



**OFFICE FOR HARMONIZATION IN THE INTERNAL MARKET
(TRADE MARKS AND DESIGNS)**

OPERATIONS DEPARTMENT
Cancellation Division

C411

Alicante, 07/08/2014

Walter Scheffrahn
Herengracht 23
NL-1015 BA Amsterdam
PAÍSES BAJOS

**Notification to the CTM proprietor/IR holder of an application
for a declaration of invalidity**

<i>Invalidity number:</i>	000009648 C
<i>Contested trade mark:</i>	007502263
	Lambretta
<i>Language of proceedings:</i>	English
<i>Fax number:</i>	00 31-205244526

Please find a full copy of the application for a declaration of invalidity filed on **31/07/2014** against the abovementioned trade mark of which you are the proprietor.

The Office finds that the application is admissible under Rule 40(1) CTMIR. Pursuant to Article 58(2) CTMR, this decision may be appealed together with the final decision on the application.

If the application for a declaration of invalidity is based on earlier Community trade marks, you can access the relevant information about these marks on the Office's Internet site via the free online access to CTM applications and registrations via eSearch plus (<https://oami.europa.eu/eSearch/#basic>).

Your observations must be submitted to the Office by **17/11/2014**.

Unless submitted by fax transmission or by e-communication through MyPage any document or item of evidence, other than that consisting of loose sheets, shall be presented in two copies, one being for transmission to the other party (see Rule 79a CTMIR). If no copy is provided, these documents or items of evidence will not be taken into account.

If you do not submit any observations within this time limit, the Office will decide on the application on the basis of the evidence before it (Rule 40(2) CTMIR).

Arkadiusz GORNY



Enclosures (excluding the cover letter): 25 pages – application form and observations; and 445 – other evidence (470 pages)

STUDIO AVVOCATO SPOLIDORO
ASSOCIAZIONE PROFESSIONALE
VIA DAVERIO 6
20122 MILANO



AVV. YORICK SPOLIDORO (1918-1998)
AVV. SERGIO R. SPOLIDORO
PROF. AVV. MARCO S. SPOLIDORO

AVV. GIORGIO BATTISTI
AVV. MICHELE IMBORNONE
AVV. STEFANO RICCIARDI
AVV. TOBIA BIANCHINI

29th July 2014

TELEFONO: 02.55.19.64.91

TELEFAX: 02.55.19.64.90

E-MAIL: SPOLEX@SPOLEX.IT

Att.
Office for Harmonization in the internal market
Receiving unit
Avenida de Europa, 4
E - 03008 Alicante, Spain

Via express courier

Object: invalidity claim for CTM n. 7502263

Dear Sirs,

please, find herewith enclosed the invalidity application
for CTM n. 7502263, complete with the attached documents.

Should you need any additional information, you can either
call the phone number +39 02 55196491, or send a fax to the
number +39 02 55196490, or send an e-mail to the following
mailbox: spolex@spolex.it

Best regards.

Marco S. Spolidoro
(Prof. Avv. Marco S. Spolidoro)

All.

OFFICE FOR HARMONIZATION IN THE INTERNAL MARKET (OHIM)

APPLICATION FOR A DECLARATION OF INVALIDITY OF A COMMUNITY TRADE MARK

Number of pages (including this one)	20	Applicant/representative reference (not more than 20 characters) lambrettasrl263	Mod.011
---	----	---	---------

Applicant	ID number	390068	☐ multiple applicants	
Name of legal entity or first name and surname		Motom Electronics Group S.p.A.		
Legal form of the entity		Società per Azioni		
Tel, fax, e-mail				
Address		Foro Bonaparte, n. 63,		
Street and number		I - 20122 Milano (MI)		
City and postal code		I - ITALY		
Country				
Postal address (if different)				
Nationality		I - Italian		

Representative	ID number		☐ multiple representatives	
Name		Marco Saverio Spolidoro		
Tel, fax, e-mail		+390255196491 +390255196490 spolex@spolex.it		
Address		via Daverio, n. 6		
Street and number		I - 20122 MILANO (MI)		
City and postal code		ITALY		
Country				
Postal address (if different)				
Type of representative		☒ legal practitioner ☐ professional representative ☐ association of representatives ☐ employee		

Challenged Community Trade Mark	CTM No	007502263	Date of registration (DD/MM/YYYY)	3 / 11 / 2010										
	IR No													
Name and address of CTM proprietor			Language of the cancellation proceedings											
Lambretta S.r.l. via Mario Pagano 39 Milano Italy			<table border="0"> <tr> <td>ES</td> <td>DE</td> <td>EN</td> <td>FR</td> <td>IT</td> </tr> <tr> <td>☐</td> <td>☐</td> <td>☒</td> <td>☐</td> <td>☐</td> </tr> </table>		ES	DE	EN	FR	IT	☐	☐	☒	☐	☐
ES	DE	EN	FR	IT										
☐	☐	☒	☐	☐										

Extent of the application

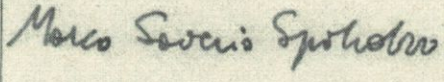
☒ against all the goods and services in the challenged registration

☐ against part of the goods and services in the challenged registration, namely:

☐ continuation sheet(s)

Declaration

I declare that a cancellation request relating to the same subject matter and cause of action, and involving the same parties, has not been adjudicated on by a court in a Member State and has acquired the authority of a final decision. I further declare that I have not previously applied for a cancellation based on another earlier right.

Invalidity fee	Total	€ 700	Signature	
Current account with OHIM			Name	
☐ Account No			Marco Saverio Spolidoro	
☐ Do not use my current account with OHIM			Signature	
Transfer to account of OHIM				
☒ Banco Bilbao Vizcaya Argentaria ☐ La Caixa				
Date of transfer (DD/MM/YYYY)				
28 / 07 / 2014				



APPLICATION FOR A DECLARATION OF INVALIDITY OF A COMMUNITY TRADE MARK

GROUND(S)

Absolute grounds for invalidity

- ☐ Article 52(1)(a) CTMR - Community trade mark registered in breach of Art. 7 CTMR
- ☐ Article 7(1)(a) CTMR
 - ☐ Article 7(1)(b) CTMR
 - ☐ Article 7(1)(c) CTMR
 - ☐ Article 7(1)(d) CTMR
 - ☐ Article 7(1)(e) CTMR
 - ☐ Article 7(1)(f) CTMR
 - ☒ Article 7(1)(g) CTMR
 - ☐ Article 7(1)(h) CTMR
 - ☐ Article 7(1)(i) CTMR
 - ☐ Article 7(1)(j) CTMR
 - ☐ Article 7(1)(k) CTMR
- ☒ Article 52(1)(b) CTMR - Applicant was acting in bad faith when filing the application
- ☐ Article 74 CTMR - Collective Community trade mark registered in breach of Art. 66 CTMR

Reasoned statement

see attached sheets

☒ continuation sheet(s)

Relative grounds for invalidity

- ☐ Article 53(1) CTMR - Community trade mark registered contrary to Art. 8 CTMR
- ☐ Article 53(2) CTMR - Community trade mark registered contrary to any other earlier rights

For relative grounds, fill out the details of the appropriate right(s) on the next pages

Reference of the plaintiff "lambrettasrl263"

In the proceedings started by Motom Electronics Group S.p.A.
for the declaration of invalidity of the
CTM n. 7.502.263
for all the claimed goods and services

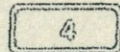
SUMMARY OF FACTS

I - "Lambretta": a famous old name of scooters, still well known (and liked) by the EU public.

The sign "Lambretta" is still well known to the European public for being the name of a scooter that - during the post WWII years and until the early seventies of the last century - competed with the famous "Vespa" in the Italian and European market of scooters during the so called "post war economic boom". Lambretta was in particular the name of a series of models of scooter developed and manufactured by the Italian company "Innocenti" and sold on Italian and European market from 1950 until 1972. During those twenty years, some Lambrettas were manufactured and sold also in India by state owned companies on the basis of the original Italian projects and with the consent (license) of Innocenti.

In 1972 - due to Innocenti insolvency - all the "Lambretta" assembly lines, marks, goodwill, projects and know how were acquired by the Indian State Company "Scooter India Limited" (SIL), who continued the production of Lambretta scooters in India. It is important to highlight that also those "second generation" Lambretta scooters were still manufactured on the basis of the original know how, projects and designs developed by Innocenti and transferred to SIL. The "Indian Lambrettas" were also distributed in Europe from the beginning of their production until years 1997-1998 (doc. 1 - 3).

Due to its continuous presence on the European market for nearly fifty years, even after the interruption of the actual distribution of Lambrettas in European countries, the name "Lambretta" still identifies today, in the mind of the public (both in Italy and in other EU countries, in particular in the UK), the scooters once manufactured by Innocenti (and - later - by SIL). Lambretta - with the other "Italian glory" of the scooter, the "Vespa" - is in fact nothing less than an "icon" for European scooter public: there are in fact several Lambretta clubs all over Italy, almost one for each region of the Country (doc. 4). There are also Lambretta clubs in several other member states of the EU, as well as in some extra UE



Reference of the plaintiff "lambrettasrl263"

countries (doc. 5 - 18). There are two Lambretta Museum in Europe, one in Italy (doc. 19) and one in the UK (doc. 20). The Lambrettas are the subject of monographic books, published also in English language (doc. 21 - 23) and the image of the scooter and of the corresponding trademark still appear in several "vintage themed" wallpapers and calendars still sold across the EU right now (doc. 24 - 25). Moreover, the original Lambretta scooters – as well as their spare parts (doc. 26 - 31) – are actually object of an active vintage aftermarket in several EU member states (doc. 32 - 34). Finally the trademark Lambretta, often with its particular graphic styling, still appears – as it happens for others famous "vintage marks" – on t-shirts and other merchandising objects (doc. 35 – 36).

Therefore – in the mind of the EU public (and in particular for Italian and UK public) – the name "Lambretta" is a reminder of the name of the iconic old scooters, originally developed and produced by the Italian Innocenti and, later on, manufactured and sold by the Indian SIL (who nevertheless continued the original Italian tradition by actually purchasing directly from Innocenti the original concepts, assembly lines, trademarks, projects and know how of the Lambrettas).

II - The struggle on "Lambretta" trademarks after 1997

After the interruption of the distribution in Europe of SIL Lambrettas, that occurred in 1997-1998 *circa*, SIL duly renewed its old national trademarks (doc. 37) and – in 2000 – filed also two CTM applications for "Lambretta" in several classes, including class 12, which were both granted with the numbers 1.495.100 (doc. 38) and 1.610.982 (doc. 39). SIL - in 1998 - licensed also its exclusive rights for European Union on the trademarks "Lambretta" to an English company, named Derry Kunman Ltd. After the said company was declared bankrupt, a new license was granted by SIL - in 2001 - to the English company Fine White Line Ltd. (hereinafter "FWL"). Finally - in 2006 - SIL granted to FWL a new license (doc. 40) – which covered *inter alia* also CTMs 1.495.100 and 1.618.982 (SIL's "Lambretta" community trademarks) – for several classes, including class 12, extended to the whole territory of the EU and lasting 15 years. Since 2001 (and until the termination of the last license, that occurred in 2012) FWL was therefore – on behalf of SIL - the subject entitled to use and to authorize the use of the "true" old Lambretta trademarks in Europe.

In the meantime another entity (the Netherland company Brandconcern BV, owned by Mr. Walter Scheffrahn, an individual that should be known enough this Office, doc. 41) – without getting any consent neither from SIL nor from FWL – had started filing its own

Reference of the plaintiff "lambrettasrl263"

"Lambretta" trademarks in several classes, claiming – on the basis of those registrations – to be the legitimate owner of the exclusive rights on the name "Lambretta" in Europe. On the basis of such registrations, Brandconcern granted – in 2007 (doc. 42) – to the Italian company Motom Electronics Group S.p.A. (the plaintiff for invalidity in this action, hereinafter "MOTOM") a license on the mark "Lambretta" for manufacturing and selling scooters in Italy, Spain, Portugal and France. Under such license MOTOM paid Brandconcern roughly 200.000 Euro in *royalties*.

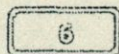
Needless to say that the Brandconcern trademarks – once filed – were opposed by FWL and – in 2008 (after MOTOM began selling its scooters with the brand "Lambretta" under Brandconcern's license) – SIL, and its licensee FWL, sued MOTOM and Brandconcern before the Italian Community Trademark Courts claiming the infringement of the "older" SIL's and FWL's Lambretta trademarks. In the same lawsuit, FWL and SIL claimed also the invalidity – for lack of novelty with respect to their older trademarks – of Brandconcern's national Italian trademarks.

Brandconcern reacted to SIL and FWL legal actions by claiming – both before national Courts and before the OHIM – the revocation, for lack of effective use, of the older SIL/FWL national and community trademarks. These actions were of course carried out with the purpose of eliminating SIL's older Lambretta trademarks in order to let OHIM and the national Court ascertain the novelty (and – then – the validity) of Brandconcern's younger Lambretta registrations.

Notwithstanding Brandconcern's actions for revocation, the Italian Court of first instance – recognizing the *prima facie* validity of the prior trademarks rights owned by SIL and FWL – issued, on 28 November 2008, a preliminary injunction order against MOTOM, which decided to terminate the license with Brandconcern and to reach – on December 10th 2008 (doc. 43) – a settlement agreement with SIL and FWL (according to which MOTOM paid more than 250.000 Euros in compensation to FWL).

After the performance of the obligations set forth in the settlement agreement, MOTOM was then granted by FWL (on October 30th 2009) a first provisional sublicense on SIL's authorized "Lambretta" trademarks (doc. 44) and, later on (on March 31st 2010), a second sublicense (doc. 45) granted by FWL through the controlled company Lambretta Scooters Limited (hereinafter "LSL") (doc. 46).

In the meantime, a third entity – the Italian company named Lambretta S.r.l., also under the control of Mr. Scheffrahn, the owner of Brandconcern – was filing its own "Lambretta" trademarks, including CTMs n. 5.991.559 (cfr. doc. 47) and n. 7.502.263 (cfr. doc. 48). Among those "new" trademarks, there is also the CTM n. 7.502.263 – filed on 5th January



Reference of the plaintiff "lambrettasrl263"

2009 - which is the object of these invalidity proceedings. Such a CTM trademark application – like it had happened before with Brandconcern's ones - was immediately opposed by FWL.

The turning point of the Lambretta trademark saga came across the end of 2010, when the Cancellation Division of the OHIM revoked, for lack of effective use, both SIL's community trademark registrations (doc. 49 – 50). Even if such decisions were appealed by SIL, FWL decided to suddenly turn its back on the Indian company and to ally with Scheffrahn's (Brandconcern and Lambretta S.r.l.) party.

In particular – and only to mention what MOTOM is aware of - it happened that

a) FWL:

1) on 15th October 2010 – without obtaining (or even only asking) any consent from SIL - assigned to Lambretta S.r.l. – confirming the assignment with a deed executed by Mr. Scheffrahn on the side of Lambretta S.r.l. (doc. 51) – several of its "Lambretta" trademarks registrations, including among others also CTMs n. 8.718.405 (doc. 52), 6.510.291 (doc. 53), 6.509.822 (doc. 54).

2) on 26th October 2010 – without obtaining (or even only asking) any consent from SIL - withdrew its oppositions against the "Lambretta" community trademarks applications of Lambretta S.r.l. n. 7.502.263 (cfr. doc. 55) and n. 5.991.559 (cfr. doc. 56);

3) on 29th October 2010 claimed a breach of the license contract with SIL and suspended the payment of the royalties, maintaining that SIL was no longer able to warrant the legitimate ownership of the licensed trademarks (doc. 57 - 58). In response to this claim, SIL contested the breach of contract of FWL and served on FWL a formal notice of termination of the license (doc. 59), starting later on a lawsuit in India against FWL in order to recover damages and royalties (doc. 60 – 62);

4) suddenly terminated – without any legitimate ground or reason and without obtaining (or even only asking) any consent from SIL - the license agreement that FWL – through the controlled company LSL – had executed with MOTOM in March 2010. For this reason, MOTOM (on one side) and FWL, Lambretta S.r.l. and Brandconcern (on the other side) started cross actions among each other before Italian Courts claiming, on the side of MOTOM, the correct and entire performance of the license agreement with LSL and, on the other side, the termination of such an agreement and the infringement of Lambretta S.r.l.'s trademarks.

Reference of the plaintiff "lambretta srl263"

5) became a dormant company - under the direct legal control of Mr. Scheffrahn (doc. 63) - owning only the terminated license with SIL (or, better, "owning" only the Indian lawsuit with SIL on the termination and the lawsuits in Italy against MOTOM).

b) Brandconcern and Lambretta S.r.l.:

as a consequence of the assignment of FWL trademarks to Lambretta S.r.l., withdrew their opposition against FWL's CTM application n. 6.510.291 (doc. 64) and 8.718.405 (doc. 65).

c) Brandconcern:

assigned to Lambretta S.r.l. its (national, International and community) "Lambretta" trademarks and trademark applications (docs. 66 – 70).

At the end of this complex operation Mr Scheffrahn – the real mind behind all the plot (a lot of details thereof are obviously unknown to MOTOM) – was therefore able, in May 2011 (doc. 71), to obtain from the OHIM the certification of Lambretta S.r.l.'s ownership on all the "Lambretta" CTMs (except for the two CTMs still in the name of SIL and which were object of the two pending revocation proceedings). One month later Mr. Scheffrahn became also the only representative before the OHIM of all the "Lambretta" pool of CTMs (doc. 72).

All those steps were carried out in order to allow Lambretta S.r.l. to form (together with some other legal entities which had no relationship with SIL but apparently all under the control of Mr. Scheffrahn and which involve also the directors of FWL) the so called "Lambretta Consortium", an entity that is now claiming on the market (in particular against SIL and MOTOM) to be the sole and exclusive owner of the "pool of rights" on the "Lambretta" brand in Europe.

Notwithstanding the fact that the lawsuits for the revocation of SIL's older "Lambretta" trademarks were still pending before national Courts as well as before Community Courts (doc. 73 – 76), Mr. Scheffrahn's self proclaimed "Lambretta Consortium" started in fact a very aggressive advertising campaign on the internet, heavily focused on claiming a (not existing at all) direct heritage of its scooters from Innocenti and SIL ones (doc. 77).

Instead – relying on the notice of termination of the license between SIL and FWL – SIL granted, in June 2013, a direct provisional license on Lambretta Trademarks to MOTOM (doc. 78), so that – at the moment – the Italian company MOTOM is the last subject that was entitled to claim a use of the trademark "Lambretta" which was actually in some way connected with the original trademarks and goodwill of the old "Lambretta" trademarks of SIL (and – therefore – with the old iconic scooters of Innocenti).

Reference of the plaintiff "lambrettasrl263"

For this reason MOTOM finally decided to bring further actions against its competitor Lambretta S.r.l., claiming before the OHIM the invalidity of all "Lambretta" CTMs already granted and owned by Lambretta S.r.l. (among which there is also the CTM n. 7.502.263 which is the very object of this petition) for all the goods and/or services for which such trademarks have been registered.

However, due to the possibility of a final decision of revocation (for lack of actual use) of both SIL's "Lambretta" national and community trademarks, such actions **are not grounded on the basis of relative invalidity reasons** (i.e. lack of novelty with respect to the prior SIL's trademarks) **but on the basis of two absolute grounds of invalidity**. In particular MOTOM is not willing to let Lambretta S.r.l. taking an unfair commercial advantage exploiting the **clear deceptive attitude of their new "Lambretta" trademarks**, whose applications had been also filed in **bad faith**.

LEGAL GROUNDS OF INVALIDITY CLAIM

I – DECEPTIVENESS OF THE TRADEMARK

Article 52(1)(a) CTMR provides that a Community trademark is invalid when filed in breach of – *inter alia* – art. 7.1.(g) CTMR, thus if the sign which is object of the registration is deceptive for the public. A sign is deceptive – according to a consolidated (OHIM and Court of first instance) case law as well as pursuant to general legal principles of several EU Member States – when the sign object of the mark is likely to provoke in the public an error on qualities and/or features of the products that can influence the commercial behavior of the consumer, enhancing the possibility that the consumer prefers the product bearing the deceptive sign with respect to other similar products.

On the other hand, it is clear that the filing of Lambretta CTM n. 7.502.263 was carried out with the very purpose (and with the actual effect) of inducing the public to believe that the scooters – and other products manufactured and sold by the Lambretta Consortium (or under its license) – benefit of some kind of direct heritage of (or of some kind of business connection with) the original, and still appreciated, Lambrettas which had been being produced in the past by Innocenti (and, later on, by SIL, but still on the basis of Innocenti's original know how, projects and assembly lines).

Reference of the plaintiff "lambrettasrl263"

Nevertheless it is also clear that Lambretta S.r.l.'s new scooters and products have nothing in common with the heritage of the historic Lambretta and/or with the related project and know how, goodwill or business, since SIL – the Indian company that bought from Innocenti in 1972 the original Lambretta assembly lines, trademarks, goodwill and know how - neither authorized the filing of such trademarks by Lambretta S.r.l. nor transferred to Lambretta S.r.l. any know how, project, design or goodwill regarding the old Lambrettas.

On the other hand, it has been proven that - in the view of the Italian, UK and European public - the name "Lambretta" still resembles the old Innocenti/SIL iconic scooters production.

Finally, the well known success of the recent cases of *vintage* motor product names used to brand modern models (New Mini and New Beetle i.e.) shows that using an old trademark (and – in particular - a trademark that is still remembered even if the corresponding products are not manufactured anymore, as it happened for the Mini and the Beetle) in order to create, for a new product, an association with the "image" of the vintage product is, without any doubt, a commercial policy that awards a strong commercial positive impact on the reception of the new product.

The difference between Lambretta S.r.l.'s new "Lambretta" marks and i.e. BMW's new "MINI" marks is that, while the German producer of the new Minis lawfully acquired the "old" trademarks (and the connected goodwill and know how) from the former "historical" owner of the trademark (which was British Leyland, absorbed by BMW with the acquisition of Rover), the Italian company "Lambretta S.r.l." on the contrary is trying unfairly to appropriate the "old glorious name" of Lambretta without having spent a cent in purchasing the corresponding marks, goodwill, projects or know how! What is even more important is anyway that, while BMW (having acquired the goodwill and know how connected to the old cars bearing the mark MINI) is not misleading at all the public by filing its new "MINI" trademarks for its new cars and merchandising products, the owner of CTM n. 7.502.263 did instead mislead (and is still misleading) the consumer by filing its new "Lambretta" trademarks due to the lack of any possibility to claim any actual heritage or connection with the old (and still well known and liked by the public) business of the Lambrettas manufactured in the past by Innocenti and SIL.

MOTOM believes in fact that the trademark "Lambretta" CTM n. 7.502.263 is likely to deceive the relevant EU public on one feature of the product (connection with the old original Lambrettas) that is clearly relevant in terms of influence on the consumer's preference; that feature being – at least for products in class 12 (and in particular for ground and motor vehicles) as well as for any accessories and clothing for motorbikers and

Reference of the plaintiff "lambrettasrl263"

scooterists - the existence of an actual direct link/heritage of the new marked products with the old Lambretta scooters once produced by Innocenti and later on by SIL on the basis of Innocenti Goodwill and know how (scooters – the "old" ones - that still are well known, remembered and appreciated by the relevant public in the EU).

In order to support the invalidity claim with reference (not only to products included in class 12, but also) to other products claimed in Lambretta S.r.l.'s CTM, it is important to highlight also that the commercial advantage of branding a product with a mark "Lambretta" (thus creating a resemblance of the old original trademark of Innocenti/SIL) is not limited to the market of motorbikes and of similar or connected products (like bicycles and/or motor vehicles and like motorbikers/scooterists clothing and other accessories), but extends also to any kind of products that are eligible for the merchandising of the said trademark. The "plus" of selling power connected to the use of "*vintage marks*" (clearly shown by the fact that "Lambretta" is actually used today for fashion clothing, footgear, headgear, bags, wallpaper, calendars and so on) consists in fact in the "enhancement of commercial visibility" for the public that any product bearing a "well known old mark" could grant to its exploiter.

For this reason, practically any "consumer product" – and, in particular, any product that can be the object of the traditional "merchandising operations" of the reputed trademark - could benefit from the misleading misappropriation of the goodwill and reputation of the Lambretta trademark: products claimed by the CTM applicant in class 3 (in particular perfumes and other products for the personal care, which are consumer products and typical merchandising products, but also all other consumer products claimed therein); products claimed in class 9 (since the definitions set forth in the trademark specification are so broad and generic that they include also products that can be purchased by consumers and which are often the object of merchandising operation, like cameras, glasses, tablets and mobile phones); products claimed in class 12 (since other kind of vehicles are the object of markets close to the one of ground vehicles, which includes motorbikes and scooters); products claimed in class 14 (also watches and jewels are consumer and merchandising products); products claimed in class 16 (cards, wallpapers, adhesives, stickers, books are typical consumer products and the object of merchandising of well known trademarks); products in class 18 and 25 (clothing, footgear, headgear, bags, accessories, umbrellas, belts and leather products are the most obvious target for operation of merchandising of well known marks and – of course – are consumer products as well).

What MOTOM is trying to maintain here is that - even in the event in which SIL's old Italian and community trademarks were actually revoked for lack of use - this will not imply, at

Reference of the plaintiff "lambrettasrl263"

least as long as the EU public still remembers the old "true" Lambrettas of Innocenti and SIL, that any third parties (with no connection at all with the original "old" Lambretta goodwill and business) will have the right to get a monopolistic misleading competitive advantage against other competitors – especially in terms of "enhancement of commercial visibility" of its products - by means of the registration of any CTMs on the old name "Lambretta".

In other words: even if SIL (the purchaser from Innocenti of the original Lambretta trademarks and therefore of the connected goodwill) had actually lost – for lack of sufficient use - its exclusive rights on the trademark "Lambretta" in the EU Member States, it is still without doubt that the corresponding sign is still part of the collective memory of the European public, due to the fact that "Lambretta" is still recognized by a substantial part of such public as the name of the old iconic Italian scooters. This means that the use of the sign "Lambretta" still has some kind of inherent "social appeal" on the public, in the sense that the public will recognize this sign on a product with more ease than it would recognize another "anonymous" trademark.

This being the situation, MOTOM believes that the OHIM should refuse (or declare invalid for deceptiveness, if already granted) any registrations on the word "Lambretta" when such a registration is asked by a subject that seeks to monopolize the exploitation of the image and reputation of the old mark (so that it wants to appropriate of the commercial value of the old mark in terms of enhancement of commercial visibility of any products bearing that mark) without being able to claim any actual connection with (or any actual personal contribution to) the products and/or the business that in the past actually created the goodwill for what the mark is still now remembered by the public.

For this first reason the CTM trademark n. 7.502.263 owned by Lambretta S.r.l. shall be declared invalid by OHIM - according to Article 52(1)(a) CTMR for breach of art. 7.1.(g) CTMR - with regards to all the products claimed therein.

II - BAD FAITH TRADEMARK APPLICATION

Article 52(1)(b) CTMR provides that a CTM is invalid if the applicant was in bad faith in filing the application.

a) Legal background of the bad faith according to EU case Law

Reference of the plaintiff "Iambrettasrl263"

Whether a CTM proprietor acted in bad faith when filing a trade mark application must be the subject of an overall assessment, taking into account all the factors relevant to the particular case (judgment of 11/06/2009, C-529/07, 'Chocoladenfabriken Lindt & Sprüngli', paragraph 37). For a finding of bad faith there must be, first, some action by the CTM proprietor which clearly reflects a **dishonest intention** and, second, an **objective standard** against which such action can be measured and subsequently qualified as constituting bad faith. There is bad faith when the conduct of the applicant for a Community trade mark departs from **accepted principles of ethical behaviour or honest commercial and business practices**, which can be identified by assessing the objective facts of each case against the standards (Opinion of Advocate General Sharpston of 12/03/2009, C-529/07, 'Chocoladenfabriken Lindt & Sprüngli', paragraph 60).

b) Analysis of the EU, international and national legal principles

In almost all the Member States of the EU, Courts consider as an act of unfair competition the conduct of a market operator which issues on the market messages that can mislead or deceive the public, in particular when the deception concerns a feature of the product which can influence the purchase preferences of the consumer.

The unlawfulness and unfairness of any misleading act in commercial communication is also confirmed, as far as the EU uniform law is concerned, by the contents of the European Directive n 2006/114/EC on misleading and comparative advertising.

It is also known that – in several Member States of the EU (including i.e. Germany, the UK and Italy) – the case law confirms that the misappropriation, with no legitimate title or reason, of commercial goodwill/reputation that has been legitimately built up through investments and efforts of third parties may be regarded as an act of unfair competition (with the name of "free riding" and/or of "commercial parasitism"). And this also in the case in which the unfair conducts do not imply or cause a likelihood of confusion on products or on businesses and do not infringe any intellectual property rights of third parties.

Moreover, all the legal systems of the EU Member States – on the basis of a general definition that was coded since the adoption of **art. 10 bis of the Paris Convention for the Protection of Industrial Property** – accept that, on one side, deceptive practices are to be considered an act of unfair competition and that, on the other side, any acts of competition infringe well established ethical conduct standard in trade or business.

Article 10 bis: Unfair Competition

Reference of the plaintiff "lambretta srl263"

(1) *The countries of the Union are bound to assure to nationals of such countries effective protection against unfair competition.*

(2) **Any act of competition contrary to honest practices in industrial or commercial matters constitutes an act of unfair competition.**

(3) *The following in particular shall be prohibited:*

(i) *all acts of such a nature as to create confusion by any means whatever with the establishment, the goods, or the industrial or commercial activities, of a competitor;*

(ii) *false allegations in the course of trade of such a nature as to discredit the establishment, the goods, or the industrial or commercial activities, of a competitor;*

(iii) **indications or allegations the use of which in the course of trade is liable to mislead the public as to the nature, the manufacturing process, the characteristics, the suitability for their purpose, or the quantity, of the goods.**

Therefore: if the application for a CTM can be considered - according to the general legal principles of EU Member States - an act of unfair competition (and that happens for sure in case of deception and/or free misappropriation of an image/goodwill that was developed by the commercial efforts of third parties), such an application should also meet the requisites to be deemed a bad faith CTM application according to CTMR (an this under the rule of the principle according to which "*There is bad faith when the conduct of the applicant for a Community trade mark departs from **accepted principles of ethical behaviour or honest commercial and business practices***", set forth in para. 60 of the Opinion of Advocate General Sharpston of 12/03/2009, C-529/07 in the Case 'Chocoladenfabriken Lindt & Sprüngli').

c) the deceptive and parasitic intent and effect of the filing of the CTM n. 7.502.263

In order to give evidence of the deceptive intent (and effect) of Lambretta S.r.l.'s CTM bad faith application, MOTOM refers the reader back to what we wrote above in order to demonstrate the deceptiveness of the counterparty's CTM.

As far as the parasitic intent is concerned, the EU Member states case law shows that the unfair attitude of a conduct may be declared when there is:

i) knowledge of the prior title of a third party, due to its own reputation and/or to past relationships with the said third party;

Reference of the plaintiff "lambrettasrl263"

ii) intention – with no title or reason - to misappropriate the goodwill or the reputation of a third party in order to get commercial advantage.

As far as the misappropriation is concerned (but also in order to confirm even better the deception), MOTOM desires to highlight in particular that: i) the filer of the mark did not buy from SIL any goodwill or know how relating to Lambrettas; ii) the filer of the mark did not ask the consent of SIL in order to file their own "Lambretta" trademarks and – above all – (iii) Brandconcern and Lambretta S.r.l. challenged - both before national Courts and before the OHIM – the validity of SIL's Lambretta trademarks. This fact - since both Brandconcern and Lambretta S.r.l. are entities under the control of Mr. Scheffran and members of the "Lambretta Consortium" - implies in fact quite clearly that the defendant in these proceedings will not be able to hold that the filer of the mark, at the moment of the application of their trademarks, could claim any heritage (or even only any kind of "legitimate link") of their "Lambretta" new trademarks with the old marks of SIL or with the goodwill and image thereof. This is the reason why the applicant of the 7.502.263 CTM could not seek to have, when it filed the trademark application, any legitimate title for its attempt of usurping the goodwill connected to the name of the old Innocenti/SIL Lambrettas.

On the other hand, the clear intent of deception and parasitism of the new "Lambretta" trademarks applications is confirmed even better by the fact that the advertising campaign of the Lambretta Consortium - instead of highlighting to the public the novelty of the "new Lambrettas" of the Consortium - heavily focuses on the claim of a (in reality, not existing at all) direct heritage of the Innocenti/SIL tradition.

In particular, Lambretta consortium website:

- a) includes the sign "Lambretta" imitating also the exact graphic appearance and typeface of the old Innocenti/SIL trademarks;
- b) tells the story of the first Lambretta project of Innocenti and shows the original technical designs corresponding to the first Innocenti Lambrettas (although neither Lambretta S.r.l. nor the Lambretta Consortium never ever acquired any kind of rights on such designs, whose IP rights are still in SIL's sole ownership);
- c) claims that Lambretta Consortium *"is considered the sole legitimate successor of the former Italian company Innocenti [omissis], the former trademark holder of Lambretta [omissis] that ceased its activity during the 70es of the last century"*. So: once more no mention at all of SIL (which actually was the sole and only legitimate successor of Innocenti's Lambretta marks, goodwill and know how) and yet another false claim aimed

Reference of the plaintiff "lambrettasrl263"

at attracting the attention of the public by means a misappropriation of the reputation of and old mark, still known and appreciated in Europe.

Moreover, the bad faith of the filer of CTM n. 7.502.263 results also from the fact that the registration of the "new" Lambretta trademarks could take place only thanks to the fact that FWL withdrew its oppositions against such marks after it allied with Brandconcern, Scheffrahn and Lambretta S.r.l. against its former licensor SIL. And – at least under this profile - the unfair and bad faith conduct of FWL against its former licensor SIL is really undisputable.

Finally, it is not a mere coincidence that – on one side – Lambretta S.r.l. is now the owner not only of several new "Lambretta" trademarks but also some new "INNOCENTI" trademarks (docc. 79 - 81) and that – on the other side – many of the new Lambretta trademarks owned by Lambretta S.r.l. claim a sign that is the identical copy– in terms of typeface used and graphic appearance - of the original Innocenti/SIL Lambretta marks as they were used by Innocenti and SIL.

d) The present case in the light of the OHIM decision of the "Aermacchi" case.

Summarizing, in the view of MOTOM:

- 1) The deceptive contents of the advertising of Lambretta Consortium;
- 2) the evidence of an unfair scheme agreed – in 2010 - against SIL by all the subjects involved in the Lambretta Consortium (Lambretta S.r.l., Brandconcern, Mr. Scheffrahn and – in particular - FWL);
- 3) the fact that Lambretta S.r.l. got the ownership (not only of "Lambretta" trademarks, but also) of "INNOCENTI" trademarks filed by Scheffrahn's companies;
- 4) the fact that several new "Lambretta" trademarks owned by Lambretta S.r.l. protect a sign which is a "carbon copy" of the graphical shape and of the typeface of the old original Lambretta Innocenti Trademarks;

are enough to give evidence that the filing of the "Lambretta" CTM was:

- a) supported by the dishonest intention of misleading the public and of misappropriating – with no consideration, title or right - of a third party's (Innocent/SIL) goodwill and image in order to grant to the applicant's new products an unfair advantage in terms of "enhancement of commercial visibility" that, without the recall of the famous "old name" of the original Innocent/SIL scooters, it would never have been possible to reach.

Reference of the plaintiff "Iambrettasrl263"

b) a conduct that – as any act of deception and/or misappropriation of third parties assets with no title, right or consideration – may be regarded as an act of unfair competition according to the law of several member states as well as according to the general provisions of the Paris convention and, finally, according also to the general principles contained in community directives on misleading advertising (thus infringing legal principles of ethical commercial behavior and/or of honest commercial and Business practices that are accepted and well established in the EU and in EU Member States law and, therefore, constitutes a conduct that should be considered relevant under the already mentioned Lindt & Sprüngli doctrine on bad faith).

Furthermore, the subject matter of these invalidity proceedings resembles very closely a case which formed the object of an important leading case for bad faith CTMs applications: the Decision of the Board of Appeals given on 25 January 2013 (doc. 82) in the case R 2448/2010-4 Finmeccanica/Grupo Canosci (trademark "Aermacchi").

Also in that case, in fact, a non Italian company was considered in bad faith because it filed a CTM application in classes 14, 18 and 35 (jewellery, watches, leather and advertising and other services) on a trademark of an Italian aircraft manufacturer (Aermacchi), known by the EU public mainly for being the manufacturer of almost all the "historical warplanes" used by Italian aviation during WW II. It is important to highlight that – even if the usurped trademark concerned planes - nonetheless the trademark filed in bad faith was declared invalid for all the good and service claimed therein, which were in no way similar to aircrafts.

In that aforesaid case the Bad Faith in particular grounded by the Board on the fact (see point 18 of the decision) that the filed CTM *"exploits the reputation and history [of the old trademark] by intentionally creating links with the earlier mark"* and because the use of the trademark (in the website of the usurper) *"creates the impression of the Italian origin ... although the respondent is a Spanish company"*, so that the Board of Appeal concluded that the CTM was filed *"solely in order to benefit from the repute of the name 'AERMACCHI', which can be considered as dishonest commercial behavior in the light of article 52(1)(b)CTMR"*.

Again, in point 25 of the same decision, the Board of Appeal stated that *"in legal terms, bad faith is tantamount to manifestly dishonest business intentions and comprises situations where reputed trade marks of third parties were filed with which the filer has no connection"*.

Reference of the plaintiff "lambrettasrl263"

Finally the Board – in point 25 of the decision - maintained that – unless it happens in cases in which the plaintiff seeks protection under art. 8 CTMR – in cases of bad faith (according to art. 52.1.b CTMR) the plaintiff shall not give evidence of the high reputation of the former trademark, but shall give evidence of the *"subjective intention of the filer"*, which *"can be inferred from circumstances that the filer deliberately chose a mark on account of its reputation or attractive force"*.

Among the relevant circumstances that could demonstrate that the filer of the mark was in bad faith, the Board of Appeal expressly mentioned:

"the way the respondent presented himself and the mark on the website",

"the filing of at least one other mark in like circumstances",

"the clear impression the respondent sought to give that is connected to the airplane field" (which was the field in which the trademark was remembered and still reputed by the EU public).

MOTOM believes that when the OHIM will apply those legal principles to the present case, this will imply almost automatically the demonstration of the bad faith of the filer of "Lambretta" CTM n. 7.502.263 with regards to all the products claimed by the applicant.

For these reasons CTM trademark n. 7.502.263 shall be declared invalid also according to Article 52(1)(b), with regards to all the products claimed therein.

* * *

LIST OF DOCUMENTS

A – copy of the order of wire transfer for the application tax;

1. extract from "Wikipedia" website on "Lambretta";
2. extract from SIL website;
3. list of historical Lambretta models of Innocenti and SIL;
4. list of Italian Lambretta fan Clubs (in Italian) extracted from Lombardy Lambretta Club webpage;
5. list of international Lambretta fan Clubs extracted from the website "illambretta.com";
6. first page of the website of the German Lambretta fan Club;
7. first page of the website of the French Lambretta fan Club
8. first page of the website of the Great Britain Lambretta fan Club
9. first page of the website of the Spanish Lambretta fan Club

Reference of the plaintiff "lambrettasrl263"

10. first page of the website of the Scottish Lambretta fan Club
11. first page of the website of the Irish Lambretta fan Club
12. first page of the website of the Belgian Lambretta fan Club
13. first page of the website of the Netherland Lambretta fan Club
14. first page of the website of the Portuguese Lambretta fan Club
15. first page of the website of the Austrian Lambretta fan Club
16. first page of the website of the Greek Lambretta fan Club
17. first page of the website of the Polish Lambretta fan Club
18. first page of the website of the Swiss Lambretta fan Club
19. page on "Lambretta Museum" extracted from the Official website Milan Tourism;
20. first page of the website of the UK Lambretta Museum;
21. book review on "Innocenti Lambretta – the definitive history";
22. webpage for the online sale of the book "The Lambretta Bible";
23. amazon webpage for the online sale of the book "Service & repair – Lambretta scooters";
24. ebay page on lambretta vintage plaques and wallpapers;
25. amazon webpage for the online sale of the 2014 calendar "Lambretta Innocenti";
26. ebay page on Innocenti Lambretta spareparts sold on the internet;
27. google results for the search "lambretta spare parts uk";
28. google results for the search "Lambretta rechange" (spare part in French);
29. google results for the search "Lambretta recambios" (spare parts in Spanish);
30. google results for the search "Lambretta Ersatzteile" (spare parts in German);
31. google results for the search "pezzi ricambi Lambretta" (spare parts in Italian);
32. extract from the website "Den of the Lambretta";
33. extract from website "carandclassic.co.uk";
34. google results for the search "Lambretta Europe vintage retailers";
35. google image results for the search "Lambretta t-shirts";
36. google image results for the search "Lambretta Clothing";
37. list of SIL lambretta trademarks;
38. copy of SIL's "Lambretta" CTM 1.495.100;
39. copy of SIL's "Lambretta" CTM n. 1.618.982;
40. copy of SIL/FWL license agreement (September 2006);
41. extract from website "Scheffrahn.com";
42. copy of Branconcern/Motom license agreement (November 2007);
43. copy of FWL/Motom settlement agreement (December 2008);

Reference of the plaintiff "lambrettasrl263"

44. copy of FWL/Motom license agreement (October 2009);
45. copy of LSL/Motom license agreement (March 2010);
46. copy of FWL/LSL license agreement (March 2010);
47. CTM n. 5.991.559;
48. CTM n. 7.502.263;
49. Decision of the OHIM Cancellation Division 24 September 2010 (OHIM ref. 2460 C);
50. Decision fo the OHIM Cancellation Division 24 September 2010 (OHIM ref. 2555 C);
51. deed of confirmation of assignment between FWL and Lambretta S.r.l. dated 15 October 2010;
52. CTM n. 8.718.405;
53. CTM n. 6.510.291;
54. CTM n. 6.509.822;
55. withdrawal of opposition n. B001518896 dated 26 October 2010;
56. withdrawal of opposition n. B0001319435 dated 26 october 2010;
57. FWL letter to SIL dated 29 October 2010;
58. FWL letter to SIL dated 13 May 2011;
59. Indian affidavit deed concerning the notice of resolution served by SIL on FWL for the termination of the license agreement of 2006;
60. FWL letter to the lawyer of SIL dated 15 April 2012;
61. SIL's Lawyer letter to FWL dated 8 June 2012;
62. copy of the writ of summons served by SIL on FWL and dated 16 April 2012;
63. copy of the power of attorney of FWL (signed by Mr. Scheffrahn) in the Indian Lawsuit against SIL;
64. withdrawal of opposition n. B001364375 dated 26 October 2010;
65. withdrawal of opposition n. B001651028 dated 26 October 2010;
66. CTM n. 6.464.291;
67. CTM n. 5.849.071;
68. extract from Romarin on WIPO mark n. 977.372;
69. extract from Romarin on WIPO mark n. 936.595;
70. extract from Romarin on WIPO mark n. 900.047;
71. OHIM notification of the change of ownership dated 30 May 2011;
72. OHIM notification of the change of representative dated 23 June 2011;
73. OHIM appeal decision in case 2312/2010-1 dated 1 December 2011;
74. OHIM appeal decision in case 2308/2010-1 dated 12 January 2012;

Reference of the plaintiff "lambretta srl263"

- 75. EU Court of first instance notification of Chamber re-assignment in the proceedings T 132/12-46 between SIL and Brandconcern;
- 76. EU Court of first instance notification of Chamber re-assignment in the proceedings T 51/12-84 between SIL and Brandconcern;
- 77. Extract from the website "lambretta.com";
- 78. License agreement dated 18 June 2014 SIL/Motom;
- 79. CTM n. 9.648.791;
- 80. CTM n. 6.114.136;
- 81. CTM 7.502.181;
- 82. Decision of the OHIM Board of Appeal dated 25 february 2013 in case R 2448/2010-4 ("Aermacchi").

LIST OF DOCUMENTS

A – copy of the order of wire transfer for the application tax;

1. extract from "Wikipedia" website on "Lambretta";
2. extract from SIL website;
3. list of historical Lambretta models of Innocenti and SIL;
4. list of Italian Lambretta fan Clubs (in Italian) extracted from Lombardy Lambretta Club webpage;
5. list of international Lambretta fan Clubs extracted from the website "illambretta.com";
6. first page of the website of the German Lambretta fan Club;
7. first page of the website of the French Lambretta fan Club
8. first page of the website of the Great Britain Lambretta fan Club
9. first page of the website of the Spanish Lambretta fan Club
10. first page of the website of the Scottish Lambretta fan Club
11. first page of the website of the Irish Lambretta fan Club
12. first page of the website of the Belgian Lambretta fan Club
13. first page of the website of the Netherland Lambretta fan Club
14. first page of the website of the Portuguese Lambretta fan Club
15. first page of the website of the Austrian Lambretta fan Club
16. first page of the website of the Greek Lambretta fan Club
17. first page of the website of the Polish Lambretta fan Club
18. first page of the website of the Swiss Lambretta fan Club
19. page on "Lambretta Museum" extracted from the Official website Milan Tourism;
20. first page of the website of the UK Lambretta Museum;
21. book review on "Innocenti Lambretta – the definitive history";
22. webpage for the online sale of the book "The Lambretta Bible";
23. amazon webpage for the online sale of the book "Service & repair – Lambretta scooters";
24. ebay page on lambretta vintage plaques and wallpapers;
25. amazon webpage for the online sale of the 2014 calendar "Lambretta Innocenti";
26. ebay page on Innocenti Lambretta spareparts sold on the internet;
27. google results for the search "lambretta spare parts uk";
28. google results for the search "Lambretta rechange" (spare part in French);
29. google results for the search "Lambretta recambios" (spare parts in Spanish);
30. google results for the search "Lambretta Ersatzteile" (spare parts in German);

31. google results for the search "pezzi ricambi Lambretta" (spare parts in Italian);
32. extract from the website "Den of the Lambretta";
33. extract from website "carandclassic.co.uk";
34. google results for the search "Lambretta Europe vintage retailers";
35. google image results for the search "Lambretta t-shirts";
36. google image results for the search "Lambretta Clothing";
37. list of SIL lambretta trademarks;
38. copy of SIL's "Lambretta" CTM 1.495.100;
39. copy of SIL's "Lambretta" CTM n. 1.618.982;
40. copy of SIL/FWL license agreement (September 2006);
41. extract from website "Scheffrahn.com";
42. copy of Branconcern/Motom license agreement (November 2007);
43. copy of FWL/Motom settlement agreement (December 2008);
44. copy of FWL/Motom license agreement (October 2009);
45. copy of LSL/Motom license agreement (March 2010);
46. copy of FWL/LSL license agreement (March 2010);
47. CTM n. 5.991.559;
48. CTM n. 7.502.263;
49. Decision of the OHIM Cancellation Division 24 September 2010 (OHIM ref. 2460 C);
50. Decision of the OHIM Cancellation Division 24 September 2010 (OHIM ref. 2555 C);
51. deed of confirmation of assignment between FWL and Lambretta S.r.l. dated 15 October 2010;
52. CTM n. 8.718.405;
53. CTM n. 6.510.291;
54. CTM n. 6.509.822;
55. withdrawal of opposition n. B001518896 dated 26 October 2010;
56. withdrawal of opposition n. B0001319435 dated 26 October 2010;
57. FWL letter to SIL dated 29 October 2010;
58. FWL letter to SIL dated 13 May 2011;
59. Indian affidavit deed concerning the notice of resolution served by SIL on FWL for the termination of the license agreement of 2006;
60. FWL letter to the lawyer of SIL dated 15 April 2012;
61. SIL's Lawyer letter to FWL dated 8 June 2012;
62. copy of the writ of summons served by SIL on FWL and dated 16 April 2012;
63. copy of the power of attorney of FWL (signed by Mr. Scheffrahn) in the Indian Lawsuit against SIL;
64. withdrawal of opposition n. B001364375 dated 26 October 2010;

65. withdrawal of opposition n. B001651028 dated 26 October 2010;
66. CTM n. 6.464.291;
67. CTM n. 5.849.071;
68. extract from Romarin on WIPO mark n. 977.372;
69. extract from Romarin on WIPO mark n. 936.595;
70. extract from Romarin on WIPO mark n. 900.047;
71. OHIM notification of the change of ownership dated 30 May 2011;
72. OHIM notification of the change of representative dated 23 June 2011;
73. OHIM appeal decision in case 2312/2010-1 dated 1 December 2011;
74. OHIM appeal decision in case 2308/2010-1 dated 12 January 2012;
75. EU Court of first instance notification of Chamber re-assignment in the proceedings T 132/12-46 between SIL and Brandconcern;
76. EU Court of first instance notification of Chamber re-assignment in the proceedings T 51/12-84 between SIL and Brandconcern;
77. Extract from the website "lambretta.com";
78. License agreement dated 18 June 2014 SIL/Motom;
79. CTM n. 9.648.791;
80. CTM n. 6.114.136;
81. CTM 7.502.181;
82. Decision of the OHIM Board of Appeal dated 25 february 2013 in case R 2448/2010-4 ("Aermacchi").

**BONIFICO SEPA**

CRO/TRN 1101142090222291

Esito BONIFICO SEPA DI EUR 700,00 INVIATO A FAVORE DI UAMI-UFFICIO PER L'ARMONIZZAZIONE NEL MERCATO

ORDINANTE

Denominazione STUDIO AVVOCATO SPOLIDORO ASSOCI AZIONE PROFESSIONALE

Indirizzo VIA FRANCESCO DAVERIO, 6 Città MILANO

Provincia MI Rif. Cliente

Conto corrente di addebito 00218 00000100309179

Ordinante effettivo MOTOM ELECTRONICS GROUP SPA Riferimento 390068

BENEFICIARIO

Denominazione UAMI-UFFICIO PER L'ARMONIZZAZIONE NEL MERCATO INTERNO

Indirizzo AVENIDA DE EUROPA 4 Città ALICANTE

Cod. BIC/SWIFT BBVAESMMXXX Paese ES

Codice IBAN ES8801825596900092222222

Beneficiario effettivo Riferimento

DATI OPERAZIONE

Importo 700,00 Divisa EUR

Commissioni 1.13

Motivazione 'SHA' INVALIDITY APPLICATION FEE APPLICANT REF. LAMBRETTASRL263-APPLICANT ID NUMBER 390068

Data esecuzione 28.07.2014

Scopo pagamento CTM INVALIDITY FEE Categoria pagamento

Tipo bonifico SEPA

Si rimanda alla sezione Documenti OnLine> Archivio documenti, per la consultazione dei documenti relativi alla tipologia Bonifico Sepa.