Respondent is unable to comply beyond what it has produced during its initial disclosures due to the reasons outlined in Document Request No. 5.

## **DOCUMENT REQUEST NO. 11:**

On April 18, 2014, Cheryl Fox, Vice President of Registrant, having agreed that willful false statements and the like are punishable by fine or imprisonment or both, stated that the mark SCHIEDMAYER has been in continuous use in commerce for five consecutive years from the date of registration or the date of publication, and is still in use in commerce in connection with grand pianos. Please produce all documents, including, without limitation, documents relating to promotion and sales and manufacture of grand pianos which supports this allegation.

Respondent is unable to comply beyond what it has produced during its initial disclosures due to the reasons outlined in Document Request No. 5. Respondent notes that the piano in the photograph used as a specimen for the renewal appears to be a grand piano.

Respondent reserves the right to supplement/correct the foregoing with relevant information as discovery progresses.

Dated: //29, 2016

Respectfully submitted,

Respondent, Piano Factory Group, Inc.

## VERIFICATION

STATE OF CALIFORNIA ) County of <u>Los Arg</u>(15) ss.

I have read the foregoing RESPONDENT'S AMENDED RESPONSES TO PETITIONER'S FIRST AND SECOND SET OF DOCUMENT REQUESTS and know its contents. The facts contained therein are true and correct to the best of my information and belief.

hi Ton

Glenn Treibitz

Subscribed and sworn to (or affirmed) before me this  $29^{\frac{72}{2}}$  day of <u>January</u>, 2016, by <u>GLENN TREASTE</u>, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

WITNESS my hand and official seal.

Easie morales



## **CERTIFICATE OF SERVICE**

It is hereby certified that one (1) copy of the foregoing RESPONDENT'S RESPONSES TO PETITIONER'S FIRST AND SECOND SET OF DOCUMENT REQUESTS is being sent via email and U.S. Mail to Petitioner Schiedmayer Celesta GmbH's attorney of record as follows:

> Michael J. Striker Striker, Striker & Stenby 103 East Neck Road Huntington, NY 11743 striker@strikerlaw.com

Dated: January 14, 2016

<u>/s/ Adam R. Stephenson</u>
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Attorney for Respondent, Piano Factory
Group, Inc.