANG
Gene Chang

Executed Oct 13, 2014

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing OPPOSER'S RESPONSES TO APPLICANT'S FIRST REQUESTS FOR ADMISSION was served upon counsel for Opposer on this 15 day of October, 2014 by first class mail and e-mail to:

SHANNON MCCUE

HAHN LOESER & PARKS LLP

200 PUBLIC SQUARE, SUITE 2800

CLEVELAND, OH 44114

UNITED STATES

trademarks@hahnlaw.com, bareese@hahnlaw.com, smccue@hahnlaw.com, bclark@hahnlaw.com

By Electronic Mail.

By Priority First Class Mail

Date: October 15, 2014

/ Erin C. Bray /
Erin C. Bray

SWORN DECLARATION OF GENE CHANG

I, Gene Chang, swear an oath and under penalty of perjury that the following statements, facts and representations are true:

1. I am the present Chief Executive Officer of Alliance Powersports, Inc.
2. In March 2011, Alliance Powersports signed an exclusive distribution agreement with Sanyang Industrial Co. Ltd.
3. Sanyang Industrial has been manufacturing the SYM Wolf Classic 150 since 1974.
4. Alliance Powersports has been importing the SYM Wolf Classic 150 into the United States since August 2011.
5. Alliance Powersports was the first United States Distributor to import the SYM Wolf Classic 150 into the United States for sale to the public.
6. Alliance Powersports, Inc. entered into a Contractual Agreement with Sanyang Industry Co. Ltd. on June 11, 2012 for the import of SYM motorcycles and engines into the USA.
7. November 27, 2013, Alliance Powersports filed an application to register its use of the mark "Wolf" for scooters.
8. On November 21, 2013, I directed Alex Chang, who was at the time the web designer for Alliance Powersports to email the photos of the Wolf Classic to my attorney to use as the specimen of use for my application.
9. On August 21, 2014, after careful inspection of the photos that had been submitted, I became aware that the photos that were supplied as the specimen of use were the "decal placement" photos that had been sent our manufacturer as part of the specifications for the WOLF.
10. At no time prior to August 21, 2014 was I aware that the photos submitted were not original photos of the Wolf Classic 150.

{Signature Page Follows}

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on Oct 5, 2014 _____:

gene chang
Gene Chang

6. Opposer objects to the Requests to the extent that they seek information that calls for a legal conclusion.
7. Opposer objects to the Requests to the extent that they require Opposer to seek information from parties over whom Opposer possesses neither control nor ability to control.
8. Opposer objects to any Requests that pose a hypothetical and/or are based upon facts that have not been established.
9. These Responses are based upon information presently available. Opposer expressly reserves its right to supplement these Responses as more information becomes available to it.
10. Opposer's specific Responses and Objections to the individual requests shall be deemed to incorporate, and shall not be deemed a waiver of, these General Objections.

OBJECTIONS AND RESPONSES REQUESTS FOR ADMISSION

4. Admit the photographs produced by Applicant (Bates Numbers HAM 000196, HAM 000197, HAM 000198, HAM 000199, HAM 000200, HAM 000201, HAM 000202, HAM 000203, HAM 000204 and 000205) are authentic photographs of Opposer's scooters within the meaning of authentic under the Federal Rules of Evidence.

RESPONSE: Opposer states that after a reasonable inquiry, the information known to or readily obtainable by them is insufficient to enable it to admit or deny this request.

5. Admit Opposer does not dispute Applicant's indication that the authentic photographs identified in Request for Admission No. 4, taken and produced by Applicant, are representative of Opposer's scooters as provided to dealerships and as seen in dealerships no earlier than August 1, 2014.

RESPONSE: Opposer states that after a reasonable inquiry, the information known to or readily obtainable by them is insufficient to enable it to admit or deny this request.

6. Admit Opposer does not dispute Applicant's indication that the photographs identified in Request for Admission No. 4, taken and produced by Applicant, were taken at Opposer's authorized dealers in Ohio and Florida.

RESPONSE: Opposer states that after a reasonable inquiry, the information known to or readily obtainable by them is insufficient to enable it to admit or deny this request.

7. Admit Opposer receives scooters from manufacturer SYM with all markings or other cosmetic features applied or complete.

RESPONSE: Opposer admits in part and denies in whole. Opposer receives scooters from manufacturer SYM, however, due to mistakes in manufacturing and other variables out of Opposer's control, including missing parts, missing stickers, and missing logo

decals, Opposer cannot respond that it categorically receives scooters from manufacturer SYM with all markings or other cosmetic features applied or complete in every instance.

8. Admit Opposer does not affix or otherwise apply any WOLF marking to its scooters.

RESPONSE: Opposer admits in part and denies in whole. As stated in response to Request for Admission 7, Opposer does not always receive scooters from manufacturer SYM with all decals and markings applied, therefore, if the correct decal is on hand in inventory, Opposer has, when necessary, affixed or applied WOLF markings to its scooters.

9. Admit Opposer did not sell, ship, or distribute in the United States any scooter marked as shown in its specimens filed in support of its trademark application before the U.S. Patent and Trademark Office prior to filing its trademark application.

RESPONSE: Denied. Opposer has sold and distributed a scooter as shown in the specimen filed with Opposer's trademark application.

10. Admit Opposer has never sold, shipped, or distributed in the United States any scooter marked as shown in its specimens filed in support of its trademark application before the U.S. Patent and Trademark Office.

RESPONSE: Denied. Opposer has sold and distributed a scooter as shown in the specimen filed with Opposer's trademark application.

11. Admit Opposer did not receive from Manufacturer SYM or any other source scooters bearing any WOLF mark in the U.S. prior to the filing date of Opposer's trademark application before the U.S. Patent and Trademark Office.

RESPONSE: Denied. Prior to the filing of Opposer's trademark application it received scooters bearing the WOLF mark. Opposer received all SYM Wolf Classic 150 scooters with the previously provided WOLF manuals attached to the scooter.

12. Admit Opposer did not receive from Manufacturer SYM or any other source scooters bearing any WOLF mark in the U.S. prior to Opposer's request to begin marking the scooters with a WOLF mark in October 2013 in accordance with Opposer's response to Applicant's Interrogatory 55.

RESPONSE: Denied. Prior to October 2013, Opposer received scooters bearing the WOLF mark. Opposer received all SYM Wolf Classic 150 scooters with the previously provided WOLF manuals attached to the scooter.

13. Admit Opposer did not sell, ship, or distribute any scooters bearing any WOLF mark in the United States prior to the filing date of Opposer's trademark application.

RESPONSE: Denied. Prior to the filing date of Opposer's trademark application it sold, shipped, and distributed scooters bearing the WOLF mark. Since the SYM Wolf Classic 150 was first imported by Opposer in August 2011, Opposer has distributed all SYM Wolf Classic 150 scooters with the previously provided WOLF manuals attached to the scooter.

14. Opposer did not sell, ship, or distribute any containers for scooters, displays associated with scooters, or tags or labels affixed to scooters bearing any WOLF mark in the United States prior to the filing date of Opposer's trademark application.

RESPONSE: Denied. Opposer sold, shipped and distributed displays associated with, manuals, tags, and labels, affixed to its SYM Wolf Classic 150 prior to the filing date of its trademark application.

15. Admit Opposer did not sell, ship, or distribute any scooters bearing any WOLF mark in the United States prior to becoming the distributor for SYM.

RESPONSE: Admit.

16. Admit Opposer did not sell, ship, or distribute any containers for scooters, displays associated with scooters, or tags or labels affixed to scooters bearing any WOLF mark in the United States prior to becoming the distributor for SYM.

RESPONSE: Admit.

Dated: December 3, 2014

Respectfully submitted,

/Erin C. Bray/

Erin C. Bray, Esq.
Lee, Lee & Associates, P.C.
2531 Jackson Road, Suite 234
Ann Arbor, MI 48103
Tel: 866-400-2507
Fax: 800-689-7978
erin@llapc.com
jj@llapc.com
Attorneys for Opposer
Alliance Power Sports, Inc.

VERIFICATION

I verify that the foregoing interrogatory answers to Opposer's First Requests for Admission are true and correct on information and belief.

Gene Chang

Executed _____

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing OPPOSER'S RESPONSES TO APPLICANT'S FIRST REQUESTS FOR ADMISSION was served upon counsel for Opposer on this 3rd day of December, 2014 by first class mail and e-mail to:

SHANNON MCCUE
HAHN LOESER & PARKS LLP
200 PUBLIC SQUARE, SUITE 2800
CLEVELAND, OH 44114
UNITED STATES
trademarks@hahnlaw.com, bareese@hahnlaw.com, smccue@hahnlaw.com, bclark@hahnlaw.com
By Electronic Mail.
By Priority First Class Mail

Date: December 3, 2014

/ Erin C. Bray /
Erin C. Bray

SWORN DECLARATION OF GENE CHANG

I, Gene Chang, swear an oath and under penalty of perjury that the following statements, facts and representations are true:

1. I am the present Chief Executive Officer of Alliance Powersports, Inc.
2. In March 2011, Alliance Powersports signed an exclusive distribution agreement with Sanyang Industrial Co. Ltd.
3. Sanyang Industrial has been manufacturing the SYM Wolf Classic 150 since 1974.
4. Alliance Powersports has been importing the SYM Wolf Classic 150 into the United States since August 2011.
5. Alliance Powersports, Inc. entered into a Contractual Agreement with Sanyang Industry Co. Ltd. on June 11, 2012 for the import of SYM motorcycles and engines into the USA.
6. The SYM Wolf Classic 150 model has not been modified or changed since it was first imported to the United States in 2011.
7. Attached are true and correct photos of the SYM Wolf Classic 125M/P 150M Series Owner's Manual from 2011, 2012, 2013, 2014, and 2015, which are indistinguishable from each other.
8. The owner's manual is shipped with each SYM Wolf Classic 150 from the factory in Taiwan.
9. The "WOLF" mark has appeared on the cover of the owner's manual since 2011.

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

Executed on Oct 13, 2014 _____:

GENE CHANG
Gene Chang





Owner's Manual
125M/P150M SERIES

Motif
classic





SANYANG INDUSTRY CO., LTD.
3 Chung Hua Road Hukou Hsinchu Taiwan R.O.C.
T 886-3-598-1911
F 886-3-598-1844
W www.sym.com



4. SAFETY DEFECT REPORT

SANYANG INDUSTRY CO., Ltd.
NO. 3, chung-Hua Road
Hukou Shiang
Hsin-Chu County, 303
Taiwan, R.O.C

Reporting Safety Defects

If you believe that your vehicle has a defect which could cause a crash or could cause injury or death, you should immediately inform the National Highway Traffic Safety Administration (NHTSA) in addition to notifying Sanyang Industry Co., Ltd. If NHTSA receives similar complaints, it may open an investigation, and if it finds that a safety defect exists in a group of vehicles, it may order a recall and remedy campaign. However, NHTSA cannot become involved in and individual problems between you, your dealer, or Sanyang Industry Co., Ltd.

To contact NHTSA you may either call the Auto Safety Hotline toll-free at 1-800-424-9393/366-0123 in Washington, DC area) or write to:
NHTSA

U.S. DEPARTMENT OF TRANSPORTATION

400 7 th Street SW, (NSA-11)
Washington, DC 205090.

You can also obtain other information about motor vehicle safety from the Hotline.

1. CONTENTS	1
2. CONTROL LOCATION	3
3. BEFORE RIDING	4
4. USE GENUINE SPARE PARTS	4
5. SAFE RIDING	5
6. RIDING	6
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Use of buttons	10
Fuel tank cap	11
Fuel coke	11
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Brake	12
8. IMPORTANT POINTS AND CAUTIONS FOR STARTING ENGINE	13
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9. RIDING THE MOTORCYCLE	13
Set up riding	15
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Transmission operation	16
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10. INSPECTION AND MAINTENANCE BEFORE RIDING	18
Routine inspection	19
Fuel inspection	19
Fuel coke cleaning	19
Engine oil inspection and change	20
Oil filter cleaning	20
Inspection and adjustment of brake free play	21
Clutch lever	21
Throttle valve handle clearance adjustment	22
.....	23



SAFETY DEFECT REPORT

SANYANG INDUSTRY CO., Ltd.

NO. 3, chung-Hua Road

Hukou Shiang

Hsin-Chu County, 303

Taiwan, R.O.C

Reporting Safety Defects

If you believe that your vehicle has a defect which could cause a crash or could cause injury or death, you should immediately inform the National Highway Traffic Safety Administration (NHTSA) in addition to notifying Sanyang Industry Co., Ltd.

If NHTSA receives similar complaints, it may open an investigation, and if it finds that a safety defect exists in a group of vehicles, it may order a recall and remedy campaign.

However, NHTSA cannot become involved in and individual problems between you, your dealer, or Sanyang Industry Co., Ltd.

To contact NHTSA you may either call the Auto Safety Hotline toll-free at 1-800-424-9393(366-0123 in Washington, DC area) or write to:

NHTSA

U.S. DEPARTMENT OF TRANSPORTATION

400 7 th Street SW, (NSA-11)

Washington, DC 205090.

You can also obtain other information about motor vehicle safety from the Hotline.

SYM

RIDING IN GRADE

Up Grade - Lightly grade can ride with high position gear. When riding up a hill, turn the throttle valve handle slowly to allow the engine to output its power.

Down Grade -



THE CONTROL OF THROTTLE VALVE HANDLE

Acceleration : To increase speed. When riding on an inclined road, turn the throttle valve handle slowly to allow the engine to output its power.

Deceleration : To decrease speed.



Maintenance Performance - During the initial period, it is better to ride in low speed for running the engine in good condition and long life.

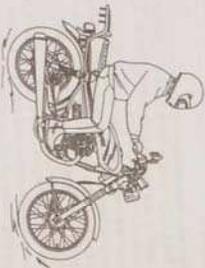
During the first month or first 1,000 km, never exceed 80km/h. Avoid abrupt acceleration.

Avoid engine stalling in RPM (over 8,000RPM) while under no load.

Never Making Abrupt Braking Or Making A Full Turn.

Make braking or making a full turn may cause wheel slip.

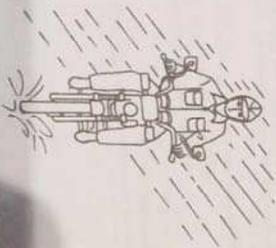
When riding in wet or rainy conditions, making abrupt braking or making a turn may cause wheel slip, may lose control of the motorcycle.



Extreme Caution When Riding In Rainy

Condition - When riding in wet or rainy, Conditions needs longer distance to stopping the motorcycle. Slow the motorcycle down early to brake.

When descending a grade, close the throttle fully and use both brakes to slow the motorcycle.



9. Riding the motorcycle

SYM

RIDING IN GRADE

Up Grade - Lightly grade can ride with high position gear. When riding up a hill, turn the throttle valve handle slowly to allow the engine to output its power.

Down Grade -



THE CONTROL OF THROTTLE VALVE HANDLE

Acceleration : To increase speed. When riding on an inclined road, turn the throttle valve handle slowly to allow the engine to output its power.

Deceleration : To decrease speed.

Maintenance Performance - During the initial period, it is better to ride in low speed for running the engine in good condition and long life.

During the first month or first 1,000 km, never exceed 80km/h. Avoid abrupt acceleration.

Avoid engine stalling in RPM (over 8,000RPM) while under no load.

Never Making Abrupt Braking Or Making A Full Turn.

Make braking or making a full turn may cause wheel slip.

When riding in wet or rainy conditions, making abrupt braking or making a turn may cause wheel slip, may lose control of the motorcycle.



Extreme Caution When Riding In Rainy

Condition - When riding in wet or rainy, Conditions needs longer distance to stopping the motorcycle. Slow the motorcycle down early to brake.

When descending a grade, close the throttle fully and use both brakes to slow the motorcycle.



9. Riding the motorcycle

SYM

RIDING IN GRADE

Up Grade - Lightly grade can ride with high position gear. When riding up a hill, turn the throttle valve handle slowly to allow the engine to output its power.

Down Grade -



THE CONTROL OF THROTTLE VALVE HANDLE

Acceleration : To increase speed. When riding on an inclined road, turn the throttle valve handle slowly to allow the engine to output its power.

Deceleration : To decrease speed.

Maintenance Performance - During the initial period, it is better to ride in low speed for running the engine in good condition and long life.

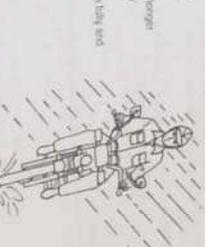
During the first month or first 1,000 km, never exceed 80km/h. Avoid abrupt acceleration.

Avoid engine stalling in RPM (over 8,000RPM) while under no load.

Never Making Abrupt Braking Or Making A Full Turn.

Make braking or making a full turn may cause wheel slip.

When riding in wet or rainy conditions, making abrupt braking or making a turn may cause wheel slip, may lose control of the motorcycle.



Extreme Caution When Riding In Rainy

Condition - When riding in wet or rainy, Conditions needs longer distance to stopping the motorcycle. Slow the motorcycle down early to brake.

When descending a grade, close the throttle fully and use both brakes to slow the motorcycle.

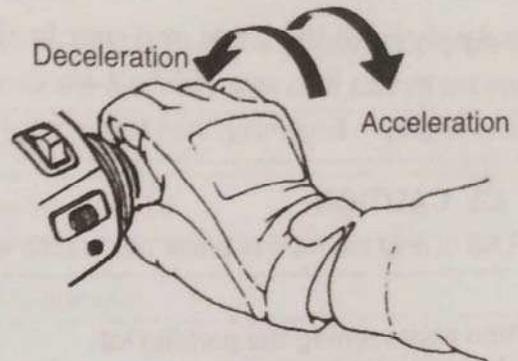


9. Riding the motorcycle

THE CONTROL OF THROTTLE VALVE HANDLE

Acceleration : To increase speed. When riding on an inclined road, turn the throttle valve handle slowly to allow the engine to output its power.

Deceleration : To decrease speed.



Maintenance Performance-During the initial period, it is better to ride in low speed for running the engine in good condition and long life.

During the first month or first 1,000 km, never exceed 80km/h.

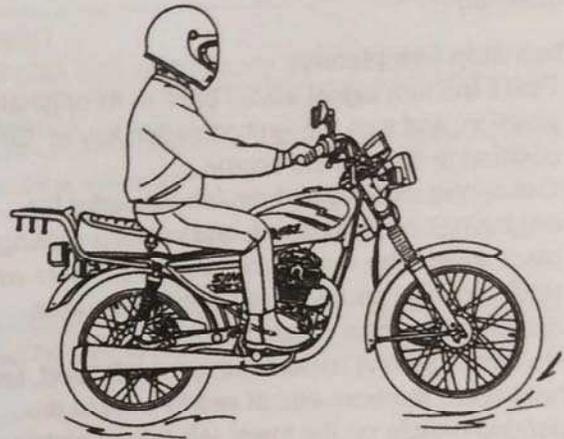
Avoid abrupt acceleration.

Avoid engine running in RPM (over 8,000RPM) while under no load.

Never Making Abrupt Braking Or Making A Full Turn.

Make braking or making a full turn may cause wheel slip.

When riding in wet or rainy conditions, making abrupt braking or making a turn may cause wheel slip, may lose control of the motorcycle.



Extreme Caution When Riding In Rainy Condition.

When riding in wet or rainy. Conditions needs longer distance to stopping the motorcycle. Slow the motorcycle down early to brake.

When descending a grade, close the throttle fully and use both brakes to slow the motorcycle



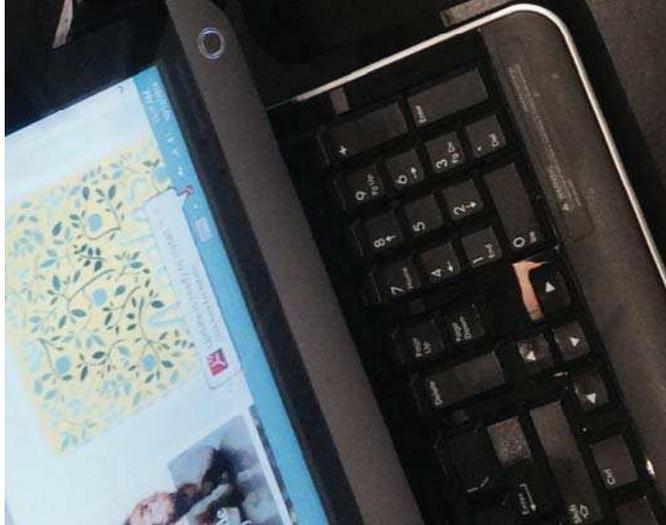
Model	PA12B	PA12C	PA12E	PA12F
Capacity	1.2 TB	1.2 TB	1.2 TB	1.2 TB
Form factor	3.5" SATA	3.5" SATA	3.5" SATA	3.5" SATA
Transfer rate	150 MB/s	150 MB/s	150 MB/s	150 MB/s
Power consumption	5.5W	5.5W	5.5W	5.5W
Dimensions	147 x 112 x 26 mm			
Weight	100g	100g	100g	100g
Warranty	3 years	3 years	3 years	3 years

Model	PA12B	PA12C	PA12E	PA12F
Capacity	1.2 TB	1.2 TB	1.2 TB	1.2 TB
Form factor	3.5" SATA	3.5" SATA	3.5" SATA	3.5" SATA
Transfer rate	150 MB/s	150 MB/s	150 MB/s	150 MB/s
Power consumption	5.5W	5.5W	5.5W	5.5W
Dimensions	147 x 112 x 26 mm			
Weight	100g	100g	100g	100g
Warranty	3 years	3 years	3 years	3 years

Model	PA12B	PA12C	PA12E	PA12F
Capacity	1.2 TB	1.2 TB	1.2 TB	1.2 TB
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Transfer rate	150 MB/s	150 MB/s	150 MB/s	150 MB/s
Power consumption	5.5W	5.5W	5.5W	5.5W
Dimensions	147 x 112 x 26 mm			
Weight	100g	100g	100g	100g
Warranty	3 years	3 years	3 years	3 years

Model	PA12B	PA12C	PA12E	PA12F
Capacity	1.2 TB	1.2 TB	1.2 TB	1.2 TB
Form factor	3.5" SATA	3.5" SATA	3.5" SATA	3.5" SATA
Transfer rate	150 MB/s	150 MB/s	150 MB/s	150 MB/s
Power consumption	5.5W	5.5W	5.5W	5.5W
Dimensions	147 x 112 x 26 mm			
Weight	100g	100g	100g	100g
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Model	PA12B	PA12C	PA12E	PA12F
Capacity	1.2 TB	1.2 TB	1.2 TB	1.2 TB
Form factor	3.5" SATA	3.5" SATA	3.5" SATA	3.5" SATA
Transfer rate	150 MB/s	150 MB/s	150 MB/s	150 MB/s
Power consumption	5.5W	5.5W	5.5W	5.5W
Dimensions	147 x 112 x 26 mm			
Weight	100g	100g	100g	100g
Warranty	3 years	3 years	3 years	3 years



Model	PA12B	PA12C	PA12E	PA12F
Capacity	1.2 TB	1.2 TB	1.2 TB	1.2 TB
Form factor	3.5" SATA	3.5" SATA	3.5" SATA	3.5" SATA
Transfer rate	150 MB/s	150 MB/s	150 MB/s	150 MB/s
Power consumption	5.5W	5.5W	5.5W	5.5W
Dimensions	147 x 112 x 26 mm			
Weight	100g	100g	100g	100g
Warranty	3 years	3 years	3 years	3 years



Item	Model Specification	
	PA12B	PA12C
Length	1,910 mm	1,925 mm
Width	760 mm	725 mm
Height	1,030 mm	1,075 mm
Wheel base	1,210 mm	1,235 mm
Net Weight	118.5 kg	124 kg
Type	4- stroke single cylinders engine	
Fuel	Unleaded (octane 90 or higher)	
Cooling type	Air-cooled	
Displacement	124.0 c.c.	
Compression ratio	9.0:1	
Max. HP	14 ps/9,500 rpm	
torque	1.0 kg-m/7,500 rpm	
Starting methods	1,500±100 rpm	
Front shock absorber	Electrical & foot type	
Rear shock absorber	Telescope	
Clutch	Unit swing	
Transmission	Wet disk type	
Front tire	Gear	
Rear tire	2.75 - 18 - 42P	

Item	Model Specification	
	PA12E	PA15E
Length		
Width	1,940 mm	
Height	775mm	
Wheel base	1,045 mm	
Net Weight	1,250 mm	
Type	130 kg	
Fuel	4- stroke single cylinders engine	
Cooling type	Unleaded (octane 90 or higher)	
Displacement	Air-cooled	
Compression ratio	124.0 cc.	
Max. HP	9.0:1	149.4 cc.
Max. torque	11.5 ps/9,500 rpm	9.3:1
Idle	1.0 kg-m/7,500 rpm	12.5 ps/9,000 rpm
Starting methods	1,700±100 rpm	1.07 kg-m/8,000 rpm
Front shock absorber	Electrical	
Rear shock absorber	Telescope	
Clutch	Unit swing	
Transmission	Wet disk type	
Front tire	5-speed gear change	
Rear tire	9.75 - 18 - 42P	



Item	Model Specification	PA12B	PA12C
Length		1,810 mm	1,825 mm
Width		760 mm	795 mm
Height		1,530 mm	1,075 mm
Wheel base		1,210 mm	1,235 mm
Net Weight		118.2 kg	124 kg
Type		4-stroke single cylinder engine	
Fuel		Unleaded (Octane 90 or higher)	
Cooling type		Air-cooled	
Displacement		124.0 c.c.	
Compression ratio		9.0:1	
Max. RPM		14 psi/9,560 rpm	
Max. torque		1.0 kg-m/7,500 rpm	
Idle		1,500±100 rpm	
Starting methods		Electrical & foot type	
Front shock absorber		Telescopic	
Rear shock absorber		Unit swing	
Clutch		Wet disk type	
Transmission		Gear	
Front tire		275 - 18 - 43P	
Rear tire		3.00 - 17 - 45P	
Wheel rim		Steel	
Tire pressure		Front: STD 1.8kg/cm ² Rear: STD 2.0kg/cm ² for 1 person, 2.4kg/cm ² for 2 person	
Front brake		Disk type (Ø 240 mm)	
Rear brake		Drum type (Ø 130 mm)	
Front light bulb (high, low)		12V 35/55W	
Brake light bulb (tail light)		12V 20W / 8W	
Turn signal light bulb		12V 10W	
Meter plug bulb		12V 1.7W	
Meter illumination bulb		12V 1.7W	
Engine oil capacity		1.0 L (0.8L for change)	
Fuel tank capacity		9.3L	
Fuse		5A	
Spark plug		NGK D7EA	
Battery capacity		12V 7Ah (closed type, maintenance-free battery)	
Air cleaner		Foam wet type	
Rear grab frame		Can load cargo (Under 5kg)	

SWORN DECLARATION OF MICHELE STANLEY

I, Michele Stanley, swear or affirm:

1. That I am an owner and manager of Tropical Scooters, LLC, located at 11610 Seminole Boulevard, Largo Florida 337788.
2. That at least as early as November 2011 my dealership has been an authorized SYM dealer through Alliance Powersports, Inc.
3. On or about November 15, 2011, my dealership received its first shipment of the SYM Wolf Classic 150.
4. Since November 15, 2011, my dealership has received regular shipments of the SYM Wolf Classic 150.
5. Since September 2011, the SYM Wolf Classic 150 model has not been changed.
6. Each SYM Wolf Classic 150 is delivered to my dealership in a cardboard shipping crate with the keys in the ignition. Attached to the keys with a twist tie is a ziplock bag containing the Owner's Manual for the SYM Wolf Classic 150.
7. The "WOLF" mark has always appeared on the front cover of the manual in an old-English type calligraphy font.
8. The owner's manual has not changed since my dealership first received a SYM Wolf Classic 150 in our stock in 2011.
9. Customers of my dealership are familiar with the SYM Wolf Classic 150, and often request or refer to it as the "Wolf" or "SYM Wolf".
10. I have personal knowledge of the scooter brand currently calling itself Wolf Brand Scooters and was previously known as GMW or Gorilla Motor Works.
11. GMW or Wolf Brand Scooters operates in my local area.
12. When I heard that GMW had changed their name to Wolf Brand Scooters I was surprised that they would choose a brand already in use by another scooter maker.
13. GMW or Wolf Brand Scooters does not have a good reputation in the scooter market.

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

Executed on Oct 13, 2014 :

Michele R Stanley
Michele Stanley

Sold to:

Adam Michael Ris
6138 Warwood Rd.
Lakewood, Ca 90713

562 212 4413

EMAIL: earsfilled@yahoo.com

Date: March 13, 2012

Services/ Product Description (color, size,

2012 Sym Wolf classic
Registration
FREE HELMET

Note: Special order subject to financing

ALL
NO RE
NO P
AR

Make:SYM
Model:Wolf Classic 150cc
Year:2012
Color:Green
Mileage: 1
Vin # RFGBB1ME5CSPA01013
Engine # RV700078 (TWO ONES)

Adam Michael Ris

Customer Signature



Owner's Manual
125M/P150M SERIES

Wolf
classic



HB SCOOTERS



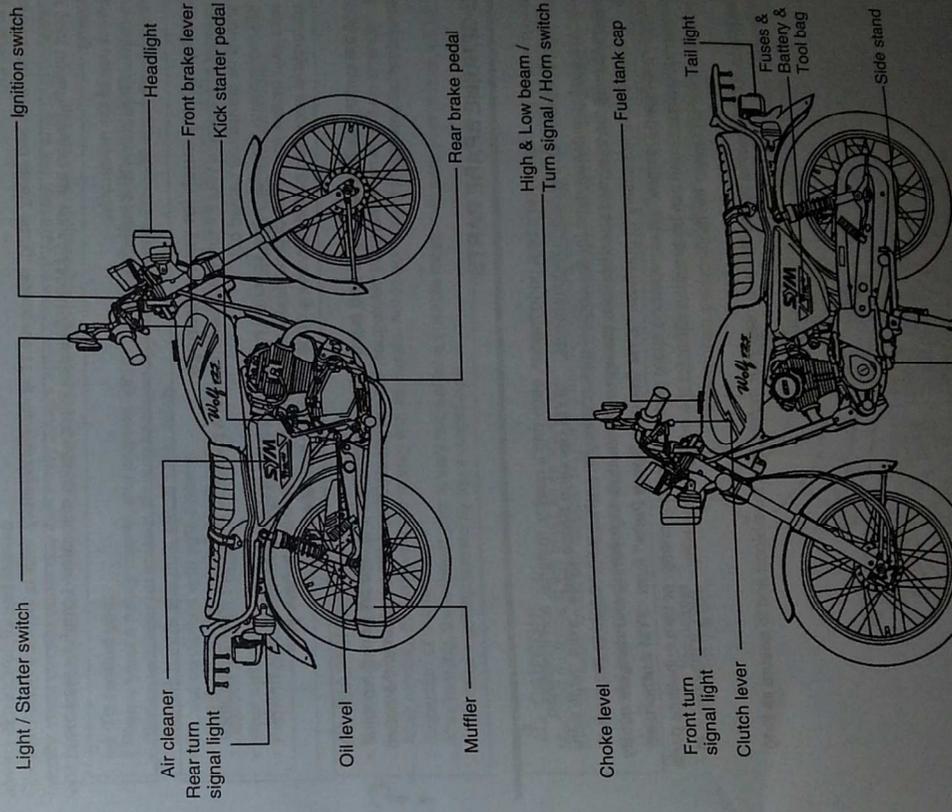
HB SCOOTERS – full service motor scooter & electric bike dealership
5960 Warner Avenue, Huntington Beach, CA 92649
tel: 714.840.8090
fax: 714.8409062
www.hbscooters.com

Sold to:

Adam Michael Ris
6138 Warwood Rd.
Lakewood, Ca 90713

Date: March 13, 2012

MODEL: WOLF SERIES



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ORMAL CONDITION OR A TROUBLE

not start

ON SYSTEM

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MOTORCYCLE

NCE SCHEDULE

Symwolf Classic 150 Gallery







(wolf.html)

[GALLERY \(wolf_gallery.html\)](#)

[VIDEO \(wolf_video.html\)](#)

[SPECS \(wolf_specs.html\)](#)

[ACCESSORIES \(./shop/main.html\)](#)

[BROCHURE \(https://www.dropbox.com/s/vx9z0e5r9himx9v/SYM_Wolf150.pdf\)](https://www.dropbox.com/s/vx9z0e5r9himx9v/SYM_Wolf150.pdf)

[REVIEWS \(wolf_reviews.html\)](#)

[MAINTENANCE \(https://www.dropbox.com/s/4kdh216subzgj0w/Wolf150_Maintenance.pdf\)](https://www.dropbox.com/s/4kdh216subzgj0w/Wolf150_Maintenance.pdf)

[WARRANTY \(../owners/warranty-registration.html\)](#)

Wolf Classic 150 Gallery

Like 303



(../images/models/Wolf/Gallery_Wolf_1.jpg)



(../images/models/Wolf/Gallery_Wolf_2.jpg)



(../images/models/Wolf/Gallery_Wolf_3.jpg)



(../images/models/Wolf/Gallery_Wolf_4.jpg)



(../images/models/Wolf/Gallery_Wolf_5.jpg)



(../images/models/Wolf/Gallery_Wolf_6.jpg)



(../images/models/Wolf/Gallery_Wolf_7.jpg)



(../images/models/Wolf/Gallery_Wolf_8.jpg)



(../images/models/Wolf/Gallery_Wolf_9.jpg)



(../images/models/Wolf/Gallery_Wolf_10.jpg)



(../images/models/Wolf/Gallery_Wolf_11.jpg)



(../images/models/Wolf/Gallery_Wolf_12.jpg)



(../images/models/Wolf/Gallery_Wolf_13.jpg)



(../images/models/Wolf/Gallery_Wolf_14.jpg)



(../images/models/Wolf/Gallery_Wolf_15.jpg)



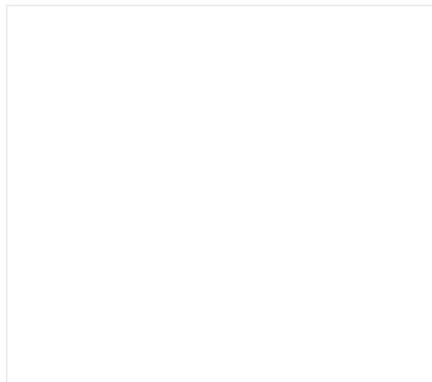
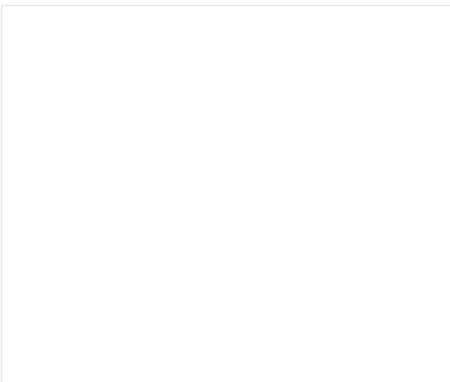
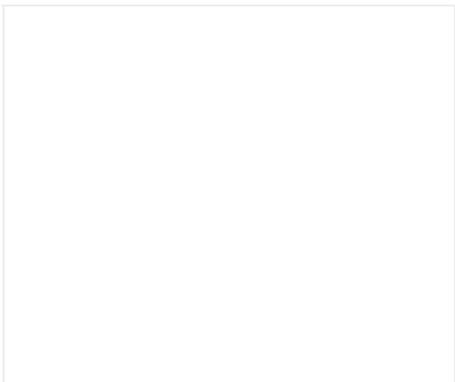
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(../images/models/Wolf/Gallery_Wolf_17.jpg)



(../images/models/Wolf/Gallery_Wolf_18.jpg)

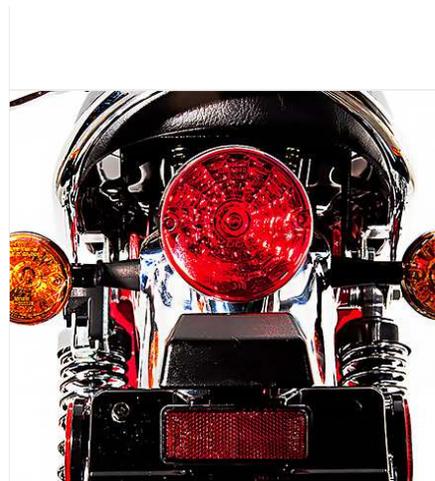




(../images/models/Wolf/Gallery_Wolf_22.jpg)



(../images/models/Wolf/Gallery_Wolf_23.jpg)



(../images/models/Wolf/Gallery_Wolf_24.jpg)



(../images/models/Wolf/Gallery_Wolf_25.jpg)



(../images/models/Wolf/Gallery_Wolf_26.jpg)



(../images/models/Wolf/Gallery_Wolf_27.jpg)



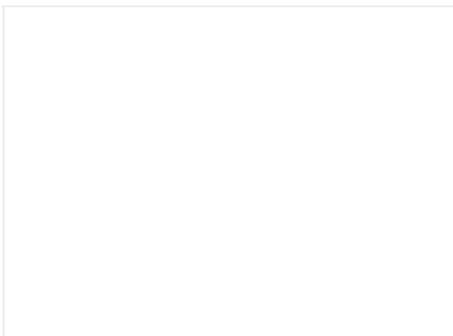
(../images/models/Wolf/Gallery_Wolf_28.jpg)



(../images/models/Wolf/Gallery_Wolf_29.jpg)



(../images/models/Wolf/Gallery_Wolf_30.jpg)





* MODELS

[T2 250i \(t2.html\)](#)

[All SYM Scooters \(index.html\)](#)

[Citycom 300i \(citycom.html\)](#) (images/models/Wolf/Gallery_Wolf_31.jpg)

[RV 200 Evo \(rv.html\)](#)

[HD 200 Evo \(hd.html\)](#)

[Wolf Classic 150 \(wolf.html\)](#)

[Fiddle II 125 \(fiddle.html\)](#)

[Symba 100 \(symba.html\)](#)

[Mio 50 \(mio.html\)](#)

[Jet 50 Evo \(jet.html\)](#)

i INFO

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[News & Review \(../news.html\)](#)

[Contact Us \(../contact.html\)](#)

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📍 DEALERS

[Find a Dealer \(../find_dealer.html\)](#)

[Dealer Login \(../dealer_login.html\)](#)

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♥ OWNERS

[Owners Main \(../owners/main.html\)](#)

[Shop SYM Accessories \(../shop/main.html\)](#)

[Owners Gallery \(../owners/owners_gallery.html\)](#)

[Share Your Love \(../special-offers.html\)](#)

[Owners Manual \(../owners/maintenance-guides.html\)](#)

[Warranty Registration \(../owners/warranty-registration.html\)](#)

[FAQ \(../owners/faq.html\)](#)

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CAFE RACER



DEC. 2011/JAN. 2012 • Issue 18

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BROUGH SUPERIOR
THE ROLLS OF MOTORCYCLES

RIDE 'EM, DON'T HIDE 'EM

Motorcycle

CLASSICS

March/April 2012

LEGENDARY DUCATI

THE LAST 900SS WAS THE BEST

PROJECT BIKE GIVEAWAY!
SEE PAGE 12



SUPER SUZUKI

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Andrew Dost

Member of Grammy Award
Winning Rock Band - fun.

FUN.

* fun. logo is trademark of Rock Band of fun.



EXHIBIT AP

2017
classic 150

85
mpg*



*Based on tests conducted in lab conditions. Actual mileage vary depend on vehicle condition, weather, rider weight and riding style.

Highlights



- ▶ Classic Style Motorcycle
- ▶ 5 Speed Transmission
- ▶ Vintage Style Muffler

- ▶ 30" Seat Height
- ▶ 85 MPG*
- ▶ Made in Taiwan

Specifications

ENGINE / DRIVETRAIN

Displacement	149.4 cc
Horsepower	14.79 hp - 8,500 RPM
Max Torque [nm/(r/min)]	9.04 lb/ft - 9,000 RPM
Cooling System	Air
Transmission	5-Speed, Circulated
Ignition	CDI
Top Speed	65.5 mph

CHASSIS / SUSPENSION / BRAKES

Front Suspension	Telescopic Fork
Rear Suspension	Swing Arm
Front Brakes	Disk (240mm)
Rear Brakes	Drum (130mm)
Front Tires	2.75 - 18
Rear Tires	3.00 - 17

CAPACITIES / DIMENSIONS / ADDITIONAL INFO

Weight Capacity	360 Lbs
Net Weight	266 Lbs
Fuel Capacity	3.3 Gallons
Length	77.95"
Width	30.51"
Height	41.73"
Seat Height	30"
Wheelbase	49.21"
Warranty	24 Month
MSRP	\$2,999

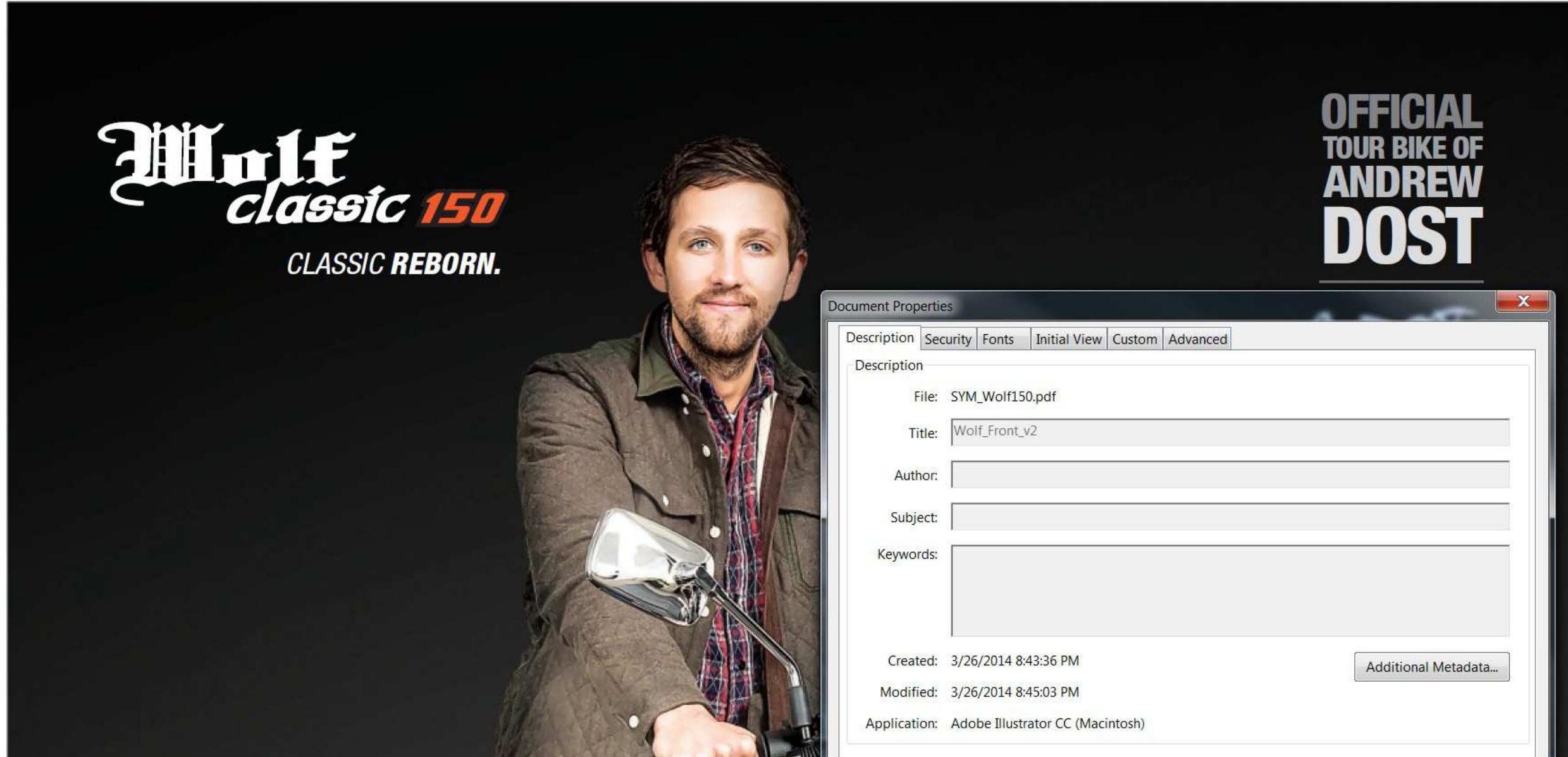


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Ready to join a company (actually 2 companies Lance P Powersports) with recent explosive growth? So much so now! We are looking for a couple of Industry Experience sales reps with a GREAT compensation package related persons performance. Result driven applicants are the o apply. Please send your resume to mike@lancepowersp a winning team!

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Lance Powersports
May 27

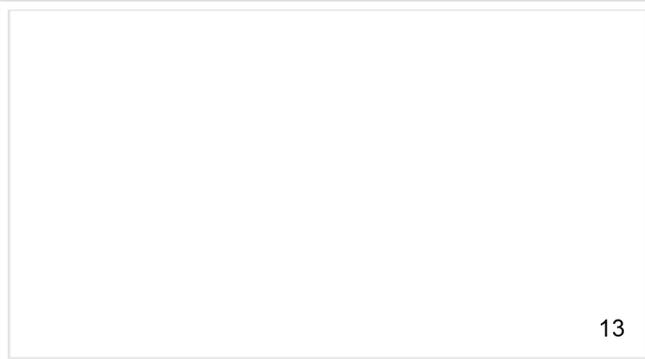
Chat (5)

Lance Powersports

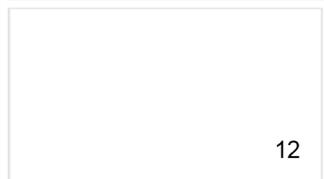
Erin Home



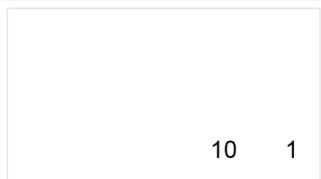
VIDEOS



13



12



10

1

POSTS TO PAGE



Oceanside Scooters

June 2 at 9:00pm

LANCE POWERSPORTS - - Just want to say you guys absolutely rock! Tha... See More

Like · Comment



Alberto Benito

May 27 at 7:27pm

Hello! What is the Bore and Stroke of the Lance PCH 50? Thanks for your help.

Like · Comment

Like · Comment · Share

34 people like this.



Write a comment...



Lance Powersports For the very few in the country that h Cabo here it is and what an Awesome bike!

Like · Reply · 1 · May 27 at 4:57pm



Jimenez Daniel Nice.

Like · Reply · 1 · May 28 at 10:07pm

View 3 more comments



Lance Powersports shared Alberto Benito's photo.

May 27

Extremely happy with my new Lance PCH 50 !! Thank Green for your excellent service !! — in Cranston, RI.

Chat (5)

Lance Powersports

Erin Home

Extremely happy with my new Lance PCH 50 !!
Thank you Scooters Go Green for your excellent service !!

Like · Comment 3 1 Share

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Like · Comment · Share

4 people like this.



Write a comment...



Lance Powersports shared Main Street Scooters's photo
May 24



Chat (5)

Lance Powersports

Erin **Home**

Like · Comment · Share

12 people like this.



Write a comment...

Chat (5)



Lance Powersports

May 23

Erin Home

SYM WOLF 150CC - Cafe Racer style - 2 Year Warranty - 65 Miles Per Hour - Great Urban commuter - Only \$2999.....



Like · Comment · Share

2 Shares

14 people like this.



Write a comment...



Lance Powersports

May 22

The 2014 Cabo 50cc will be back in stock tomorrow morning, please get your order in right away, these bikes will absolutely not last!

Like · Comment · Share

Tris Iron likes this.



Write a comment...



Lance Powersports

May 21

The Cabo 125 cc are back in stock, Last load sold out in 2 days!

Like · Comment · Share

2 people like this.

Chat (5)

Lance Powersports

Erin Home

Chat (5)

Adventure Rider

RIDE THE WORLD.



ADVrider > Bikes > Thumpers

SYM Wolf Classic 150

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08-29-2011, 09:38 PM

#1

MaineScout **OP**

Gnarly Adventurer

Joined: Jan 2011
Location: Portland
Odometer: 494

SYM Wolf Classic 150

Word is these bikes are on the water and will finally be available here in the US in a couple of weeks.



What do you guys think? I think I want one.



08-29-2011, 10:03 PM

#2

Jimmy the Heater

Tilting the Horizon



Joined: Sep 2004
Location: WA Palouse area
Odometer: 1,776

I have absolutely no use for a bike like that but it is still pretty damn cool looking and I would sure as hell ride one.



08-30-2011, 01:30 PM

#3

Smoke Show

Gnarly Adventurer

Love the look! Any word on a price point??

06 R1200GS
03 250 EXC-F

EXHIBIT AS

 <p>Joined: Mar 2007 Location: Toronto Odometer: 110</p> 	<p>06 CRF-50F</p> <p style="text-align: right;"></p>
<p> 08-30-2011, 03:00 PM #4</p>	
<p>MaineScout ^{OP} Gnarly Adventurer</p> <p>Joined: Jan 2011 Location: Portland Odometer: 494</p> 	<p>I think I heard \$2999 but that was a while ago.</p> <p style="text-align: right;"></p>
<p> 11-03-2011, 05:26 AM #5</p>	
<p>MaineScout ^{OP} Gnarly Adventurer</p> <p>Joined: Jan 2011 Location: Portland Odometer: 494</p> 	<p>There is a good review of the Wolf here: http://www.twincitiesrider.com/symwolf012.htm</p>  <p style="text-align: right;"></p>
<p> 11-03-2011, 07:15 AM #6</p>	
<p>tastroman Beastly Adventurer</p> <p>Joined: May 2009 Location: Collinsville Va Odometer: 1,485</p> 	<p>If it were a 350-500cc they would have cornered the market. As it stands for an extra grand I'd go with the TU 250.</p> <p>-----</p> <p>The world would be a better place if there were fewer people who felt like they needed to teach other people a lesson. 2007 Daelim S-2 250 2009 Buell Ulysses XB12XT</p> <p style="text-align: right;"></p>
<p> 11-03-2011, 09:51 AM #7</p>	
<p>ChrisC Molon Labe</p>  <p>Joined: Feb 2003 Location: Prescott, Arizona USA Earth Odometer: 6,304</p> 	<p>The article lost me right here... </p> <p>"SYM is Sanyang Motors out of Taiwan. They've been around since 1961 and they build some of the highest quality motorcycles and scooters in the world. "</p> <p>Chris '03 KTM Adventure 640 '43 BSA M20WD</p> <p style="text-align: right;"></p>
<p> 11-03-2011, 09:56 AM #8</p>	

gogogordy

Beastly Adventurer



Joined: Feb 2009
 Location: Temecula, So. California
 Odometer: 1,819



Quote:

Originally Posted by **ChrisC** *The article lost me right here...*

"SYM is Sanyang Motors out of Taiwan. They've been around since 1961 and they build some of the highest quality motorcycles and scooters in the world. "

They actually built hundreds of thousands of engines for...HONDA. Right there in Taiwan. US bound HONDAS at that...

Isn't it past your bedtime?



11-03-2011, 04:27 PM

#9

MaineScout ^{OP}

Gnarly Adventurer

Joined: Jan 2011
 Location: Portland
 Odometer: 494



And not just Honda engines. Millions of Hondas, too. I'm thinking of getting a Wolf. Just right for around town and a little more power than my Symba. My daughter really wants the Symba anyway.



11-09-2011,
 11:11 PM

mojave

Gnarly Adventurer

Joined: Oct 2007
 Location: Inyokern - middle of frixxen nowhere
 Odometer: 165

Well, if you see one of these SYM's (Symba or Classic 150) in person you will want it to take it home are cute. A few weeks ago I dragged my Linda over to see the Symba on the computer screen. For years and thousands of these patient viewings she got excited. Looking further into SYM online I found and she fell in love. So for her 55th birthday yesterday she got this...





I can give some impressions but with just 35 miles on it this is still the breakin. It's small and feels like a 150. The manual says 266 pounds wet weight but it just can't be - it feels under 200 pounds - I'll weigh it later. The seat height is 29 inches unladen. Linda is 5'3" and 115 pounds, so the bike fits her better than me but it's even so.

I cruised about keeping the revs below 6,000 (45 in 5th). It has decent low and midrange power for a 150 but I have a feeling it isn't going to get exciting higher in the rev range. I did take it up to 60 on highway and it was still barely pulling when I let off. I've read a report where some reviewer hit 82mph (GPS) on a 150 but must have been heartlessly revving the \$#%@ out of it because the 9,500 rpm redline is only good for a rough calculation. Engine is a little buzzy at 6,000, more at 7,000, and seems to get smoother above that. I started revving it at the end of my run. I predict that it will cruise at 60 mph OK, and will make 70 mph in 5th.

Handling is a doodle as they say - slightly too quick if anything. As it turned out the tires were over 33 (front). I've since put them at 30 and 26, this will probably slow things down a little. Sitting position is comfortable! The bars are clip-ons but seem to be in a great position for the street. Forks are plush. Suspension seems stiff and under damped - kind of like the 70's again! Brakes are more than good and have good power and feel.

This is a California bike and there is a ton of CARB crap on it - charcoal can, CAT exhaust, air injectors, zillion little vacuum lines running here and there. One of these days I'm going to The battery is a 9AH, that's getting replaced by a 9AH Shorai post haste. Bless SYM's heart the chain is an O-ring. Stainless steel front fender - stainless? All the little gadgets and wiggies seem standard OEM quality. A little large but so then is the headlight, it grows on you. The taillight is plain cool.

Overall, the fit and finish is quality, kind of like the old Hondas. There appears to be NO aftermarket accessories from SYM either. This bike needs a Dynojet kit and a real exhaust - it has that choked exhaust. It's my wife's bike I'm leaving it alone. Well, maybe I'll fiddle with the airbox, jetting, and exhaust system another (used for cheap) it's getting stripped - these will make great micro anything bikes - cafe, s

All for now!

2003 XL883R/1200
2008 WR250R
2006 Ninja 250
2012 SYM Wolf Classic 150
2012 NC700X

mojave screwed with this post 11-11-2011 at 06:58 AM



11-10-2011, 09:26 PM

#11

mojave

Gnarly Adventurer

Joined: Oct 2007
Location: Inyokern - middle of frixxen nowhere
Odometer: 165

Longer ride today, mileage is up to 80. Started taking it up in speed, it seems to like 55mph but will go 60 just as well. Above that it starts to sound frantic. I went halfway up the grade toward Kennedy Meadows but took it pretty slow and easy on the engine. Going down I took the hairpins just as fast as any bike I've been on - Ducati's BMW's R6 etc.

Odometer is about perfect. My impression is the speedo is accurate too. I'll use a GPS tomorrow to check. 5 percent optimistic by GPS - indicated 55 is 52 on the GPS

Checked nuts and bolts, nothing loose. Checked front wheel balance, perfect. Checked engine compression - 135 psi (!) Bore is ceramic coated and apparently the rings are properly sealed. Idle crept up from 1800 to 2100 over the ride today - engine running better with break in ??? adjusted it down to 1500.

Tomorrow oil change and then more break in mileage.

If this was my bike I be thinking about heavier oil in the forks and some decent shocks.

2003 XL883R/1200
2008 WR250R
2006 Ninja 250
2012 SYM Wolf Classic 150
2012 NC700X

mojave screwed with this post 11-11-2011 at 01:11 PM



11-11-2011, 04:37 AM

#12

8gv

Beastly Adventurer

Joined: Nov 2009
Location: North central CT
Odometer: 2,194

So....

Is wifey sitting at home making sammiches while you're out tearing it up on HER bike?🤔

Rich

<http://www.advrider.com/forums/showthread.php?t=815824>

<http://www.advrider.com/forums/showthread.php?t=888478>

<http://www.advrider.com/forums/showthread.php?t=958274>

DR650



11-11-2011, 06:41 AM

#13

mojave

Gnarly Adventurer

Joined: Oct 2007
Location: Inyokern - middle of frixxen nowhere
Odometer: 165

She is up in Tahoe at the wedding of her best friends daughter (weddings 😊). So I'm holding the fort feeding dogs and horses. I see my role in this affair as her mechanic and future ridding buddy, I've got to get this machine sorted out so we can go on middle of the day adventure rides to greater Mojave Desert tri-tip establishments

The way I see it is she is like one of us. She will want more power, then i can find and buy another bike. But on her budget! And then I can have at this bike



2003 XL883R/1200
 2008 WR250R
 2006 Ninja 250
 2012 SYM Wolf Classic 150
 2012 NC700X



quote



12-07-2011,
 08:35 PM

mojave

500 miles and counting

Gnarly
 Adventurer

Joined: Oct
 2007

Location:

Inyokern -
 middle of
 friixen
 nowhere

Odometer:
 165

The Wolf is running strong! Linda got her learner's permit a couple weeks ago and has started her style. Today we rode out to Panamint Valley in chilly 50 degree temp. Last week up Nine Mile Canyon Meadows and then Randsburg. The Wolf does pretty well - goes up the grades out here at a steady enough for desert highways.

Got 80mpg and 84mpg on the last two tanks. BTW, the tank holds 2.5 gallons not the 3 gallons listed. The gas light comes on at about 180-185 miles, there is about one quart in reserve so about 20 miles out.

Pics from today's 120 mile ride to Panamint Valley.



Lovely Trona



Telescope Peak in the background



Beauty and the Beast

- 2003 XL883R/1200
- 2008 WR250R
- 2006 Ninja 250
- 2012 SYM Wolf Classic 150
- 2012 NC700X



12-19-2011, 09:26 AM

#15

3 up

Les in LV



Joined: Dec 2006
 Location: Boulder City NV
 Odometer: 143



Sym 150

I have about 450 miles on mine, I'm in Nevada no smog here so I removed all the crap , installed a 17t counter shaft and it's running good it really needs jetting so that's my next mission. The counter shaft helped the revs at hwy speed and made first usable.🙏

Life is Short Ride More Work Less

quote

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-- cRASH

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[Alliance's SYM Lineup Grows, Wolf Coming Soon](#)

August 31, 2011

Mike Hickman from Alliance Powersports [let us know](#) that new SYM HD200s, Symba, and Fiddle IIs have arrived in the U.S, and the promising [Wolf motorcycle](#) is on the way. This is great news, SYM is a great manufacturer and we're happy to see them making a comeback. SYM's distributor network and web presence definitely needs some clarification, but we'll take any baby steps we can get.

Here's Hickman's comment:

So the 2012 HD 200 EVO with the disc brake, powder coated black forks and rims along with stitching in the seat to match the color of the bike, Awesome!!! The 2012 Symba and Fiddle 11 have also arrived, and the much anticipated Wolf Classic 150cc is on the water with an arrival date of just after Labor Day! Let's get this party started! Ride Safe!

Posted by illnoise · Categories: [Sym](#), [The Biz](#)

[“The Bad Boy Returns”](#)

August 11, 2011



Did anyone notice the Piaggio Typhoon was *gone*? Was anyone clamoring for it to come back? Again, nothing wrong with the bike, but Piaggio USA's "Bad Boy" marketing is just weird. Perhaps they're trying to position it as a Zuma 125 alternative: the 80s 'clawmark' stickers and yellow paint are definitely from the Yamaha playbook. (You never thought you'd long for [spirals](#), didya?) The Typhoon isn't quite so, um, "distinctive" as the Zuma (which may be a good thing) and it *is* \$500 cheaper, so maybe there's hope.

Posted by illnoise · Categories: [Dealers](#), [Piaggio](#)

[Add a Wheel, Subtract \\$2000](#)

August 2, 2011

Piaggio's [selling 2008 model year MP3s at discounts exceeding \\$2000](#). While its pretty discouraging that 2008 MP3s are still on dealers' floors in 2011 (wasn't 2008 the year dealers couldn't stock scooters fast enough?), if you've ever dreamed of riding on three wheels, now is the time, it is a quite great scooter after all. Unspecified discounts are available on more recent models as well.

Posted by illnoise · Categories: [Dealers](#), [Piaggio](#)

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- [21 June 2012](#) RT @[Amerivespa](#): Trailer parking is at the Grand Geneva Mountain Top parking lot. It's free and there's plenty of room. Spread the word. ...
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When scooter news breaks, we put it under a tarp in the garage.     

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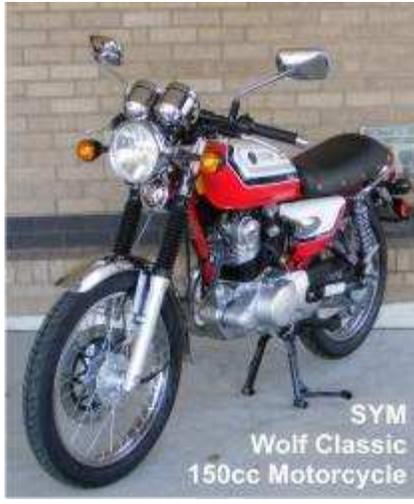
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Review of the SYM Wolf Classic 150cc Motorcycle



612-331-7266

UPDATE, April 2012

How do you feel about early 1970s small displacement motorcycles? Something like, oh, a 1973 Honda CB100 or CB125? Any found thoughts/memories? Like many riders of a certain age, I started on very small, fat tire trail bikes and "graduated" to a small displacement motorcycle. Being a typical power/speed hungry youth, I quickly moved up the ladder through 250cc - 500cc - 750cc and landed at a six-cylinder Honda CBX in the 1980s. These days I find myself looking

with interest at the small displacement machines being offered in the US market. Maybe I'm just getting tired of hauling an 800-pound motorcycle around town, maybe my motorcycle tastes are (*gasp*) maturing, I don't know. I just know that I really like bikes like the Suzuki TU250, Royal Enfield, and now the SYM Wolf Classic 150.



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1973 Honda CB100



2012 SYM Wolf 150



Looking at pictures of an early 1970s small Honda and a new 2012 SYM Wolf Classic, it's easy to see the resemblance. If you were one of the many, many riders of a small displacement Japanese motorcycle back in the day, I can tell you that the SYM Wolf Classic also "feels" like one of those wonderful little machines.

Living here in the Twin Cities, you'd be forgiven for never having heard of SYM before. SYM is Sanyang Motors out of Taiwan. They've been around since 1961 and they build some of the highest quality motorcycles and scooters in the world. Based on first-person experience I can honestly say that some SYM products are the equal of anything from Japan so far as quality is concerned. In fact, SYM has been a manufacturer for Honda under license in Asia. So if they're so great, why haven't we seen them here in the USA? One word - distribution. OK, lets' make that two words - poor distribution.

In January of 2006, SYM established an agreement with Carter Brothers for distribution of SYM products in the USA. Carter Brothers never really did anything with SYM. They had a few dealers and seemed to be gaining some ground, but they just couldn't take off the way other Taiwanese brands did (*Kymco and PGO via Genuine in Chicago come to mind*). In July of 2010, the Carter Brother warehouse was destroyed (*along with the inventory*) in a fire that was believed to have been caused by arson. After that came a dark period of little-to-no support and an annoying struggle to get parts from SYM of Canada. In April of 2011, Lance Powersports in California announced the formation of [Alliance Powersports](#) which would be the new USA SYM distributor. Since April, Alliance has been working to re-establish a parts supply and started to bring new product into the USA.

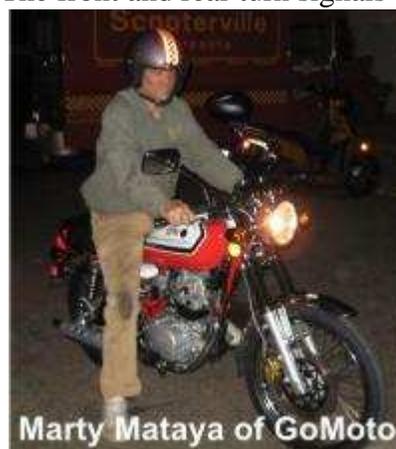
One of those new products is the SYM Wolf Classic 150 motorcycle. [GoMoto](#) is the Twin Cities dealer for SYM. A few years back BlueCat Motors in St. Paul was the SYM dealer, but they decided not to continue with *any* brand of new scooter sales. Alliance shipped the bike to [Scooterville](#) in Minneapolis with the gracious permission of Bob Hedstrom, the owner. At the time, GoMoto was in the process of moving to their new location on Washington Avenue. Marty from GoMoto came over after hours and we prepped the bike in the Scooterville shop. Yeah, we all need to take a minute and be thankful for guys like Bob and Marty. They are (*technically*) competitors, but they are scooter/motorcycle enthusiasts first. How many businesses would let someone work on a product they don't sell after hours?



The bike came out of the carton, the battery was filled with acid and put on the charger, and the very few loose parts were installed. The quality of the Wolf Classic was already evident. The mirrors, side stand, foot pegs and battery needed to be installed.



The battery provided is NOT a sealed, maintenance-free battery as one might expect, but a pretty cheap conventional type. The front and rear turn signals are in ugly black plastic housings that also look cheap. Everything else on the SYM Wolf Classic is so nice and of such good quality that these couple of small things stand out. The prep didn't take long, and the Wolf Classic was on the road. Marty from GoMoto had a spin and pronounced the bike a lot of fun. His first comments were all about the chassis and how sweet it was. This turned out to be a common theme when experienced riders had a spin on the Wolf. Marty had to head home to dog-sit and I road back to St. Paul. The inaugural ride was wonderful. I felt like a seventeen-year-old coming home after working a late shift at the pizza parlor.



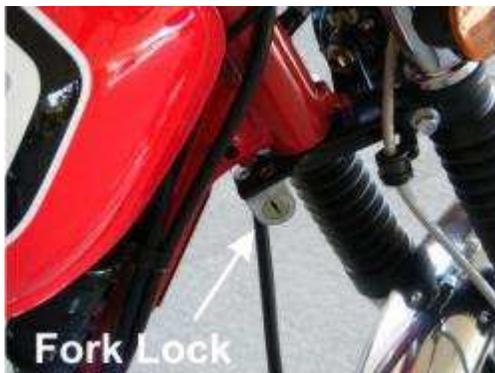
My GPS went on the bike the next morning to begin some real testing. The SYM Wolf Classic speedometer reads about 5% optimistic. An indicated 61

MPH is actually 58 MPH. The odometer was also slightly optimistic with 10.4 miles indicated being 10.0 miles in actuality. I consider these good numbers. Most motorcycles and scooters that I test are more optimistic than this with 10% being average and some off by as much as 20%. This was a brand new bike, not yet broken in, so I didn't search the upper limits of performance. I did see an honest 62 MPH on the GPS (*66 MPG indicated on the speedo*) and I would expect that a smaller rider (*I'm 220 pounds*) after break in would do a bit better than that. In over 100 miles of riding I averaged 85 MPG which is **EXCELLENT** fuel economy and would likely get even better after break-in.

	SYM - Wolf Classic 150
MSRP	\$2,999
Warranty	2-Year
Engine	149.4 cc 4-stroke OHC
Power	14.7 hp, 9 lb/ft torque
Cooling	Air
Fuel System	Carburetor
Transmission	Manual 5 speed
Final Drive	Chain
Wheelbase	49.2 Inches
Dry Weight	260 Pounds
Seat Height	29.5 Inches
Front Suspension	Telescopic Fork
Rear Suspension	Swingarm Dual Shocks
Front Tire	2.75 -18
Rear Tire	3.0 -17
Front Brake	Disc
Rear Brake	Drum

The SYM Wolf Classic is a 150cc (*149.4, close enough*) overhead cam 4-stroke that has a claimed output of 14.7 horses. This is not a fast bike by any means. At \$2,999 I was hoping for fuel injection. The MSRP on the Suzuki TU250 which IS injected is \$3,999 - but it's a **250** and a **Suzuki** which is an infinitely more recognized brand in the USA than SYM. Still, the SYM engine is a real sweetheart. It features the latest ceramic cylinder coating which should

help with heat and wear resistance. The transmission is a 5-speed and shifts in the conventional manner (*1 down, 2,3,4,5 up*) with a chain final drive. A telescopic fork in the front and a couple of shocks in the rear handle suspension duty and the bike rides on an 18 inch up front with a 17 in the rear. The fuel tank holds a little over 3 gallons. I'd strongly suggest non-oxygenated fuel as this is a carbureted bike.



The controls and switches are conventional with another minor complaint. The turn signal switch is NOT of the push-to-cancel variety but is a rocker with left, center (*off*) and right positions. The fork lock is not on the main ignition switch but is down on the right side. The Wolf Classic comes equipped with both push-button electric start and kick

starter. The bike kick starts pretty easily, though the starter lever tended to bind on the exhaust shield on the upward swing. Lighting is very nice with a bright H4 halogen headlight.

The dash includes pods for the speedometer and a tachometer. Going back to

our early 1970s bikes, the tach was not usually provided on those bikes. The speedo is to the left, biased to miles-per-hour, with the odometer (*in miles*) above the center of the gauge and a trip meter below. The knob to the left of the pod resets the trip meter. The manual choke and 2-position ignition switch are in the middle and the tachometer and warning lights are in the pod to the right. There is no fuel gauge and no fuel petcock, but there is a low fuel warning light.



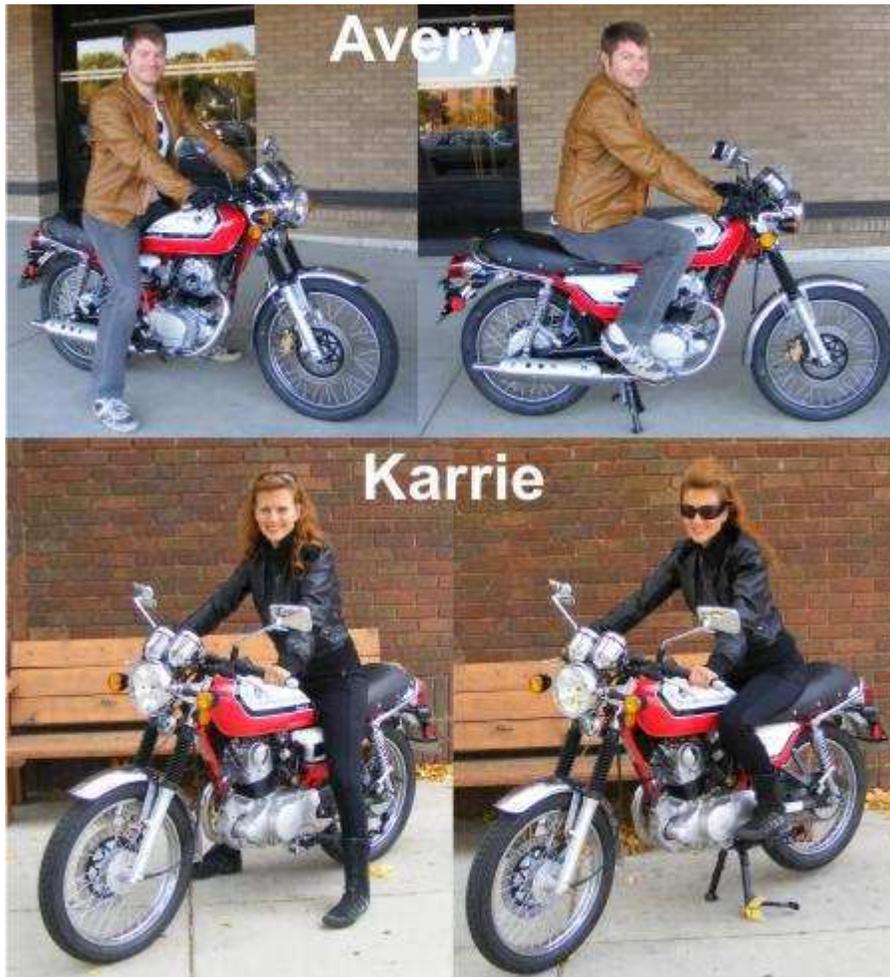
Rear Wheel



Front Wheel

The conventional specifications of the SYM Wolf Classic don't really do justice to how exceptionally nice this bike is to ride. As Marty stated right away, this is one sweet chassis. The

light weight (*of the bike, not me*) have a lot to do with this, but it's also the combination of quality components and skilled manufacture that bring it all together. Handling is crisp and precise. Braking is strong and easy to modulate. The transmission upshifts like a dream. Gear spacing is a little odd, there isn't much of a ratio different between 3rd and 4th. Think of 4th as an overdrive for 3rd and it makes more sense. Downshifts were fairly vague, and the Wolf Classic doesn't like stacked downshifts (*4,3,2 all at once without letting the clutch out*) but this may improve as some miles are put on the bike. The seating position favors those of shorter leg. With a 30 inch inseam I was very comfortable.



Everyone who saw the SYM Wolf Classic wanted to ride it. The ergonomics are really good and cover a wide range of people. The clip-ons aren't too low or too far forward and even with the short seat height riders a bit over 6 feet were OK with the position. I stopped by [BlueCat Motors](#) in St. Paul where they work on vintage bikes all the time. Ryan the owner and all the guys in the shop took it for a spin and all came back with a big grin on their faces. Overall, over a dozen people rode the Wolf Classic and all had positive comments, mostly about the ride and handling.

The Wolf Classic does come equipped with foot pegs for a passenger. I'd take them off and throw them away (*not really, they'd sit in a box in my garage forever*). The seat is also set up for solo riding. I did take a couple of people on the back and nobody complained, but those were SHORT rides and I'm pretty sure that longer jaunts would have solicited some whining.

At first glance, the SYM Wolf Classic seems like an expensive toy. At \$3,000 and with only 150 cc what else could it be? After spending several days riding it, the Wolf Classic seems reasonable to me. It's just about a perfect urban bike. It's light, nimble, fast enough for brief runs on urban highways, gets great fuel economy, and will likely be cheap to insure and maintain. It's also really, really good-looking and draws attention everywhere it goes. Whenever I parked or stopped to gas up people would come

wondering over and ask me about the bike. I sincerely hope that Alliance Powersports can rebuild the SYM dealer network in the USA so we can continue to enjoy fine machines like the SYM Wolf Classic.



David Harrington



UPDATE April 2012

New SYM Wolf Classic 150 Colours



The SYM Wolf Classic 150cc motorcycle continues to build a following in the US market. A good quality, small displacement, cool-looking and FUN motorcycle actually selling in this country? North Americans starting to "get" what great machines small displacement bikes can be? What could be better! How about more colours to choose from. In addition to the two-tone shown in this article and the sold green, white, black and red are now available.

SYM Classic 150 Review. Back To My Youth.

Posted on [2012/04/12](#)



You can be forgiven for wondering why – in the first of my series of scooter reviews – I'm talking about a motorcycle.

There is method in my madness, however, for the little gem I'd like to talk about today carries a name that is very familiar to most scooter riders: SYM.

That's right. SYM, the Taiwanese company famous for such well-made scooters as the Mio and the MAXSYM, have released a little motorcycle.

Many thanks to [Vespa Marietta](#), who allowed me to take this fun little bike and review it.

Specifications at a Glance

- 149.4 cc 4-Stroke OHC air-cooled engine producing 14.79 HP at 8,500 revs. Max. torque: 9.04 ft/lb at 9,000 revs.
- Top Speed: 65.5 MPH.
- 5 gear. Wet clutch.
- High strength steel frame.
- Single disk brake front – Drum brake rear.
- Net Weight: 266.7 lbs.
- Seat Height: 29.9 Inches.
- Fuel Capacity: 3.3 Gallons.
- Fuel Economy. 85 MPG.
- 24 months limited warranty.
- MSRP: \$2,999.

I can do no better to describe the SYM Classic 150, than recount my first ride:

EXHIBIT AV

There I was, sitting at traffic lights in Marietta Square, when a little vintage sports car pulled up beside me (actually a very nice Austin Healey Sprite [Thanks to that driver, who found this review, and corrected my mistake in identifying the car!]). The driver beamed over at me and asked: “what is that?”

Much of the ensuing discourse centred around his youth, and how much the little bike reminded him of his first bike – a Honda.



And that about sums up the SYM 150 Classic. It harkens back to the days when the Japanese manufacturers were making their first forays into the Western market – and it does it very well.

If, like me, you were one of the original “1%” teenagers who terrorised your town on small Japanese motorcycles – such

as the Honda CB125 pictured here – the SYM 150 Classic is sure to take you right back to those heady days of carefree living and endless gas mileage.

So much for the evocative nature of the little beast, let’s go into some more detail:

Fit and Finish



There is a good deal of chrome on this bike, and it seems good and deep. Only time will tell as far as its longevity, but it definitely sparkles well in its new state.

Likewise, the paintwork, which has a deep shine, and appears tough.

[Rubber / Gym Flooring](#)

[rubberflooringinc.com](#)



Controls

Everything about this bike screams “retro”, and the clocks don’t



disappoint.

The classically-styled speedometer and rev counter have chrome housings and bezels, and are equal-sized.

The speedo contains a trip clock, and the rev counter houses bright indicator lights for neutral, low fuel, turn signals and high-beam.



Switch-gear will look a little on the “miniature” side if you’re used to larger bikes, but I experienced no problems and everything fell well to hand.



The only gripe I would have about the controls is that I would have liked to have seen “push to cancel” for the turn signals. It seems you can only cancel the turn signals by moving the switch back to the central position manually. I did initially find myself switching on the opposite signal when attempting to cancel, but the easily visible turn signal indicator in the clock soon warned me of the error of my ways and, within a few miles, I got used to

them.

Overall, everything fell to hand, and was instantly comfortable. Never once did I have to look down to “hunt” for the appropriate switch.

You don’t have to ride in Atlanta for long without being given ample opportunity to test the horn. I was fully expecting a barely audible, anaemic “meep”, as is often the case with even some of the larger scooters on the market, but I was pleasantly surprised.

It’s actually loud enough to get a sleeping cager’s attention! Well done, SYM.

One unusual thing, which is rarely seen nowadays, is the humble kick-starter. It has, of course, electric start, but should things go awry, you have an alternative.

Suspension and Handling



What can I say? Springy?



To be fair, we're not dealing with a race-bred bike here. No upside-down forks, pre-load or damping adjustments on this bike.

This makes for a plush ride in-town (once you get used to the huge fork-dive when stopping), and fits in well with the riding feel of the bike – more about this later. It handles pot-holes and railway tracks with aplomb, but I don't think I'd be pushing it too hard on a spirited ride in the mountains without a little suspension work.

What's it Like to Ride?

I have to say, I love this little bike! Ergonomically, SYM really seem to have got it right. From the first time I set off on it, I found it amazingly comfortable for this 5'10", 180lb frame – and it remained so. I truly felt I could ride this thing all day long in perfect comfort.

The engine is about what one would expect from a 150cc four stroke. Obviously not earth-shattering, but perfectly adequate to hold its own in the red-light grand prix. With a top speed of 65 MPH, it won't get in anybody's way unless you were (fool)hardy enough to venture onto the freeway.

Vibration through the foot-pegs did become intrusive from about 45-50 onwards – quite noticeably so.

I considered that a worthy upgrade would be rubber-clad foot-pegs until I looked down and saw that they already were!

Surprisingly enough, there was very little vibration through the handlebars, and the mirrors remained vibration-free and usable (notwithstanding the usual issue with smaller bikes that a third to a half of your mirror yields a perfect view of your elbow).

Clutch action is smooth and light, and the gearbox is surprisingly positive. I experienced no false-neutrals or missed changes all the time I rode it.

Conclusion

When you consider the price point, I think the little SYM makes perfect sense for an around-town vehicle. The claimed 85MPG is not to be sniffed at, and it would make the perfect alternative to somebody who is wanting most of the benefits of a smaller scooter with some classic styling and "wow" factor built in.



Where I think this bike would really shine, though, is as a learner bike – a starter bike, or for those going through life with a less-than-generous inseam.

If I was equipping a motorcycle school, this little gem would be right at the top of the list!

Of course, it will also appeal to those of us who “cut our teeth” on this kind of machine in our teenage years, and would like to be

reminded of simpler times when our biggest worry was whether we could afford the few notes it took for a full week’s worth of freedom and fun.

It certainly put a smile on this old-school rider’s face.

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4 THOUGHTS ON “SYM CLASSIC 150 REVIEW. BACK TO MY YOUTH.”



Adam Darby

on [2012/04/13 at 9:46 AM](#) said:

man, i want one even MORE now! damn you Floyd for showing me this awesome piece of machinery . . .

starts saving



Steve H

on [2012/04/19 at 6:59 PM](#) said:

HA! I am that vintage car driver!! I thought this bike was so darned pretty, I web searched it and found the review you said you were doing. Pictures do not do this bike justice. It is WAY prettier than my Moms orange CB125 Honda that I learned on. That's all I have to say... that, and that these little bikes really are a hoot to ride, and easy. BTW, my little car is an Austin Healey Sprite, 1964 – it does look Sunbeamish. Best Wishes! I hope I see some more of these bikes.



[Alan Hearnshaw](#)

on [2012/04/19 at 7:05 PM](#) said:

Hi Steve! Nice to meet you!

So sorry I got the model of your car wrong! Being an Englishman, you'd think I'd do better, right?

Actually, I was thinking of a Sunbeam Alpine anyway.

I'm going to amend the review to put the make/model right.

Thanks for stopping by!



Mikr

on [2012/07/16 at 1:05 AM](#) said:

Is there any way to make this motorcycle faster? Really great review. I love the cafe retro look! I want one.



SF First Ride: SYM Wolf Classic 150



The SYM Wolf Classic 150 is a machine that seems to defy category. It's a motorcycle, but SYM is best known as a scooter company. It's on sale at scooter shops all across the country, yet with its clip-on handlebars and flat-top frame, it's visually more at home in the current Cafe Racer renaissance. Forgetting about categorization, what has SYM really got here, and why should scooterists take notice?

That's a complicated question to answer. The Wolf has a lot to offer for both scooterists and small motorcycle fans alike. It's approachable. It's good looking. It's light. It's extremely forgiving and easy to ride. It's even comfortable, which was a pleasant surprise given its small stature and clip-on handlebars.

EXHIBIT AW

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SYM Wolf Classic vs. CCW tha Misfit



Gabe Ets-Hokin Contributing Editor | [Articles](#) | [Articles RSS](#)

Gabe Ets-Hokin is a well-known motojournalist, but he knows scooters well, too: he's been a factory sales rep for Derbi scooters, re-built a Vespa motor in room 107 at the Elvis Presley Motor Lodge in Memphis, TN and has edited several scooter buyer's guides. He unapologetically loves da' scoots.

Wednesday, May 16, 2012

You and I get it: scooters are cool. That's why you're here, browsing Moto-USA's scooter reviews. But since we're friends, we can admit it: there's something a little geeky, a little square about riding a scooter. But we overlook that because scooters are just so fun, convenient and easy to ride.

But in many places around the world, a motorcycle is the choice for urban transportation, and that makes sense, too. A small motorcycle is light, cheap, great on gas and with its more robust suspension, longer wheel travel and flexible manual gearbox, a little better for the busted-up pavement and other obstacles inner cities feature. So if we enjoy getting around town on our scooters, we (okay, mostly me, but M-USA's editorial staff did sign off on the story) thought you may also get off on one of these two takes on classic cafe-racer style, one from Taiwan, the other from mainland China.

Not only are the bikes from the same corner of the globe, they share a common motor ancestor, have similar weights and are priced within two hundred dollars of each other. So how could they feel so different?

To answer that question, I'll have to tell you about each bike. SYM's \$2999 Symwolf Classic 150 is built in Taiwan and is the more slick-looking product—not surprising, as SYM has been churning out powered two-wheelers since 1962 (when it started license-building Hondas in Taiwan), building a million two-wheelers and 35,000 automobiles annually.

I've been told the entire package is based on Honda's venerable CB125, a widely copied design originally intended as a low-cost, durable, easy-to-operate machine for third-world and developed markets, and it's clear the two bikes have similar architecture, but SYM has done plenty of development on this model. Engine capacity has been increased to 149.4cc, and the simple, reliable overhead cam has been retained. Carburetors handle fueling duties. An electric starter and CDI ignition make the bike easy to live with, and the motor is rated at almost 15 hp at the crank—not bad for a 150cc air-cooled motor.



The 2012 SYM Wolf Classic 150 (top) is made in Taiwan and Cleveland CycleWerks' tha Misfit is made in China.



Tha Misfit has plenty of cornering clearance and owes its styling and chassis to the work of Taiwanese firm CPI.

The chassis is also upgraded. It's still a tube-steel frame, but it also gets aluminum spoked wheels—an 18-incher in front and a 17-inch hoop in back—as well as a 240mm front disc brake with a cute little two-piston caliper and steel-braided brake line. Cheng-Shin tires keep the bike off the ground. Convenience touches include a centerstand, electric starter, tripmeter, low-fuel light, passenger footpegs and grabrail and preload-adjustable rear suspension. It weighs in at a feathery claimed wet weight of 266 pounds, and the MSRP is a buck under \$3000—about as cheap as freeway-legal transportation gets.

Standard stuff, but it's probably the styling that makes this bike special. Deep, bright paint and quality chrome festoon the sporty 3.5-gallon gas tank. Real clip-on bars clamp to the fork tubes above the triple tree, and a cafe-styled seat adds to the look. It needs rear-set footpegs to make it a real cafe bike, I know, but then you'd have no room for passenger

pegs and where's the fun in that?

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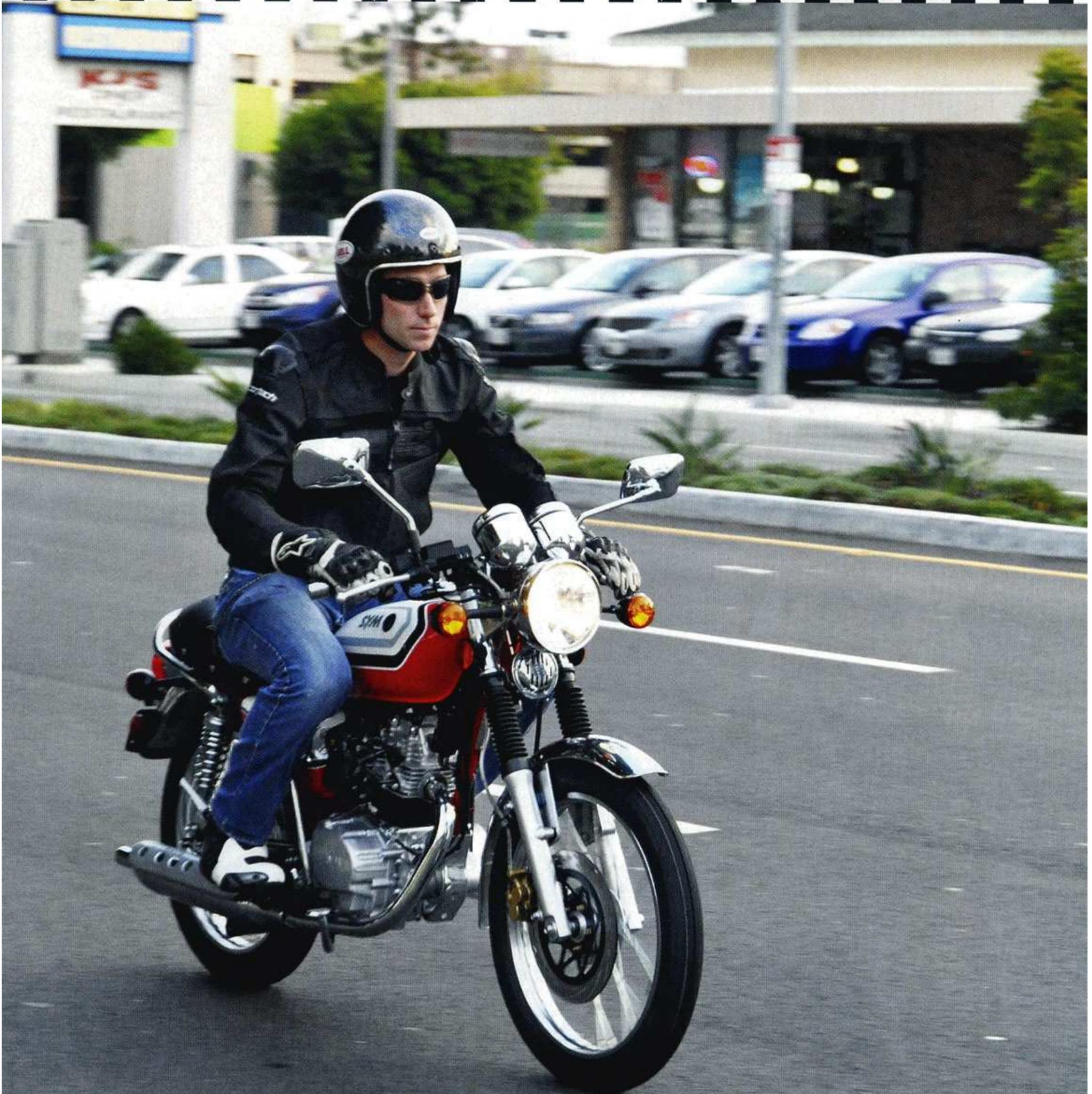
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Road Test



SYM Wolf Classic 150— Wolf in Commuter's Clothing



Story: Blake Kelly
Photos: Mike Seate

With the economy still in a slouch, fuel prices soaring and less and less money in our pockets, the time of over-priced, fuel consuming monster glam bikes is on a downturn. Cheap, simple, and smart are the new cool. With that, SYM/Alliance Motorsports, a company that has its roots in the scooter world, has stepped up with a lightweight retro that's a real heavy-hitter—the Wolf Classic 150. A motorcycle embracing old-world feel with new age tech, the Classic offers an off the shelf café racer feel, a very reasonable sticker price, stupendous fuel economy and superb urban handling. The Wolf is on our Top 10 list of best bang for your buck.

Don't let its nimble appearance, small stature and just shy of 15 horsepower fool you. It's a single cylinder, 149 cc electric start, four-stroke city street thumping master. With a weight of 266 lbs, the Wolf Classic is lighter than some fast food junkies; the updated, twin-piston front disc brake has no problem



Road Test



halting the bike and a rider to an abrupt stop in any hectic urban environment or back road deer-dodging circumstance.

All these attributes help provide the Wolf with an 85 MPG fuel efficiency rating and a top speed of 65 mph - no lie. With a sleek, early BSA-inspired gas tank holding 3.3 gallons, trips to the gas station are far between and very few.

The Wolf's toy-like stature may underwhelm on first inspection, but once aboard the motorcycle, you take note of just how roomy this underdog really is. The footpegs offer plenty of useful, comfortable space with room to spare, even for my size 11 feet. There are nice details to be found from one end to the other including nicely made clip-ons instead of standard, tubular handlebars, rubber fork gaiters, a riveted café style seat with chrome passenger grab rail and, best of all, a smooth, thumping exhaust note that thrums from a Bonneville-replica muffler replete with a heat shield featuring embossed, Chinese characters.

By mounting the clip-ons on top of the triple trees instead of under them, the bike offers back relief and an all-day favorable riding position. With a glance in a storefront window as you make your way down a city street and you'll notice not only the vintage 1970s styling, but also how well the rider and bike become one. Handling finds the Wolf at home on city streets and tight back roads, but freeways with hyper-aggressive SUVs and the need for quick, roll-on acceleration, can be a challenge. The Wolf's nimbleness, however, provides quick transitions and split-second direction changes, making it perfect for filtering through traffic on our ever-crowded city streets.

The upright riding position, which places the rider well forward, helps with early visual detection of trouble, and helps move the bike where you're looking with only the slightest input to the handlebars. The Wolf's power-to-weight ratio is well-balanced, letting the motor pull the bike with ease and offers surprising quickness when traveling from point A to point B. Outside of highway use, anything over the top speed of 65 mph is seldom legally needed. Sure, for café racers, more speed is always better, but it's not always practical when we're talking fuel economy. Better than a ton-up top speed are plusses like a 24-month warranty, a growing dealer



Drilled disc brake is more than up top stopping the lightweight 150

network, and a bike that appears easy to customize for the DIY set. It's already a looker and the 2012 model comes in six tastefully rendered color combinations. There's even a kick starter for nostalgia buffs bent on impressing when leaving the local bike night.

With the history of SYM's engineering quality in its scooter production and reasonably priced at \$2,999, the Wolf Classic 150 fits the bill when looking for a reliable gas-friendly commuter motorcycle with style. Whether

it's urban assaults or some back road fun you're after, this bike deserves a place on any buyers test ride list.

The Wolf helps hit the mark with small is cool again.

We Dig: Light weight, ease of use, café racer detailing.

We'd Ditch: The muffler's packing - a Wolf needs to growl, baby! **CR**



Detailing on exhaust heat shield is impressive - wonder what it says?

Wolf Classic 150 Specs

MSRP: \$2,999

Engine: 149cc Four-stroke, Air-cooled single

Horsepower: 149 BHP at 8,500 RPM

Torque: 9 foot-pounds at 9,500 RPM

Transmission: 5-speed, wet clutch

Fueling: Carbureted, manual choke

Rear Suspension: Twin chrome coil shocks

Front Forks: Telescopic, non-adjustable

Front Wheel: 18" w/240mm drilled rotor, 2-piston caliper

Rear Wheel: 17" w/130mm drum brake

Seat Height: 30"

Wheelbase: 49.21"



They say:

"Classic reborn."

We say:

"This classic's time has come, again."

WORDS: Aaron Frank PHOTOS: Jim Moy

SYM WOLF CLASSIC 150

A Sheep in Wolf's Clothing

Riders of a certain age instantly recognize the Wolf Classic. It looks exactly like the Honda CB125 that provided thousands of Americans cheap, practical, and fun transportation during the early '70s. This is no coincidence. SYM, aka Sanyang Industry, one of Taiwan's largest vehicle manufacturers, built countless CB125s under license from Honda between 1969 and 2002.

After that joint venture ended, SYM continued developing the model under the Wolf name. The latest Wolf Classic 150 is utterly charming urban transportation that looks and feels just like a classic, small-displacement streetbike, but is improved with modern updates like a disc brake, CDI ignition and a bright halogen headlight.

Large-diameter spoked wheels, a bullet saddle and clip-on bars mounted above the triple clamp nail the trendy vintage café racer look. The paint is smooth and bright, the ample chrome is rich, and analog gauges, fork gaiters and a functioning kickstart lend authenticity. Curb appeal is way beyond the bargain, \$2999 price—and a centerstand comes standard.

You'll want to use the old-school choke lever between the speedo and tach—modern emissions regs make the carbureted four-stroke single slightly cold-blooded. Once

choked it starts instantly, on the button or midway through the first kick, settling into a smooth, purring idle. A mild state of tune and a ceramic-coated cylinder promise ruthless durability—as proven daily by millions of SYM-mounted commuters and delivery riders around the globe.

Fifteen horsepower is just enough to keep ahead of buses and other urban assault vehicles. Low gearing and decent torque make the Wolf ridiculously easy to ride. It's almost impossible to stall, and you can start from any of the bottom four gears with just a slight slip of the clutch. Fifth gear covers everything from 30 mph to the 65 mph top speed. It can handle the occasional emergency interstate stint, but best stick to secondary roads—vibes get bad beyond 6500 rpm, corresponding with 55 mph in fifth.

Inside city limits, the Wolf rules. A 49-inch wheelbase and light aluminum wheels keep it nimble, and the front disc (with a braided line!) provides quick stops from any speed the Wolf is capable of. It is 7/8ths-scale small, but the long, flat seat and low footrests accommodate even over-six-footers for short trips. Beginners, women, and shorter-stature riders feel immediately in control.

With idiot-proof operation and EPA-rated 85 mpg fuel consumption, the Wolf Classic

TECH SPEC

Price	\$2999
Engine type	a-c single
Valve train	SOHC, 2v
Displacement	149.4cc
Transmission	5-speed
Claimed horsepower	14.8 bhp @ 8500 rpm
Claimed torque	9.0 lb.-ft. @ 9000 rpm
Frame	Tubular steel spine
Front suspension	Telescopic fork
Rear suspension	Dual shocks with adjustable spring preload
Front brake	Single two-piston caliper, 240mm disc
Rear brake	Drum, 130mm
Front tire	2.75-18 Cheng Shin
Rear tire	3.00-17 Cheng Shin
Seat height	30.0 in.
Wheelbase	49.2 in.
Fuel capacity	3.3 gal.
Claimed curb weight	266 lbs.
Contact	www.alliancepowersports.com

VERDICT



Cheap, cool and economical to own and insure—a perfect city bike. It sure beats any scooter!



The air-cooled, 150cc, four-stroke single is a modern interpretation of Honda's stone-simple CB125. It produces almost 15 horsepower, enough for a 65 mph top speed.

combines the economy and convenience of a scooter with true motorcycle functionality. It's more than just a throwback for nostalgia-minded oldsters, however; first-time riders and downtown-dwelling hipsters are equally attracted to this attention-grabbing bike that offers all the style of a vintage café racer without the same mechanical commitment, and a 24-month warranty to boot. None of the cobbled-up CBs or worn-out RDs on Craigslist can compete with that! **MC**

SYM WOLF CLASSIC 150

The small-bore single gets a new lease on life

Story and photos by Richard Backus

Once upon a time, small-bore singles occupied a significant slot in the motorcycle market. Simple, approachable and easy to ride, they were an affordable way to decide if you really wanted to be a motorcyclist after all.

Back in the Sixties, every motorcycle manufacturer — even Harley-Davidson — had at least one small single in its model lineup. Honda was no exception, hardly surprising from the company often credited with bringing motorcycling to the U.S. masses, its catchy “You meet the nicest people on a Honda” ads showing happy, non-motorcycle-type people riding single-cylinder C100 or C110 step-throughs.

It was a different era, slowly ushered out in the U.S. as small bikes were increasingly pushed aside to make way for ever-larger multi-cylinder machines, many of them from Honda. By 1973, the year Honda introduced the CB125S overhead cam single to our market, the influence of small bikes on the U.S. market had dramatically diminished.

But that didn't mean small singles weren't appreci-

ated elsewhere, and they continue to influence many markets today, particularly in large cities where parking space is non-existent or in developing countries where incomes don't support automobile ownership. Although you wouldn't know it judging by the U.S. market, Honda's presence in the category continues, with its own products and license-built clones of its singles selling by the millions around the world.

Almost from the start, Honda pursued licensing agreements with other companies to build its bikes. In 1962, Taiwan's Sanyang Industry Co. Ltd. partnered with Honda to build Honda motorcycles, eventually manufacturing Honda cars before the joint venture was abandoned in 2002. In the intervening 40 years, SYM, Sanyang's motorcycle division, built literally millions of little Honda singles.

It still does today, but now they're sold under the SYM banner.



EXHIBIT BA

Yes, it's small, but that's part of its charm. And at only 266 pounds all-in the SYM is easy to handle.

The Wolf Classic 150

Honda may no longer build the CB125, but SYM has continued cranking them out, first in 125cc guise and now as a 150 (actually 149.4cc, but who's counting?) it markets here as the Wolf Classic.

If you're only mildly familiar with the original CB125S you'll be forgiven for looking at the Wolf and thinking, "Hey, cool old Honda," because that's what most people think. While we were photographing our test bike, a 50-something passerby was mildly incredulous when we told him our SYM wasn't a restored classic but a brand new bike.

That was a common reaction to the Wolf Classic while we had it, and we'd wager it's precisely what SYM is banking on in the U.S. market, where making small bikes hip seems to be a good — and necessary — marketing strategy.

And the Wolf is definitely hip-looking. The white paint on our test bike was lustrous, nicely set off by the contrasting red-painted frame and the seeming acres of chrome splashed on the Wolf. Granted, some of that chrome isn't of the heavy metal kind. The mirrors, for example, are chrome plastic, as are the instrument housings and turn signals.

Plastic or not, those bits look good, and combined with the Wolf's other vintage cues — like a nicely stitched two-up saddle, a low-slung exhaust and a pair of très-cool looking clip-on handle bars mounted above the upper triple clamp — they let the little Wolf shine in a café sort of way. It's sort of old school standard meets new school urban 20-something.

On the road

We picked up our Wolf Classic from Kansas City SYM dealer Mike Bergstrand at M & M Motorsports (www.kcscootertrends.com), who checked it over and gave it a few break-in miles before we took delivery.

Riders with memories of vintage singles will feel immediately at home on the Wolf Classic. Its small size makes it easy to swing a leg over, and a low, 30-inch seat height lets you plant both feet easily and firmly on the ground. An 80mph speedometer sits to the left, with a 14,000rpm tach to the right. The black clip-on bars are angled back nicely, giving a comfortable reach, and the traditional switchgear is easily deciphered, with turn signals, horn and headlamp high/low on the left, and an ignition kill switch and starter button on the right.

The ignition key is dead center on a nice little chromed strap bridging the speedo and tach, with a choke knob — yes, the Wolf is actually carbureted — poking up just behind the ignition switch.

Pull the choke full up, turn the key one stop, check for neutral, thumb the starter button and the little Wolf fires to life almost immediately.



Given its likely lean jetting, we expected the Wolf to be somewhat cold blooded, but we found it needed very little warm-up before we could shut off the choke and let it settle into a smooth idle. Restarts from warm were always sans choke, and when ambient temps were above 70 F our bike started easily without the choke. Electronic ignition surely helps.

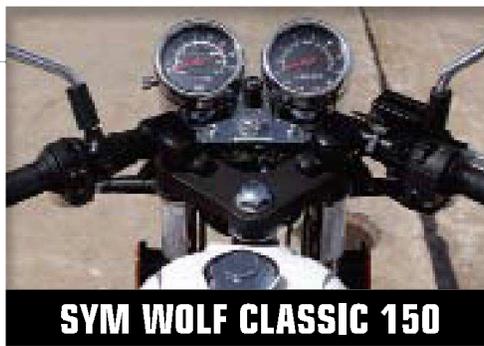
The transmission on our bike was faultless, snicking into first with only a gentle push of the shift lever and shifting through its other four gears with equal ease. Pulling away from a stop is drama-free, requiring little more than a short twist of the throttle to bring the engine up to speed and a feathered release of the clutch to get rolling. With only 15hp on tap it'll never get away from you, and reasonable torque for such a small engine (SYM claims 9 ft/lb at 9,000rpm) makes it surprisingly hard to stall, even with second gear launches.

Moving down the road, the SYM displays its modest ambitions; it doesn't so much accelerate as incrementally build speed, the tach happily swinging up to 6,000rpm as you twist the throttle, the speedo only slowly rising as you work through the gears. Work it hard and you get a little more oomph, but it feels happiest with a gentle push rather than a full twist of the wrist.

Top speed is a claimed 65mph, a figure we never touched, if only to be nice to "our" SYM's engine, which had only 2 miles on it when we took delivery. A ceramic-coated cylinder (!) should relegate the traditional 500-mile new engine break-in routine to the dustbin (and provide superior



Tiny Keihin carb (top) feeds the fuel/air mixture. Oddly amusing warning on plastic exhaust cover.



SYM WOLF CLASSIC 150

Engine: 149.4cc air-cooled OHC single, 62mm x 49.5mm bore and stroke, 14.8hp @ 8,500rpm (claimed)

Top speed: 65.5mph (claimed)

Carburettor: Single Keihin

Transmission: 5-speed, chain final drive

Electrics: 12v, electronic ignition

Frame/wheelbase: Single downtube, engine as stressed member/49.2in (1,295mm)

Suspension: Telescopic forks front, dual shocks w/ adjustable preload rear

Brakes: Single 9.45in (240mm) disc front, 5.12in (130mm) SLS drum rear

Tires: 2.75 x 18in front, 3 x 19in rear

Weight (wet): 266lb (121kg)

Seat height: 30in (762mm)

Fuel capacity/MPG: 3.3gal (12.5ltr)/85mpg (claimed)

Price: \$2,999 (MSRP)



long-term durability), but we didn't want to be the ones proven wrong so we went easy on our little Wolf, limiting our top speed to 55mph.

A short, 49.2-inch wheelbase makes the Wolf a little twitchy at speed, but 18-inch rear and 19-inch front wheels help the bike move confidently through turns. It's no canyon carver, nor was it ever meant to be, but you never worry about the bike's ability to take a turn. And when it comes time to slow down, a 2-piston front caliper paired with a 9.5-inch disc (plumbed with a stainless steel brake line; nice touch) hauls the bike down to a stop quickly and confidently. It's linear and predictable, exactly what the entry rider needs.

And that's really where the Wolf shines, as an entry-level motorcycle. While some will be quick to dismiss the Wolf as a toy, we'd beg to differ. This is a real motorcycle, with all the

attributes of a real motorcycle, just in three-quarter scale. We think its small size and low power are its greatest assets, making the Wolf a bike anyone can ride with ease. It will never over-power you, giving the entry-level rider in particular the chance to learn to ride to his or her — and the bike's — limits. Even so, it's equally fun for the experienced rider looking for something light and easy to toss around town, a reminder that bigger

isn't always better, and that small-bore bikes aren't just for new riders.

Old school ergonomics make it easy to warm up to, and a touch of café styling gives it the sort of panache even the original CB125 never had. And while a \$2,999 MSRP isn't exactly chicken feed, we think the Wolf Classic delivers a lot in return. **MC**



Return of the simple single:
The Wolf Classic 150 rides
like a real motorcycle, and
looks like one, as well.



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SYM gets revived with Alliance Powersports

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Dave McMahon, Senior Editor

April 2, 2012

Filed under [Features](#)

Taiwanese brand's U.S. distributor sees growth ahead

SYM has risen from the ashes in the United States.

The Taiwanese scooter manufacturer's presence in the U.S. hit rock bottom in July 2010, when arson destroyed the warehouse and manufacturing facility of Carter Brothers Manufacturing, the SYM distributor in the U.S. at the time.

But since Alliance Powersports, based in Mira Loma, Calif., became the official distributor of SYM in April 2011, the brand has landed on solid ground.

Alliance Powersports CEO Gene Chang spent some time during Dealer Expo to update *Powersports Business* readers on the company's growth.



The new Wolf Classic 150 by SYM provides dealers with an entry-level motorcycle at an attractive price point (\$2,999). Alliance Powersports distributes the brand in the United States.

PSB: *I know you began in the industry as a powersports dealer, selling on-road and off-road bikes and ATVs. What made you decide to become the SYM distributor?*

GC: Lance Powersports was formed in 2004, and in 2007 we started importing and branding our own line of entry-level Chinese scooters. It was a good decision to do that, with the rising gas prices we saw in 2007 and '08. But a lot of the consumers who originally bought scooters for leisure in the past started using them for

transportation and commuting due to rising gas prices. We saw that there was a need for better quality, reliable scooters for transportation. So, in 2009, we discontinued all the entry-level Chinese scooters and started partnering with SYM, Sanyang Industry Co., in Taiwan to exclusively produce the Lance Cali Classic 50/125 with high quality, high value and exceptional dealers margin. Our cooperation with Sanyang has always been positive, and so when Carter was destroyed by arson, which left a dark period for SYM dealers and owners, it was a natural fit for us to take over and continue the SYM franchise, which has a superb line of scooters and motorcycles. In 2011, we formed Alliance Powersports, sister company to Lance Powersports, to exclusively service, warranty and distribute SYM scooters and motorcycles in the U.S.

PSB: *What was the first scooter that really sold well for Lance?*

GC: Our flagship model was the Cali Classic, and it continues to perform really, really well. We built a lot of value into that bike, where you get affordability and quality at the same time. This model started our relationship with SYM, and it's been great for a couple of years now. The sales performance continues to grow stronger every year. The SYM quality is on par — just as good as — with the Japanese brands in the small displacements.

PSB: *Why are dealers becoming interested in carrying the SYM brand?*

GC: We build value into the bike. We set up competitive pricing, especially among the Taiwanese brands, and we build more dealer profit margins into the bikes to help the dealer grow. We have a rich product line, with the SYM Wolf that we brought in last fall. That's our most recent addition. It's a 150cc motorcycle, which the industry does not have right now.

PSB: *How have dealers reacted to the Wolf 150 and its café racer appeal?*

GC: It's been very good. The demographic is all over with men, women, young and old. There are first-time riders who buy it to get into motorcycling, and we're seeing a lot of women who like it because they can plant their feet on their ground when they're seated on it. Its seat height is 29.9 inches and with a 266-pound curb weight, they can straddle it. We've had overwhelming demand. The price point is also very attractive and competitive for an entry-level form of transportation. At \$2,999, it's a great gateway to get people into motorcycling, or for somebody who wants that throwback look who is getting back into motorcycling. One guy in Alabama bought one for his kid who was a junior in high school to get to school. The dad had done the same thing on the Honda CB125.

PSB: *What types of powersports retailers are selling the Wolf?*

GC: We're focusing on scooter boutiques, but we also have powersports dealers selling them. It's a mix of both. The scooter shops are adding the Wolf in addition to the scooter line. They still carry the scooters, and they're able to offer an entry-level motorcycle. For them, the Wolf isn't "instead of" of a scooter, it's "in addition to" a scooter.

PSB: *What's coming down the road from SYM?*

GC: We're going to be bringing a lot of variety to the market. This summer we're going to be coming out with a street bike, a 250cc fuel-injected street fighter, called the SYM Fighter. We will also bring back the Citycom 300cc fuel-injected. As we move forward, we will continue to increase our product line to at least a dozen different models, so our dealers and consumer have value and variety to choose from.

PSB: *Your scooters have been featured in TV commercials a few times recently, notably on a Miller Lite ad. They're definitely equated to having fun.*

GC: I also ride a Yamaha YZF-R1, but I don't have as much fun as I do on the SYM scooters. On my R1, I have to go 100-plus on the freeway wide open to get that adrenaline going, but on the scooters at any speed in the city, you're going 10-15 miles per hour and you sort of grin as you're riding. You get the freedom and it's a lot of fun.

PSB: *What can dealers expect in dealing with SYM and Alliance?*



Parent company Lance Powersports found early success in partnering with SYM for the Cali Classic scooter, which maintains strong sales for the company. Dealers showed an interest in the model at Dealer Expo in Indianapolis.

GC: It's a high quality Taiwanese brand, and we're here to continue to build more value for the customer and give them more bang for their buck and help dealers get better margins on the SYM product they sell. We have dealers who sell other brands, and their profit margins are 5-10 percent on their investment if they're lucky. We're building an average of 35 percent profit margin on each unit. Dealers love it, and the brand is doing really well. The product sells itself. We're here to provide service and warranty, two years that the manufacturer backs 100 percent. We have a great team that is willing and able and dedicated to our company and the SYM brand. Our ultimate goal is to support our dealers and add to their success as we are only as successful as our dealers.

PSB: *What status does the SYM brand hold domestically?*

GC: In Taiwan, it's neck-and-neck with KYMCO. Combined they have about 80 percent of the market share, about 40-40 each, with domestic consumption about 1 million units per year. So both SYM and KYMCO pump out about a half million units per year. In Taiwan, they're both bigger than the Japanese brands, who only have about 10 percent of the market.

PSB: *Any other news to share with dealers?*

GC: SYM is back and will be stronger than ever. Both Sanyang and Alliance care a great deal about our SYM franchise partners. We're committed to your success and our support will through increased dealer profit margins, parts and warranty support and quality products with value and variety.

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Comments

2 Responses to "SYM gets revived with Alliance Powersports"

1. jerry on May 5th, 2013 7:35 pm



Why don't you bring the Sym 400I to the states, it would compete with the Burgman 400. I have a RV 250 from Sym but would like a little more power for on freeways and long trips. I really like the scooter and I think a 400 would be just right for me

Thanks,

Jerry

[\[Reply\]](#)

2. larry throneburg on May 6th, 2014 8:42 am



I have a 250rv and it only has 1250 miles and I love it but how can I get a service manuel for this bike . I know that you do not make it anymore but it is a great bike

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Advertisement for National Powersport Auctions (NPA). The top section shows several motorcycles in a dark, industrial setting. Below the image, the text reads "SAN DIEGO • DALLAS • CINCINNATI • ATLANTA" and "NATIONAL POWERSPORT AUCTIONS NPA". The central part of the ad features a blue background with the text "DO YOU HAVE WHAT IT TAKES?" in white and yellow. Below this is a large yellow star with "POWERSPORTSBUSINESS POWER50" written inside. The bottom section shows a person riding an ATV, with the text "ATVs" in a red box. To the right of the ATV image, the text reads "WANT TO BECOME AN AUTHORIZED KYMCO DEALER?" and "CLICK TO LEARN MORE »". The KYMCO logo is also present in a red box.

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About

Published on Jun 7, 2012

Official Sym Wolf Classic 150 Motorcycle video, product review commercial. 24 month warranty, 85 mpg, \$2,999 msp with top speed of 65 mph. Available in Chili Red, Matte Black, Midnight Black, Hunter Green, Century White and Red/White. Urban and highway use. Superior quality. Made in Taiwan.

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-  **Nhân Nguyễn Trọng** 3 months ago
please bring it to Viet Nam!
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-  **ogaleana** 1 year ago
looks too short
-  **AARON GALEA** 1 year ago
Very efficient bikes I own an XS 125-K and its awesome, one day I might get a Wolf, it looks very nice and classy :)
-  **Hodad McRasta** 10 months ago [in reply to badderthanyou](#)
What looks unstable about it? I have had one for over a year and unless you are going to ride it next to an 18-wheeler it's pretty goddamn stable.
-  **AudiophileTubes** 1 year ago [in reply to gankstakrib](#)
Where did you get it? Are these available in the U.S.?
-  **daniel0922** 1 year ago [in reply to Alex's Bikes and Motors](#)
We have SYM T2 250 in Taiwan, put this 250 in Wolf Classic must be great!
-  **AudiophileTubes** 1 year ago
I had the opportunity to ride one recently. Fantastic, fun, well made bike! Why anyone would want a small displacement scooter over this is beyond me! The bike is light and highly maneuverable, and plenty fast around town and in the 'twisties'. This is a good buy at just under 3 grand retail.
-  **edwardschlosser1** 11 months ago
I'm a 6 foot 2 inch tall person weighing about 220 lbs. Is this thing going to be able to carry me? Will some one my size look odd on this small bike?
-  **badderthanyou** 1 year ago
Looks very unstable for a \$3,000 bike.
-  **Hodad McRasta** 10 months ago [in reply to ogaleana](#)
It does look short. I am 6' tall though and it feels perfectly comfortable and the bike doesn't feel small at all.
-  **gankstakrib** 1 year ago [in reply to AudiophileTubes](#)
From the company that made this video. Alliance Powersports.
-  **Hodad McRasta** 10 months ago [in reply to Gabriel Caste](#)
To buy one new is would not be \$2000. The MSRP is \$3000. It would be about \$3700 after taxes, registration, etc. You would not find one used for under \$2k.
-  **AudiophileTubes** 1 year ago
Beats a scooter BY FAR!
-  **gankstakrib** 1 year ago
I have owned a SYM Wolf Classic 150 for a month. It has the advantage of being light and maneuverable and has enough torque to get out of harm's way. I won't say it's a fast bike, but it's suprisingly quick for a 150 and it can beat most cars off the line so you won't feel like a sitting duck in traffic. It's not my first bike, but it would be a good starter bike. I was looking for something that I could use to tool around town but that would be light enough to put on a hitch carrier.
-  **Rednave Dlonra** 1 year ago
yeah wolf XS125A is awesome,,,, try this one ^_^
-  **Tai** 1 year ago
You need to have a dealer in New York City.
-  **daniel0922** 1 year ago
I ride a 05' SYM Wolf Classic 125 (or callid 野狼傳奇 which means 'Wolf Legend' in Mandarin Chinese) in Taiwan. It was equipped with carburetor engine then, but by the enforcement of the new environmental regulations since three or four years ago in Taiwan, new bikes should only be equipped with EFI engines to sell in my country, that's a little sad because I prefer carburetor. Is this bike sold in the State now? It's so nice to hear that!
-  **Solomon Sanchez** 1 year ago
Go to the Sym forums and you'll find a link to an online store based in Taiwan. I think some Honda CB 125 accessories are a direct fit too.
-  **J. Hernandez** 7 months ago
this is a niche bike, of sorts. Its not a bike like a Rebel or whatever. Its for a certain purpose and has a certain style. thats why its \$3000. those who buy one know what they're getting, and its a good quality bike. looks great in person, well assembled. flawless comes to mind. its worth the money if you want a small, around town motorcycle. great for the city, very lightweight and easy to handle
-  **mexkdspEd44** 1 year ago
This or tha misfit?

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Official SYM Wolf Classic 150 Motorcycle Video - Distributed ...



www.youtube.com/watch?v=3ujkfhqcDvg ▾ YouTube ▾

Jun 8, 2012 - Uploaded by SymAlliance

Official Sym **Wolf Classic** 150 Motorcycle video, product review commercial. 24 month warranty, 85 mpg, \$2999 ...

SYM WOLF Classic Motorcycle - Twin Cities Rider

www.twincitiesrider.com/symwolf012.htm ▾

Looking at pictures of an early 1970s small Honda and a new 2012 SYM **Wolf Classic**, it's easy to see the resemblance. If you were one of the many, many riders ...

Wolf Classic Kitchen Cabinets Design Ideas, Pictures ...

www.houzz.com/wolf-classic-kitchen-cabinets ▾ Houzz ▾

"island counter surface is walnut. Conveniences include a 60" **Wolf** range, a 36" Subzero refrigerator and freezer and two farmhouse sinks by Kallista.

Anyone use cabinets by Wolf? - Kitchens Forum - GardenWeb

ths.gardenweb.com/forums/load/kitchbath/msg0221002511102.html ▾

Feb 20, 2012 - 9 posts - 9 authors

Our GC recommended kitchen cabinets by Wolf and, based on info on ... The **Wolf Classic** cabinet is intended to compete against chinese and ...

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Wolf Scooter Model RX-50 - Motorcycle Ave

www.motorcycleave.com/wolf-scooter-rx50-50cc.html

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by **Lentils** • 7 months ago • 5,665 views
My review and first impressions of the **SYM Wolf Classic 150**. I'm 6'1" and 160 pounds for reference.

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by **david inumerable** • 4 months ago • 1,974 views
A quick review of my 2012 **SYM Wolf Classic**.

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**SYM Wolf Classic 150 — Motorcycle Classics**

by **motorcycleclassics** • 1 year ago • 14,705 views
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**Sym Wolf SB125N Review**

by **Kieran Bell** • 1 year ago • 18,341 views
Longer review on the **wolf**. Any questions feel free to ask.

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**Essai SYM Wolf 250**

by **motor-infos** • 1 year ago • 24,060 views
Nous connaissons déjà la **Sym Wolf 125**, un petit roadster au look sportif et au tarif serré. Cette machine est désormais déclinée ...

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**Sym Wolf 250 ve Cbr 250 ile Bolu Tüneli**

by **Mustafa Akseli** • 10 months ago • 13,816 views
Dafra Next 250 Turkey Bolu Tunnel with CBR 250. Sorry about that shooting angle Çekim açısı için kusura bakmayın.

**SYM Wolf Review**

by **HonestOpinion2** • 1 year ago • 19,123 views
This is my honest review of the **SYM Wolf** motorbike. ***the review is only 7min, the rest is driving footage*** I have driven it for ...

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**Sym Wolf 125**

by **dresantos24** • 2 years ago • 44,636 views

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by **ECS MediaTV** • 7 months ago • 6,562 views
SYM Wolf SB250N Review Videographer: Anup Shrestha Editor: Anup Shrestha Rider: Samar Manandhar V/O: Subeshya ...

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**Sym Wolf Sb 125 Ni**

by **Alex Zy** • 1 year ago • 15,634 views
Os presento como es mi **Sym Wolf Sb 125 Ni** y como ruge (like si quieres verla en marcha y si quieres un top speed)

**Sym Wolf T2 - обзор by @nimoff**

by **mike nimoff** • 10 months ago • 11,092 views
Небольшой обзор данного мотоцикла для <https://www.facebook.com/motorussia>
Характеристики Модель **Wolf T2** Двигатель ...

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**SYM Wolf Classic 150 - Information Snapshot - College Scooters**

by **collegescooters** • 10 months ago • 6,421 views
Short video showing off the **SYM Wolf Classic 150** motorcycle. For more information or to purchase one, visit ...

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Essai Sym Wolf 125

by **motor-infos** • 1 year ago • 19,117 views
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SYM Wolf Classic 150 Motorcycle

by hooohohoblin • 2 years ago • 16,667 views
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The SYM Wolf 150

by RT66ModernClassics • 1 year ago • 8,161 views
A brief look at the **SYM Wolf 150 motorcycle**. A vintage styled bike with modern reliability. Come get yours at Route 66 Modern ...
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Sym Wolf Classic 125 Budapest

by soszi74 • 2 years ago • 24,281 views
Igazi kis retrómotor, klasszikus forma, eredeti rozsdamentes anyagú sárvédők, és lámpafej, berúgó és önindító, közép és oldal ...



SYM WOLF SB250Ni / T2 250

by iBike999 • 2 years ago • 28,105 views
http://www.ibike.com.hk/01_bike_report/12/sym/t2/t2_02.htm.
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NOVA DAFRA NEXT 300 - SYM WOLF T3 - MOTONEWS

by Canal MotoNews • 1 month ago • 13,010 views
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Sym wolf 125 off road/road

by Alex Zy • 9 months ago • 6,441 views
Comportamiento en autopista 2 personas y en off road.



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SYM



WARNING
DO NOT USE THIS FUEL TANK



MADE IN TAIWAN

311 cc
Classic 120

SYM



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SYM MADE IN TAIWAN



SYM

Triple classic 150

1-2-3-4-5 GEAR SHIFT PATTERN
FOR CATALAN, FIVE-GEAR, SIX-SPEED (50/55/60/65/70) VERSION
OF SYM 150-160. DO NOT ATTEMPT TO SHIFT TO A HIGHER
GEAR WITHOUT FIRST SHIFTING TO THE NEXT LOWER
GEAR. ALWAYS USE THE CLUTCH LEVER TO SHIFT TO THE
NEXT HIGHER GEAR. ALWAYS USE THE CLUTCH LEVER TO
SHIFT TO THE NEXT LOWER GEAR.

 **SYM | MADE IN TAIWAN**

SYM
Classic 150

SYM 

Wolf
classic 150

1-N-2-3-4-5 GEAR SHIFT PATTERN

FOR INFORMATION ONLY, BEFORE RIDE, PLEASE READ THE
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THE MOTORCYCLE MUST BE KEPT IN THE BEST CONDITION
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MUST BE TAKEN IN ACCORDANCE TO THE LOCAL
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 **SYM** | MADE IN TAIWAN

SYM
classic 150

WKS

1-N-2-3-4-5 GEAR SHIFT PATTERN
FOR ENLARGED FUEL, OCTANE RATING (SMALLER METHOD)
OR BETWEEN 4 AND 5
THE MOTORCYCLE MEETS ALL UNITED STATES REGULATORY
OR TRANSPORTATION REQUIREMENTS. THE RIDER SHOULD
WEAR A MOTORCYCLE HELMET AT ALL TIMES. A VALID
MOTORCYCLE LICENSE IS REQUIRED TO OPERATE THIS UNIT.
OPERATE RESPONSIBLY. AT ALL TIMES, WEAR YOUR SEATBELT.

 **SYM** | MADE IN TAIWAN

SHOCKER
CAPACITOR



SYM MADE IN TAIWAN

PLEASE READ THE USER MANUAL

SYM





sf m

RESERVED

WARNING: Fuel System
Do not touch the fuel system components when the engine is running or hot. Fuel is under pressure and can spray out, causing fire or injury. Do not use a flame or open flame near the fuel system. Do not smoke or use a flame near the fuel system. Do not use a flame or open flame near the fuel system. Do not use a flame or open flame near the fuel system.



SYM

1-N-2-3-4-5 GEAR SHIFT PATTERN

USE UNLEADED FUEL OCTANE RATING (R+M)/2 METHOD
OR BETWEEN 87 & 92.

THIS MOTORCYCLE MEETS ALL UNITED STATES DEPARTMENT
OF TRANSPORTATION REQUIREMENTS. THE RIDER SHOULD
WEAR A MOTORCYCLE HELMET AT ALL TIMES. A VALID
DRIVER'S LICENSE IS REQUIRED TO OPERATE THIS UNIT.
OPERATE MOTORCYCLE AT HIS/HER OWN RISK. MSR11-2008-03



SYM | MADE IN TAIWAN

SPORTS

wolf-white-tank-03.jpg - Windows Photo Viewer
File Print E-mail Burn Open

wolf-white-tank-03.jpg Properties

General Security Details Previous Versions

Property	Value
Date taken	6/25/2014 4:44 PM
Program name	Ver.1.01
Date acquired	
Copyright	
Image	
Image ID	
Dimensions	1024 x 683
Width	1024 pixels
Height	683 pixels
Horizontal resolution	300 dpi
Vertical resolution	300 dpi
Bit depth	24
Compression	
Resolution unit	2
Color representation	
Compressed bits/pixel	2
Camera	
Camera maker	NIKON CORPORATION
Camera model	NIKON D3100

[Remove Properties and Personal Information](#)

OK Cancel Apply



EXHIBIT BI
FILED UNDER SEAL



三陽工業股份有限公司
新竹縣湖口鄉鳳山村一鄰中華路3號
電話: (03)598-1911
傳真: (03)598-1844
網址: www.sym.com.tw

SANYANG INDUSTRY CO., LTD.
3 Chung Hua Road Hukou Hsinchu
Taiwan R.O.C.
T 886-3-5981911
F 886-3-5981844
W www.sym.com.tw

Statement

5, Sep, 2014

TO whom it may concern;

We,
SANYANG INDUSTRY CO., LTD.
3 Chung Hua Road, Hukou
Hsinchu, Taiwan R.O.C.
Tel: 886-3-5981911

hereby appoint
Alliance powersports
3788 Milliken Ave. Unit C Mira Loma, CA 91752
Tel: 951.361.9000

as our official distributor for sales and spare parts and homologation of SYM
Products within the territory of U.S.A.

Alliance powersports also has the exclusive right of exercising "Wolf Classic"
trademark and Logo legitimately within the territory of U.S.A.

Yours Truly

SANYANG INDUSTRY CO., LTD

3 Chung Hua Road Hukou Hsinchu
Taiwan R.O.C.

Tel:+886-3-5981911 Fax:+886-3-5981844

<http://www.sym.com.tw>

Manufacturer of the "SYM" products
SANYANG INDUSTRY CO., LTD.


Overseas Marketing Division
(Authorized signature)

EXHIBIT BJ

disclose, which are beyond the scope of the protective order stipulated by the parties on June 13, 2014 and approved on June 19, 2014.

4. Opposer objects to these Interrogatories to the extent they require the production of information and/or documents containing information that is confidential and/or proprietary to Opposer which are beyond the scope of the protective order stipulated by the parties on on June 13, 2014 and approved on June 19, 2014.

5. Nothing in these answers/responses should be construed as waiving rights or objections which might otherwise be available to Opposer, nor should Opposer's answering any of these discovery requests be deemed an admission of relevancy, materiality or admissibility in evidence of the discovery requests or the responses thereto.

6. To the extent Opposer responds to Interrogatories by offering to produce documents in lieu of identifying them or compiling information from them, it will make such documents available for inspection and copying as they exist, can be located, and are not subject to the attorney-client privilege, work-product immunity or any other objection.

7. The following answers/responses reflect Opposer's present knowledge, information and belief, and may be subject to change or modification based on Opposer's further discovery, or on facts or circumstances which may come to Opposer's knowledge in the future.

8. These General Objections apply to all of Opposer's answers to Interrogatories, and subsequent responses to Document Requests and/or Requests for Admissions. To the extent specific General Objections are cited in a specific response, those specific citations are provided because they are believed to be particularly applicable to the specific request(s) and are not to be construed as waiver of any other General Objection applicable to information falling within the scope of the request.

9. These objections, answers, and the production of any documents pursuant to Rule 33(d) of the Federal Rules of Civil Procedure, are subject to and without waiver of: (a) the right to object to other discovery directed to the subject matter of these Interrogatories; (b) the right to make additional or supplementary objections; and (c) the right to revise, correct, supplement or clarify these responses in accordance with the Federal Rules of Civil Procedure.

10. Opposer objects to the Instructions set forth in Applicant's Second Set of Interrogatories to the extent that such Instructions exceed the requirements of the Federal Rules of Civil Procedure. To the extent that they do, said Instructions are ignored.

11. Opposer objects to Applicant's Interrogatories to the extent that they are unduly burdensome, oppressive, overly broad, harassing, or duplicative.

12. Opposer objects to any Interrogatories which seek the identification of "all," "any," and "each" document which may be related to a specific point or points, as being unduly burdensome, over extensive, not within the practical capabilities of Opposer, as potentially requiring the disclosure of privileged information and documents and beyond the requirements of

the applicable Rules. In each case where an answer is provided, such answer is based upon all information which has come to light by reason of a logically directed search through the records of Opposer. Opposer has not undertaken or completed a review of every document it retains, and objects to any purported requirement that it do so.

13. The following Responses and documents produced in connection with the Responses contain "Confidential," information, "Highly Confidential" information, and "Trade Secret/Commercially Sensitive" information that is subject to a protective order stipulated to by the parties on June 13, 2014 and approved on June 19, 2014, and should be treated in accordance with the instructions set forth in the protective order.

14. Opposer reserves the right to amend and/or supplement its responses to these Interrogatories throughout and at the close of discovery.

OBJECTIONS AND RESPONSES TO INTERROGATORIES

Opposer provides the following objections and responses to Applicant's interrogatories:

Interrogatory 50. Describe the source of the photographs submitted as specimens in connection with Opposer's trademark application for the mark WOLF, including identifying the name and role of each of the individual(s) who took the photographs, who transmitted the photographs from SYM to Opposer, and/or who received the photographs on behalf of Opposer; and the date, time and location at which each of those events occurred.

Response: Objection is made to this interrogatory as overbroad, unduly burdensome in that it requests information that is not relevant to the issues in the opposition and unlikely to lead to discovery of admissible evidence. The name of the individual who took the photographs, who transmitted the photographs, and who received the photographs is not pertinent to the issues involved in this opposition, namely, whether there is a likelihood of confusion and which party has superior rights in the WOLF trademark, nor would such information lead to the discovery of admissible evidence. The Opposer also objects to this interrogatory as being in multiple parts.

Subject to the foregoing objection, Opposer responds that the Photograph provided was taken by Opposer's design firm, Design Only, Inc.

Interrogatory 51. Identify each individual who had custody or control over the photographs (or digital or physical versions of the photographs, original or modified) from the time the photograph was taken until the photograph was provided to Opposer's counsel for filing with the U.S. Patent and Trademark Office.

Response: Opposer objects to this Interrogatory as redundant of Interrogatory No. 1, and, therefore, Opposer incorporates the objection and response made to Interrogatory No. 1

by reference in response to this Interrogatory. Opposer objects to this interrogatory to the extent that it seeks information protected under attorney-client privilege or work product immunity.

Subject to the foregoing objection, Opposer responds that Gene Chang directed Alex Chen of Design Only, to transmit photos of the SYM Wolf 150 Classic to directly Opposer's Counsel.

Interrogatory 52. Identify any photo editing software within Opposer's custody or control that was used to modify the photographs submitted as a specimen in connection with Opposer's trademark application for the mark WOLF, and the name of each individual who performed any such modifications.

Response: Objection is made to this interrogatory as unduly burdensome in that it requests information that is not relevant to the issues in the opposition and unlikely to lead to discovery of admissible evidence.

Subject to the foregoing objection, Opposer responds that Opposer is not, and has not been, in custody or control of any photo editing software. Opposer uses communication architecture company, Design Only, Inc., for its print and web marketing and design needs.

Interrogatory 53. Identify any persons or companies employed by Opposer or SYM for the purpose of photographing Opposer's scooters and/or providing image management or editing services related to Opposer's products.

Response: Opposer is a client of the communications architecture company, Design Only, Inc. located at 2072-A Villa Del Lago Dr. Chino Hills, CA 91709.

Interrogatory 54. Identify the source of the stickers, decals, or other materials bearing Opposer's WOLF mark that are allegedly affixed to Opposer's scooters and identify the creator of the sticker, including the date and location at which the sticker was created.

Response: Objection is made to this request to the extent that it seeks information outside the possession, custody, or control of Opposer.

Subject to the foregoing objection, Opposer responds that the manufacturer, Sanyang Industry Co., Ltd. creates and causes to be produced, the parts, decals, stickers and other materials for the SYM Wolf Classic 150. To the best of Opposer's knowledge and belief the stickers, decals and other materials bearing the WOLF mark that are affixed to Opposer's scooters are produced at the same facility at the scooters.

Interrogatory 55. Identify the date and nature any changes in the marking of Opposer's products branded with the Opposer's WOLF mark, including when Opposer began affixing WOLF mark stickers to its products in their current configuration as seen on

Opposer's web site photo gallery at
http://www.alliancepowersports.com/models/wolf_gallery.html.

Response: Opposer contacted its manufacturer in Late October 2013 to have the WOLF decal sticker placed on the top of the fuel tank, this placement was intended to allude to another scooter brand that places a British flag in the same position at the top of the fuel tank.

Interrogatory 56. Identify the date and nature any changes to Opposer's web site at <http://www.alliancepowersports.com/> (and other sites or pages within the same domain) related to Opposer's WOLF mark effected since Opposer alleges its use of Opposer's WOLF mark began.

Response: Opposer's current website we launched on March 1, 2014, the previous version of Opposer's website was launched on September 12, 2011. The changes to Opposer's website reflected the launch of Opposer's new marketing campaign for the SYM Wolf Classic 150 with marketing featuring Andrew Dost, member of the band Fun, seated on or with the SYM Wolf classic 150.

Interrogatory 57. Identify when all photos displaying the WOLF mark on Opposer's web site at <http://www.alliancepowersports.com/> (and other sites or pages within the same domain) were taken.

Response: Objection is made to this interrogatory as unduly burdensome in that it requests information that is not relevant to the issues in the opposition and unlikely to lead to discovery of admissible evidence.

Opposer provides the following screen shots showing the date of creation for the photos. See Exhibits 39-40, 45-49, and 52.

Dated: November 13, 2014

Respectfully submitted,
/Erin C. Bray/

Erin C. Bray
Lee, Lee & Associates, P.C.
2531 Jackson Road, Suite 234
Ann Arbor, MI 48103
Tel: 866-400-2507

Fax: 800-689-7978
erin@llapc.com
jj@llapc.com
Attorneys for Opposer
Alliance Power Sports, Inc.

VERIFICATION

I verify that the foregoing interrogatory answers to Opposer's Amended Responses to Applicant's Second Set of Interrogatories are true and correct on information and belief.

gene chang
Gene Chang

Executed Nov 12, 2014

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing OPPOSER'S AMENDED RESPONSES TO APPLICANT'S SECOND SET OF INTERROGATORIES was served upon counsel for Opposer on this 13th day of November, 2014 by first class mail and e-mail to:

SHANNON MCCUE
HAHN LOESER & PARKS LLP
200 PUBLIC SQUARE, SUITE 2800
CLEVELAND, OH 44114
UNITED STATES
trademarks@hahnlaw.com, bareese@hahnlaw.com, smccue@hahnlaw.com, belark@hahnlaw.com

Date: November 13, 2014

/ Erin C. Bray/
Erin C. Bray

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

ALLIANCE POWER SPORTS, INC.,)

 Opposer,) Opposition No. 91215049

v.) Serial No. 85608003

HAMMER BRAND, LLC.) Mark: WOLF

 Applicant.)

OPPOSER'S AMENDED RESPONSES TO
APPLICANT'S SECOND SET OF REQUESTS FOR PRODUCTION

46. All documents, things, and electronically stored information, including without limitation all emails and email attachments in native form, containing any version of the photographs submitted as specimens in connection with Opposer's trademark application for the mark WOLF.

RESPONSE: Opposer provides the .jpg files which were uploaded to the USPTO, and the affidavit of Gene Chang regarding the photos. See Exhibits 35-37.

47. The image files shown in the screen captures that were uploaded to the U.S. Patent and Trademark as specimens in connection with Opposer's trademark application for the mark WOLF, including the file "wolf.jpg".

RESPONSE: Objection is made to this production request to the extent that the discovery sought is unreasonable cumulative or duplicative.

Subject to the foregoing objection, Opposer provides Exhibits 35-37.

48. The original, unedited image files from which the image files shown in the screen captures that were uploaded to the U.S. Patent and Trademark Office as specimens were created, including the file "wolf.jpg" as identified on the specimen (*i.e.*, original pictures taken of the scooters shown in the specimens).

RESPONSE: Objection is made to this production request to the extent that the discovery sought is unreasonable cumulative or duplicative.

Subject to the foregoing objection, Opposer provides Exhibits 35-37.

49. All documents, things, and electronically stored information related to communication between Opposer and anyone who took or modified the pictures submitted as specimens

RESPONSE: Objection is made to this production request to the extent that it is overly broad and unduly burdensome, and to the extent that it seeks documents that are not within Opposer's knowledge, custody or control.

Subject to the foregoing Objection, Opposer responds that Opposer meets with its design firm in person and therefore, Opposer has no documents at this time.

50. All documents, things, and electronically stored information related to communication between Opposer and any persons or companies employed by Opposer for the purpose of photographing Opposer's scooters and/or editing photographs of Opposer's scooters.

RESPONSE: Objection is made to the production request to the extent that the discovery sought is unreasonable cumulative or duplicative. Objection is made to this production request to the extent that it is overly broad and unduly burdensome, and to the extent that it seeks documents that are not within Opposer's knowledge, custody or control.

Subject to the foregoing Objection, Opposer responds that Opposer meets with its design firm in person and therefore, Opposer has no documents at this time.

51. All documents, things, and electronically stored information related to the creation, manufacture, purchase, or use of stickers, decals, or other material applied to Opposer's products bearing Opposer's WOLF mark that are allegedly affixed to Opposer's scooters.

RESPONSE: Objection is made to this production request to the extent that it is overly broad and unduly burdensome, and to the extent that it seeks documents that are not within Opposer's knowledge, custody or control.

Subject to the foregoing objection, Opposer provides Exhibit 38, photos of the manufacturing process of the SYM Wolf Classic 150 by Sanyang Industry Co., Ltd. To the best of Opposer's knowledge and belief, the stickers, decals, or other materials bearing the WOLF mark are manufactured in the same facility as the scooters. Opposer has no additional documents at this time.

52. Produce for inspection each of the two scooters reflected in the images submitted as specimens in connection with Opposer's trademark application for the mark WOLF.

RESPONSE: Opposer objects to this Request for Production to the extent the burden or expense of the proposed discovery outweighs its likely benefit. Objection is made to the production request to the extent the discovery sought is obtainable from some other source that is more convenient, less burdensome, or less expensive.

Subject to the foregoing, Opposer is not in possession of the actual scooters that were the subject of the photographs.

53. All documents, things, and electronically stored information related to changes to Opposer's web site at <http://www.alliancepowersports.com/> (and other sites or pages within the same domain) related to Opposer's WOLF mark effected since Opposer alleges its use of Opposer's WOLF mark began.

RESPONSE: Opposer objects to this Request for Production to the extent the burden or expense of the proposed discovery outweighs its likely benefit.

Subject to the foregoing objection, Attached are copies of Opposer's website. Opposer's current website we launched on March 1, 2014, the previous version of Opposer's website was launched on September 12, 2011. Opposer provides screen shots of the directories containing the photos for its websites, See Exhibits 50-52. Opposer is unable to show its previous website as it was run on a special host server that Opposer no longer has in its possession.

54. To the extent not covered by the above Requests, all documents that relate to or were relied upon for any of Opposer's answers to Applicant's Second Set of Interrogatories or any of Applicant's Requests for Admission.

RESPONSE: Opposer has no additional documents at this time.

Dated: November 13, 2014

Respectfully submitted,

/Erin C. Bray/

Erin C. Bray, Esq.
Lee, Lee & Associates, P.C.
2531 Jackson Road, Suite 234
Ann Arbor, MI 48103
Tel: 866-400-2507
Fax: 800-689-7978
erin@llapc.com
jj@llapc.com
Attorneys for Opposer
Alliance Power Sports, Inc.

VERIFICATION

I verify that the foregoing interrogatory answers to Opposer's Amended Responses to Applicant's Second Set of Requests for Production are true and correct on information and belief.

gene chang
Gene Chang

Executed Nov 12, 2014

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing OPPOSER'S AMENDED RESPONSES TO APPLICANT'S SECOND REQUESTS FOR PRODUCTION was served upon counsel for Opposer on this 13th day of November, 2014 by first class mail and e-mail to:

SHANNON MCCUE
HAHN LOESER & PARKS LLP
200 PUBLIC SQUARE, SUITE 2800
CLEVELAND, OH 44114
UNITED STATES
trademarks@hahnlaw.com, bareese@hahnlaw.com, smccue@hahnlaw.com, bclark@hahnlaw.com
By Electronic Mail.
By Priority First Class Mail

Date: November 13, 2014

/ Erin C. Bray /
Erin C. Bray



Wolf Brand Scooters- formerly Gorilla Motor Works Scooter Co.

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An American owned and operated Scooter Company. Formerly known as Gorilla Motor Works Scooter Co.

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1.

[Wolf Brand Scooters- formerly Gorilla Motor Works Scooter Co.](#)

[May 6](#)

The Wolf Lucky...These hot-hot-hot scooters have it all! Italian retro styling, comfort, speed, and durability! All for an excellent price. Visit your nearest Wolf Brand Scooter Dealership today to find out more! Available in 49cc and 150cc.





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-

[Karl-Heinz Lenz](#) Wolf Brand: PES for Performance, Endurance & Speed

[May 23 at 8:43pm](#) · [Like](#) · [1](#)



-

[Wolf Brand Scooters- formerly Gorilla Motor Works Scooter Co.](#) Thanks Karl-Heinz Lenz!!!!

[May 27 at 2:19pm](#) · [Like](#)

Write a comment...

◀▶

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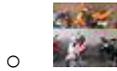


-

[Rock Road Scooter Company](#)

Choosing a favorite scooter isn't easy...

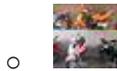
2 · May 29 at 9:38pm



[Rock Road Scooter Company](#)

A Blaze 50! A surprise high school graduation gift from grandma. CONGRATULATIONS!

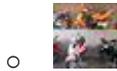
1 · May 29 at 9:34pm



[Rock Road Scooter Company](#)

just lucky... I guess.. Check out the new LUCKY!!! :)

1 · May 21 at 10:56pm



[Rock Road Scooter Company](#)

You're going to have too much fun with the new Wolf M-1.

11 · May 11 at 11:31pm



[Brandon Cossu](#)

My new 2013 wolf v 150 60mph plus best scooter I have owned

11 · April 28 at 8:41am

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Automotive

5.



[Wolf Brand Scooters- formerly Gorilla Motor Works Scooter Co.](#)

[January 6](#)

Wolf Brand Scooters hopes that everyone had a wonderful holiday season and we wish all of you a happy and a healthy New Year! May 2014 bring you all the best!

[6LikeLike](#) · · [Share](#)

6.



[Wolf Brand Scooters- formerly Gorilla Motor Works Scooter Co.](#)

[September 27, 2013](#)

LED Smart Caps with 1 year of Roadside Assistance! Just like AAA. YEP- it's TRUE! Don't miss out. Pick up some of these awesome little LED Smart Cap tire-pressure sensors, and get 1 year of roadside assistance INCLUDED. All for a ridiculously low price. Available through any Wolf/Gorilla Dealer NOW!



[31 ShareLikeLike](#) · · [Share](#)

7.



[Wolf Brand Scooters- formerly Gorilla Motor Works Scooter Co.](#)

[September 5, 2013](#)

The Blaze 49cc and 150cc are both In-Stock NOW! Check one out at your local Wolf Dealership!

[19LikeLike](#) · · [Share](#)

8.



[Wolf Brand Scooters- formerly Gorilla Motor Works Scooter Co.](#)

[July 26, 2013](#)



[1133 SharesLikeLike](#) · · [Share](#)



[Wolf Brand Scooters- formerly Gorilla Motor Works Scooter Co.](#)

[July 19, 2013](#)

Introducing the ALL NEW...WOLF BLAZE!
With...LED headlights, LED Smart Caps with 1 year of Roadside Assistance, Motobatt Battery, Performance Carburetor, Gates Belt, NGK Spark Plug, Duro Tires, and Ultra COOL Styling!! Wolf knows good scooters...



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[Wolf Brand Scooters- formerly Gorilla Motor Works Scooter Co.](#)

[July 5, 2013](#)

NEW Wolf Ts and Hats!!! Post cool scooter pics and videos and automatically enter to win free apparel!



[86LikeLike](#) · [Share](#)



11.

[Wolf Brand Scooters- formerly Gorilla Motor Works Scooter Co.](#)

[May 30, 2013](#)

LED Smart Caps, with WHAT??!! Yep, it's true. Buy LED Smart Caps and get free roadside assistance for a whole year. 5 tows, up to 15 miles per tow, per year! That's AAA Status right there. These caps screw right onto your valve stems and li... [See More](#)



[31 ShareLikeLike](#) · [Share](#)



12.

[Wolf Brand Scooters- formerly Gorilla Motor Works Scooter Co.](#) shared [Mopedu Favetteville's](#) [photo](#).

[May 30, 2013](#)

The Sons of Scootarchy thank you for your wonderful RX50s.



[41 ShareLikeLike](#) · · [Share](#)



13.

[Wolf Brand Scooters- formerly Gorilla Motor Works Scooter Co.](#) shared [Wil Jarnagan's photo](#).

[May 30, 2013](#)

MopedU!



[24LikeLike](#) · [Share](#)



14.

[Wolf Brand Scooters- formerly Gorilla Motor Works Scooter Co.](#) shared [MopedU's](#) [photo](#).

[May 30, 2013](#)

Thanks to the Squires and Swailes families for stopping by and picking up a couple RX-50's. Happy Scootin!



[1LikeLike](#) · [Share](#)



15.

[Wolf Brand Scooters- formerly Gorilla Motor Works Scooter Co.](#)

[July 18, 2011](#) · [Edited](#)

NEW MODEL- WOLF RX-50 Available in Red, Blue, Black and Yellow!



[61 ShareLikeLike](#) · · [Share](#)

2011



[Tim Heysler](#) *posted to* [Wolf Brand Scooters- formerly Gorilla Motor Works Scooter Co.](#)

[May 6, 2011](#)

Just picked up the v150 and it rides great.

[33LikeLike](#) ·



Joined Facebook

February 11, 2011

Social Media

[Powersports Business](#)

facebook



Name:
Powersports
Business

Status:
Victoria
Keller-Melton and
the staff at
American...

Fans:
1111

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New name, improved game for Wolf



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Nifty 50 gets 2014 started on the right foot

Liz Keener, Managing Editor

September 25, 2013

Filed under [Features](#), [Top Stories](#)

Gorilla Motor Works becomes Wolf Brand Scooters following trademark battle

Gorilla Motor Works was just gaining momentum last year, importing new scooter models and recruiting fresh dealers to carry its product, when the company was stopped flat. GMW was hit with a trademark challenge that kept it embroiled in legal battles for about a year. Now the company, led by CEO Diana Hammer's family, has reemerged with a new Wolf Brand Scooters name and a refreshed commitment to the scooter market.

The legal battle began in 2012 when an automotive company using the Gorilla name in California informed GMW of an intellectual property issue. The California company isn't directly involved in the scooter segment, but it feels some of its products may overlap. The Hammers began fighting the name change, but finally decided to keep the issue out of court and move on with a new brand.

Wolf Brand Scooters was born this summer. Dealers and consumers had enjoyed the company's previous branding, so the Hammer family wanted to keep the same type of look with an animal at the center.

"We didn't want to lose our image or our brand per se," she said. "We thought the wolf was very cool; it's very American and strong and tough. We felt like we could really work around the cool factor of the wolf."

Also key to the name was adding the word "scooters," as it was missing from the former branding. The company is currently in the process of obtaining official trademark rights to Wolf Brand Scooters, which can take six months to a year, but with the research it has conducted over the new name, Hammer is confident the approval will come.

"There's nobody else out there that has the trademark Wolf in powersports or scooters," Hammer said. "We made sure we're as safe as possible."

Wolf Brand Scooters' first model is the Blaze, a high-performing scooter available with a 50cc or 150cc engine.

"We wanted it to be really sporty and very cool," Hammer said.



Wolf Brand Scooters is the rebranded name of

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the former Gorilla Motor Works. The Blaze, available as a 50cc or a 150cc, is Wolf's first model.

The Blaze features a MotoBatt battery, a Gates belt, LED lights, an LED tire air pressure sensing system, a performance 20mm carburetor and Duro tires. Each unit comes with one year of roadside assistance. The 50cc version has an MSRP of \$1,599, while the 150cc sells for \$1,699.

The vehicle was imported from the same Chinese factory the company used in the past, and it began distribution to dealerships in mid-August. Throughout its transition, Wolf Brand Scooters has retained all of the approximately 60 GMW dealers.

"We treat our dealers like friends, so it means a lot to us that they're supportive and didn't really blink or flinch at the name change," Hammer said.

And now that the new branding has launched, Wolf is looking to increase its network, which mostly consists of small mom and pop scooter stores but also includes some metric franchise dealerships.

"We are definitely looking for new dealers in new territories. We have the supply to support dealer growth, lots of scooters and parts and lots of room for growth," Hammer said.

Wolf Brand offers what it sees as superb customer service, recognizing most of its dealers by name and keeping a strong parts supply in its 5,000-square-foot warehouse in Clearwater, Fla.

"We stock everything here. Anything that comes on the scooter is kept in inventory and then some — not just warranty items, but wholesale parts distribution. All of our dealers buy parts from us, so we stock a huge surplus of parts," Hammer said.

With the trademark issue, Hammer's company's growth was brought to a halt, but Wolf is ready to move forward. In October, Wolf Brand will attend the American International Motorcycle Expo (AIMExpo), giving away a Blaze model to one dealer. The company is also revamping its QualityScooterParts.com website, which should be completed by October, and Wolf plans to have more models available by the end of the year.

Though Hammer admits that legal woes caused dealer growth to slow and is leading the company to have to regain recognition, some of the rebranding work that had to be completed allowed the company to improve and refocus.

"We're definitely really happy to get passed that. We feel like it's really revitalizing. We got to look at our company and what we can do new," Hammer said. "We felt like it kind of gave us a push; you have to reinvent yourself and come out with something, so everyone's happy with this name change."

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Wolf Brand Scooters



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Wolf Brand Scooters, formally known as Gorilla Motor Works scooters, are a favorite at New Scooters 4 Less. With unique, high quality designs, you can have a scooter that is different than all the others on the road, but at an amazingly great price! Come in to check out these models in person! Wolf makes 49cc and 150cc scooter models!

New Scooters 4 Less was founded on a principle we called SIQ. *Service. Integrity. Quality.* With the growth of our company, our team then established a set of **core values** to guide all decisions made at NS4L.

Looking for \$699 - \$899 'new' scooters? Check out our [FAQ](#) section and question number 27!

We vow to provide the very *best quality for the price* while providing nothing but superior customer service. Come by and ask to take a **FULL TOUR** of the shop! You will LOVE it! :)

Extend your warranty on any Wolf Brand Scooter or RedStreak Scooter at the time of purchase to a 2 year parts and labor warranty for only **\$200.00!** This extends the **FULL MANUFACTURER'S WARRANTY** of your scooter and covers all defective parts and labor for 2 years!



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