



February 14, 2012

To whom it may concern

Subject: FIRBIMATIC dry cleaning machines

Please find below the correlation between basic list models (F.M.B.) and the models concerning the brand **FIRBIMATIC**;

The same correlation table is included in the Intertek listing report NO. I0412020.

| FIRBIMATIC | | Capacity (Lbs.) | F.M.B. |
|-----------------|----------------------|--------------------|------------|
| SAVER 35P | may be followed by K | 35 | HC7-15-CS |
| SAVER 350P | may be followed by K | 35 | HC7-15-CS |
| SAVER 35 | may be followed by K | 35 | HC7-15-CL |
| SAVER 350 | may be followed by K | 35 | HC7-15-CL |
| ECO AS 15 ST2 | may be followed by K | 35 | HC8-15-CS |
| F AS 15 ST2 | may be followed by K | 35 | HC8-15-CS |
| ECO AS 15 LT3 | may be followed by K | 35 | HC8-15-CL |
| F AS 15 LT3 | may be followed by K | 35 | HC8-15-CL |
| | | | |
| SAVER 40P | may be followed by K | 40 | HC7-18-CS |
| F AS 18 ST2 | may be followed by K | 40 | HC7-18-CS |
| SAVER 40 | may be followed by K | 40 | HC7-18-CL |
| F AS 18 LT2/LT3 | may be followed by K | 40 | HC7-18-CL |
| ECOPRO AM918 | may be followed by K | 40 | HC7-18-CLM |
| S2118 | may be followed by K | 40 | HC8-18-CS |
| L2118 | may be followed by K | 40 | HC8-18-CL |
| AM2118 | may be followed by K | 40 | HC8-18-CLM |
| | | | |
| SAVER 50P | may be followed by K | 50 | HC7-20-CS |
| F AS 20 ST2 | may be followed by K | 50 | HC7-20-CS |
| SAVER 50 | may be followed by K | 50 | HC7-20-CL |
| F AS 20 LT2/LT3 | may be followed by K | 50 | HC7-20-CL |
| S2120 | may be followed by K | 50 | HC8-20-CS |
| L2120 | may be followed by K | 50 | HC8-20-CL |
| | | | |
| SAVER 60P | may be followed by K | 60 | HC7-25-CS |
| F AS 25 ST2 | may be followed by K | 60 | HC7-25-CS |
| SAVER 60 | may be followed by K | 60 | HC7-25-CL |
| F AS 25 LT2/LT3 | may be followed by K | 60 | HC7-25-CL |
| ECOPRO AM925 | may be followed by K | 60 | HC7-25-CLM |
| S2125 | may be followed by K | 60 | HC8-25-CS |
| L2125 | may be followed by K | 60 | HC8-25-CL |
| AM2125 | may be followed by K | 60 | HC8-25-CLM |



| FIRBIMATIC | | Capacity (Lbs.) | F.M.B. |
|-----------------|----------------------|--------------------|------------|
| SAVER 80P | may be followed by K | 80 | HC7-32-CS |
| F AS 32 ST2 | may be followed by K | 80 | HC7-32-CS |
| SAVER 80 | may be followed by K | 80 | HC7-32-CL |
| F AS 32 LT2/LT3 | may be followed by K | 80 | HC7-32-CL |
| S2132 | may be followed by K | 80 | HC8-32-CS |
| L2132 | may be followed by K | 80 | HC8-32-CL |
| | | | |
| SAVER 90P | may be followed by K | 90 | HC7-40-CS |
| F AS 40 ST2 | may be followed by K | 90 | HC7-40-CS |
| SAVER 90 | may be followed by K | 90 | HC7-40-CL |
| F AS 40 LT2/LT3 | may be followed by K | 90 | HC7-40-CL |
| ECOPRO AM940 | may be followed by K | 90 | HC7-40-CLM |
| S2140 | may be followed by K | 90 | HC8-40-CS |
| L2140 | may be followed by K | 90 | HC8-40-CL |
| AM2140 | may be followed by K | 90 | HC8-40-CLM |
| | | | |
| S2120 TRIO | may be followed by K | 50 | TR8-20-CS |

Please contact us if you have any questions or require further information.

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EXHIBIT 22

FMB Group Derivative Model Scheme & Technical Renaming of Corbett-Authored Machines

Submitted by: James Corbett – Corbett Equipment

Dated: May 16, 2025

I. Executive Summary

This exhibit demonstrates that Corbett Equipment was the original author and U.S. distributor of FIRBIMATIC-branded machines later **rebranded by FMB Group and affiliates** through derivative naming schemes that **concealed their true origin**. Using factory base model numbers, FMB Group issued identical machines under FIRBIMATIC, UNION, REALSTAR, and SOVRANA brands — all without Corbett's consent, falsely implying independent engineering and authorship.

II. Timeline of Certificates and Rebranding Events

- **April 20, 2004:** Intertek certificate identifies FIRBIMATIC S.p.A. and FMB Group at the same factory location in Sala Bolognese, Italy. All base models originate here.
- **February 8, 2012:** Intertek reissues a certificate listing the exact same model numbers under four brand names: FIRBIMATIC, UNION, REALSTAR, and SOVRANA — all under FMB S.p.A.
- **The Attachment to the 2012 certificate** shows clearly that these are not new machines. They are simply **derivatives renamed** from earlier listings marketed by Corbett Equipment.

III. Technical and Legal Significance

- The machine designs, model capacities, and configurations **match exactly** those originally described and sold on CorbettEquipment.com
- **Model rebranding** (e.g., ECOGREEN™ → EcoPro, AXIAL™ → F-Series, etc.) demonstrates intentional **trademark and identity confusion**
- **Corbett-authored product descriptions and technical model naming systems** were directly lifted and reapplied under altered names
- Haiges Machinery and FMB Group then distributed these renamed models under false pretenses, **severing the market connection** between Corbett and the technology he developed

IV. Direct Evidence of Fraud and Derivative Behavior

III. Model-by-Model Derivative Renaming Analysis

Each row below outlines a *single act of derivative rebranding*—where Corbett's original model was stripped of its name and reissued under Haiges's misappropriated designation

| FMB Model (Base) | Original Corbett Model (2004) | Renamed Haiges Model (2012) |
|-------------------------|--------------------------------------|---|
| HC7-15-CS | ECOPRO 915S/35 | SAVER 35P / SAVER 350P |
| HC7-15-CL | ECOPRO 915/35 | SAVER 35 / SAVER 350 |
| HC7-18-CS | ECOPRO 918S/40 | SAVER 40P / F AS 18 ST2 |
| HC7-18-CL | ECOPRO 918/40 | SAVER 40 / F AS 18 LT2/LT3 |
| HC7-18-CLM | ECOPRO AM918/40 | <i>(No corresponding listing found)</i> |
| HC8-18-CS | S2118 | S2118 |
| HC8-18-CL | L2118 | L2118 |
| HC8-18-CLM | AM2118 | AM2118 |
| HC7-20-CL | ECOPRO 920/50 | SAVER 50 / F AS 20 LT2/LT3 |
| HC8-20-CS | S2120 | S2120 |
| HC8-20-CL | L2120 | L2120 |
| HC7-25-CL | ECOPRO 925/60 | SAVER 60 / F AS 25 LT2/LT3 |
| HC7-25-CLM | ECOPRO AM925/60 | AM2125 |
| HC8-25-CS | S2125 | S2125 |
| HC8-25-CL | L2125 | L2125 |
| HC8-25-CLM | AM2125 | AM2125 |
| HC7-32-CL | ECOPRO 932/80 | SAVER 80 / F AS 32 LT2/LT3 |
| HC8-32-CL | L2132 | L2132 |
| HC7-40-CL | ECOPRO 940/95 | SAVER 90 / F AS 40 LT2/LT3 |
| HC7-40-CLM | ECOPRO AM940/95 | AM2140 |
| HC8-40-CL | L2140 | L2140 |
| HC8-40-CLM | AM2140 | AM2140 |

IV. Legal Interpretation

Each of these examples shows

- **Identical technical lineage (FMB base model)**
- **Unchanged engineering and configuration**
- **Only the name and sales attribution were altered**

This deliberate "model laundering" is consistent with

- **Willful copyright infringement (17 U.S.C. § 504(c)(2))**

- 1 **Base model numbers on the 2004 certificate are used again in 2012.**
- 2 **No material design changes are indicated — only brand label alterations**
- 3 **The derivative naming practice began after Corbett was unlawfully removed**
- 4 **Customer-facing names changed to avoid referencing Corbett-developed machines**
- 5 **Products were positioned in the market as if newly engineered by Haiges or FMB — in reality, they were Corbett's machines, renamed**

V. Legal Claims Supported

- **False designation of origin** – 15 U.S.C. § 1125(a)
- **Common law trademark infringement** – including Corbett's unregistered marks like EcoGreen™, Axial™, Smart 10™, Vortex™, HydroVac™, and SecureLock™
- **Copyright infringement** – content lifted from Corbett's site
- **Constructive fraud** – via concealment of true origin and authorship
- **Market sabotage and interference** – rebranded products cut Corbett out of the chain

Attachment: EXHIBIT 22-A Derivative Model Comparison Table

Conclusion

FMB Group and Haiges Machinery knowingly reused and redistributed Corbett-authored designs, descriptions, and model systems, issuing them under new names and claiming technical innovation they never developed. This is one of the most direct examples of derivative theft and should be added to support your motions for

- Declaratory relief
- Asset freeze
- Trademark and copyright enforcement
- Damages under 17 U.S.C. § 504(c)(2) and 15 U.S.C. § 1125(a)