

Exhibit A

34. If the answer to Interrogatory No. 31 is in the affirmative, please explain what actions over the next 30 years Petitioner took to protect the SCHIEDMAYER mark from being subjected to false designation of origin by any part, including Ibach.

Response to Interrogatory No. 34: No answer required.

35. Please explain why Petitioner did not file for a U.S. trademark application for the SCHIEDMAYER mark for keyboard instruments of any kind following the abandonment of the mark by Ibach around 2001-2002.

Response to Interrogatory No. 35: Objected to as irrelevant.

36. Does Petitioner believe that Ibach abandoned use of the SCHIEDMAYER trademark for piano fortes sometime between 2000-2002?

Response to Interrogatory No. 36: Ibach became insolvent and ceased manufacture of pianos.

37. If the answer to Interrogatory No. 36 is negative, then please describe the basis that authorized Petitioner to file its application for the mark SCHIEDMAYER on April 17, 2015, Application Serial No. 86/600,864 (the '864 application).

Response to Interrogatory No. 37: No answer required.

38. Please identify the names, addresses, and telephone numbers of all persons in addition to Ellianne Schiedmayer that have personal knowledge of the facts surrounding the filing of the '864 application.

Response to Interrogatory No. 38: The person who has the most knowledge of the facts surrounding the filing of '864 application is Ellianne Schiedmayer.

39. On April 17, 2015, Michael J. Striker, counsel for Petitioner, made the following declaration by signing the '864 application on behalf of Petitioner:

The signatory believes that: if the applicant is filing the application under 15 U.S.C. Section 1051(a), the applicant is the owner of the trademark/service mark sought to be registered; the applicant or applicant's related company or licensee is using the mark in commerce on or in connection with the goods/services in the application, and such use by the applicant's related company or licensee inures to the benefit of the applicant; the specimen(s) shows the mark or use on or in connection with the goods/services in the application; and/or if the applicant filed an application under 15 U.S.C. Section 1051(b), Section 1126(d), and/or Section 1126(e), the applicant is entitled to use the mark in commerce; 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 goods/services in the application. The signatory believes that to the best of the signatory's knowledge and belief, no other person has the right to use the mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services of such other person, to cause confusion or mistake, or to deceive. The signatory being warned that willful false statements and the like 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 registration resulting therefrom, declares that all statements made of his/her own

knowledge are true and all statements made on information and belief are believed to be true.

Please describe how Petitioner believes that Michael J. Striker will not be called as a witness in this proceeding, given that Mr. Striker's declaration on the '864 application represented to the USPTO that Petitioner's date of first use of the SCHIEDMAYER trademark for "keyboard musical instruments" was "at least as early as 00/00/1860."

Response to Interrogatory No. 39: Objected to as irrelevant. The '864 application is not involved in respect to the subject cancellation proceeding.

40. Given that it is reasonable to assume that counsel for Petitioner, Michael J. Striker, was not alive in 1860, please disclose all of the personally known facts in Michael J. Striker's possession that formed a basis for him to declare, under penalty of fine or imprisonment on April 17, 2015, that the date of first use of the SCHIEDMAYER mark in the United States was in 1860.


Response to Interrogatory No. 40: Objected to. See answer to Interrogatory No. 39.

41. Please explain why Petitioner, via the declaration of its counsel Michael J. Striker, believes its date of first use of the SCHIEDMAYER mark in the United States was in 1860 rather than 1960 as made in the application for the SCHIEDMAYER logo mark by Christian Ibach on April 2, 1984.

Response to Interrogatory No. 41: Petitioner has no idea why Christian Ibach indicated April 2, 1984 as use of the trademark SCHIEDMAYER.

1001 of Title 18 of the United States Code, and that such willful false statements may jeopardize the validity of the application or any patent issued thereon.

Dated:



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As to objections:



Michael J. Striker