

ESTTA Tracking number: **ESTTA683505**

Filing date: **07/14/2015**

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

Proceeding	91215734
Party	Plaintiff Assa Realty, LLC
Correspondence Address	RICHARD J MIGLIACCIO 410 PARK AVENUE, STE 1630 NEW YORK, NY 10022 UNITED STATES joel@assaproperties.com, richard@assaproperties.com
Submission	Motion for Summary Judgment
Filer's Name	Joel Scott Ray
Filer's e-mail	joel@assaproperties.com, richard@assaproperties.com
Signature	/Joel Scott Ray/
Date	07/14/2015
Attachments	<p>OPPOSER'S SJM CASSA-TM-OPPOSITION rev 2.pdf(69087 bytes) Assa Aff in Support-CASSA-TM-OPPOSITION rev 4.PDF(450468 bytes) Exhibit 1.pdf(562552 bytes) Exhibit 2.pdf(24571 bytes) Exhibit 3.pdf(102735 bytes) Exhibit 4.pdf(108731 bytes) Exhibit 5.pdf(56514 bytes) Exhibit 6.pdf(125596 bytes) Exhibit 7.pdf(312339 bytes) Exhibit 8.pdf(95846 bytes) Exhibit 9.pdf(252618 bytes) Exhibit 10.pdf(111038 bytes) Exhibit 11.pdf(470030 bytes) Exhibit 12.pdf(106493 bytes) Exhibit 13.pdf(52713 bytes) Exhibit 14.pdf(1865634 bytes) Exhibit 15.pdf(1588002 bytes) Exhibit 16.pdf(4981196 bytes) Exhibit 17.pdf(198511 bytes) Exhibit 18.pdf(1935022 bytes) Exhibit 19.pdf(769349 bytes) Exhibit 20.pdf(58385 bytes) Exhibit 21.pdf(526101 bytes) Exhibit 22.pdf(21606 bytes) Exhibit 23.pdf(622763 bytes) Exhibit 24.pdf(553190 bytes) Exhibit 25.pdf(435907 bytes) Exhibit 26.pdf(110011 bytes) Exhibit 27.pdf(2000127 bytes) Exhibit 28.pdf(3866823 bytes) Exhibit 29.pdf(183470 bytes)</p>

II. FACTUAL AND PROCEDURAL BACKGROUND

1. The relevant facts are fully set forth in the accompanying Affidavit of Salim Assa (the “Assa Affidavit”) and the exhibits attached to the affidavit. For the Board’s convenience, the salient facts will be summarized here.

2. In 2007, Opposer created and designed the mark “CASSA” as a fanciful combination of the Spanish and Italian word “*casa*” meaning “house” and the name of Applicant’s two members, Isaac Assa and Salim Assa, to brand their various hotel and residential projects for their entities Assa Properties, LLC, Waterscape Resort, LLC and other future projects, which today includes the hotel and residences located at 515 Ninth Avenue, New York, New York, known as Cassa Times Square Hotel & Residence [Exhibit 14].

3. Starting in March, 2009 and continuing to date, Opposer has been using the trademark “CASSA” for its hotel and condominium developments, both in national and international advertisements and on the Internet, as well as newspaper advertisements, brochures and other printed materials [See Exhibits 13, 15-18, 20-31, 34, 36-37, 39 and 41].

4. On or about March 15, 2009, while under construction, Opposer began use of the CASSA mark as demonstrated by the banners at the construction site located at 70 West 5th Street [Exhibits 28 and 30], the launch of a website using the CASSA mark [Exhibits 36, 37 and 39], advertisement in newspapers and news articles [Exhibits 15-21], the opening of a showroom [Exhibits 31 and 40], the offering for sale of condominiums and the use of a sales brochure [Exhibit 34]. Several units were sold [See paragraph 10 of the Assa Affidavit].

5. Opposer started operations of the Cassa Hotel in August, 2010, when Opposer received its Temporary Certificate of Occupancy (“TCO”).

6. Opposer licensed the CASSA mark to Waterscape Resort, LLC. Waterscape Resort, LLC, for which Salim Assa is the manager, has continuously used the CASSA mark to market the residential condominiums for sale and leasing. Waterscape Resort, LLC, also used the CASSA mark to brand the hotel portion of the project, i.e. the CASSA HOTEL.

7. In January, 2012, as part of its bankruptcy re-organization, Waterscape sold the hotel portion to new owners. The purchase of the hotel was accomplished by Waterscape placing title to the hotel into a separate entity, Waterscape Resort II, LLC. Then the new owners purchased all the rights and membership interests in Waterscape Resort II, LLC. As part of the sale, the CASSA HOTEL mark was then licensed to the new owners for their use, with Opposer's permission.

8. In 2014, with the completion of Opposer's second hotel and residential project at 515 Ninth Avenue, New York, Opposer extended the CASSA mark to include this property as well.

9. Since March, 15, 2009, the CASSA mark has been in continuous use by Opposer and its licensees.

10. On June 10, 2013, Opposer filed an application in the United States Patent & Trademark Office (the "USPTO"), Serial No. 85955568, to register the mark CASSA covering the following services: "Lease of real estate; Leasing of real estate; Real estate services, namely, condominium management services; Real estate services, namely, rental of vacation homes, condominiums, cabins, and villas using pay per click advertising on a global computer network," in Class 36; "Real estate development; Real estate development and construction of commercial, residential and hotel property," in Class 37; and, "Hotel accommodation services; Hotel services;

Resort hotel services; Restaurant and hotel services,” in Class 43. This application was based upon actual use and claimed March 15, 2009 as the date of first use of the mark in commerce.

11. On April 10, 2013, Applicant filed an application in the USPTO, Serial No. 85900657, to register the mark CASSA covering the following services: “Real estate development and construction of commercial, residential and hotel property” in Class 37. This application was based upon intent-to-use.

12. On February 4, 2014, Applicant’s application was published for opposition; and, on April 1, 2014, Opposer timely filed this opposition.

13. Both sides timely served discovery demands. Opposer timely served its responses to interrogatories and its document production¹ [Exhibits 6 and 7]. As a result of perceived inadequacies, Opposer provided a supplemental response to interrogatories and a second supplemental response to interrogatories [Exhibits 8 and 9].

14. Applicant provided its responses to interrogatories [Exhibit 11]. It also provided its document production² [Exhibit 12].

15. In its Answers, in response to an interrogatory inquiring about the earliest date on which Applicant used its mark or any variation thereof, Applicant responded: “On or about March 18, 2013 the digital version of the CASSA at Georgetown Brochure was uploaded to the cassa.co website. The printed version of the brochure was available on April 17, 2013.” [see Response to Interrogatory 8 in Exhibit 11]

16. Both parties waived depositions, and discovery closed on May 20, 2015.

17. Applicant then timely brings this motion.

¹ The response is provided without exhibits or documents.

² The response is provided without exhibits or documents

III. Summary Judgment Standard

A motion for summary judgment should be granted when “the pleadings, the discovery and disclosure materials on file, and any affidavits show that there is no genuine issue as to any material fact and that the movant is entitled to judgment as a matter of law.” *Celotex Corp. v. Catrett*, 477 U.S. 317, 322 (1986) (citing Fed. R. Civ. P. 56(c)). The party moving for summary judgment “bears the burden of demonstrating absence of all genuine issues of material fact.” *SRI Intern. v. Matsushita Elec. Corp. of America*, 775 F.2d 1107, 1116, 227 U.S.P.Q. 557 (Fed. Cir. 1985). The moving party may meet this burden by demonstrating “that there is an absence of evidence to support the nonmoving party's case.” *Celotex*, 477 U.S. at 325. Once the moving party has met its burden, “[t]he nonmoving party may not rest on the mere allegations of its pleadings and assertions of counsel, but must designate specific portions of the record or produce additional evidence showing the existence of a genuine issue of material fact for trial.” *Venture Out Properties LLC v. Wynn Resort Holdings LLC*, 81 USPQ2d 1887, 1890 (TTAB 2007). *See also Sweats Fashions, Inc. v. Pannill Knitting Co., Inc.*, 833 F.2d 1560, 1562, 4 U.S.P.Q.2d 1793 (Fed. Cir. 1987) (“Where a movant has supported its motion with affidavits or other evidence which, unopposed, would establish its right to judgment, the nonmovant may not rest upon general denials in its pleadings or otherwise, but must proffer countering evidence sufficient to create a genuine factual dispute”). For purposes of considering a motion for summary judgment, “[a] dispute is genuine only if, on the entirety of the record, a reasonable jury could resolve a factual matter in favor of the non-movant.” *Id.* If the nonmoving party cannot identify any such

genuine issue as to any material fact, “the movant is entitled to judgment as a matter of law.”
Celotex, 477 U.S. at 322.

IV. **STATEMENT OF MATERIAL FACTS NOT IN DISPUTE**

18. The marks at issue in this proceeding are identical; and, the services associated with the respective marks are also identical and/or highly related. Therefore, the only issue to be decided in this proceeding is the question of priority.

19. The facts as bore out in discovery show that it is undisputed that Opposer developed its mark between 2007 and 2009. By March 15, 2009, Opposer was using its mark in commerce as detailed in the Assa Affidavit. March 15, 2009 serves as the date of first actual use by Opposer, who has used the CASSA mark since then without interruption or abandonment. Opposer has even extended the use of its mark to other projects as explained in the Assa Affidavit.

20. According to Applicant’s responses to Opposer’s interrogatories, and giving Applicant the benefit of the doubt that the use stated by Applicant constituted use of the mark in commerce, Applicant’s earliest first use date of the CASSA mark is March 18, 2013.

V. **ARGUMENT**

Given that the marks at issue are identical and the services associated with each are the same or highly related, likelihood of confusion is not an issue. The only issue here is priority.

In order for Opposer to prevail on its claim, it must prove that it has a proprietary interest in the CASSA mark and that its interest was obtained prior to either the filing date of applicant’s application for registration or applicant’s date of first use. *Herbko International Inc. v. Kappa*

Books Inc., 308 F.3d 1156, 64 USPQ2d 1375, 1378 (Fed. Cir. 2002); *Otto Roth & Co., Inc. v. Universal Corp.*, 640 F.2d 1317, 209 USPQ 40, 43 (CCPA 1981); *Miller Brewing Co. v. Anheuser-Busch Inc.*, 27 USPQ2d 1711, 1714 (TTAB 1993).

Further, a party opposing registration of another's mark on the basis of likelihood of confusion with its own unregistered mark must establish that the unregistered mark is distinctive of its goods or services either inherently or through the acquisition of secondary meaning. See *Towers v. Advent Software, Inc.*, 913 F.2d 942, 945, 16 USPQ2d 1039, 1041 (Fed. Cir. 1990); and *Otto Roth & Co. v. Universal Foods Corp.*, 640 F.2d 1317, 209 USPQ 40, 43-45 (CCPA 1981).

The first to develop and use a distinctive mark in connection with its particular line of goods or services obtains the exclusive right to the mark, so long as such use is deliberate and continuous. "The exclusive right to a distinctive mark belongs to the one who first uses it in connection with a particular line of business. This 'first actual use,' or 'prior use', must be deliberate and continuous in order to confer ownership rights [internal citations omitted]." *Talk To Me Products, Inc. v. Larami Corp.*, 804 F.Supp. 555, 559 (S.D.N.Y., 1992).

Opposer was the first to develop and use the CASSA mark. The CASSA mark is a fanciful combination of the Spanish and Italian word "*casa*" meaning "house" and the name of Applicant's two members, Isaac Assa and Salim Assa, and is therefore inherently distinctive of Opposer's services.

Opposer has been and is using the CASSA mark either directly or through its licensees since the date of its first actual use on March 15, 2009. Such use has been continuous since the CASSA mark's first use as demonstrated by the evidence of the use of websites, advertisements,

classified ads, a showroom, newspaper articles and other means both electronic and non-electronic, for sales of its condominium units, leasing of those units and stays at its hotels.

The use of the internet and traditional print media are types of uses that fall well within the definition of “use in commerce” as defined by 15 U.S.C. §1127, for hotels and for the sale and rental of residential property. A hotel offering its services via the internet, internet websites, internet advertisement, and advertising in national publications to a transient population that customarily uses the nation’s highways and airways to travel constitutes sufficient interstate activity to meet the requirement of “use in commerce” pursuant to the Lanham Act. *Kampgrounds of America, Inc. v. North Delaware A-OK Campground, Inc.*, 415 F.Supp. 1288, 1290-1291 (1976).

In *Penta Hotels Ltd. v. Penta Tours*, ___ F.Supp. ___, 9 U.S.P.Q.2d 1081 (D. Conn., 1988), the court held that the method of advertisement, including but not limited to brochures, fact sheets, rate sheets, mass mailings, sales calls, displays, exterior and interior signage, and various newspapers and trade publications, was sufficient use in commerce pursuant to the Lanham Act. In supporting such a position, the *Penta* Court cited to several examples that demonstrate how hotels and motels are services in interstate commerce.

Where a local motel provides rooms and meals to interstate travelers and advertises in interstate commerce, it is rendering services “in commerce.” *In re Ponderosa Motor Inns, Inc.*, 156 U.S.P.Q. 474, 475 (T.T.& A. Bd. 1968). Additionally with regard to hotel services, the taking and confirming of reservations in other cities outside the state where the hotel is located and the listing of a service mark in out-of-state telephone directories constitutes services rendered in interstate commerce. *In re G.J. Sherrard Co.*, 150 U.S.P.Q. 311 (T.T.& A. Bd. 1966) (“*Sherrard*”). The service mark applicant need not render all its services in commerce; it is sufficient that applicant show a service was rendered in commerce and such service is identified with the mark. *In re Federated Department Stores, Inc.*, 137 U.S.P.Q. 670 (T.T.& A. Bd. 1963). *Penta Hotels Ltd.*, supra at 21.

Opposer licensed the CASSA mark to Waterscape Resort, LLC. Waterscape Resort, LLC, for which Salim Assa is the manager, has continuously used the CASSA mark to market residential condominiums for sale and leasing. Waterscape Resort, LLC, also used the CASSA mark to brand the hotel portion of the project, i.e. the Cassa Hotel. When the hotel portion was sold to new owners in January, 2012, the CASSA mark was then licensed to the new owners for their use.

In 2014, with the completion of Opposer's second hotel and residential project at 515 Ninth Avenue, New York, Opposer's use of the CASSA mark was extended to include that property as well.

The earliest date of first use of the CASSA mark relied upon by Applicant is March 18, 2013.

Therefore, there is no issue as to priority. Because Opposer's CASSA mark is inherently distinctive, because Opposer has proven that it has a proprietary interest in the CASSA mark and that its interest was obtained prior to both the filing date of Applicant's application and four years prior the date of first use claimed by Applicant, Opposer clearly is the senior user.

Accordingly, Opposer has more than sufficiently met its burden of proof to show that it has priority to its CASSA mark and it has established exclusive rights to the CASSA mark. Thus, registration of Applicant's application should be refused.

CONCLUSION

Opposer established that its development and use of the inherently distinctive CASSA mark, which incorporates its principal's name as well as its own name, pre-dates Applicant's claimed date of first use by four years. Thus, Opposer has established its priority to the CASSA

mark. There are clearly no questions of fact and only questions of law to decide. Upon review, Opposer amply meets its burden to be awarded summary judgment. Accordingly, Opposer's motion should be granted in its entirety.

Dated: New York, New York
July 13, 2015

Yours, etc,
RICHARD J. MIGLIACCIO, ESQ.

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Attorneys for Applicant
235 SW Le Jeune Road
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**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

-----X	
ASSA REALTY, LLC,	Trademark Application
<i>Opposer,</i>	Mark: CASSA
-against-	Application Serial No.: 85900657
THE SOLUTION GROUP CORP.,	Filed: April 10, 2013
<i>Applicant.</i>	Published: February 4, 2014
-----X	Opposition No.: 91215734

**AFFIDAVIT IN SUPPORT OF OPPOSER’S
MOTION FOR SUMMARY JUDGMENT**

STATE OF NEW YORK }
 }ss.:
COUNTY OF NEW YORK }

I, Salim Assa, being duly sworn, deposes and says the following:

1. I am the Manager and a Principal of Assa Realty, LLC (“Opposer”) and am fully familiar with all of the facts and circumstances set forth below. I am also known by the name Solly.
2. The basis of my knowledge is the records and documents kept and maintained in Opposer’s files in the normal course of business, and my personal knowledge concerning the claims that are the subject of this Opposition proceeding, and are true and correct to the best of my knowledge.
3. My brother, Isaac Assa, and myself, are developers of high end quality, and luxury hotels and residences. We have developed a business for luxury accommodations that include the very best in comfort, style and taste. We have been developing our mark, “CASSA” to be brand of our business, so customers know that they are getting the very best.

4. In 2005, myself and, my brother, through the entity Waterscape Resort, LLC¹, purchased property located at 66-70 West 45th Street, New York, New York, to build a hotel and residential project in the heart of Manhattan (the “W45 Project”). We sought to brand the W45 Project and ultimately all of our hotel and residential projects with one brand or mark.

5. On or about January 5, 2007, Graham Hanson Design was retained to brand the W45 Project. Very quickly, Graham Hanson Design created and designed the “CASSA” mark in January, 2007. A copy of the design is annexed hereto as Exhibit 27. In an e-mail from Graham Hanson Design to myself dated January 16, 2007 (annexed as Exhibit 14), it explained why “CASSA” (the “Mark”) was chosen. There were two reasons the Mark was chosen: (a) from the Spanish and Italian word “casa” for house; and (b) with an additional “s” in “casa” so it becomes “cassa” to refer to our name “Assa,” and our businesses, i.e. Salim Assa, Isaac Assa, Assa Properties, LLC and Assa Realty, LLC. We liked the Mark, especially that it incorporated our name and the names of our entities. In this way people would know it was us.

6. I immediately authorized the use of the “CASSA” mark, in 2007 and directed that Opposer provided a licensing agreement to Waterscape Resort, LLC. Thereafter, Waterscape Resort, LLC, with Graham Hanson Design’s assistance, developed a marketing campaign for the W45 Project. In June, 2014, Opposer extended the use of the Mark to our next hotel & condominium project located at 515 Ninth Avenue, New York. We named that project CASSA Times Square Hotel & Residence.

7. By March 15, 2009 we were using the Mark in commerce. In and around that time the marketing for the W45 Project included all manners of advertisement that displayed the Mark. A showroom was opened around the corner from the W45 Project in which we

¹ Waterscape Resort, LLC, is an entity that I and Isaac Assa have an ownership interest. I am the manager of Waterscape Resort, LLC.

exhibited displays and signs using the Mark and its connection to us². The showroom and the W45 Project were well advertised in the New York Times³. See Exhibit 16, 17 and 20. At the same time, a website was launched for W45 Project offering units from the residential side for sale and lease. While the website also offered to bookings and other services for the hotel once the hotel opened in and around September, 2010. The website conspicuously displayed the Mark. See Exhibits 36, 37 and 39.

8. During the course of construction of the W45 Project, Waterscape Resort, LLC, had disputes with its Construction Manager that ultimately lead to litigation and Waterscape Resort, LLC, seeking Chapter 11 Bankruptcy protection.

9. On April 5, 2011, Waterscape Resort, LLC, filed for Chapter 11 Bankruptcy Protection. As part of its Chapter 11 Plan, Waterscape Resort, LLC, sold the hotel portion of the W45 Project, CASSA Hotel, to 70 West 45th Street, Holding, LLC⁴. The closing of CASSA Hotel occurred on January 23, 2012. As part of the closing, Opposer, permitted and authorized Waterscape Resort, LLC, to license the Mark to 70 West 45th Street Holding, LLC so the new owners could continue operating the hotel as CASSA Hotel.

10. Since then, Waterscape Resort, LLC, has been using the Mark to identify and market CASSA NY Residences for sale and lease. Several units have been sold, and those units that have not been sold are being offered for leasing. 70 West 45th Street Holding, LLC, has been using the Mark to identify and market CASSA Hotel.

² All that remains regarding the showroom is the designs, diagrams and renderings used during the development and use of the showroom.

³ We have no copies of the actual advertisements. Instead, all we have are the layouts and prints that were sent to the New York Times to be used.

⁴ 70 West 45th Street Holding, LLC, upon information and belief, is the New York affiliate or subsidiary of Viceroy Hotel Group. Viceroy Hotel Group through 70 West 45th Street Holding, LLC, purchased Cassa Hotel and operates it.

11. The Mark has been continually used without interruption since its first actual use on March 15, 2009. It has been displayed in various mediums, including, but not limited to, print media, internet advertisement, articles and Websites and web based content, as follows:

- a. IN NEW YORK, January, 2011, issue Exhibit 15;
- b. Article in the Croatian magazine, Putovanja Za Dvoje, in its Summer (Ljeto) 2011 issue Exhibit 18;
- c. New York Times classified ads, Exhibits 16, 17 and 20, and an e-mail that shows the dates in which ads were printed in the New York Times classified ads Exhibit 19;
- d. There was an advertisement sponsoring a film festival in NYC from 2010, Exhibit 21;
- e. City Realty internet advertisement Exhibit 23;
- f. Internet advertisement for the CASSA Hotel, Exhibit 24;
- g. Internet advertisement for rentals for CASSA NY Residence, Exhibit 25;
- h. Screen shot of the website for our second project at 515 Ninth Avenue, CASSA Times Square Hotel & Residence, using the Mark, Exhibit 26;
- i. Final approved Broker Blast sent out in March, 2015, Exhibit 27; and
- j. Copies of flyers for showroom Exhibit 31.

12. Working with our marketing people and contractors, we developed a brochure for the sale of our residential units from 2007 to 2009. The brochure went through many revisions. An early version of the brochure is annexed hereto as Exhibit 32. In December, 2008, an initial hard copy version of the brochure was printed, but had some issues, see Exhibit 33. By March, 2009, a final version was published and we commenced using it. See Exhibit 34. We have used that brochure continuously without interruption since then regarding our sales and leasing of CASSA NY Residence.

13. During the construction of the project, I directed that banners be hung at the site. I submit a photograph from February, 2009, depicting our clear use of the Mark prior to our date of Actual First use, see Exhibit 28, as we set up the banners at the site. Soon thereafter,

all our banners were up. I include photographs of banners that were hung at the Project location from about March, 2009, until the opening of the Project in Sept, 2010, Exhibit 30.

14. During the construction of the project and starting in about, March 2009, we launched a website for Cassa Hotel & Residence. A print of an early form of the website is annexed hereto as Exhibit 35. By March, 2009, we launched the website. A copy of the layout of the website at or near the time of the launch is annexed hereto as Exhibit 36. I submit a portion of the website as it was from April 15, 2009. See Exhibit 37. There were issues with the website. See Exhibit 38. Eventually the bugs were worked out and the website worked fine. A copy of the way the website looked liked in October, 2010, is annexed as Exhibit 39.

15. As a result of the sale of the hotel, the website was split up. Because Cassa Hotel was being run by the new owners, they had the responsibility for the hotel portion of the W45 Project. They set up a new website just for the Cassa NY Hotel. We continue to run the original website to sell and lease units at Cassa NY Residence, and we provide a link to the Hotel from the old website. Both websites have been in continuous use, without any interruption.

16. Both Cassa Hotel and Cassa Residence have been using the internet to advertise as the following screen shots demonstrate:

- a. A screen shot of an advertisement from the internet from Dec, 2013, Exhibit 13;
- b. A screen shot of an advertisement from the internet from January, 2014, Exhibit 23; and
- c. Screen shots for September, 2014, Exhibit 24 and Exhibit 25;

17. A Google search from September 8, 2014, using the search term "Cassa" had the top results being websites for our hotels and residences. See Exhibit 29. Note how this was done well after the alleged use by Applicant.

18. Around March 15, 2009, we opened a sales office to generate during the construction of the W45 Project. All we have left is diagrams and drawings that were used during the development and design of the showroom, Exhibit 40, and a copy of flyers that were sent out to real estate agents, Exhibit 41.

19. We spent a considerable amount of time and money working on marketing. We kept minutes from the many marketing meetings we had regarding the development and marketing of the brand from February, 2007 through June, 2009, see Exhibit 42.

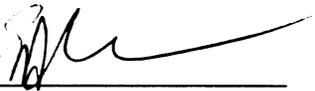
20. As part of branding and licensing, Opposer licensed and permitted Waterscape Resort, LLC, to do business as Cassa Hotel & Residence, Exhibit 43; and as CASSA NY, Exhibit 44.

21. In extending the Mark to our new project, located at 515 Ninth Avenue, New York, owned through the entity 511 Property, LLC, I had it also register to do business using the Cassa brand. 511 Property, LLC, registered with the State of New York to do business as Cassa Times Square Hotel & Residence, Exhibit 45, and to do business as Cassa NY Times Square Hotel, Exhibit 46.

22. All this evidence demonstrates that I and my brother, through Opposer, created and developed the Mark so as to brand all our current and future projects under "CASSA." We chose the Mark because we liked that it incorporates our name in the Mark so the public can make that connection to ourselves and our various companies.

23. I am advised by counsel that because we created and developed the Mark and have continuously used it since March 15, 2009, we have established our exclusive right to "CASSA" for our hotels and residential properties. Such use pre-dates Applicant's alleged

earliest use and entitles us to priority. As such we should be entitled to register the Mark and registration of Applicant's mark should be denied.



Salim Assa
Manager of Assa Realty, LLC

Affirmed before me this the
13th day of July, 2015


Notary Public

RICHARD J. MIGLIACCIO
Notary Public, NY State
No. 02M14974109 QUEENS
Comm. Expires 11/05/2018

EXHIBIT 1

Trademark/Service Mark Application, Principal Register

Serial Number: 85900657

Filing Date: 04/10/2013

The table below presents the data as entered.

Input Field	Entered
SERIAL NUMBER	85900657
MARK INFORMATION	
*MARK	\\TICRS\EXPORT16\IMAGEOUT 16\859\006\85900657\xml1\APP0002.JPG
SPECIAL FORM	YES
USPTO-GENERATED IMAGE	NO
LITERAL ELEMENT	CASSA
COLOR MARK	NO
*DESCRIPTION OF THE MARK (and Color Location, if applicable)	The mark consists of the word CASSA in lowercase in a stylized font.
PIXEL COUNT ACCEPTABLE	NO
PIXEL COUNT	767 x 167
REGISTER	Principal
APPLICANT INFORMATION	
*OWNER OF MARK	The Solution Group Corp.
*STREET	2 NE 40 Street, Suite 204
*CITY	Miami
*STATE (Required for U.S. applicants)	Florida

*COUNTRY	United States
*ZIP/POSTAL CODE (Required for U.S. applicants only)	33137
PHONE	305-447-1617
FAX	305-445-8484
LEGAL ENTITY INFORMATION	
TYPE	corporation
STATE/COUNTRY OF INCORPORATION	Florida
GOODS AND/OR SERVICES AND BASIS INFORMATION	
INTERNATIONAL CLASS	037
* IDENTIFICATION	real estate development and construction of commercial, residential and hotel property
FILING BASIS	SECTION 1(b)
ATTORNEY INFORMATION	
NAME	Jesus Sanchelima, Esq.
ATTORNEY DOCKET NUMBER	330008.1
FIRM NAME	Sanchelima & Associates, P.A.
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CITY	Miami
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CITY	Miami
STATE	Florida
COUNTRY	United States
ZIP/POSTAL CODE	33134
PHONE	305-447-1617
FAX	305-445-8484
FEE INFORMATION	
NUMBER OF CLASSES	1
FEE PER CLASS	325
*TOTAL FEE DUE	325
*TOTAL FEE PAID	325
SIGNATURE INFORMATION	
* SIGNATORY FILE	\\TICRS\EXPORT16\IMAGEOUT16\859\006\85900657\xml1\APP0003.JPG
SIGNATORY'S NAME	Camilo Lopez
SIGNATORY'S POSITION	President

Trademark/Service Mark Application, Principal Register

Serial Number: 85900657

Filing Date: 04/10/2013

To the Commissioner for Trademarks:

MARK: CASSA (stylized and/or with design, see [mark](#))

The literal element of the mark consists of CASSA.

The applicant is not claiming color as a feature of the mark. The mark consists of the word CASSA in lowercase in a stylized font.

The applicant, The Solution Group Corp., a corporation of Florida, having an address of
2 NE 40 Street, Suite 204
Miami, Florida 33137
United States

requests registration of the trademark/service mark identified above in the United States Patent and Trademark Office on the Principal Register established by the Act of July 5, 1946 (15 U.S.C. Section 1051 et seq.), as amended, for the following:

International Class 037: real estate development and construction of commercial, residential and hotel property

Intent to Use: The applicant has a bona fide intention to use or use through the applicant's related company or licensee the mark in commerce on or in connection with the identified goods and/or services. (15 U.S.C. Section 1051(b)).

The applicant's current Attorney Information:

Jesus Sanchelima, Esq. of Sanchelima & Associates, P.A.
235 SW Le Jeune Road
Miami, Florida 33134
United States

The attorney docket/reference number is 330008.1.

The applicant's current Correspondence Information:

Jesus Sanchelima, Esq.
Sanchelima & Associates, P.A.
235 SW Le Jeune Road
Miami, Florida 33134
305-447-1617(phone)
305-445-8484(fax)

A fee payment in the amount of \$325 has been submitted with the application, representing payment for 1 class(es).

Declaration

The undersigned, being hereby warned that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. Section 1001, and that such willful false statements, and the like, may jeopardize the validity of the application or any resulting registration, declares that he/she is properly authorized to execute this application on behalf of the applicant; he/she believes the applicant to be the owner of the trademark/service mark sought to be registered, or, if the application is being filed under 15 U.S.C. Section 1051(b), he/she believes applicant to be entitled to use such mark in commerce; to the best of his/her knowledge and belief no other person, firm, corporation, or association has the right to use the mark in commerce, either in the identical form thereof or in such near resemblance thereto as to be likely, when used on or in connection with the goods/services of such other person, to cause confusion, or to cause mistake, or to deceive; and that all statements made of his/her own knowledge are true; and that all statements made on information and belief are believed to be true.

Declaration Signature

Signature: Not Provided Date: Not Provided

Signatory's Name: Camilo Lopez

Signatory's Position: President

RAM Sale Number: 85900657

RAM Accounting Date: 04/11/2013

Serial Number: 85900657

Internet Transmission Date: Wed Apr 10 17:09:52 EDT 2013

TEAS Stamp: USPTO/BAS-108.67.201.17-2013041017095276

3901-85900657-5004fc47097f8e244617cdf4db

39f36c2cf2879fab69cf9f91b318ee63e033932-

CC-4150-20130410152716260161

caſſa

Declaration

The undersigned, being hereby warned that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. Section 1001, and that such willful false statements, and the like, may jeopardize the validity of the application or any resulting registration, declares that he/she is properly authorized to execute this application on behalf of the applicant; he/she believes the applicant to be the owner of the trademark/service mark sought to be registered, or, if the application is being filed under 15 U.S.C. Section 1051(b), he/she believes applicant to be entitled to use such mark in commerce; to the best of his/her knowledge and belief no other person, firm, corporation, or association has the right to use the mark in commerce, either in the identical form thereof or in such near resemblance thereto as to be likely, when used on or in connection with the goods/services of such other person, to cause confusion, or to cause mistake, or to deceive; and that all statements made of his/her own knowledge are true; and that all statements made on information and belief are believed to be true.

Signature Section:

Signature: _____

Signatory's Name: Camilo Lopez

Signatory's Position: President

Signatory's Phone Number: 305-447-1617

Date Signed: 04/10/2013

NOTE TO APPLICANT: When filed as part of the electronic form (i.e., scanned and attached as an image file), the signature page **must** include both the signature information **and** the boilerplate declaration language. Do **not** include the entire application, but do ensure that the boilerplate declaration language actually appears; *a signature by itself will not be acceptable*. If, due to browser limitations, the boilerplate declaration language appears on a previous page when printed, you must "merge" the declaration and signature block onto a single page prior to signing, so that the *one complete page* can be scanned to create an acceptable image file. It is recommended that you copy-and-paste the entire text form into another document, manipulate the spacing there to move the declaration and signature section to a separate page, and then print this new version of the text form to send to the signatory.

EXHIBIT 2

Trademark/Service Mark Application, Principal Register

*NOTE: Data fields with the * are mandatory. The wording "(if applicable)" appears where the field is only mandatory under the facts of the particular application.*

The table below presents the data as entered.

Input Field	Entered
SERIAL NUMBER	N/A
MARK INFORMATION	
*MARK	mark.jpg
STANDARD CHARACTERS	YES
USPTO-GENERATED IMAGE	YES
LITERAL ELEMENT	cassa
MARK STATEMENT	The mark consists of standard characters, without claim to any particular font, style, size, or color.
APPLICANT INFORMATION	
*OWNER OF MARK	Assa Realty LLC
*STREET	410 Park Avenue, Ste. 1630
*CITY	New York
*STATE (Required for U.S. applicants)	New York
*COUNTRY	United States
*ZIP/POSTAL CODE (Required for U.S. applicants only)	10022
PHONE	212-239-9900
LEGAL ENTITY INFORMATION	
TYPE	limited liability company
STATE/COUNTRY WHERE LEGALLY ORGANIZED	New York
GOODS AND/OR SERVICES AND BASIS INFORMATION	
INTERNATIONAL CLASS	036
*IDENTIFICATION	Lease of real estate
FILING BASIS	SECTION 1(a)

FIRST USE ANYWHERE DATE	At least as early as 03/15/2009
FIRST USE IN COMMERCE DATE	At least as early as 03/15/2009
SPECIMEN FILE NAME(S)	SPE0-243911430-154828215_._Cassa2.jpg
SPECIMEN DESCRIPTION	scan/digital photograph of building in New York City with Cassa emblazoned on the side entrance.
INTERNATIONAL CLASS	036
*IDENTIFICATION	Leasing of real estate; Real estate services, namely, condominium management services; Real estate services, namely, rental of vacation homes, condominiums, cabins, and villas using pay per click advertising on a global computer network
FILING BASIS	SECTION 1(a)
FIRST USE ANYWHERE DATE	At least as early as 03/15/2009
FIRST USE IN COMMERCE DATE	At least as early as 03/15/2009
SPECIMEN FILE NAME(S)	SPE0-2-243911430-154828215_._Cassa2.jpg
SPECIMEN DESCRIPTION	scan/digital photograph of building in New York City with Cassa emblazoned on the side entrance.
INTERNATIONAL CLASS	037
*IDENTIFICATION	Real estate development; Real estate development and construction of commercial, residential and hotel property
FILING BASIS	SECTION 1(a)
FIRST USE ANYWHERE DATE	At least as early as 03/15/2009
FIRST USE IN COMMERCE DATE	At least as early as 03/15/2009
SPECIMEN FILE NAME(S)	SPE0-2-243911430-154828215_._Cassa2.jpg
SPECIMEN DESCRIPTION	scan/digital photograph of building in New York City with Cassa emblazoned on the side entrance.
INTERNATIONAL CLASS	043
*IDENTIFICATION	Hotel accommodation services; Hotel services; Resort hotel services; Restaurant and hotel services
FILING BASIS	SECTION 1(a)
FIRST USE ANYWHERE DATE	At least as early as 03/15/2009
FIRST USE IN COMMERCE DATE	At least as early as 03/15/2009
SPECIMEN	SPE0-3-243911430-154828215_._Cassa2.jpg

FILE NAME(S)	
SPECIMEN DESCRIPTION	scan/digital photograph of building in New York City with Cassa emblazed on the side of the entrance.
ATTORNEY INFORMATION	
NAME	Richard Migliaccio, Esq.
FIRM NAME	Richard J. Migliaccio, Esq.
STREET	410 Park Avenue, Ste. 1630
CITY	New York
STATE	New York
COUNTRY	United States
ZIP/POSTAL CODE	10022
PHONE	212-239-9900 ext. 40
FAX	212-239-7498
EMAIL ADDRESS	richard@assaproperties.com
AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
OTHER APPOINTED ATTORNEY	Joel Scott Ray
CORRESPONDENCE INFORMATION	
NAME	Richard Migliaccio, Esq.
FIRM NAME	Richard J. Migliaccio, Esq.
STREET	410 Park Avenue, Ste. 1630
CITY	New York
STATE	New York
COUNTRY	United States
ZIP/POSTAL CODE	10022
PHONE	212-239-9900 ext. 40
FAX	212-239-7498
EMAIL ADDRESS	richard@assaproperties.com;joel@assaproperties.com
AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
FEE INFORMATION	
NUMBER OF CLASSES	3

FEE PER CLASS	325
*TOTAL FEE DUE	975
*TOTAL FEE PAID	975
SIGNATURE INFORMATION	
SIGNATURE	/Joel Scott Ray/
SIGNATORY'S NAME	Joel Scott Ray
SIGNATORY'S POSITION	Attorney of record, New York bar member
SIGNATORY'S PHONE NUMBER	212-239-9900 ext 15
DATE SIGNED	06/10/2013

EXHIBIT 3

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

-----X	
ASSA REALTY, LLC,	Trademark Application
<i>Opposer,</i>	Mark: CASSA
-against-	Application Serial No.: 85900657
THE SOLUTION GROUP CORP.,	Filed: April 10, 2013
<i>Applicant.</i>	Published: February 4, 2014
-----X	Opposition No.: _____

NOTICE OF OPPOSITION

In the matter of the application for registration CASSA for “real estate development and construction of commercial, residential and hotel property” in International Class 37, filed April 10, 2013, by The Solution Group Corp. (“Applicant”), assigned Application Serial No.: 85900657, and published for opposition in the *Official Gazette* on February 4, 2014, Assa Realty, LLC (“Opposer”), believes that it will be damaged by such registration and hereby opposes the registration of Applicant’s mark pursuant to 15 USC §1063 and 37 CFR §2.105. As grounds of opposition, it is alleged that:

1. Opposer, Assa Realty, LLC, is a New York Limited Liability Company that exists pursuant to the laws of the State of New York with its principal place of business at 410 Park Avenue, Ste. 1630, New York, New York 10022.
2. Opposer, since at least March, 2009, has been and is now using the mark CASSA in connection with real estate development and construction of commercial and residential and hotel properties (“Opposer’s Mark”).
3. Opposer filed an Application for CASSA with the USPTO on June 10, 2013, that was assigned Application Serial No. 85955568 (the “Opposer’s Application”).

4. The Opposer's Application was filed based on the actual use of the Mark since March 15, 2009 (the "Opposer's First Use") pursuant to Section 1(a).

5. Applicant filed the proposed mark CASSA on April 10, 2013, Application Serial No. 85900657 for "real estate development and construction of commercial, residential and hotel property" pursuant to Section 1(b), claiming a bona fide intent to use the mark in commerce (the "Applicant's Mark").

6. Opposer's use of Opposer's Mark has been valid and continuous since at least March, 2009, and has not been abandoned or limited in anyway. Opposer's Mark is symbolic of extensive goodwill and consumer recognition. As a result of the substantial amounts of time and effort in advertising and promotion, Opposers have developed an exceedingly valuable goodwill with respect to Opposer's Mark.

7. Applicant's Mark and Opposer's Mark are the very same mark in name, appearance and meaning.

8. Applicant's services and Opposer's services are very similiary.

9. Applicant's services and Opposer's services are likely to be confused.

10. On information and belief, Opposer alleges that the services of Opposer and Applicant are offered or to be offered in similar channels of commerce and offered to similar customers.

11. Applicant's use of and application to register CASSA is without the consent or permission of Opposer.

12. Applicant's Mark and Opposer's Mark are likely to be confused.

13. Opposer's first use of Opposer's Mark precedes any alleged use or intended us of Applicant's first use of Applicant's Mark in commerce.

14. Opposer's first use of Opposer's Mark precedes the filing of Applicant's application to register Applicant's Mark in the United States Patent and Trademark Office.

15. Opposer has been advertising Opposer's Mark both nationally and internationally thru magazines and the internet, since at least March, 2009.

16. Opposer's Mark has been used since as early as March, 2009, in brochures offering residential units.

17. Opposer's Mark has been used since as early as March, 2009, on the internet for its hotels and residences.

18. Opposer has entered into exclusive licensing agreements for the use of Opposer's Mark since January, 2012.

19. Opposer's Mark has been used as a marquee or name of Opposer's buildings since March, 2009.

20. Upon information and belief, Applicant had knowledge of Opposer's Mark based on Opposer's extensive advertisement campaign in print and through on-line media.

21. Upon information and belief, Applicant had knowledge of Opposer's use of Opposer's Mark prior to Applicant's filing to register Applicant's Mark.

22. Applicant is not the true owner of the mark in Application Serial No. 85900657.

23. Applicant has committed fraud in the filing of Application Serial No. 85900657.

24. Opposer's Mark consists of and is composed of the name "Assa" who is the name of the individuals, both Salim Assa and his brother Isaac Assa, who are the members/principals of Opposer and who Opposer is named for.

25. The individuals, Salim Assa and Isaac Assa, are both publicly associated with Opposer's Mark.

26. Applicant's Mark consists of or comprises the names of individuals who did not give Applicant their consent to use their name.

27. As a result of confusing similarity between Opposer's Mark and Applicant's Mark and because the goods or services of Applicant and Opposer are very similar, are in similar channels of commerce, and are directed to similar customers, registration of the proposed mark CASSA in connection with Applicant's services is likely to deceive purchasers as to the source or sponsorship of such services, to cause confusion, to cause mistake, or to deceive.

28. Consumers familiar with the Opposer's Mark are likely to mistakenly believe that Applicant's services are sponsored, authorized, associated with or otherwise approved by Opposer because the proposed mark is identical to Opposer's Mark. Deficiencies or faults in the quality of Applicant's services are likely to reflect negatively upon, tarnish and seriously injure the reputation that Opposer has established for services provided under Opposer's Mark. This confusion is likely to result in loss of revenues to Opposer and damage Opposer's reputation.

29. Applicant's use of the Applicant's Mark does or is likely to falsely suggest a relationship between Applicant's services and Opposer. Such use of CASSA is likely to cause confusion, mistake or deception with respect to the source or sponsorship of Applicant's services. Such use is likely to cause a significant level of sales by Applicant to consumers who would be confused by the use of the proposed mark into believing that Opposer is the source of Applicant's services, resulting in ill-gotten gains by Applicant. Applicant's use of the proposed

mark is therefore likely to result in Applicant's trading off and benefiting from the goodwill associated with Opposer, resulting in ill-gotten gains by Applicant.

30. Opposer is likely to be damaged by the registration of Applicant's mark in that the *prima facie* effect of registration of Applicant's mark would tend to impair Opposer's right to use the wording contained in Applicant's mark.

31. Opposer will be damaged by the registration of Applicant's mark because the Office notified Opposer, in an Office Action date September 23, 2013, that Opposer's application will be refused if Applicant's mark is granted registration by the U.S. Patent and Trademark Office.

32. The Application for the Applicant's Mark was published for opposition in the Official Gazette on February 4, 2014. On February 10, 2014, the Opposer timely filed a request for a 30-day extension of time to oppose the application of Applicant's Mark, which was granted until April 5, 2014. See Exhibit "A."

33. For the foregoing reasons, the registration sought by Applicant is contrary to the provisions of the Lanham Act, and Opposer would be damaged thereby.

WHEREFORE, Opposer prays that the application for registration of the mark CASSA, Application Serial No.: 85900657, be refused and that this Opposition be sustained in favor of Opposer.

The fee required by Sect. 2.6(a)(17) is enclosed herewith.

Opposer hereby appoints Richard Migliaccio, Esq, member of the Bar of the State of New York, and Joel Scott Ray, member of the Bars of the State of New York, Connecticut and registered Patent Attorney, Reg. No. 56,918, at RICHARD J. MIGLIACCIO, ESQ. 410 Park

Avenue, Ste. 1630, New York, NY 10022, to act as attorneys in the matter of the opposition identified above, to prosecute said opposition, to transact all business in the Patent and Trademark Office, and in the United States courts connected with the opposition, to sign its name to all papers which are hereinafter to be filed in connection therewith, and to receive all communications relating to the same.

Dated: New York, New York
April 1, 2014

Yours, etc,
RICHARD J. MIGLIACCIO, ESQ.

/s/ Joel Scott Ray
By: Joel Scott Ray, Esq.
Attorneys for Opposer
410 Park Avenue, Ste. 1630
New York, NY 10022
Tel: (212) 239-9900 ext. 40
Fax: (212) 239-7468
e-mail: Richard@assaproperties.com and
joel@assaproperties.com

TO:

SANCHELIMA & ASSOCIATES, P.A.
Attorneys for Applicant
235 SW Le Jeune Road
Miami, FL 33134

EXHIBIT A

UNITED STATES PATENT AND TRADEMARK OFFICE
Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451

Richard J. Migliaccio

410 Park Avenue, Ste, 1630
New York, NY 10022

Mailed: February 10, 2014

Serial No.: 85900657

ESTTA TRACKING NO: ESTTA586424

The request to extend time to oppose is granted until
4/5/2014 on behalf of potential opposer **Assa Realty, LLC**

Please do not hesitate to contact the Trademark Trial and
Appeal Board at (571)272-8500 if you have any questions
relating to this extension.

Note from the Trademark Trial and Appeal Board

TTAB forms for electronic filing of extensions of time to
oppose, notices of opposition, petition for cancellation, notice
of ex parte appeal, and inter partes filings are now available
at <http://estta.uspto.gov>. Images of TTAB proceeding files can
be viewed using TTABVue at <http://ttabvue.uspto.gov>.

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

-----X
ASSA REALTY, LLC,

Opposition No.: _____

Opposer,

In the matter of:

-against-

THE SOLUTION GROUP CORP.,

Mark: **CASSA**

Application Serial No.: 85900657

Published: February 4, 2014

Applicant.

-----X

CERTIFICATE OF SERVICE

I, Joel Scott Ray, Esq., do hereby certify that on April 1, 2014, a true and correct copy of the foregoing **NOTICE OF OPPOSITION** was served on the following via overnight delivery by Federal Express to Applicant at its correspondence address of record:

Jesus Sanchelima, Esq.
SANCHELIMA & ASSOCIATES, P.A.
235 SW Le Jeune Rd.
Miami, FL 33134

Dated: New York, New York
April 1, 2014

1st Joel Scott Ray

Joel Scott Ray, Esq.

EXHIBIT 4

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

Assa Realty, LLC

Opposer,

v.

Opposition No. 91215734

The Solution Group Corp.

Applicant,

_____)

ANSWER

Applicant, The Solution Group Corp., a Florida corporation, with its principal place of business at 4100 N. Miami Avenue, Miami, Florida 33127, (hereinafter “Applicant”), owner of the “CASSA” mark and the application serial No. 85/900,657 for its Answer to Petitioner’s Notice of Opposition (hereinafter “Notice”), states and alleges as follows:

1. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 1 of the Notice, and thereby denies the allegations in paragraph 1.

2. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 2 of the Notice, and thereby denies the allegations in paragraph 2.

3. Applicant admits to the assertions in paragraph 3 of the Notice.

4. Applicant admits that the application was filed alleging use but Applicant is without sufficient knowledge to admit or deny the truth of the rest of the allegations in paragraph 4.
5. Applicant admits to the assertions in paragraph 5 of the Notice.
6. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 6 of the Notice, and thereby denies the allegations of paragraph 6.
7. Applicant does not have sufficient knowledge or information to form a belief about the truth of the assertions in paragraph 7 of the Notice as to what meaning Opposer attributes to the mark, and thereby denies the allegations of paragraph 7.
8. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 8 of the Notice, and thereby denies the allegations of paragraph 8.
9. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 9 of the Notice, and thereby denies the allegations of paragraph 9.
10. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 10 of the Notice, and thereby denies the allegations of paragraph 10.
11. No consent is needed. Applicant admits that it never asks Opposer for consent and in fact did not know of its existence.
12. Applicant denies the assertions in paragraph 12.

13. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 13 of the Notice, and thereby denies the allegations of paragraph 13.
14. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 14 of the Notice, and thereby denies the allegations of paragraph 14.
15. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 15 of the Notice, and thereby denies the allegations of paragraph 15.
16. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 16 of the Notice, and thereby denies the allegations of paragraph 16.
17. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 17 of the Notice, and thereby denies the allegations of paragraph 17.
18. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 18 of the Notice, and thereby denies the allegations of paragraph 18.
19. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 19 of the Notice, and thereby denies the allegations of paragraph 19.
20. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 20 of the Notice, and thereby denies the allegations of paragraph 20.

21. Applicant denies the assertions in paragraph 21.
22. Applicant denies the assertions in paragraph 22.
23. Applicant denies the assertions in paragraph 23.
24. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 20 of the Notice, and thereby denies the allegations of paragraph 24.
25. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 20 of the Notice, and thereby denies the allegations of paragraph 25.
26. Applicant denies that the marks are the names of an individual, no need to obtain consent from Opposer.
27. Applicant denies the assertions in paragraph 27.
28. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 28 of the Notice, and thereby denies paragraph 28.
29. Applicant denies the assertions in paragraph 29.
30. Applicant denies the assertions in paragraph 30.
31. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 31 of the Notice, and thereby denies paragraph 31.

32. Applicant lacks knowledge or information sufficient to form a belief about the truth of the assertions in paragraph 32 of the Notice, and thereby denies the allegations of paragraph 32.

33. Applicant denies the assertions in paragraph 33.

Any allegation of the Notice of Opposition that is not admitted herein is expressly denied. Applicant denies that the Opposer is entitled to the relief sought in the Notice of Opposition.

THEREFORE, the Applicant respectfully requests that the Notice of Opposition be dismissed.

Dated: May 6, 2014

Respectfully submitted,

/s/ Jesus Sanchelima

Jesus Sanchelima, Esq. (Fla. Bar No. 231207)
jesus@sanchelima.com
Sanchelima & Associates, P.A.
235 S.W. Le Jeune Road
Miami, Florida 33134
Telephone: (305) 447-1617
Facsimile: (305) 445-8484
Attorneys for The Solution Group Corp.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed electronically on this 6th day of May 2014 to:

/s/ Jesus Sanchelima
Jesus Sanchelima, Esq.

SERVICE LIST

Assa Realty, LLC versus The Solution Group Corp

Richard J. Migliaccio, Esq.
richard@assaproperties.com
410 Park Avenue, Ste, 1630
New York, NY 10022

Joel Scott Ray, Esq.
Joel.Ray@assaproperties.com
410 Park Avenue, Ste, 1630
New York, NY 10022

EXHIBIT 5

- b. paid advertisements, both in magazines, newspaper and other paper forms, as well as electronic, including the internet;
- c. copyright registrations;
- d. newspaper announcements;
- e. photographs depicting advertisement, flyers, and banners demonstrating first use of Opposer that pre-dates Applicant;
- f. sales brochures;
- g. websites and web based content; and
- h. e-mails.

Dated: New York, New York
July 17, 2014

Yours, etc,
RICHARD J. MIGLIACCIO, ESQ.

/s/ Joel Scott Ray
By: Joel Scott Ray, Esq.
Attorneys for Opposer
410 Park Avenue, Ste. 1630
New York, NY 10022
Tel: (212) 239-9900 ext. 40
Fax: (212) 239-7468
e-mail: Richard@assaproperties.com and
joel@assaproperties.com

TO:

SANCHELIMA & ASSOCIATES, P.A.
Attorneys for Applicant
235 SW Le Jeune Road
Miami, FL 33134

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

-----X
ASSA REALTY, LLC, Trademark Application
Opposer, Mark: CASSA
Application Serial No.: 85900657
-against- Filed: April 10, 2013
Published: February 4, 2014
THE SOLUTION GROUP CORP., Opposition No.: 91215734
Applicant.
-----X

CERTIFICATE OF SERVICE

I, Joel Scott Ray, Esq., an attorney for Defendants, do hereby certify that on July 17, 2014, a true and correct copy of the foregoing **INITIAL DISCLOSURES** was served via e-mail on the following:

Sanchelima & Associates, P.A.
235 S.W. Le Jeune Road
Miami, Florida 33134
Jesus Sanchelima, Esq.
at legal@sanchelima.com; jesus@sanchelima.com;
and paralegal@sanchelima.com

Dated: New York, New York
July 17, 2014

RICHARD J. MIGLIACCIO, ESQ.

1st Joel Scott Ray
By: Joel Scott Ray, Esq.

EXHIBIT 6

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

-----X	
ASSA REALTY, LLC,	Trademark Application
<i>Opposer,</i>	Mark: CASSA
-against-	Application Serial No.: 85900657
THE SOLUTION GROUP CORP.,	Filed: April 10, 2013
<i>Applicant.</i>	Published: February 4, 2014
-----X	Opposition No.: 91215734

**OPPOSER’S RESPONSE TO APPLICANT’S
FIRST SET OF INTERROGATORIES**

PLEASE TAKE NOTICE that Opposer by its attorney, Richard J. Migliaccio, Esq., hereby responds and answers Applicant’s First Set of Interrogatories dated July 29, 2014:

GENERAL STATEMENTS

- A. The information supplied in this Answer is not based solely upon the knowledge of the executing party, but includes the knowledge of other employees of Opposer.
- B. The word usage and sentence structure is that of the attorney for Opposer who in fact prepared this Answer, and the language does not purport to be the exact language of the executing party.
- C. In answering this Interrogatory Request, the best current knowledge, information and beliefs of Opposer’s current personnel have been inquired into.
- D. The terms used in this Answer have the meanings established for them in Opposer’s other pleadings and filings in this case as well.

E. Opposer reserves the right to amend this Answer based on information learned after the filing of this Answer.

GENERAL OBJECTIONS

A. Opposer objects to all of these Interrogatories as unduly burdensome, oppressive, overbroad and premature. Specific interrogatories as challenged below seek information neither relevant to issues disputed in this action nor reasonably calculated to lead to the discovery of admissible evidence. The information sought in these Interrogatories is more properly the subject of a document request and/or depositions.

B. In addition, many of these Interrogatories seek information which is in possession or control of Applicant or cannot be properly provided until Applicant has produced to Opposer all of the documents requested by Opposer, and until oral depositions before trial, including those of Applicant's witnesses and of third parties, have been completed. Therefore, Opposer reserves its rights to respond more fully to these Interrogatories, if necessary, upon the completion of additional discovery.

SPECIFIC RESPONSES

INTERROGATORY NO. 1:

What are the names and addresses of the persons with the most knowledge pertaining to the matters asserted in your answers to this notice of opposition?

RESPONSE TO INTERROGATORY NO. 1:

a. Solly Assa, 410 Park Avenue, Ste. 1630, New York, NY 10022, tel: 212-239-9900.

b. Robert Lebensfeld, 410 Park Avenue, Ste. 1630, New York, NY 10022,
tel: 212-239-9900.

INTERROGATORY NO. 2:

Describe the business conducted by Opposer, including the time period Opposer, and its predecessor(“s) [*sic*] in interest for Opposer’s Marks, has(ve) been engaged in such business.

RESPONSE TO INTERROGATORY NO. 2:

Real estate development, purchasing properties, building luxury hotels and residential condominiums, leasing and selling of residential units, purchasing and leasing commercial and residential properties, hotel services and other real estate related activities and has been engaged in such business since 2005.

INTERROGATORY NO. 3:

Identify and describe the goods and services on which Opposer has used Opposer’s Marks or any variation thereof.

RESPONSE TO INTERROGATORY NO. 3:

Opposer is using and has been using since 2009 its mark, CASSA, on its project at 70 West 45, New York, New York for both the hotel and residences, e.g. Cassa NY Hotel & Residence. Further, Opposer is using Cassa to identify its new project located at 515 Ninth Avenue, New York, New York, e.g. Cassa Times Square Hotel & Residence, since June, 2014. Those projects include all related services for hotel, and selling and leasing residential units, etc.

INTERROGATORY NO. 4:

- (a) Set forth the date on which Opposer first decided to adopt Opposer's Marks or any variation thereof.
- (b) Describe the circumstances and method by which Opposer adopted the designation **CASSA** or any variation thereof.
- (c) Set forth the reasons why any proposed marks or names, if any, were rejected.
- (d) Identify all documents relating to Opposer's decision to select, adopt and/or user Opposer's Marks or any variation thereof.

RESPONSE TO INTERROGATORY NO. 4:

In January, 2007, Opposer decided to adopt Opposer's Mark. Opposer employed Graham Hanson Design, LLC ("GHD"), a branding and design agency to design and prepare its trademark and branding. GHD developed Opposer's Mark, because it incorporates the name of Opposer and its principles "Assa" as part of the mark and the Spanish/Italian word "casa" for house. Thus it immediately has a connection to Opposer and to its principles. No other marks were considered. All documents related to Opposer's decision to adopt the Mark are annexed to Opposer's document production and are Bates stamped AR0001-AR0007.

INTERROGATORY NO. 5:

State whether any searches or investigations were conducted by Opposer, its attorneys, or any person on its behalf to determine whether the designation **CASSA**, or any variation thereof, was available for use and/or registration and, if so, identify each such search or investigation including the date of the investigations, and the person that conducted said search.

RESPONSE TO INTERROGATORY NO. 5:

GHD conducted a search of Opposer's Mark in 2007.

INTERROGATORY NO. 6:

Identify each document referring or relating in any way to any application, registration, or acquisition by Opposer's Marks or any variation thereof.

RESPONSE TO INTERROGATORY NO. 6:

See Documents Bates stamp AR0001-AR0619.

INTERROGATORY NO. 7:

Identify all documents that refer or relate in any way to Opposer's use in commerce of the Opposer's Marks or any variation thereof.

RESPONSE TO INTERROGATORY NO. 7:

See documents attached to Opposer's document production Bates stamp AR0001-AR0619, which include, but are not limited to the following documents:

- a. Newspaper articles;
- b. Paid advertisements, both in magazines, newspaper and other paper forms, as well as electronic, including the internet;
- c. Copyright registrations;
- d. Newspaper announcements;
- e. Photographs depicting advertisement, flyers, and banners demonstrating first use of Opposer that pre-dates Applicant;
- f. Sales brochures;
- g. Websites and web based content; and
- h. E-mails.

INTERROGATORY NO. 8:

Identify the approximate dollar amount of Opposer's annual sales goods or services rendered bearing the designation **CASSA** or any variation thereof, as well as Opposer's annual advertising and promotional expenditures for such services.

RESPONSE TO INTERROGATORY NO. 8:

Annual sales and revenue using CASSA are for the 45th Street property are approximately \$20 Million per year and for the 515 property that just recently started operating total revenue is projected to be approximately \$14.8 Million per year.

The annual expenses for advertisement and promotion for all properties that use Opposer's Mark for this year is projected to be \$375,000.00.

INTERROGATORY NO.9:

Identify by title, full name, present business address and home address, all persons who participated in and/or authorized and/or directed the promotion of Opposer's goods and services using Opposer's Mark.

RESPONSE TO INTERROGATORY NO. 9:

Graham Hanson Design, 475 Park Avenue South, Floor 19 New York, NY 10016; The Marketing Directors, Inc., 750 Lexington Ave., 18th Floor, New York, NY 10022; Nadine Johnson & Associates, Inc., 436 West 18th Street, New York, NY 10011; KVD Communications, LLC 419 Lafayette St, New York, NY 10003; and Douglas Elliman Real Estate, 575 Madison Ave., New York, NY 10022.

INTERROGATORY NO. 10:

State the advertising media (radio, TV., newspapers, yellow pages, internet, etc.) used by Opposer, to promote its goods and services, by listing the names of the companies, addresses and duration of the advertisements using Opposer's Marks.

RESPONSE TO INTERROGATORY NO. 10:

Websites on the Internet, internet advertisement and magazines.

INTERROGATORY NO. 11:

Identify each different printed advertisement, and/or promotional material and the like, known to Opposer which contains or bears Opposer's Marks or any variation thereof, which has been used or disseminated at the time by Opposer.

RESPONSE TO INTERROGATORY NO. 11:

Websites with domains, e.g. www.cassanyc.com; www.cassatimesquare.com; www.cassarediencenesyc.com; the New York Times, IN NY magazine, and various magazines which are provided as part of Opposer's document production.

INTERROGATORY NO. 12:

Identify any licenses, assignments, consents to use, coexistence agreements and the like, granted by or to Opposer concerning Opposer's Marks, or any variation thereof?

RESPONSE TO INTERROGATORY NO. 12:

Opposer has a licensing agreement with Waterscape Resort, LLC, and Waterscape Resort, LLC has a licensing agreement with 70 West 45th Street, LLC.

INTERROGATORY NO. 13:

If Opposer, or any person acting for or on behalf of Opposer, has consulted with or retained the services of any expert with respect to any of the issues involved in this proceeding, identify each such expert and describe the subject matter on which he or she was consulted or retained, and identify all documents which refer or relate thereto.

RESPONSE TO INTERROGATORY NO. 13:

Opposer objects to this Interrogatory as being improper for this discovery device and is an abuse of the discovery device. Further, Opposer will respond in accordance with the Federal Rules of Civil Procedures, the TTAB procedures and the orders issued by the Office.

INTERROGATORY NO. 14:

Identify each person who participated in the preparation of Opposer's responses to the foregoing interrogatories and who furnished any information in response thereto.

RESPONSE TO INTERROGATORY NO. 14:

Robert Lebensfeld participated in the preparation of this response.

INTERROGATORY NO. 15:

Identify any use of the mark **CASSA**, by Opposer, prior to April of 2013 for any of the services listed in Application No. 85955568.

RESPONSE TO INTERROGATORY NO. 14:

See documents AR0001-AR0530 and AR0534-AR0619. Those documents show the earliest use of Opposer's Mark in March, 2009 to the present.

INTERROGATORY NO. 16:

Identify each communication that Opposer or any person acting for or on behalf of Opposer, has received, either, oral, via electronic means, or in writing, from any person which suggests, implies, or infers that the Opposer may be connected or associated with Applicant, or which inquires as to whether there is or may be such a connection or association, including Opposer's response thereto.

RESPONSE TO INTERROGATORY NO. 16:

Upon information and belief, no such communication has been received.

INTERROGATORY NO. 17:

Identify any instances of actual confusion with Applicant's use of its "CASSA" mark including but not limited to, checks, courier services, letters, invoices, etc. received by Opposer concerning Applicant's "CASSA" mark subject of this application.

RESPONSE TO INTERROGATORY NO. 17:

Opposer sets forth as an instance of actual confusion is Applicant's Mark as depicted on its website and in photographs showing Applicant's Mark posted on walls. The style and form is exactly like Opposer's Mark. Applicant uses all lower case letters. The fact that Applicant uses a fatter font than Opposer is minimal regarding likelihood of confusion. Applicant does not even use a different font or stylization distinct from Opposer. See documents AR0530-AR0533.

PLEASE TAKE FURTHER NOTICE that this response is a continuing response and that Plaintiff reserves that right to supplement or amend this response based on information learned after the filing of this response.

Dated: New York, New York
September 8, 2014

Yours, etc,
RICHARD J. MIGLIACCIO, ESQ.

/s/ Joel Scott Ray
By: Joel Scott Ray, Esq.
Attorneys for Opposer
410 Park Avenue, Ste. 1630
New York, NY 10022
Tel: (212) 239-9900 ext. 40
Fax: (212) 239-7468
e-mail: Richard@assaproperties.com and
joel@assaproperties.com

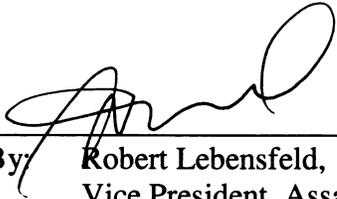
TO:

SANCHELIMA & ASSOCIATES, P.A.
Attorneys for Applicant
235 SW Le Jeune Road
Miami, FL 33134

VERIFICATION

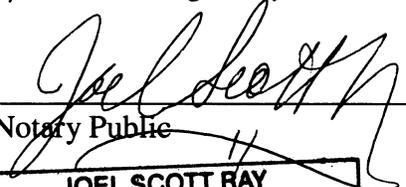
STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

ROBERT LEBENSFELD, under oath, under penalties of perjury, hereby affirms and says that he a Vice President of Assa Realty, LLC, the Opposer in this action; that he has read the foregoing **OPPOSER’S RESPONSE TO APPLICANT’S FIRST SET OF INTERROGATORIES** and is familiar with the contents thereof; and that, he knows the contents thereof to be true, based on his personal knowledge and his review of company records, except with respect to those matters stated upon information and belief, which he believes to be true.



By Robert Lebensfeld,
Vice President, Assa Realty, LLC

Affirmed to me under oath before me this
19th day of December, 2014.



Notary Public

JOEL SCOTT RAY
Notary Public, State of New York
Registration #02RA6217996
Qualified In Queens County
Commission Expires February 22, 2018

EXHIBIT 7

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

-----X	
ASSA REALTY, LLC,	Trademark Application
<i>Opposer,</i>	Mark: CASSA
-against-	Application Serial No.: 85900657
THE SOLUTION GROUP CORP.,	Filed: April 10, 2013
<i>Applicant.</i>	Published: February 4, 2014
-----X	Opposition No.: 91215734

**OPPOSER’S RESPONSE TO APPLICANT’S
FIRST SET OF INTERROGATORIES**

PLEASE TAKE NOTICE that Opposer by its attorney, Richard J. Migliaccio, Esq., hereby responds and answers Applicant’s First Set of Interrogatories dated July 29, 2014:

GENERAL STATEMENTS

- A. The information supplied in this Answer is not based solely upon the knowledge of the executing party, but includes the knowledge of other employees of Opposer.
- B. The word usage and sentence structure is that of the attorney for Opposer who in fact prepared this Answer, and the language does not purport to be the exact language of the executing party.
- C. In answering this Interrogatory Request, the best current knowledge, information and beliefs of Opposer’s current personnel have been inquired into.
- D. The terms used in this Answer have the meanings established for them in Opposer’s other pleadings and filings in this case as well.

E. Opposer reserves the right to amend this Answer based on information learned after the filing of this Answer.

GENERAL OBJECTIONS

A. Opposer objects to all of these Interrogatories as unduly burdensome, oppressive, overbroad and premature. Specific interrogatories as challenged below seek information neither relevant to issues disputed in this action nor reasonably calculated to lead to the discovery of admissible evidence. The information sought in these Interrogatories is more properly the subject of a document request and/or depositions.

B. In addition, many of these Interrogatories seek information which is in possession or control of Applicant or cannot be properly provided until Applicant has produced to Opposer all of the documents requested by Opposer, and until oral depositions before trial, including those of Applicant's witnesses and of third parties, have been completed. Therefore, Opposer reserves its rights to respond more fully to these Interrogatories, if necessary, upon the completion of additional discovery.

SPECIFIC RESPONSES

INTERROGATORY NO. 1:

What are the names and addresses of the persons with the most knowledge pertaining to the matters asserted in your answers to this notice of opposition?

RESPONSE TO INTERROGATORY NO. 1:

a. Solly Assa, 410 Park Avenue, Ste. 1630, New York, NY
10022, tel: 212-239-9900.

b. Robert Lebensfeld, 410 Park Avenue, Ste. 1630, New York, NY 10022,
tel: 212-239-9900.

INTERROGATORY NO. 2:

Describe the business conducted by Opposer, including the time period Opposer, and its predecessor("s) [*sic*] in interest for Opposer's Marks, has(ve) been engaged in such business.

RESPONSE TO INTERROGATORY NO. 2:

Real estate development, purchasing properties, building luxury hotels and residential condominiums, leasing and selling of residential units, purchasing and leasing commercial and residential properties, hotel services and other real estate related activities and has been engaged in such business since 2005.

INTERROGATORY NO. 3:

Identify and describe the goods and services on which Opposer has used Opposer's Marks or any variation thereof.

RESPONSE TO INTERROGATORY NO. 3:

Opposer is using and has been using since 2009 its mark, CASSA, on its project at 70 West 45, New York, New York for both the hotel and residences, e.g. Cassa NY Hotel & Residence. Further, Opposer is using Cassa to identify its new project located at 515 Ninth Avenue, New York, New York, e.g. Cassa Times Square Hotel & Residence, since June, 2014. Those projects include all related services for hotel, and selling and leasing residential units, etc.

INTERROGATORY NO. 4:

- (a) Set forth the date on which Opposer first decided to adopt Opposer's Marks or any variation thereof.
- (b) Describe the circumstances and method by which Opposer adopted the designation **CASSA** or any variation thereof.
- (c) Set forth the reasons why any proposed marks or names, if any, were rejected.
- (d) Identify all documents relating to Opposer's decision to select, adopt and/or user Opposer's Marks or any variation thereof.

RESPONSE TO INTERROGATORY NO. 4:

In January, 2007, Opposer decided to adopt Opposer's Mark. Opposer employed Graham Hanson Design, LLC ("GHD"), a branding and design agency to design and prepare its trademark and branding. GHD developed Opposer's Mark, because it incorporates the name of Opposer and its principles "Assa" as part of the mark and the Spanish/Italian word "casa" for house. Thus it immediately has a connection to Opposer and to its principles. No other marks were considered. All documents related to Opposer's decision to adopt the Mark are annexed to Opposer's document production and are Bates stamped AR0001-AR0007.

INTERROGATORY NO. 5:

State whether any searches or investigations were conducted by Opposer, its attorneys, or any person on its behalf to determine whether the designation **CASSA**, or any variation thereof, was available for use and/or registration and, if so, identify each such search or investigation including the date of the investigations, and the person that conducted said search.

RESPONSE TO INTERROGATORY NO. 5:

GHD conducted a search of Opposer's Mark in 2007.

INTERROGATORY NO. 6:

Identify each document referring or relating in any way to any application, registration, or acquisition by Opposer's Marks or any variation thereof.

RESPONSE TO INTERROGATORY NO. 6:

See Documents Bates stamp AR0001-AR0619.

INTERROGATORY NO. 7:

Identify all documents that refer or relate in any way to Opposer's use in commerce of the Opposer's Marks or any variation thereof.

RESPONSE TO INTERROGATORY NO. 7:

See documents attached to Opposer's document production Bates stamp AR0001-AR0619, which include, but are not limited to the following documents:

- a. Newspaper articles;
- b. Paid advertisements, both in magazines, newspaper and other paper forms, as well as electronic, including the internet;
- c. Copyright registrations;
- d. Newspaper announcements;
- e. Photographs depicting advertisement, flyers, and banners demonstrating first use of Opposer that pre-dates Applicant;
- f. Sales brochures;
- g. Websites and web based content; and
- h. E-mails.

INTERROGATORY NO. 8:

Identify the approximate dollar amount of Opposer's annual sales goods or services rendered bearing the designation **CASSA** or any variation thereof, as well as Opposer's annual advertising and promotional expenditures for such services.

RESPONSE TO INTERROGATORY NO. 8:

Annual sales and revenue using CASSA are for the 45th Street property are approximately \$20 Million per year and for the 515 property that just recently started operating total revenue is projected to be approximately \$14.8 Million per year.

The annual expenses for advertisement and promotion for all properties that use Opposer's Mark for this year is projected to be \$375,000.00.

INTERROGATORY NO.9:

Identify by title, full name, present business address and home address, all persons who participated in and/or authorized and/or directed the promotion of Opposer's goods and services using Opposer's Mark.

RESPONSE TO INTERROGATORY NO. 9:

Graham Hanson Design, 475 Park Avenue South, Floor 19 New York, NY 10016; The Marketing Directors, Inc., 750 Lexington Ave., 18th Floor, New York, NY 10022; Nadine Johnson & Associates, Inc., 436 West 18th Street, New York, NY 10011; KVD Communications, LLC 419 Lafayette St, New York, NY 10003; and Douglas Elliman Real Estate, 575 Madison Ave., New York, NY 10022.

INTERROGATORY NO. 10:

State the advertising media (radio, TV., newspapers, yellow pages, internet, etc.) used by Opposer, to promote its goods and services, by listing the names of the companies, addresses and duration of the advertisements using Opposer's Marks.

RESPONSE TO INTERROGATORY NO. 10:

Websites on the Internet, internet advertisement and magazines.

INTERROGATORY NO. 11:

Identify each different printed advertisement, and/or promotional material and the like, known to Opposer which contains or bears Opposer's Marks or any variation thereof, which has been used or disseminated at the time by Opposer.

RESPONSE TO INTERROGATORY NO. 11:

Websites with domains, e.g. www.cassanyc.com; www.cassatimesquare.com; www.cassarediencenyc.com; the New York Times, IN NY magazine, and various magazines which are provided as part of Opposer's document production.

INTERROGATORY NO. 12:

Identify any licenses, assignments, consents to use, coexistence agreements and the like, granted by or to Opposer concerning Opposer's Marks, or any variation thereof?

RESPONSE TO INTERROGATORY NO. 12:

Opposer has a licensing agreement with Waterscape Resort, LLC, and Waterscape Resort, LLC has a licensing agreement with 70 West 45th Street, LLC.

INTERROGATORY NO. 13:

If Opposer, or any person acting for or on behalf of Opposer, has consulted with or retained the services of any expert with respect to any of the issues involved in this proceeding, identify each such expert and describe the subject matter on which he or she was consulted or retained, and identify all documents which refer or relate thereto.

RESPONSE TO INTERROGATORY NO. 13:

Opposer objects to this Interrogatory as being improper for this discovery device and is an abuse of the discovery device. Further, Opposer will respond in accordance with the Federal Rules of Civil Procedures, the TTAB procedures and the orders issued by the Office.

INTERROGATORY NO. 14:

Identify each person who participated in the preparation of Opposer's responses to the foregoing interrogatories and who furnished any information in response thereto.

RESPONSE TO INTERROGATORY NO. 14:

Robert Lebensfeld participated in the preparation of this response.

INTERROGATORY NO. 15:

Identify any use of the mark **CASSA**, by Opposer, prior to April of 2013 for any of the services listed in Application No. 85955568.

RESPONSE TO INTERROGATORY NO. 14:

See documents AR0001-AR0530 and AR0534-AR0619. Those documents show the earliest use of Opposer's Mark in March, 2009 to the present.

INTERROGATORY NO. 16:

Identify each communication that Opposer or any person acting for or on behalf of Opposer, has received, either, oral, via electronic means, or in writing, from any person which suggests, implies, or infers that the Opposer may be connected or associated with Applicant, or which inquires as to whether there is or may be such a connection or association, including Opposer's response thereto.

RESPONSE TO INTERROGATORY NO. 16:

Upon information and belief, no such communication has been received.

INTERROGATORY NO. 17:

Identify any instances of actual confusion with Applicant's use of its "CASSA" mark including but not limited to, checks, courier services, letters, invoices, etc. received by Opposer concerning Applicant's "CASSA" mark subject of this application.

RESPONSE TO INTERROGATORY NO. 17:

Opposer sets forth as an instance of actual confusion is Applicant's Mark as depicted on its website and in photographs showing Applicant's Mark posted on walls. The style and form is exactly like Opposer's Mark. Applicant uses all lower case letters. The fact that Applicant uses a fatter font than Opposer is minimal regarding likelihood of confusion. Applicant does not even use a different font or stylization distinct from Opposer. See documents AR0530-AR0533.

PLEASE TAKE FURTHER NOTICE that this response is a continuing response and that Plaintiff reserves that right to supplement or amend this response based on information learned after the filing of this response.

Dated: New York, New York
September 8, 2014

Yours, etc,
RICHARD J. MIGLIACCIO, ESQ.

/s/ Joel Scott Ray
By: Joel Scott Ray, Esq.
Attorneys for Opposer
410 Park Avenue, Ste. 1630
New York, NY 10022
Tel: (212) 239-9900 ext. 40
Fax: (212) 239-7468
e-mail: Richard@assaproperties.com and
joel@assaproperties.com

TO:

SANCHELIMA & ASSOCIATES, P.A.
Attorneys for Applicant
235 SW Le Jeune Road
Miami, FL 33134

EXHIBIT 8

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

ASSA REALTY, LLC,	-----X	Trademark Application
	<i>Opposer,</i>	Mark: CASSA
-against-		Application Serial No.: 85900657
THE SOLUTION GROUP CORP.,		Filed: April 10, 2013
	<i>Applicant.</i>	Published: February 4, 2014
	-----X	Opposition No.: 91215734

**OPPOSER’S SUPPLEMENTAL RESPONSE TO
APPLICANT’S FIRST SET OF INTERROGATORIES**

PLEASE TAKE NOTICE that Opposer by its attorney, Richard J. Migliaccio, Esq., hereby supplements its prior response and answers Applicant’s First Set of Interrogatories dated July 29, 2014:

GENERAL STATEMENTS

- A. The information supplied in this Answer is not based solely upon the knowledge of the executing party, but includes the knowledge of other employees of Opposer.
- B. The word usage and sentence structure is that of the attorney for Opposer who in fact prepared this Answer, and the language does not purport to be the exact language of the executing party.
- C. In answering this Interrogatory Request, the best current knowledge, information and beliefs of Opposer’s current personnel have been inquired into.
- D. The terms used in this Answer have the meanings established for them in Opposer’s other pleadings and filings in this case as well.

E. Opposer reserves the right to amend this Answer based on information learned after the filing of this Answer.

GENERAL OBJECTIONS

A. Opposer objects to all of these Interrogatories as unduly burdensome, oppressive, overbroad and premature. Specific interrogatories as challenged below seek information neither relevant to issues disputed in this action nor reasonably calculated to lead to the discovery of admissible evidence. The information sought in these Interrogatories is more properly the subject of a document request and/or depositions.

B. In addition, many of these Interrogatories seek information which is in possession or control of Applicant or cannot be properly provided until Applicant has produced to Opposer all of the documents requested by Opposer, and until oral depositions before trial, including those of Applicant's witnesses and of third parties, have been completed. Therefore, Opposer reserves its rights to respond more fully to these Interrogatories, if necessary, upon the completion of additional discovery.

SPECIFIC RESPONSES

INTERROGATORY NO. 6:

Identify each document referring or relating in any way to any application, registration, or acquisition by Opposer's Marks or any variation thereof.

RESPONSE TO INTERROGATORY NO. 6:

All the following documents were used or were referred to in some way as part of the application for registration or for acquisition and development of the mark. See Documents Bates stamp AR0001-AR0530 and AR0534-AR0593.

INTERROGATORY NO. 7:

Identify all documents that refer or relate in any way to Opposer's use in commerce of the Opposer's Marks or any variation thereof.

RESPONSE TO INTERROGATORY NO. 7:

See documents attached to Opposer's document production Bates stamp AR0001-AR0619, which include, but are not limited to the following documents:

- a. Newspaper articles: documents AR056-AR0568, AR0574-AR0575;
- b. Paid advertisements, both in magazines, newspaper and other paper forms, as well as electronic, including the internet: AR0001-AR0017, AR0338-AR0344, AR0349-AR0360, AR0439-AR0440, AR0477, AR0490-AR0494, AR0530, AR0534-AR0535, AR0563, AR0569, AR0573-AR0575, AR0589-AR0609;
- c. Trade Names: AR0610-AR0619;
- d. Newspaper announcements: Broker Blasts and stationary; AR0158-AR0159, AR0251-AR0253, AR0255, AR0258, AR0260, AR0262, AR0477, AR0569-AR0573;
- e. Photographs depicting advertisement, flyers, and banners demonstrating first use of Opposer that pre-dates Applicant: AR0256, AR0477, AR0479-AR0489, AR0527-AR0528; AR0576-AR0588
- f. Sales brochures: AR0018-AR0043, AR0046-AR0076, AR0084-AR0105, AR0112-AR0132, AR0134-AR0136, AR0161-AR0212, AR0214, AR0220-AR0242, AR0441-AR0473, AR0503-AR0526;
- g. Websites and web based content: AR0207-AR0212, AR0245, AR0250, AR0254, AR0259, AR0261, AR0263-AR0291, AR0337, AR0345-

AR0348, AR0357-AR0359, AR0474-AR0475, AR0495-AR0502, AR0529, AR0536-AR0562, AR0589-AR0609;

- h. E-mails: AR0044-AR0045, AR0077-AR083, AR0106-AR0107, AR0213, AR0244, AR0355-AR0356;
- i. Signage: AR0108-AR0111, AR0133, AR0160, AR0215-AR0217, AR0243, AR0246-AR0249, AR0257, AR0321, AR0336, AR0478-AR0489;
- j. Sales Office: AR0137-AR0157, AR0292-AR0303, AR0304-AR0320, AR0322-AR0335, AR0490-AR0494;
- k. Development and anticipated usage: AR0361-AR0438.

INTERROGATORY NO. 8:

Identify the approximate dollar amount of Opposer's annual sales goods or services rendered bearing the designation **CASSA** or any variation thereof, as well as Opposer's annual advertising and promotional expenditures for such services.

RESPONSE TO INTERROGATORY NO. 8:

A search is still being conducted and upon completion, Opposer will provide such information that is responsive.

INTERROGATORY NO. 10:

State the advertising media (radio, TV., newspapers, yellow pages, internet, etc.) used by Opposer, to promote its goods and services, by listing the names of the companies, addresses and duration of the advertisements using Opposer's Marks.

RESPONSE TO INTERROGATORY NO. 10:

Currently, Opposer's marketing company, Tambourine, 2941 W Cypress Creek Road, 2nd Floor, Fort Lauderdale, Florida 33309, Telephone: 954-975-2220, is responsible for

advertisement and it is uses its discretion to put advertisement on websites on the Internet, internet advertisement and magazines and other media outlets. Opposer has been using Tambourine since January, 2014. Further, Opposer has been using various internet travel sites including, but not limited to, Booking.com, Expedia, Travelocity, World Hotel, Travel Tripper, and Kayak, since 2009.

In the past, Opposer used the Marketing Directors, The Corcoran Group, BAM Signs, L.A.M. Enterprises Inc, Laserwave Inc., Douglas Elliman Real Estate, and Winterson Design for advertisement and marketing. As previously disclosed, Graham Hanson Designs helped to develop the mark and did some of the initial marketing in connection with the Marketing Directors.

INTERROGATORY NO. 13:

If Opposer, or any person acting for or on behalf of Opposer, has consulted with or retained the services of any expert with respect to any of the issues involved in this proceeding, identify each such expert and describe the subject matter on which he or she was consulted or retained, and identify all documents which refer or relate thereto.

RESPONSE TO INTERROGATORY NO. 13:

Opposer objects to this Interrogatory as being improper for this discovery device and is an abuse of the discovery device. Further, Opposer will respond in accordance with the Federal Rules of Civil Procedures, the TTAB procedures and the orders issued by the Office.

INTERROGATORY NO. 17:

Identify any instances of actual confusion with Applicant's use of its "CASSA" mark including but not limited to, checks, courier services, letters, invoices, etc. received by Opposer concerning Applicant's "CASSA" mark subject of this application.

RESPONSE TO INTERROGATORY NO. 17:

As previously stated, Opposer set forth as an instance of actual confusion is Applicant's Mark as depicted on its website and in photographs showing Applicant's Mark posted on walls. The style and form is exactly like Opposer's Mark. Applicant uses all lower case letters. The fact that Applicant uses a fatter font than Opposer is minimal regarding likelihood of confusion. Applicant does not even use a different font or stylization distinct from Opposer. See documents AR0530-AR0533.

PLEASE TAKE FURTHER NOTICE that this response is a continuing response and that Plaintiff reserves that right to supplement or amend this response based on information learned after the filing of this response.

Dated: New York, New York
December 11, 2014

Yours, etc,
RICHARD J. MIGLIACCIO, ESQ.

/s/ Joel Scott Ray
By: Joel Scott Ray, Esq.
Attorneys for Opposer
410 Park Avenue, Ste. 1630
New York, NY 10022
Tel: (212) 239-9900 ext. 40
Fax: (212) 239-7468
e-mail: Richard@assaproperties.com and

joel@assaproperties.com

TO:

SANCHELIMA & ASSOCIATES, P.A.
Attorneys for Applicant
235 SW Le Jeune Road
Miami, FL 33134

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

-----X
ASSA REALTY, LLC, Trademark Application
Opposer, Mark: CASSA
Application Serial No.: 85900657
-against- Filed: April 10, 2013
Published: February 4, 2014
THE SOLUTION GROUP CORP., Opposition No.: 91215734
Applicant.
-----X

CERTIFICATE OF SERVICE

I, Joel Scott Ray, Esq., an attorney for Defendants, do hereby certify that on July December 11, 2014, a true and correct copy of the foregoing **OPPOSER'S SUPPLEMENTAL RESPONSE TO APPLICANT'S FIRST SET OF INTERROGATORIES** was served via e-mail on the following:

Sachelima & Associates, P.A.
235 S.W. Le Jeune Road
Miami, Florida 33134
Jesus Sachelima, Esq.
at legal@sachelima.com; jesus@sachelima.com;
and paralegal@sachelima.com

Dated: New York, New York
December 11, 2014

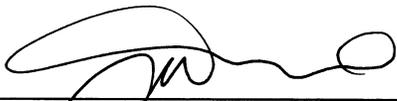
RICHARD J. MIGLIACCIO, ESQ.

1st Joel Scott Ray
By: Joel Scott Ray, Esq.

VERIFICATION

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

ROBERT LEBENSFELD, under oath, under penalties of perjury, hereby affirms and says that he a Vice President of Assa Realty, LLC, the Opposer in this action; that he has read the foregoing **OPPOSER’S SUPPLEMENTAL RESPONSE TO APPLICANT’S FIRST SET OF INTERROGATORIES** and is familiar with the contents thereof; and that, he knows the contents thereof to be true, based on his personal knowledge and his review of company records, except with respect to those matters stated upon information and belief, which he believes to be true.



By: Robert Lebensfeld,
Vice President, Assa Realty, LLC

Affirmed to me under oath before me this
19th day of December, 2014.



Notary Public

JOEL SCOTT RAY
Notary Public, State of New York
Registration #02RA6217996
Qualified In Queens County
Commission Expires February 22, 2018

EXHIBIT 9

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

-----X	
ASSA REALTY, LLC,	Trademark Application
<i>Opposer,</i>	Mark: CASSA
-against-	Application Serial No.: 85900657
THE SOLUTION GROUP CORP.,	Filed: April 10, 2013
<i>Applicant.</i>	Published: February 4, 2014
-----X	Opposition No.: 91215734

**OPPOSER’S SECOND SUPPLEMENTAL RESPONSE TO
APPLICANT’S FIRST SET OF INTERROGATORIES**

PLEASE TAKE NOTICE that Opposer by its attorney, Richard J. Migliaccio, Esq., hereby supplements its prior response and answers Applicant’s First Set of Interrogatories dated July 29, 2014:

GENERAL STATEMENTS

- A. The information supplied in this Answer is not based solely upon the knowledge of the executing party, but includes the knowledge of other employees of Opposer.
- B. The word usage and sentence structure is that of the attorney for Opposer who in fact prepared this Answer, and the language does not purport to be the exact language of the executing party.
- C. In answering this Interrogatory Request, the best current knowledge, information and beliefs of Opposer’s current personnel have been inquired into.
- D. The terms used in this Answer have the meanings established for them in Opposer’s other pleadings and filings in this case as well.

E. Opposer reserves the right to amend this Answer based on information learned after the filing of this Answer.

GENERAL OBJECTIONS

A. Opposer objects to all of these Interrogatories as unduly burdensome, oppressive, overbroad and premature. Specific interrogatories as challenged below seek information neither relevant to issues disputed in this action nor reasonably calculated to lead to the discovery of admissible evidence. The information sought in these Interrogatories is more properly the subject of a document request and/or depositions.

B. In addition, many of these Interrogatories seek information which is in possession or control of Applicant or cannot be properly provided until Applicant has produced to Opposer all of the documents requested by Opposer, and until oral depositions before trial, including those of Applicant's witnesses and of third parties, have been completed. Therefore, Opposer reserves its rights to respond more fully to these Interrogatories, if necessary, upon the completion of additional discovery.

SPECIFIC RESPONSES

INTERROGATORY NO. 8:

Identify the approximate dollar amount of Opposer's annual sales goods or services rendered bearing the designation **CASSA** or any variation thereof, as well as Opposer's annual advertising and promotional expenditures for such services.

RESPONSE TO INTERROGATORY NO. 8:

Since Opposer first developed and commenced use of the Mark to the present, Opposer has spent approximately \$3,715,000.00 on sales and marketing of the Mark for its projects at 515 Ninth Avenue, New York, New York, e.g. Cassa Times Square Hotel & Residence, and 70 West 45th Street, New York, New York, e.g. Cassa NY Hotel & Residence. However, expenditures do not include any sales and marketing of the Mark with regards to the hotel at Cassa NY Hotel & Residence, since January, 2012. Since then, the licensee is responsible for sales and marketing of the Hotel and not Opposer.

PLEASE TAKE FURTHER NOTICE that this response is a continuing response and that Plaintiff reserves that right to supplement or amend this response based on information learned after the filing of this response.

Dated: New York, New York
December 19, 2014

Yours, etc,
RICHARD J. MIGLIACCIO, ESQ.

/s/ Joel Scott Ray
By: Joel Scott Ray, Esq.
Attorneys for Opposer
410 Park Avenue, Ste. 1630
New York, NY 10022
Tel: (212) 239-9900 ext. 40
Fax: (212) 239-7468
e-mail: Richard@assaproperties.com and
joel@assaproperties.com

TO:

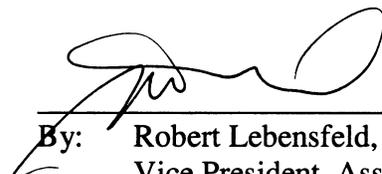
SANCHELIMA & ASSOCIATES, P.A.
Attorneys for Applicant

235 SW Le Jeune Road
Miami, FL 33134

VERIFICATION

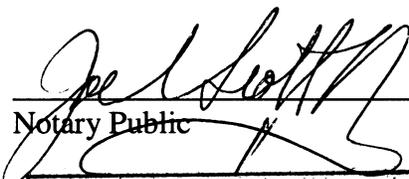
STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

ROBERT LEBENSFELD, under oath, under penalties of perjury, hereby affirms and says that he a Vice President of Assa Realty, LLC, the Opposer in this action; that he has read the foregoing **OPPOSER'S SECOND SUPPLEMENTAL RESPONSE TO APPLICANT'S FIRST SET OF INTERROGATORIES** and is familiar with the contents thereof; and that, he knows the contents thereof to be true, based on his personal knowledge and his review of company records, except with respect to those matters stated upon information and belief, which he believes to be true.



By: Robert Lebensfeld,
Vice President, Assa Realty, LLC

Affirmed to me under oath before me this
19th day of December, 2014.



Notary Public

JOEL SCOTT RAY
Notary Public, State of New York
Registration #02RA6217996
Qualified In Queens County
Commission Expires February 22, 2018

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

-----X
ASSA REALTY, LLC, Trademark Application
Opposer, Mark: CASSA
Application Serial No.: 85900657
-against- Filed: April 10, 2013
THE SOLUTION GROUP CORP., Published: February 4, 2014
Applicant. Opposition No.: 91215734
-----X

CERTIFICATE OF SERVICE

I, Joel Scott Ray, Esq., an attorney for Defendants, do hereby certify that on July December 19, 2014, a true and correct copy of the foregoing **OPPOSER'S SECOND SUPPLEMENTAL RESPONSE TO APPLICANT'S FIRST SET OF INTERROGATORIES** was served via e-mail on the following:

Sanchelima & Associates, P.A.
235 S.W. Le Jeune Road
Miami, Florida 33134
Jesus Sanchelima, Esq.
at legal@sanchelima.com; jesus@sanchelima.com;
and paralegal@sanchelima.com

Dated: New York, New York
December 19, 2014

RICHARD J. MIGLIACCIO, ESQ.

1/s/ Joel Scott Ray
By: Joel Scott Ray, Esq.

EXHIBIT 10

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

Assa Realty, LLC

Opposer,

v.

Opposition No. 91215734

The Solution Group Corp.

Applicant,

_____)

INITIAL DISCLOSURES

TO: Richard J. Migliaccio, Esq.
richard@assaproperties.com
410 Park Avenue, Ste, 1630
New York, NY 10022

Joel Scott Ray, Esq.
Joel.Ray@assaproperties.com
410 Park Avenue, Ste, 1630
New York, NY 10022

PLEASE TAKE NOTICE that Applicant submits its initial disclosures pursuant to Rule 26(a)(1) and (2) of the Federal Rules of Civil Procedure based on the information currently and reasonably available to it. Applicant reserves the right to further supplement these disclosures should additional information become available.

A. INDIVIDUALS WITH DISCOVERABLE INFORMATION

Applicant believes that the following individuals are likely to have discoverable information that Applicant may use to support its claims:

1. Camilo A. Lopez, President and Managing Director of the Solution Group Corp. (4100 . Miami Avenue, 2nd Floor, Miami, FL 33127).
2. Raul Sanchez de Varona, Chief Operating Officer/Chief Fianancial Officer of the Solution Group Corp. (4100 N. Miami Avenue, 2nd Floor, Miami, FL 33127).

B. Documents

Applicant may use the following categories of documents to support its claims:

1. Documents Bates numbered 00001 through 00019 identifying Applicant's use in real estate development and construction of commercial and real estate properties. The documents attached identify promotion for the CASSA development project.
2. Documents Bates numberd 00020 through 00051 identifying Applicant's United States Patent and Trademark records for its current application.

The above-identified documents have been provided to Opposer's counsel and are in possession, custody, or control of the attorneys for Applicant.

Dated: , 2014

Respectfully submitted,

/s/ Jesus Sanchelima
Jesus Sanchelima, Esq. (Fla. Bar No. 231207)
jesus@sanchelima.com
Sanchelima & Associates, P.A.
235 S.W. Le Jeune Road
Miami, Florida 33134
Telephone: (305) 447-1617
Facsimile: (305) 445-8484
Attorneys for Applicant The Solution Group Corp.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed electronically on this 6th day of May 2014 to:

/s/ Jesus Sanchelima
Jesus Sanchelima, Esq.

SERVICE LIST

Assa Realty, LLC versus The Solution Group Corp

Richard J. Migliaccio, Esq.
richard@assaproperties.com
410 Park Avenue, Ste, 1630
New York, NY 10022

Joel Scott Ray, Esq.
Joel.Ray@assaproperties.com
410 Park Avenue, Ste, 1630
New York, NY 10022

EXHIBIT 11

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

Assa Realty, LLC

Opposer,

v.

Opposition No. 91215734

The Solution Group Corp.

Applicant,

_____)

**APPLICANT'S ANSWERS TO OPPOSER'S FIRST SET OF
INTERROGATORY REQUESTS**

Applicant The Solution Group Corp hereby answers to Opposer's First Set of Interrogatories as follows:

INTERROGATORY 1. Identify the person, including their name and relationship to Applicant, who will answer these Interrogatories on behalf of Applicant, and the basis of the person's knowledge.

RESPONSE: Raul Sanchez de Varona, Chief Operating Officer/Chief Financial Officer and Vice President of the Solution Group Corp.

INTERROGATORY 2. Set forth the names and addresses of those peoples of Applicant or hired by Applicant who have knowledge of the issues involved in this matter.

RESPONSE:

1. Camilo A. Lopez, President and Managing Director of the Solution Group Corp. (4100 N. Miami Avenue, 2nd Floor, Miami, FL 33127).
2. Raul Sanchez de Varona, Chief Operating Officer/Chief Financial Officer of the Solution Group Corp. (4100 N. Miami Avenue, 2nd Floor, Miami, FL 33127).

INTERROGATORY 3. Set forth the facts and circumstances how Applicant developed Applicant's Mark.

RESPONSE: The mark was initially selected after holding several meetings with members of the advertising agency, Plvral, LLC on or about October 2012. It was further developed through a study of the market and a reflection on what Applicant perceived as a cross-cultural word to define the idea and concept.

INTERROGATORY 4. Describe the methods, investigations and procedures used by Applicant, its attorneys or any person on its behalf to determine whether Applicant's Mark was available for use or registration, including the dates of each search or investigation and the name of the persons who conducted such search or investigation.

RESPONSE: A trademark search was conducted on January 31, 2013 for Applicant's mark. See Bates Nos. 000092 through 0000186.

INTERROGATORY 5. Set forth the results of all investigations and searches to determine whether Applicant's Mark was available for use or registration.

RESPONSE: A trademark search was conducted on January 31, 2013 for Applicant's mark. See Bates Nos. 000092 through 0000186 for the results of the trademark search.

INTERROGATORY 6. Set forth the date on which Applicant decided to adopt and to use Applicant's Mark or any variation thereof.

RESPONSE: Beginning in October 2012, several meetings were conducted with the advertising agency, Plvral, LLC., wherein Applicant's Mark was selected and developed.

INTERROGATORY 7. Set forth what other marks were considered and why they were not used.

RESPONSE: No other marks were considered.

INTERROGATORY 8. Set forth the earliest date on which Applicant used Applicant's Mark or any variation thereof.

RESPONSE: On or about March 18, 2013, the digital version of the CASSA at Georgetown Brochure was uploaded to the cassa.co website. The printed version of the brochure was available on April 17, 2013. Bates Nos. 000064 through 000082 corresponds to the digital

CASSA at Georgetown brochure. Bates Nos. 000061 through 000063 correspond to cached pages of the website from May 9, 2013.

INTERROGATORY 9. Set forth whether Applicant, its principals, employees or any person hired by Applicant knows of or has heard of Salim or Solly Assa, Isaac Assa or Assa Realty, LLC, include the earliest dates, and how they learned of them.

RESPONSE: Applicant became aware of Salim or Solly Assa, Isaac Assa and Assa Realty, LLC only through the cease and desist letter sent by Assa Realty, LLC on June 10, 2013.

INTERROGATORY 10. Did Applicant ever obtain permission from Salim or Solly Assa or Isaac Assa to use Applicant's Mark. If your answer is in the affirmative, then include the date of such permission and how it was given.

RESPONSE: Permission was not requested, as Applicant was not aware of Salim or Solly Assa or Isaac Assa nor that permission was necessary.

INTERROGATORY 11. Set forth the goods or service that Applicant uses for Applicant's Mark or any variation thereof.

RESPONSE: Applicant uses and/or intends to use its mark for Real estate development and construction of commercial, residential and hotel property in international class 037.

INTERROGATORY 12. Set forth Applicant's annual sale of goods or service using Applicant's Mark or any variation thereof.

RESPONSE: To date Applicant has sold approximately \$6,776,000.00. Applicant also has a pending contract of an additional \$39,000,000.00.

INTERROGATORY 13. Set forth Applicant's annual advertising and promotional expenses for such goods or services that use the Applicant's Mark or any variation thereof.

RESPONSE: Annual advertising and promotional expenses amount to approximately \$520,315.00.

INTERROGATORY 14. Set forth all the advertng media, including, but not limited to, television, radio, internet, newspapers, magazines, e-magazines, social media, used by Applicant to promote its goods and services using Applicant's Mark. Include in your response the names of companies, addresses and length of time of the advertisements and the geographic locations of such advertisement.

RESPONSE: Advertisements and marketing for CASSA includes, but is not limited to:

- a. Brochures, PowerPoint presentations, fliers, newsletters, and fact sheets.
- b. Websites: cassa.co, cassabrickell.com, thesolutiongroup.net
- c. Press releases

d. Social media: Facebook and Instagram

e. Paid advertisements, in magazines, newspapers, online journals, and other media:

Miami Diario | Miami | Printed and digital | January 2014 - July 2014
ClearChannel | Miami | Digital Billboard | November 2013
YPO Gala | Miami | Printed | October 2013
Nuevo Habitat | Venezuela | Printed | September 2013
Diario Urbano | Venezuela | Printed | April 2014
Noticias 24 | Venezuela | Digital | Sept. - Nov., 2014
El Pais | Uruguay | Printed | June 2013
Brickell Magazine | Printed: 2 Page Spread Ad in 6 Consecutive Issues: Sep., Oct., Nov. and Dec. 2014 / Jan. and Feb. 2015
Venezuela | Bloque de Armas | Printed and Web Campaign
Variedades | Monthly
OK Venezuela | Every two weeks
Too Much | Every two months
H&D Decoracion | Every two months
Ronda | Every two weeks
Playboy | Monthly
Fascinacion | 2001
Meridiano | Daily news

f. Trade Shows: Expo Habitat Internacional Caracas | Oct. 31 – Nov. 3, 2013
Miami New Construction Show, Miami | Aug 29 – 31
The Real Deal | South Florida Forum and Showcase | October 23
Florida Expo 2014, San Juan | August 30
Gran Salón Inmobiliario, Bogotá | October 8-12
Expo Habitat Internacional, Caracas | November 5 – 9

g. Email marketing through weekly eblasts since February 2013

h. Online videos: *cassa Concept*: https://www.youtube.com/watch?v=_GV_Yre9XG8
Helicopter Tours: <https://www.youtube.com/watch?v=2Nug8e7rywM>

i. Events: *cassa talks* #1 - Ponce de Leon Architects | TSG Offices | April 11
TSG Corporate Run - cassa brickell | TSG Team featuring cassa brickell | Downtown & Brickell | April 24
Experience cassa brickell | cassa brickell Sales Center | May 29
cassa walks | #1 - Architecture, nature and art | PAMM | June 10
Groundbreaking | cassa at GT community | Sept 13, 2013
Helicopter tours | Ft. Lauderdale Executive Airport | January 17, 2013

j. Media Coverage: *Metro Citizen* - posted 7/7/14
BisNow - posted 7/3/14

South Florida Business Journal - posted 7/23/14
Miami Today: posted 7/30/14.

See Bates Nos. 000001 through 000019, 000053 through 000091, and 000187 through 000348.

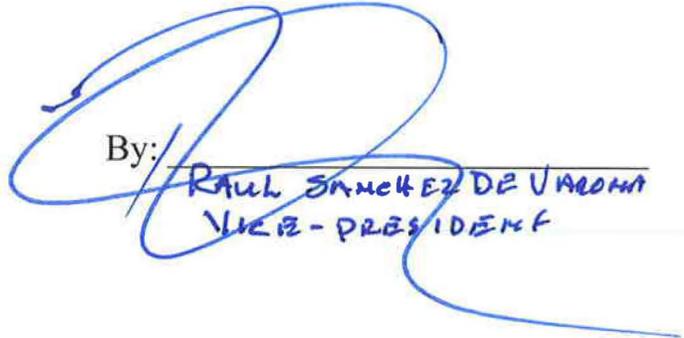
INTERROGATORY 15. Set forth all licenses, agreements, assignments, consents to use, co-existence agreements entered into or concerning Applicant's Mark or any variation thereof.

RESPONSE: No agreements, or contracts or licenses exist.

INTERROGATORY 16. Set forth any instances of actual confusion between Applicant's Mark and Opposer's Mark received by Applicant. Such actual confusion includes, but is not limited to, invoices, letters, inquires, reports, blogs, social media, etc.

RESPONSE: Applicant is not aware of the existence of any of documents related to instances of actual confusion.

THE SOLUTION GROUP CORP.

By: 
RAUL SANCHEZ DE VARONA
VICE-PRESIDENT

VERIFICATION OF INTERROGATORY RESPONSES

STATE OF FLORIDA

COUNTY OF MIAMI-DADE

Before me, the undersigned authority, personally appeared

RAUL SANCHEZ DE VARONA

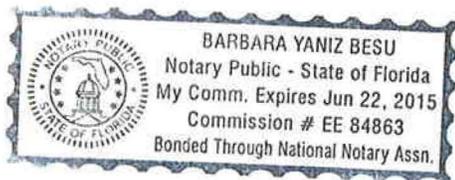
who, being duly sworn, deposes and says that the attached Answers to Interrogatories are true and correct to the best of his/her knowledge, information, and belief.

SWORN TO AND SUBSCRIBED

Before me this 30th day of Sept, 2014.


Notary Public
State of Florida

My Commission Expires:



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed electronically by mutual agreement on this 3rd day of October 2014 to:

Richard J. Migliaccio, Esq.
richard@assaproperties.com
410 Park Avenue, Ste, 1630
New York, NY 10022

Joel Scott Ray, Esq.
Joel.Ray@assaproperties.com
410 Park Avenue, Ste, 1630
New York, NY 10022

Sanchelima & Associates, P.A.
235 S.W. Le Jeune Rd.,
Miami, FL 33134-1762
Telephone: (305) 447-1617
Facsimile: (305) 445-8484
jesus@sanchelima.com

By: /s/ Jesus Sanchelima
Jesus Sanchelima

EXHIBIT 12

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

Assa Realty, LLC

Opposer,

v.

Opposition No. 91215734

The Solution Group Corp.

Applicant,

_____)

**APPLICANT'S RESPONSE TO OPPOSER'S FIRST SET OF
REQUEST FOR PRODUCTION OF DOCUMENTS**

Applicant The Solution Group Corp hereby responds to Opposer's First Set of Request for Production as follows:

Applicant produces these documents and continues to search for more relevant documents. Applicant also files herewith its privilege log for all communications prior to the institution of this proceeding and relating to the mark applied for.

REQUEST NO 1. All documents showing the earliest use of Applicant's mark.

RESPONSE: On March 18, 2013, the digital version of the CASSA at Georgetown Brochure was uploaded to the cassa.co website. The printed version of the brochure was available on April 17, 2013. Bates Nos. 000064 through 000082 corresponds to the digital CASSA at Georgetown brochure. Bates Nos. 000061 through 000063 correspond to cached pages of the website from May 9, 2013.

REQUEST NO 2. All documents showing the current use of Applicant's mark.

RESPONSE: See Bates Nos. 000053 through 000060, 000064 through 000091, and 000245 through 000247.

REQUEST NO 3. All documents regarding the development of Applicant's mark.

RESPONSE: The mark was initially selected after holding several meetings with personnel of the Plvral, LLC advertising agency, a study of the market and a reflection on a truly cross-cultural word to define the idea and concept. No documents exist.

REQUEST NO 4. All e-mails or correspondence regarding the development of Applicant's mark.

RESPONSE: No documents exist.

REQUEST NO 5. All documents referring to or demonstrating actual confusion between Applicant's mark and Opposer's mark.

RESPONSE: Applicant is not aware of the existence of any of these documents.

REQUEST NO 6. All documents, memorandums (sic), e-mails or other writings in which Applicant referred to or discuss Opposer's mark.

RESPONSE: The requested documents pertaining to communication with its attorney is privileged. Applicant is not aware of the existence of non-privileged documents created prior to the institution of these proceedings since Applicant did not know of Opposer's existence.

REQUEST NO 7. All documents, reports, studies or surveys discussing or analyzing the likelihood of confusion between Applicant's mark and Opposer's mark.

RESPONSE: To the best of Applicant's knowledge, no such documents exist.

REQUEST NO 8. All documents, reports, studies or surveys discussing or analyzing the development of the connection of Applicant's mark with Solution as the source in the public's mind.

RESPONSE: To the best of Applicant's knowledge, no such documents exist.

REQUEST NO 9. All documents, reports, studies or surveys produced in the development of Applicant's mark.

RESPONSE: To the best of Applicant's knowledge, no such documents exist.

REQUEST NO 10. All documents evidencing Applicant's plan to expand it (sic) use of Applicant's mark in connection with Applicant's goods and services.

RESPONSE: To the best of Applicant's knowledge, no such documents exist.

REQUEST NO 11. All news stories and other media that have referred to Applicant's mark, including but not limited to, newspapers, magazines and social media.

RESPONSE: See Bates Nos. 000187 through 000244, 000256 through 000266.

REQUEST NO 12. All contracts, licenses or other agreements Applicant has entered into with any other party involving the use of Applicant's mark.

RESPONSE: No agreements, or contracts or licenses exist.

REQUEST NO 13. All documents indicating the identity of the employees of Applicant that were responsible for developing Applicant's mark.

RESPONSE: To the best of Applicant's knowledge, no such documents exist.

REQUEST NO 14. All documents relating to Applicant's searches conducted for marks that included the designations that constitute Applicant's mark.

RESPONSE: See Bates Nos. 000092 through 000186.

REQUEST NO 15. All documents regarding Applicant's promotional efforts using the Applicant's mark in connection with Applicant's goods and services.

RESPONSE: See Bates Nos. 000001 through 000017, and 000053 through 000091, 000245 through 348.

REQUEST NO 16. All documents regarding or concerning Applicant's first use of Applicant's mark in connection with its goods and services.

RESPONSE: See Bates Nos. 000 061 through 000084.

REQUEST NO 17. All documents referring to or relating in any way to Applicant's application, registration or acquisition of Applicant's Mark or any variation thereof.

RESPONSE: See Bates Nos. 000020 through 000060.

REQUEST NO 18. All documents regarding Applicant's decision to select, adopt or use Applicant's Mark or any variation thereof.

RESPONSE: See Bates Nos. 000092 through 000186.

Dated: October 3rd, 2014

Respectfully submitted,

/s/ Jesus Sanchelima
Jesus Sanchelima, Esq. (Fla. Bar No. 231207)
jesus@sanchelima.com
Sanchelima & Associates, P.A.
235 S.W. Le Jeune Road
Miami, Florida 33134
Telephone: (305) 447-1617
Facsimile: (305) 445-8484
Attorneys for The Solution Group Corp.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed electronically by mutual agreement on this 3rd day of October 2014 to:

Richard J. Migliaccio, Esq.
richard@assaproperties.com
410 Park Avenue, Ste, 1630
New York, NY 10022

Joel Scott Ray, Esq.
Joel.Ray@assaproperties.com
410 Park Avenue, Ste, 1630
New York, NY 10022

Sanchelima & Associates, P.A.
235 S.W. Le Jeune Rd.,
Miami, FL 33134-1762
Telephone: (305) 447-1617
Facsimile: (305) 445-8484
jesus@sanchelima.com

By: /s/ Jesus Sanchelima
Jesus Sanchelima

EXHIBIT 13



Cassa Hotel New York

70 West 45th Street
New York, NY 10036 USA

T: +1 212 302 8700

F: +1 212 302 8701

Reservations: +1 212 302 8700

Cassa Hotel New York

70 West 45th Street

New York, NY 10036 USA

T: +1 212 302 8700

F: +1 212 302 8701

Reservations: +1 212 302 8700

The Best Address with Unrivaled Service.

Our boutique hotel's unrivaled location adjacent to NYC's Times Square, serves our guests by placing them steps away from all the indulgence the city has to offer, while at the same time providing a sanctuary away from the bustle. Whether you want to see the city lights, explore the exhibits of the Metropolitan Museum of Art, watch the latest Broadway play, explore Central Park or shop along 5th Avenue, Cassa hotel's prime location presents guests with the best New York City has to offer.

EXHIBIT 14

Subject: Re: 70 West 45th Street Contact Notes

Date: Tuesday, January 16, 2007 11:44 AM

From: Graham Hanson <jgh@grahamhanson.com>

To: Lauren Salmanson L.Salmanson@themarketingdirectorsinc.com, Hale Everets h.everets@ten-arquitectos.com, "Solly@assaproperties.com" solly@assaproperties.com, More...

Cc: Dorothy Lin dl@grahamhanson.com

Conversation: 70 West 45th Street Contact Notes

All,

Please find attached the "Cassa" name/identity layout as well as the naming overview page.

Cassa:

Derived from the familiar "Casa", Spanish and Italian (and now English) for "House". The original Spanish also provides a subtle referential nod to Ten Arquitectos.

Modified with an additional "s" in reference to "Assa". This reference is, and was intended to be, very subtle. In most cases the connection will not be made unless pointed out. Nevertheless, the distinctive spelling is what makes the name effective. The familiar "Casa" will not work. The ambiguity achieved through the modified name allows the name to work for the entire project - residences and guestrooms.

"Cassa" is a unique yet universal name that can be trademarked and used if and when additional projects are developed in other locations.

Once we receive your formal approval, we will move quickly to issue a comprehensive development schedule.

Thanks,
Graham

On 1/16/07 8:02 AM, "Lauren Salmanson"
<L.Salmanson@themarketingdirectorsinc.com> wrote:

Please find contact notes from yesterday's meeting attached.

Thank you

Lauren Salmanson
The Marketing Directors, Inc

EXHIBIT 15

EVERYTHING TO SEE, DO, EAT, BUY AND ENJOY IN THIS GREAT CITY

tenth anniversary year

SHOPPING
DINING
ENTERTAINMENT
ART & ANTIQUES
SPAS & SALONS
TOURS
TRANSPORTATION
MUSEUMS
MAPS

GOSSIP GIRL'S

SPEAKS NO EVIL

**Ring in
THE TOP
DINING
TRENDS of the New Year!**

features

18 Westwick on the Hudson

by Bob Cannon

Hunky British actor Ed Westwick's claim to fame is on this side of The Pond—and in this city—where he plays the kind of man women love to hate on *Gossip Girl* and manages to stay out of the tabloids.

20 10 Savory Trends

by Kiri Tannenbaum

As *IN New York* magazine begins its second decade, we present a plateful of chefs' most *au courant* ideas, including parsnip for dessert, wine-friendly foods and feasting on every single part of a pig.

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Hot happenings around town
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Behind-the-curtain news
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Art, antiques and stylish finds
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Local real-estate survey
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All things terrific and chic

inside source

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Only-in-New-York fun facts



inside source

YOUR PERSONAL CONCIERGE™



PHOTO: JEFFREY M. HARRIS/GETTY IMAGES

Melting-pot Blocks

We've all heard of Chinatown and Little Italy, but there are several other less well-known ethnic enclaves in New York City. Nick Stofocik, Chef Concierge at Cassa Hotel and Residences and self-proclaimed Midtown expert, thinks that Little Brazil (W. 46th St., btw Fifth & Sixth aves.) is one of this multicultural city's best-kept secrets. Minutes from the flashy, frenzied heart of Times Square, this block, a mini Brazilian neighborhood since the 1980s, is lined with restaurants, including Ipanema (13 W. 46th St., 730-5848), that offer the flavors and culture of Rio de Janeiro. "Order a daily special, *linguica frita* (fried sausage) or *bacalhau cozido*, which is broiled or fried codfish with potatoes," suggests Stofocik. Visitors can walk from Brazil to Korea by heading only 14 blocks south (W. 32nd St., btw Fifth & Sixth aves.) to always bustling Koreatown. Close to Macy's Herald Square, the street features restaurants, such as perennially packed Woorijip (12 W. 32nd St., 244-1115), and "shops that are completely authentic to Korea," Stofocik says. These and other pocket communities in all five boroughs add color and spice to the flavorful metropolitan melting pot.—AB



TIPS FROM:
Nick Stofocik,
Chef Concierge,
Cassa NY Hotel and
Residences, 70 W. 45th
St., 302-8700

THE SYMBOLS below identify key listing distinctions: \$ inexpensive, \$\$ moderate, \$\$\$ expensive; ♿ handicap accessible; 🎁 gifts; 👶 child friendly; 🍴 food/snacks; 🍹 drinks; 🏳️ gay/lesbian patrons; 📄 dress code; 🎵 music; 🛏 private rooms; 🔄 replace; ☀ outdoor dining; 🗺 CityPass. Telephone numbers are in area code 212, unless noted. Dial 1+area code+seven-digit number. For essential numbers, turn to "FYI" (p. 81). For mass transit, see **Bus & Subway Maps** (pp. 82-83).

SHOPS & SERVICES

stores, salons, spas,
24-hour services...

Chic spending spots for all, new store openings, great places to relax and reenergize and more.

40

ART & ANTIQUES

galleries, boutiques,
antiques, vintage items...

48

ENTERTAINMENT

theater, nightlife,
attractions, tours...

The scoop on Broadway
and Off-Broadway shows,
city sights, music, clubs, special
events and travel info.

52

MUSEUMS

exhibits
and collections...

A guide to world-renowned
showcases of art, culture,
science and history.

64

DINING

restaurants, cafés,
hotel dining...

Recent openings, trendy
eateries, hot hotel restaurants
and the latest on celeb chefs'
incredible edibles.

68

EXHIBIT 16

From: "Monica Klingenberg" <M.Klingenberg@tmdre.com>
Subject: **Price of Ads for Cassa**
Date: April 3, 2009 11:32:31 AM EDT
To: "Solly@assaproperties.com Assa" <solly@assaproperties.com>
Cc: "Andrea Mignone" <A.Mignone@tmdre.com>, "Jackie Uργο" <J.Uργο@tmdre.com>, "Bob Hooley" <B.Hooley@tmdre.com>, "Graham Hanson" <jgh@grahamhanson.com>, "Dorothy Lin" <dl@grahamhanson.com>

Hi Solly,

Below is the approximate cost for ads in the New York Times and Real Deal.

A DOC (display over classified) in the NY Times that is 4 columns by 7.2" is about \$10,000, depending on how often you commit to run the ad

A small classified strip ad is in the \$2500-\$3500 depending on size and frequency. There is an additional one time charge for digitizing your logo or any other graphic you want to appear in the ad.

The Real Deal Remnant ads are about \$3000 per month, depending on what you negotiate with them at the last minute. You will need to have an ad produced to their format to take advantage of these last minute deals.

Monica Klingenberg
Executive Vice President
The Marketing Directors, Inc.
P: 212-271-2819
C: 914-325-2519
F: 212-271-2789

From: Dorothy Lin <dl@grahamhanson.com>
Subject: **Cassa classified ad**
Date: April 13, 2009 2:31:55 PM EDT
To: "Solly@assaproperties.com Assa" <solly@assaproperties.com>
Cc: Robert Lebensfeld <robert.lebensfeld@assaproperties.com>, Andrea Mignone <A.Mignone@tmdre.com>, Monica Klingenberg <M.Klingenberg@tmdre.com>, Jackie Urgo <J.Urgo@tmdre.com>, Graham Hanson <jgh@grahamhanson.com>
▶ 1 Attachment, 59.2 KB

d

Hi all,

Attached please find some layout and pricing options for the Cassa in-column classified ad.

We can only run an ad with a black background if we submit graphic artwork as shown on page 3 of the attached PDF. They do not offer white type on a black background.

Feel free to contact me with questions.

Thanks,
Dorothy

--
Dorothy Lin
Design Director
Graham Hanson Design LLC
60 Madison Avenue
Floor 11
New York, New York 10010
212 481 2858 telephone, x13
212 481 0784 telefax
dl@grahamhanson.com
www.grahamhanson.com



[70W45 Adpdf \(59.2 KB\)](#)

GRAND OPENING

70 WEST 45 ST

TEN Arquitectos/
Enrique Norton
with Cetra/Ruddy

World Condo
Residences with
Hotel Services



Graphic image

Winter 2009 Occupancy

Starting at \$800,000
Limited collection of
studio to 4-br residences
w/ spectacular views

Sales Showroom
1140 Avenue of the Americas, Floor 2
Open House on Sundays, 12-4pm

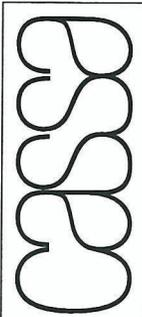
212 398 4545 Tel
info@casnyc.com
www.casnyc.com

Developer: Casan Properties
Executive Marketing & Sales Agent:
The Marketing Directors, Inc.

Equal Housing Opportunity.
The complete offering terms are in
an Offering Plan available from the
Sponsor. File no. CD080721.

In-column text

NYT Class. \$3,864.00
plus a one-time prod.
charge of \$1,150.00



Graphic image

GRAND OPENING

WORLD
CONDOMINIUM
RESIDENCES
WITH HOTEL
SERVICES

70 West 45 Street
Winter 2009 Occupancy

TEN Arquitectos/
Enrique Norton
in collaboration with
Cetra/Ruddy

Starting at \$800,000
Limited collection of
studio to 4-br residences
w/ spectacular views

Sales Showroom
1140 Avenue of the Americas, Floor 2
Open House on Sundays 12-4pm

212.388.4545 Tel
info@cassanyc.com
www.cassanyc.com

Developer: Acza Properties
Exclusive Marketing & Sales Agent:
The Marketing Directors, Inc.

Equal Housing Opportunity.
The complete offering terms are in
an Offering Plan available from the
Sponsor. File no. CD060721.

in-column text

NYT Class. \$3,864.00
plus a one-time prod.
charge of \$960.00



**GRAND
OPENING**

WORLD
CONDOMINIUM
RESIDENCES
WITH HOTEL
SERVICES

70 WEST 45 STREET
Opening Winter 2009

TEN Arquitectos/
Enrique Norton
in collaboration with
Cetra/Ruddy

Starting at \$800,000
Limited collection of
studio to 4-br residences
with spectacular views

SALES SHOWROOM
145 Ave of the Americas, 112
Open Hours: Sundays 12-5pm
212-698-4545 tel
info@catsany.com
www.catsany.com

Developer: Assa Properties
Exclusive Marketing & Sales Agent:
The Marketing Directors, Inc.

Equal Housing Opportunity.
The complete offering terms are
in an Offering Plan available from
the Sponsor, File no. CD080121.

Graphic image

in-column text

NYT Class, \$3,622.50
plus a one-time prod.
charge of \$1,800.00

GRAND OPENING



WORLD
CONDOMINIUM
RESIDENCES
WITH HOTEL
SERVICES

70 West 45 Street
Winter 2009 Occupancy

TEN Arquitectos/
Enrique Norton
in collaboration with
Cetra/Ruddy

Starting at \$800,000
Limited collection of
studio to 4-br residences
w/ spectacular views

Sales Showroom
1140 Avenue of the Americas, Floor 2
New York, New York 10036

212-268-4545 Tel
info@cassanyc.com
www.cassanyc.com

Developer: Aliza Properties
Exclusive Marketing & Sales Agent:
The Marketing Directors, Inc.

Equal Housing Opportunity:
The complete offering terms are in
an Offering Plan available from the
Sponsor, File no. CD060121.

NYT Class, \$2,932.50
plus a one-time prod.
charge of \$450.00



GRAND OPENING

WORLD CONDOMINIUM
RESIDENCES
WITH HOTEL SERVICES

70 West 45 Street
Winter 2009 Occupancy

TEN Arquitectos/
Enrique Norton
with Cetra/Ruddy

Starting at \$800,000
Studio to 4-br residences
w/ spectacular views

Sales Showroom
1140 Ave of the Americas, Floor 2
212 268 4545 Tel
info@cassanyc.com
www.cassanyc.com

Developer: Asta Properties
Exclusive Marketing & Sales Agent:
The Marketing Directors, Inc.

Equal Housing Opportunity.
The complete offering terms are in
an Offering Plan available from the
Sponsor. File no. CD060721.

NYT Class, \$2,208.00
plus a one-time prod.
charge of \$450.00

EXHIBIT 17

Subject: Re: Cassa NYT classified ad
Importance: High

Yes -- that is the issue with having the entire ad on a black background. If there are any copy changes, we will need to resubmit and digitize the "graphic."

I just called the Times classified dept again. If I send them artwork by EOD today, we can still make the deadline.

On Apr 20, 2009, at 12:20 PM, Monica Klingenberg wrote:

My concern is that 95% of this ad is the "graphic". Does that mean if we change the price, for example, the whole ad has to be digitized again? Usually, we try to put pricing, or anything that may change, in the portion of the ad that is not digitized.

Monica Klingenberg
Executive Vice President
The Marketing Directors, Inc.
P: 212-271-2819
C: 914-325-2519
F: 212-271-2789

From: Dorothy Lin [<mailto:dl@grahamhanson.com>]
Sent: Monday, April 20, 2009 12:13 PM
To: Solly J. Assa
Cc: Robert Lebensfeld; Monica Klingenberg; Andrea Mignone; Graham Hanson; Jackie Uργο
Subject: Re: Cassa NYT classified ad

I will need your approval/comments shortly to make this Sunday's Times.
Thanks.

On Apr 20, 2009, at 10:48 AM, Dorothy Lin wrote:

All,

Please find attached 2 options with approximate pricing for this Sunday's classified ad in the Times:

- 1. Please confirm starting price (highlighted in yellow in the ad)**
- 2. I will need approval by noon to run the ad on Sunday. Since the entire image is black, it is considered digital art and will take 3-4 days for them to digitize.**

Thanks,
Dorothy

--
Dorothy Lin
Design Director
Graham Hanson Design LLC

Ten Arquitectos/
ENRIQUE NORTEN
 in collaboration with
 CetraRuddy present



World Condominium
 Residences
 with Hotel Services

70 WEST 45 STREET
 Limited collection
 of Studio to 4-br
 residences with
 spectacular views

**GRAND
 OPENING**

SALES SHOWROOM
 840 Ave of the Americas, #12
 Open House: Sundays 12-4pm

212.298.4565 Tel
 info@cassanyc.com
 www.cassanyc.com

Cassa Residences
 Available Winter 2009
 Starting at \$850,000

Developer: Asa Properties
 Exclusive Marketing & Sales Agent:
 The Marketing Directors, Inc.

Equal Housing Opportunity. The complete
 offering terms are in an Offering Plan available at
 www.theopenhouse.com. ©2008/12

Graphic image

In-column text

**NYT Class. \$3,070.50
 plus a one-time prod.
 charge of \$1,380.00**

Ten Arquitectos/
ENRIQUE NORTEN
 in collaboration with
 CetraRuddy present



CASSA WORLD
 CONDOMINIUM RESIDENCES
 WITH HOTEL SERVICES
 70 WEST 45 STREET
 Available Winter 2009

STARTING AT \$850,000
 Limited collection of
 studio to 4-br residences
 with spectacular views

**GRAND
 OPENING**

SALES SHOWROOM
 1140 Ave of the Americas, Fl 2
 Open House: Sundays 12-4pm
 212 388 4545 Tel
 info@cassanyc.com
 www.cassanyc.com CASSA
 Residences

Developer: Asta Properties
 Exclusive Marketing & Sales Agent:
 The Marketing Directors, Inc.

Equal Housing Opportunity: The complete
 offering terms are in an Offering Plan available
 from the Sponsor. PLN No. 20080121.

Graphic image

In-column text

**NYT Class. \$2,829.00
 plus a one-time prod.
 charge of \$750.00**

From: Dorothy Lin <dl@grahamhanson.com>
Subject: Classified logo submission
Date: April 20, 2009 5:49:54 PM EDT
To: classifiedgraphics@nytimes.com

d

▶ 1 Attachment, 19.1 KB

Hi there,

Attached please find a PDF of logo art that we would like to submit for this Sunday's classifieds.

I have a logo request form, but would like to know the number of lines to enter before I fax the form over.

Thanks!
Dorothy

--
Dorothy Lin
Design Director
Graham Hanson Design LLC
60 Madison Avenue
Floor 11
New York, New York 10010
212 481 2858 telephone, x13
212 481 0784 telefax
dl@grahamhanson.com
www.grahamhanson.com



EXHIBIT 18

PUTOVANJE

ZA DVOJE

www.putovanjazadvoje.com

cijena 35

Ronjenje
na Jadranu

Tema broja:

Istra

Krstarenje
Volge

Edinburgh

Andamansk
otočje

TOP
TRGOVA

Abu Dhabi

Four Seasons
Hualālai Hawaii

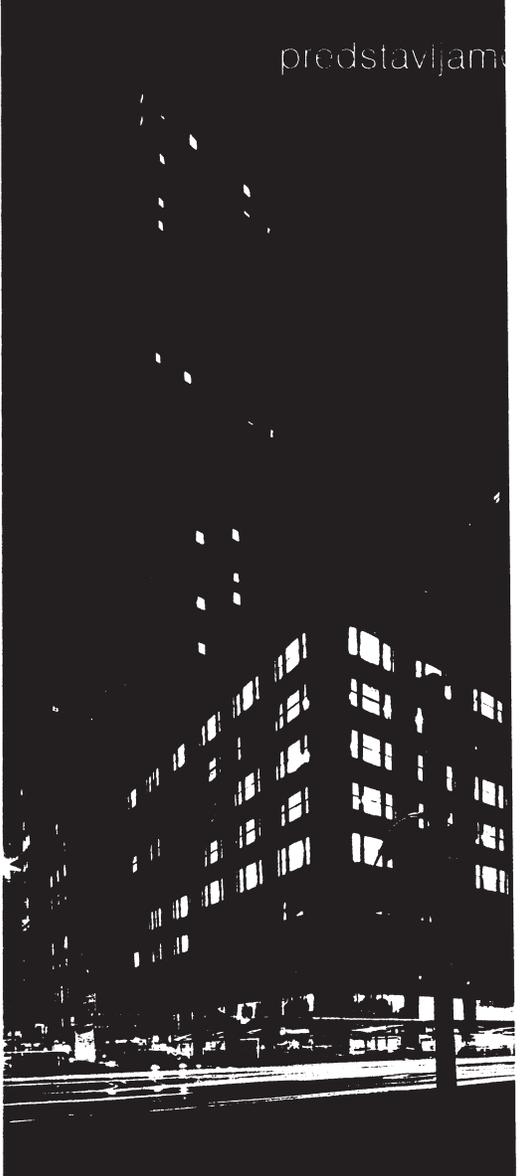
• Budimpešta • Lošinj
• Kirgistan • Čikago • Torino



9 771846 292003 00511

ISSN 1846-2928

AK0505



Cassa Hotel and Residences New York

U središtu Manhattana, u blizini užurbanosti i vreve Times Squarea, šoping iskustava Pete i Madison avenije te blještavih svjetala njujorške kazališne četvrti, smjestio se Cassa Hotel and Residences. Svojim sofisticiranim stilom, hotel pruža gostima osjećaj udobnosti i luksuza istovremeno. U njemu se nalazi 165 soba i 57 apartmana, moderno i luksuzno uređenih. Sve sobe su prostrane i prozirne, a neki od apartmana imaju spojene sobe, što je idealno za obitelji. U sobama je pomno odabran svaki detalj: od načina na koji su izložene knjige o umjetnosti do relaksirajućih proizvoda za kupanje Angela Carolla. Na raspolaganje vam je korištenje modernog fitness studija. Krenete li u razgled grada, nezaobilazno hotela naazi se mnoštvo muzeja, galerija i ostala znamenitosti: kao što su Museum of Modern Art, The Metropolitan Museum of Art, Metropolitan Opera, zgraba Chrysler i Central Park. Više informacija pronađite na www.cassahotelny.com



EXHIBIT 19

From: Dorothy Lin <dl@grahamhanson.com>
Subject: **Cassa ads**
Date: August 19, 2009 2:49:43 PM EDT
To: Graham Hanson <jgh@grahamhanson.com>

d

Hi Graham,

I spoke to someone from the NYT, she says that Assa ran 3 ads in addition to the processing fee to digitize logo art.

Apr 26
May 3
May 10

They are going to email me a list of the invoice, but she says it will take a while, and I think you have hard copies of everything.

Thanks,
Dorothy

--

Dorothy Lin
Design Director
Graham Hanson Design LLC
60 Madison Avenue
Floor 11
New York, New York 10010
212 481 2858 telephone, x13
212 481 0784 telefax
dl@grahamhanson.com
www.grahamhanson.com

EXHIBIT 20

Ten Arquitectos/
**ENRIQUE
NORTEN**
in collaboration with
CetraRuddy present



World
Condominium
Residences
with Hotel Services

70 WEST 45 STREET
Limited collection
of studio to 4-br
residences with
spectacular views

**PRIVATE
PREVIEW**

SALES SHOWROOM
1140 Ave of the Americas
Floor 2

212 398 4545 Tel
info@cassanyc.com
www.cassanyc.com

Cassa Residences brought to you
by Anis Properties,
Exclusive Marketing & Sales Agent.
The Marketing Director, Inc.

EXHIBIT 21

A proud sponsor of the Israel Film Festival

CASSA^{NY}

HOTEL AND RESIDENCES



The city never sleeps...but you need to

Offering a boutique hotel experience of sophisticated style and indulgence, Cassa Hotel and Residences is rich in texture, contemporary in design yet warm and inviting. Situated in a prime location on 45th Street in midtown Manhattan near the bustle of Times Square, world class shopping and experiences of Fifth and Madison Avenues.

70 West 45th Street, NYC
btwn. 5th and 6th Avenues

212.302.8700

www.cassahotelny.com

reservations@cassahotelny.com

Managed by



HOTEL & RESIDENCES

EXHIBIT 22



Cassa Sales Showroom
1140 Avenue of the Americas
Floor 2
New York, NY 10036

212 398 4545 Tel
212 398 4541 Fax
info@cassanyc.com
www.cassanyc.com

70 WEST FORTY FIFTH STREET

WORLD CONDOMINIUM RESIDENCES

EXHIBIT 23

CITYREALTY CASSA, 70 WEST 45TH STREET

INFO & RATINGS BUILDING RELATIONSHIPS AVAILABLE APARTMENTS (12) SOLD DATA AERIAL VIDEO & IMAGERY

EMAIL US (212) 755-5544 | SIGN IN OR JOIN NOW

EMAIL US (212) 755-5544 | SIGN IN OR JOIN NOW

INFORMATION & APPOINTMENTS

Search for a Building by Name or Address Subr

OVERVIEW REVIEW RATINGS SIMILAR BUILDINGS MAP STREET VIEW

BUY RENT REVIEWS & SALES DATA NEW CONDOS MARKET INSIGHT

Call (212) 755-5544 NEIGHBORHOODS

CityRealty > New York City > Midtown West > Cassa, 70 West 45th Street

CASSA

70 West 45th Street, between Fifth Avenue & Sixth Avenue

INFO & RATINGS AVAILABLE APARTMENTS (12) SOLD DATA AERIAL VIDEO & IMAGERY

OVERVIEW REVIEW RATINGS SIMILAR BUILDINGS MAP STREET VIEW

Info & Ratings - Overview

83

BUILDING SUMMARY

Building Type: Condominium

Located in [Midtown West](#)

\$2,262

AVG. PRICE / FT² (CURRENTLY AVAILABLE APTS)

5

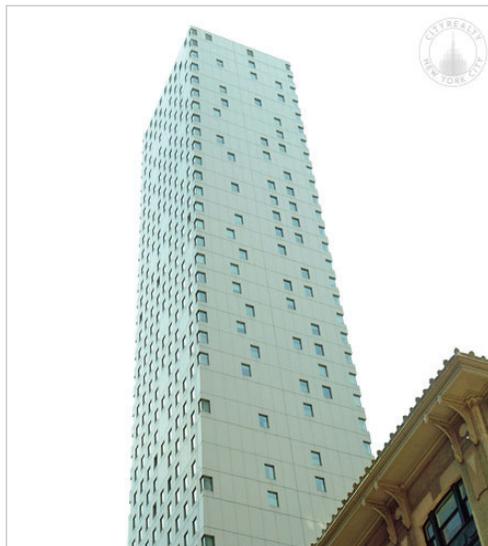
APTS FOR SALE

7

APTS FOR RENT

Two Bedrooms from \$2,350,000

(1 available apt - updated January 10, 2014)



Search

For New York City Apartments

3,712

APARTMENTS FOR SALE

6,207

APARTMENTS FOR RENT

HOW CITYREALTY WORKS

INTERNATIONAL BUYERS

Four Bedrooms from \$5,000,000 to \$16,032,500
 (3 available apts - updated January 2014)
Five Bedrooms from \$20,332,000
 (1 available apt - updated January 2014)



EMAIL US (212) 755-5544 | SIGN IN OR JOIN NOW

INFORMATION & APPOINTMENTS

Email Us

Call (212) 755-5544



SPECTACULAR FLOOR PLANS
 SPECTACULAR VIEWS
 SPECTACULAR PRICING
 NOW OVER 75% SOLD

1,205 SF 2 bedrooms from \$1,575,000
 1,818 SF 3 bedrooms from \$2,375,000
 2,952 SF 4 bedrooms from \$4,375,000

333 East 91st Street (between 1st & 2nd Avenue)
 OPEN HOUSE SAT & SUN 11AM - 4PM

find out more

OVERVIEW REVIEW RATINGS SIMILAR BUILDINGS MAP STREET VIEW

2010 YEAR BUILT | **57** APARTMENTS | **48** FLOORS

OVERVIEW

Cassa Hotel and Residences, the striking, white, mid-block building at 70 West 45th Street, which overlooks the large and lushly landscaped mid-block plaza of the black skyscraper at 1166 Avenue of the Americas, was designed by Enrique Norten of Ten Arquitectos and Cetra/Ruddy for Assa Properties, which was founded by Solly and Isaac Assa. Assa's other properties include the nearby 7 Times Square, the former Knickerbocker Hotel built by John Jacob Astor.

This slender, mixed-use tower is 48 stories high with 57 condominium apartments starting on the 28th floor above the 166-room hotel. It was completed in 2010.

TEN Arquitectos, which is headed by Enrique Norten, was founded in 1986 in Mexico City and opened an office here in 2001. It was the subject of a major exhibition at the Museum of the City of New York in 2005. Enrique Norten is also the architect of [Mercedes House](#), the sinuous mixed-use development with many staggered penthouses on West 54th street, and [1 York Street](#) in TriBeCa.

He had designed some important projects featured in a 2005 exhibition at the Museum of the City of New York that were not built, a mixed-use building on Park Avenue at 125th Street that was notable for its wavy waffle-like façade and bright colors, and a library in Brooklyn near the Brooklyn Academy of Music.

CARTER HORLEY'S REVIEW OF CASSA, 70 WEST 45TH STREET

AREA MAP



NEARBY SUBWAY STATIONS

S	M	1	2	3	B	D	F	N	Q
R	4	5	6	A	C	E	7		

Like Tweet



CASSA, 70 WEST 45TH STREET
READ A REVIEW OF CASSA, 70 WEST 45TH STREET BY

Carter Horsley

APARTMENT APARTMENTS

SOLD DATA

AERIAL VIDEO & IMAGERY

EMAIL US (212) 755-5544

SIGN IN OR JOIN NOW

INFORMATION & APPOINTMENTS

Email Us

TRACKING NYC'S BLUE CHIP BUILDINGS
Call (212) 755-5544



OVERVIEW REVIEW RATINGS SIMILAR BUILDINGS MAP STREET VIEW

FEATURES & AMENITIES

- Attended Lobby
- Concierge
- FT Doorman
- Hi Rise
- Post War
- Basement Storage
- Central AC
- Full Service Garage
- Health Club
- Elevator
- Mail Room
- Business Center
- Lounge
- Fitness Center

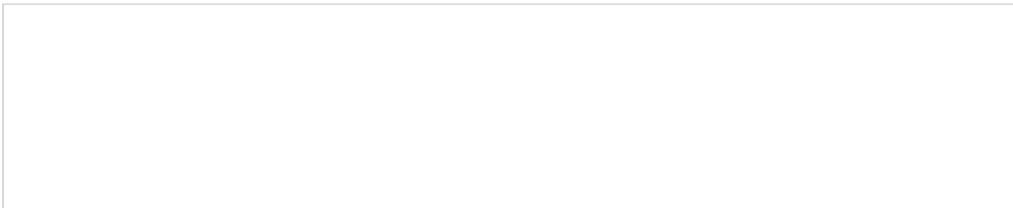
PROS

- Across street from large and lushly landscaped plaza
- A la carte hotel services
- Concierge
- Doorman
- Residents lounge
- Rear garden
- Close to Bryant Park
- Close to Times Square and theater district
- Not far from Grand Central Terminal
- Turn-down service

CONS

- No balconies
- Commercial street
- Traffic

CASSA, 70 WEST 45TH STREET AERIAL IMAGERY



CASSA, 70 WEST 45TH STREET

[EMAIL US](#) (212) 755-5544 | [SIGN IN OR JOIN NOW](#)

INFO & RATINGS AVAILABLE APARTMENTS (12) SOLD DATA AERIAL VIDEO & IMAGERY

[OVERVIEW](#) [REVIEW](#) [RATINGS](#) [SIMILAR BUILDINGS](#) [MAP](#) [STREET VIEW](#)

MAXIMIZE IMAGE FOR BEST RESULTS

INFORMATION & APPOINTMENTS

[Email Us](#)
Call (212) 755-5544

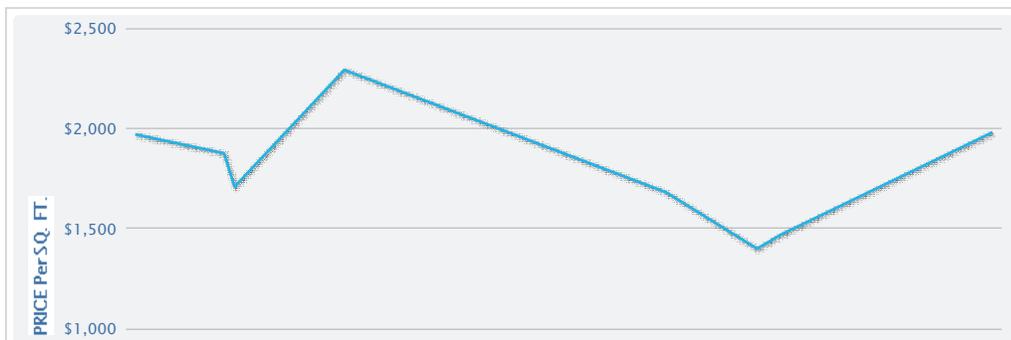
CASSA, 70 WEST 45TH STREET FEATURED IN

CityRealty Indices:

"Midtown Condos"

CASSA - 3 YEAR SALES HISTORY

[VIEW DETAILED GRAPH](#)



CASSA, 70 WEST 45TH STREET						EMAIL US	(212) 755-5544	SIGN IN OR JOIN NOW
INFO & RATINGS	AVAILABLE APARTMENTS (12)		SOLD DATA	AERIAL VIDEO & IMAGERY			INFORMATION & APPOINTMENTS	
OVERVIEW	REVIEW	RATINGS	SIMILAR BUILDINGS	MAP	STREET VIEW			
\$0	Sep '10	Jan '11	May '11	Sep '11	Jan '12	May '12	Sep '12	Jan '13
ALL SALES	AVERAGE PRICE / FT ²	TRANSACTIONS	ALL SALES	AVERAGE PRICE / FT ²	TRANSACTIONS			
2013	\$1,979	1	2007	N/A	0			
2012	\$1,515	3	2006	N/A	0			
2011	\$2,293	1	2005	N/A	0			
2010	\$1,881	4	2004	N/A	0			
2009	N/A	0	2003	N/A	0			
2008	N/A	0						

INFORMATION & APPOINTMENTS

[Email Us](#)

Call (212) 755-5544

EXHIBIT 24

Hotel\$avings.com

Follow 390

Currency USD Customer Service Manage Reservation Sign In Register Call to Book: 1-888-253-1628



Cassa Hotel Ny ★★★★★

Reservations Desk: 1-888-253-1628 | 70 West 45th Street, New York, NY - 10036
1-888-253-1628

Like 110k +1 603

Select Your Travel Dates Rooms: 1 Adults: 2 Children: 0 Edit Check In: Check Out:

- [Hotel Details](#)
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Best Value



Verified Guest Reviews
4.3 of 5
[Based on 3 Reviews](#)



[70 West 45th Street](#)
[New York, NY 10036](#)

Contemporary Elegance Meets Soothing Comfort

Luscious location!

We really wanted to see a grand opera at the Lincoln Theatre and thought of checking in at Casaa for 2 nights. It was awesome. Lincoln Theatre was just few blocks away from the hotel along with other famous NYC landmarks. The room we had looked and f... [Read more reviews](#)

Extending a hotel experience of elegant taste, Cassa Hotel and Residences is filled with contemporary flair and warm service. It is located in the center of Midtown Manhattan, just a short distance from the busy corners of Time Square. The hotel offers 165 tastefully designed rooms, each

comes with excellent amenities. Spacious suites connected with deluxe rooms are made available in the hotel to suit the needs of discriminating guests. Since it's just minutes away from the city's local attractions, guests can conveniently take a visit to Madison Square, Lincoln Center, and Central Park.

Amenities

[View Rooms](#)

- Pets accepted
- Family Rooms
- Fitness center
- Business center
- Meeting rooms
- Dry cleaning/laundry
- Interior Corridor
- Golf
- Luxury

Helpful Information

Check-in Time: 03:00 PM **Check-out Time:** 12:00 PM

Please ensure you that have a valid credit card available upon check-in for incidental charges. All incidental charges will be assessed by the property as you check-out. Incidental charges may include items such as room service, movies, parking, etc. Guests must be 18-21 years of age to check-in. Special requests can be made but are not guaranteed by the property. Please review the cancellation policy and terms of use in full prior to booking your reservation.

\$175.00

[Check Availability](#)

Special Online Rates. Savings up to 50%.

Unbeatable Rates

Hotel reservations at up to 50%
Off on over 70,000 of your favorite
hotels.

Great Service

Our friendly hotel experts are
available 24 hours per day, 7 days
a week.

Secure Checkout

Fast, easy and 100% secure
bookings with real time
confirmation by email.

Rating Summary based on 3 Guest Reviews.

Overall 4.3

Service 4.3

Location 4.3

Comfort 5.0

Value 4.3

[Stayed here? Rate this Hotel](#)

5



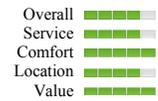
Superb stay!

This hotel is a must-try especially if you're traveling with a large group. The deluxe rooms we had were connected with a spacious suite, it was awesome... The location is superb, just few walks from Time Square, etc. they also process things very fast as we had no hassles checking in and out. Good job.

Katherine Philips

Sunday, January 16, 2011

4



breakfast indulgence!

I absolutely loved their big breakfast. It's not the typical breakfasts served by other hotels. Instead, I had really delicious items such as wild mushroom frittata, Oefus oak truffles, vanilla French toast and smoked bacons (which smelled like fresh apples). What a way to start my NYC getaway.

DawnTL_1980

Wednesday, December 22, 2010

4



Luscious location!

We really wanted to see a grand opera at the Lincoln Theatre and thought of checking in at Casaa for 2 nights. It was awesome. Lincoln Theatre was just few blocks away from the hotel along with other famous NYC landmarks. The room we had looked and felt very posh. Great stay.

Kathleen Holloway

Tuesday, June 29, 2010

Share your experience at Cassa Hotel Ny

[Write a Review](#)

\$175.00

Special Online Rates. Savings up to 50%.

Unbeatable Rates

Hotel reservations at up to 50% Off on over 70,000 of your favorite hotels.

Great Service

Our friendly hotel experts are available 24 hours per day, 7 days a week.

Secure Checkout

Fast, easy and 100% secure bookings with real time confirmation by email.



Geo-cords:

Latitude: 40.756366730 **Longitude:** -73.981758118

Address:

70 West 45th Street
New York, NY 10036

Area:

Manhattan Midtown

\$175.00

Special Online Rates. Savings up to 50%.

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Hotel reservations at up to 50% Off on over 70,000 of your favorite hotels.

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Special Discount Rates Enter dates to check availability.

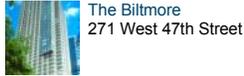
Enter Dates

EXHIBIT 25

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Similar Buildings



Cassa

70 West 45th Street | Midtown West

Cassa, a newly constructed luxury high-rise in the Midtown section of Manhattan built in 2009, stands out among Manhattan's new luxury rental apartment buildings for many reasons. Located at 70 West 45th Street in a centralized location between 5th and 6th Avenue, Cassa has a white exterior and a bold, obelisk-like design that makes it unmistakable, especially in contrast to the older buildings that surround it. Furthermore, Cassa is a Hotel and Residence, so renters at this newly constructed apartment building enjoy year-round hotel service, something that is rare in the current Manhattan luxury rental listings.

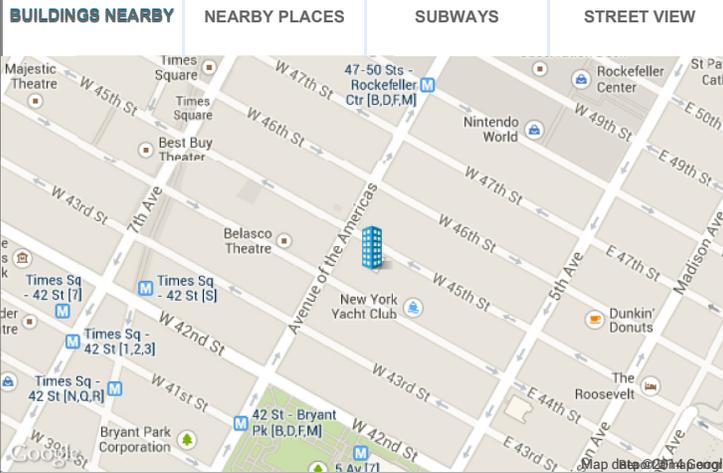
The exclusive rental apartments at Cassa boast high ceilings and modern layouts that emphasize space and light. These luxury rentals have a contemporary design that utilizes a variety of materials and finishes.

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4 Bedroom Apartment Information

Starting at \$20,000 per month Floorplans A B C D Request 4 Bedroom Showing »

70 West 45th Street Neighborhood Highlights



Apartment Details Features: Washer and Dryer Bathroom: Kitchen: Kitchen: Open Dishwasher

Cassa Building Details Neighborhood: Midtown West Developer: Assa Properties Architect: Cetra/Ruddy Incorporated Number of Apartments: 57 Number of Floors: 45 Building Access: Elevator Building Amenities: WiFi, Storage Room, Rooftop Deck, Garden, Garage, Fitness Center, Business Center Building Features: Live-in Super Elevator, Doorman, Concierge

Request More Info about Cassa



MORE PHOTOS

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Manhattan Apartments Rented for Tourist Experience

NYC Apartments by Neighborhood

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EXHIBIT 26

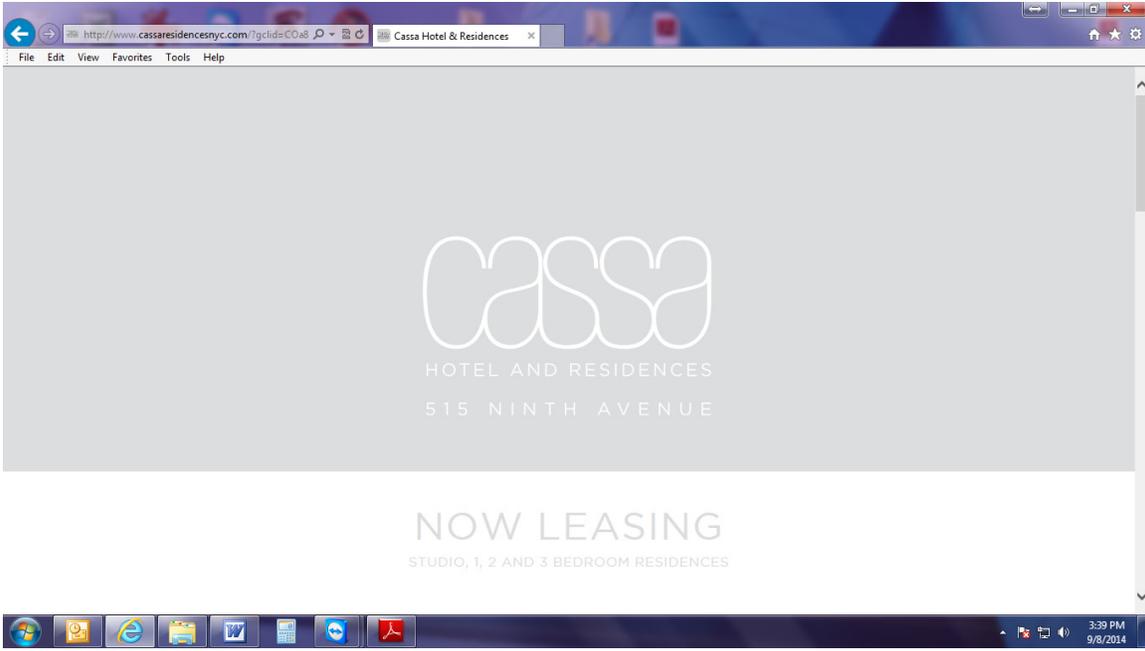
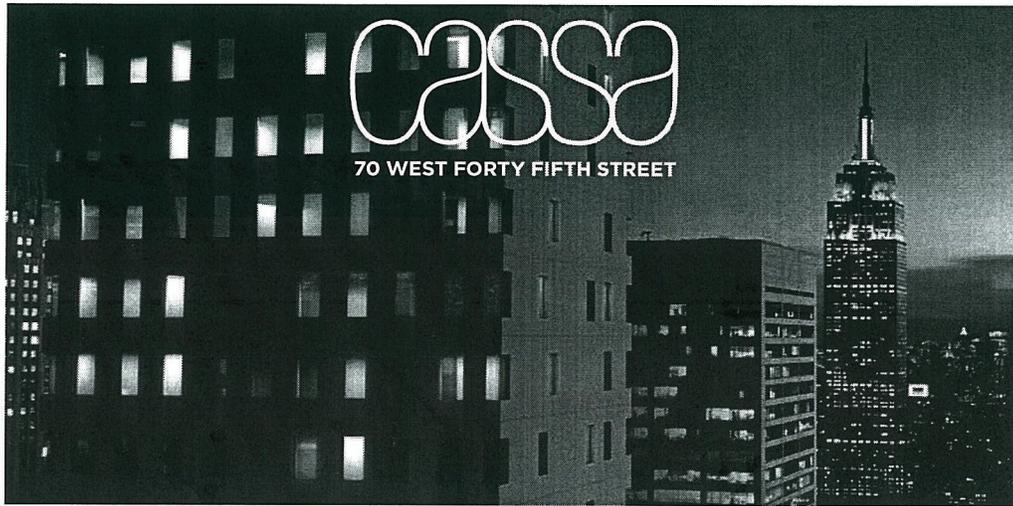


EXHIBIT 27



COMING SOON

CASSA WORLD CONDOMINIUM RESIDENCES WITH HOTEL SERVICES

Enter to win a South Beach trip for two

Register now to become an Elite Broker for an exclusive invitation to our Grand Opening Event and a chance to win a trip for 2 to The Betsy South Beach, the newest luxury boutique hotel in Miami

Architecture by TEN Arquitectos/Enrique Norten in collaboration with Cetra Ruddy

Premium a la carte hotel services

World-class luxury amenities

[CLICK HERE TO REGISTER NOW](#)

Limited collection of studio to 4-bedroom residences with spectacular cityscape views



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EXHIBIT 28



From: Dorothy Lin <dl@grahamhanson.com>
Subject: 70 West 45 signage
Date: February 27, 2009 2:44:35 PM EST
To: Adam Miller <barn922@earthlink.net>
Cc: Robert Lebensfeld <robert.lebensfeld@assaproPERTIES.com>
▶ 1 Attachment, 454 KB

Hi Adam,

We'd like to add a banner to the 70W45 bridge that faces 6th Ave (see red area on the attached jpeg). Can you provide dimensions for that panel?

Please be sure the measurements are accurate -- looking at what's currently up there I see dimensions were off.

Thanks,
Dorothy

--
Dorothy Lin
Design Director
Graham Hanson Design LLC
60 Madison Avenue
Floor 11
New York, New York 10010
212 481 2858 telephone, x13
212 481 0784 telefax
dl@grahamhanson.com
www.grahamhanson.com



EXHIBIT 29

Web Images Shopping News Maps More Search tools

About 4,330,000 results (0.36 seconds)

Cassa Residences - cassaresidencesnyc.com
 Ad www.cassaresidencesnyc.com/
 Luxury West Side NYC rentals with fine amenities and great views

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Boutique Hotel NYC in Midtown Manhattan -Cassa Hotel ...
www.viceroyhotelgroup.com/en/cassa
 Cassa Hotel 45th Street in New York is a boutique hotel in NYC with a convenient location in Midtown Manhattan adjacent to Times Square and near New York ...

4.4 [34 Google reviews](#) · [Write a review](#) · [Google+ page](#) - \$359

70 W 45th St, New York, NY 10036
 (212) 302-8700
[Guestrooms](#) - [Hotel Frequently Asked ...](#) - [Suites](#)

Cassa Hotel 45th Street New York Special Offers Page
www.viceroyhotelgroup.com/en/cassa/reservations/special_offers
 Special Offers. Share to Facebook, Twitter, or Pinterest. SECURITY WARNING: ...

Cassa hotel
www.cassanyc.com/
 standard, full service boutique hotel in the cosmopolitan heart of midtown. Manhattan. Cassa NY will place its privileged residents between the boutiques of Fifth.

Cassa Hotel and Residences at 515 Ninth Ave. in Midtown ...
streeteasy.com/.../cassa-hotel-and-residences-515-9-avenue-new_york
 Cassa Hotel and Residences, 515 Ninth Ave.: RESIDENCE FEATURES: Oversized windows, Rift cut white oak floors, Bosch washer and dryer; Chef's Kitchen ...

Cassa Hotel 45th Street New York - TripAdvisor
www.tripadvisor.com › ... › [New York City Hotels](#) › TripAdvisor
 Rating: 4.5 - 1,133 reviews - Price range: \$\$\$
 "If you are not familiar with NY hotel rooms being on the small size, I would suggest you upgrade to a suite. A suite in NY and at the Cassa Hotel will be the size ..."

Images for cassa Report images



[More images for cassa](#)

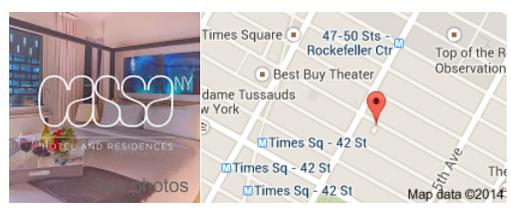
Cedar Area Select Soccer Association: Home
www.cassasoccer.com/
 CASSA club site for Cedar Springs, Michigan organization.

CASAA - The Consumer Advocates for Smoke-free ...
casaa.org/
 Non-profit organization promoting tobacco harm reduction policies, educating the public about innovative products such as electronic cigarettes and smoke-free ...

Cassa depositi e prestiti
cassadpp.it/en/index.html › Cassa Depositi e Prestiti
 Cassa Depositi e Prestiti (CDP) is a joint-stock company under public control. CDP manages a major share of the savings of Italians: postal savings.

Cassa Hotel & Residences - Wikipedia, the free encyclopedia
en.wikipedia.org/wiki/Cassa_Hotel_%26_Residences › Wikipedia
 Cassa Hotel & Residences is a 48-storey building at 70 West 45th Street in Midtown Manhattan in New York City, USA. It was designed by TEN Arquitectos ...

Number of rooms: 165 hotel rooms; 57 resi... **Architect:** Enrique Norten
 Floor count: 48 **Architecture firm:** Ten Arquitectos, Cetra Ru...



Cassa Hotel 45th Street New York

4.4 [34 Google reviews](#)
 4-star hotel • Midtown

Chic boutique retreat offers modern quarters, fitness club access & a casual indoor/outdoor eatery.

Address: 70 W 45th St, New York, NY 10036
Phone: (212) 302-8700

Ads **Book a room**

Check-in Check-out

Booking.com	\$359 / night	<input type="button" value="Book"/>
Travelocity	\$389 / night	<input type="button" value="Book"/>

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Reviews

- "The **beds were very comfortable** and the shower was amazing." 5 reviewers
- "**Standard room** not much larger than twin bed."
- "It is very centrally located and close to times square and **rockefeller center**."

[View all Google reviews](#)

More reviews: [booking.com](#), [hotelchatter.com](#), [oyster.com](#), [quikbook.com](#)

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