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8 Attorneys for Plaintiff Henrik Fisker

9
 10 **UNITED STATES DISTRICT COURT**
 11 **CENTRAL DISTRICT OF CALIFORNIA**

12
 13 HENRIK FISKER, an individual,

14
 15 Plaintiff,

16 vs.

17
 18 ASTON MARTIN LAGONDA
 19 LIMITED, a United Kingdom
 20 corporation; ASTON MARTIN
 21 LAGONDA OF NORTH AMERICA,
 22 INC., a Connecticut corporation;
 23 ANDY PALMER, an individual;
 SIMON SPROULE, an individual;
 MAREK REICHMAN, an individual;
 and DOES 1 to 25, inclusive,

24
 25 Defendants.
 26
 27
 28

Case No.

COMPLAINT FOR:

- 1. **CIVIL EXTORTION**
- 2. **DECLARATORY RELIEF**

[JURY TRIAL DEMANDED]

1 **JURISDICTION AND VENUE**

2
3 **A. Subject Matter Jurisdiction.**

4
5 1. The Court has jurisdiction over the subject matter presented by this
6 Complaint because it involves a determination of federal trademark rights, and a
7 declaration by the Court under the Declaratory Judgment Act, 28 USC § 2201.
8

9 **B. Parties and Personal Jurisdiction.**

10
11 2. Plaintiff Henrik Fisker is a California resident, giving the Court
12 personal jurisdiction over him.
13

14 3. Defendant Aston Martin Lagonda Limited is a United Kingdom
15 corporation, with its principle place of business in the United Kingdom. The
16 Court has personal jurisdiction over Aston Martin Lagonda Limited, because it
17 engages in significant business throughout the State of California, providing
18 California with general jurisdiction.
19

20 4. Defendant Aston Martin Lagonda of North America, Inc. is a
21 Connecticut corporation, with its principle place of business in Irvine, California.
22 The Court has personal jurisdiction over Aston Martin Lagonda of North America,
23 Inc., because it engages in significant business throughout the State of California,
24 providing California with general jurisdiction.
25

26 5. Defendant Andy Palmer is an individual who is the Global CEO of
27 Aston Martin Lagonda Limited, and is believed to reside in the United Kingdom.
28 The Court has personal jurisdiction over Andy Palme because he regularly visits

1 California, as Global CEO of Aston Martin Lagonda Limited. Since California is
2 one of the biggest markets for Aston Martin, and Aston Martin Lagonda of North
3 America, Inc. is based in California, Palmer regularly travels here for work.
4 Moreover, Palmer visits California to attend car shows, customer events and
5 dealer meetings.

6
7 6. Defendant Simon Sproule is an individual who is the Director of
8 Global Marketing Communications of Aston Martin Lagonda Limited, and is
9 believed to reside in the United Kingdom. The Court has personal jurisdiction
10 over Simon Sproule because he regularly visits California, as Director of Global
11 Marketing Communications of Aston Martin Lagonda Limited. Since California
12 is one of the biggest markets for Aston Martin, and Aston Martin Lagonda of
13 North America, Inc. is based in California, Sproule regularly travels here for
14 work. Moreover, Sproule visits California to attend car shows, customer events,
15 and dealer meetings.

16
17 7. Defendant Marek Reichman is an individual who is the Chief
18 Creative Officer and Design Director of Aston Martin Lagonda Limited, and is
19 believed to reside in the United Kingdom. The Court has personal jurisdiction
20 over Marek Reichman because he regularly visits California, as Chief Creative
21 Officer and Design Director of Aston Martin Lagonda Limited. Since California
22 is one of the biggest markets for Aston Martin, and Aston Martin Lagonda of
23 North America, Inc. is based in California, Reichman regularly travels here for
24 work. Moreover, Reichman visits California to attend car shows, customer
25 events, and dealer meetings.

1 the company hired world-renowned vehicle designer Plaintiff Henrik Fisker to
2 revamp the company's vehicle lineup. Fisker had previously held the position of
3 President of BMW Designworks, BMW's North America Design and
4 Development Center. Fisker gained fame in the automotive industry when he
5 designed the BMW Z8, one of BMW's most critically acclaimed vehicles and the
6 car featured in the James Bond movie "The World Is Not Enough." To entice
7 Fisker to join the company, Aston Martin named Fisker Director of Design and
8 gave him a seat on the company's board of directors in the United Kingdom.
9

10 12. While at Aston Martin, Fisker designed the Aston Martin V8
11 Vantage, and was responsible for the production launch design of the Aston
12 Martin DB9. The cars, which were put into production in 2005 and 2006,
13 respectively, were largely responsible for saving the company and reestablishing
14 market relevance. By 2006 (when both cars were in production), Aston Martin's
15 annual global sales had grown to 7,052 – a 1,663 percent increase over the
16 stagnated 400 units per year in the mid-1990s. By 2007, the company's annual
17 global sales reached 7,393 vehicles.
18

19 13. After his design work on the V8 Vantage and the DB9, Fisker left
20 Aston Martin to pursue his own entrepreneurial projects. In the late 2000s, he
21 launched Fisker Automotive, one of the world's first companies to manufacture
22 alternative fuel vehicles. While captaining Fisker Automotive, he raised over a
23 billion dollars for the company and designed the Fisker Karma, an innovative car
24 that won numerous awards, including Time Magazine's "The 50 Best Inventions
25 of 2011." A Fisker Karma vehicle is housed in the world-famous Peterson
26 Automotive Museum, as a display of the vehicle's innovativeness. In 2013,
27 Fisker resigned from Fisker Automotive, as the company experienced internal
28

1 stress when its sole battery supplier, A123, filed for bankruptcy, leaving the
2 company without an ability to produce its cars.

3
4 14. Henrik Fisker is now engaged in a variety of automotive projects in
5 the United States that leverage his ability to design world-class cars, as well as run
6 a billion-dollar company. The focus of Fisker's new projects has been on high-
7 performance luxury sports cars that cater to a celebrated clientele.

8
9 15. Having witnessed firsthand Fisker's ability to grow a sports car
10 brand, Aston Martin is greatly threatened by Fisker's return to the sports car
11 market. Aston Martin is keenly aware that, as a public figure with a large
12 following of elite automobile purchasers, Fisker has the ability to sway
13 purchasers, including potential purchasers of Aston Martin vehicles, to any sports
14 car he is involved in designing and marketing. Aston Martin's concern is
15 exacerbated by the fact that since Fisker left Aston Martin, the company has failed
16 to introduce new products that have garnered anywhere near the same level of
17 attention the V8 Vantage and the DB9 did a decade ago. In fact, the V8 Vantage
18 designed by Fisker remains the company's best selling vehicle. Yet, because the
19 company has failed to introduce new and exciting products, Aston Martin's sales
20 are again falling precipitously; in 2014 the company sold 3,661 vehicles globally
21 – a 50 percent decline from the company's high water mark of 2007.

22
23
24 16. What is worse, Aston Martin's decline in sales continued – indeed,
25 accelerated – as the global economy recovered from the Great Recession. From
26 2008 (the height of the recession) to 2014 (the last full year of sales reporting), the
27 United States market saw a 25% increase in vehicle sales. In that same time
28 period, and without having Fisker at its side, Aston Martin's sales *decreased* 44

1 percent. Referring to Porsche for comparison again, from 2008 to 2014 the
2 German automaker saw an 81 percent increase in sales.

3
4 17. Aston Martin's spiraling vehicles sales have led to severe financial
5 stress. As the *Financial Times* reported in October 2015, "The Warwickshire
6 manufacturer posted a pre-tax loss of £72m [\$106 million] for 2014, almost triple
7 the £25m [\$37 million] deficit the year before." According to *Reuters*, 2014 was
8 "the fourth consecutive year [Aston Martin] has failed to post a profit," a rather
9 astonishing fact given that the luxury sports car market is currently exploding. As
10 the *Financial Times* aptly noted, "Aston's well-documented decline has come
11 despite a boom in global luxury car sales."

12
13
14 18. Sales figures for 2015 are not yet available, but signs indicate that the
15 company continues to experience significant losses. *The Telegraph* reported in
16 October 2015 that "Aston Martin is planning to cut almost 300 jobs [14 percent of
17 the company's workforce] as losses at its parent company more than doubled."
18 The *Financial Times* stated that the privately-held company has debts in excess of
19 \$600 million, and is financing its losses through "additional investment from
20 shareholders." All of this was followed by a "deteriorate" credit rating in
21 November 2015 by the well-respected Societe Generale Private Bank. As Societe
22 Generale stated, "We maintain a DETERIORATE rating view on [Aston Martin]
23 following its poor 9M15 results ... We maintain our view that the company's
24 huge capex program (~GBP 500mn during 2013–17) will result in cash burn and
25 further worsen leverage metrics in the near-to-medium term."

1 19. Further denigrating its market relevance, Aston Martin prides itself as
2 being uniquely British. However, the company's fall into financial ruin has all but
3 stripped the United Kingdom of any meaningful ownership in the company. As
4 reported by Societe Generale, Aston Martin is owned 47 percent by the Kuwait-
5 based investment firm Dar Company, and 37.5 percent by the Italy-based private
6 equity fund Investindustrial.

7
8 20. In an effort to protect itself from further market erosion, Aston
9 Martin and the three individuals responsible for running it – Defendants Andy
10 Palmer (Global CEO), Simon Sproule (Director of Global Marketing
11 Communications) and Marek Reichman (Chief Creative Officer and Design
12 Director) – have conspired and devised a scheme to stomp out Henrik Fisker's
13 competitive presence in the luxury sports car industry.
14

15
16 21. Over the past year, Aston Martin has sent Fisker threatening letters,
17 and its executives have made disparaging comments in the press, all in an effort to
18 shun him from the industry. Many journalists noted that Aston Martin's action
19 have jeopardized Henrik Fisker's resurgence to the luxury sports car industry. As
20 Automotive News, the leading automotive industry paper, commented, "Aston
21 Martin has put the brakes on Henrik Fisker's return to the auto industry."
22

23 22. Henrik Fisker has now designed a new American sports car, branded
24 the Force 1, that is being launched at the January 2016 Detroit Auto Show. The
25 Detroit Auto Show is the largest automotive show in the world, setting forth the
26 tone for the coming year's car sales. In December 2015, Fisker introduced a
27 single top view "teaser" sketch of the vehicle, a copy of which attached hereto as
28

1 Exhibit A, and invited the media to attend the vehicle's launch. The response to
2 the Force 1 has been spectacular, receiving attention from over 50 media outlets.
3 As UK's *Daily Mail* stated, the Force 1 is one of the "nine cars ... to look out for
4 at the Detroit motor show in January."

5
6 23. Aston Martin, with its aging product line and inability to finance and
7 produce new and exciting vehicles, is extremely threatened by the reception the
8 Force 1 has received. Positioned as an American supercar with 745 horsepower
9 and a sales price of just under \$300,000, the Force 1 is a direct competitor of
10 many Aston Martin products.
11

12
13 24. Unable to respond competitively in the marketplace, on December
14 23, 2015, just two days before Christmas, Aston Martin sent Fisker a letter
15 demanding that he not launch the Force 1 vehicle at the Detroit Auto Show, or
16 make design changes to the vehicle before its launch. Aston Martin made the
17 demand under the threat of suing him if he failed to comply with Aston Martin's
18 outrageous demands. A copy of Aston Martin's December 23, 2015 letter is
19 attached as Exhibit B.
20

21 25. Based *solely* on the teaser top view sketch [Ex. A], Aston Martin is
22 claiming that the Force 1 is too similar to the Aston Martin DB10, a car that it
23 made for the recent James Bond movie, but will not be producing. However, the
24 company is aware that its claim is pure nonsense, as it admits in its letter, "We do
25 not know what the final version of Fisker's Force 1 will look like." [Ex. B]. The
26 truth is that Aston Martin and the three individuals who run it (Defendants Andy
27 Palmer, Simon Sproule and Marek Reichman) are so concerned that Fisker will be
28

1 competing with them in the marketplace, they are attempting to extort him into
2 submission.

3
4 26. As will be displayed at the Detroit Auto Show, the Force 1 is *not*
5 based on an Aston Martin chassis, is *not* in any way connected to Aston Martin,
6 and is completely *distinct* from any Aston Martin vehicle that has ever been made,
7 including the DB10. As reflected in Exhibit C, the Force 1 has a round wind
8 screen, the DB10 has a flatter wind screen; the Force 1 has a square roof with
9 parallel lines, the DB10 has a tapered roof that narrows toward the rear; the Force
10 1 has a long rear, the DB10 has a short rear; and the Force 1 has a Z side line, the
11 DB10 has a straight side line.
12

13
14 27. In fact, there are several automakers that produce cars similar to
15 Aston Martins, but like the Force 1, are distinct in their application. As shown in
16 Exhibit D, the Chevrolet Corvette and the Jaguar F-Type both have front engine
17 proportions with long hood and pushed out wheels, and both bear a resemblance
18 to the Aston Martin, but are separate and distinct vehicles, with their own specific
19 trade dress. The design elements of the Aston Martin, the Corvette, the F-Type
20 and the Force 1 are the cornerstone of front engine sports car design, dating back
21 to the golden era of the 1960s. Aston Martin does not own the market for luxury
22 sports cars, or traditional front engine sports car proportions.
23

24 28. Nevertheless, Aston Martin and Defendants Andy Palmer, Simon
25 Sproule and Marek Reichman, the three individuals who for all intents and
26 purposes run the company, are attempting to extort Fisker out of the industry,
27 threatening to declare to the world that he is infringing on its trademarks and
28

1 “stealing” the company’s designs – a claim that they know is without merit, as
2 they admit they have no idea what the car will look like. [Ex. B]. These extortion
3 tactics threaten to inflict extreme and irreparable damage on the individual who
4 made car design fashionable. Fisker has built his credibility on his design skills,
5 being referred to repeatedly in the press as a “world renowned designer.” Such a
6 baseless claim by Aston Martin would subject him to public humiliation,
7 embarrassment in the industry and significant financial losses. It would also leave
8 scores of skilled American workers who are currently slotted to build the Force 1
9 vehicles unemployed. However, the Defendants are unconcerned with the
10 consequences of their actions, so long as it silences the famed designer. Saddled
11 with a company that is teetering on the brink of insolvency, Andy Palmer, Simon
12 Sproule and Marek Reichman are desperate to stomp out Fisker as a legitimate
13 competitor, at all costs.
14

15
16 29. Aston Martin and Defendants Palmer, Sproule and Reichman are
17 well-aware of how important the Detroit Auto Show is to the industry and to a
18 prospective car’s launch. They are also keenly aware that extorting Fisker and
19 forcing him to pull out of the show would effectively kill the car, as well as his
20 reputation. The goal of the Defendants is to gain market share for Aston Martin,
21 and to quell competition from the person who revived the company a decade ago.
22

23 30. As a result of the Defendants’ improper and tortious attempt to
24 exclude Henrik Fisker from the luxury sports car industry, Henrik Fisker has been
25 damaged in excess of \$100 million.
26
27
28

COUNT ONE

CIVIL EXTORTION

(By Plaintiff Against all Defendants)

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4
5 31. Plaintiff repeats every allegation contained in the paragraphs above
6 and incorporates such allegations herein by reference.

7
8 32. Defendants Aston Martin Lagonda Limited, Aston Martin Lagonda
9 of North America, Inc., Andy Palmer, Simon Sproule and Marek Reichman are
10 engaged in an active plan to extort Plaintiff Henrik Fisker, and to eliminate him as
11 a competitor in the luxury sports car industry.

12
13 33. As reflected in the December 23, 2015 letter [Ex. B], the Defendants
14 are demanding that the Plaintiff not launch the Force 1 vehicle at the 2016 Detroit
15 Auto Show, or make design changes to the vehicle prior to its launch.

16
17 34. The Defendants are employing the wrongful use of force or fear to
18 achieve their goals. They are making their demand under the threat of subjecting
19 the Plaintiff to vexatious litigation, public humiliation, embarrassment in the
20 industry and significant financial losses.

21
22 35. The Defendants are aware that their demand has no basis in fact or
23 law, as it is based solely on a single top view “teaser” sketch of the vehicle that
24 was given to the media, and they admit that they have no idea what the Force 1
25 vehicle will look like. [Ex. B].
26
27
28

1
2 42. The Plaintiff contends that the design of the Force 1 does not violate
3 any of Aston Martin's trademarks, and that he has the right to manufacture,
4 market and sell the Force 1 vehicle free of disturbance from any of the
5 Defendants.

6
7 43. The Defendants contend that the Force 1 design infringes on
8 trademarks owned by Defendants Aston Martin Lagonda Limited and Aston
9 Martin Lagonda of North America, Inc., and that the Plaintiff is not lawfully
10 permitted to manufacture, market and sell the Force 1.

11
12 44. Pursuant to the Declaratory Judgment Act, 28 USC § 2201, the
13 Plaintiff requests that the court declare whether the design of the Force 1 infringes
14 on any of Aston Martin's trademarks.

15
16 **WHEREFORE**, Plaintiff prays that the Court award him:

17
18 Count One

- 19 1. Compensatory damages of not less than \$100 million.
20 2. Punitive damages.

21
22 Count Two

- 23 1. Declaratory judgment.

24
25 All Causes of Action

- 26 1. Costs of suit.
27 2. All other relief the Court deems necessary and proper.
28

MLG AUTOMOTIVE LAW, APLC

Dated: January 4, 2016

By: /s/ Jonathan A. Michaels
Jonathan A. Michaels, Esq.
Kathryn J. Harvey, Esq.
Kianna C. Parviz, Esq.
Attorneys for Plaintiff Henrik Fisker

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JURY DEMAND

Plaintiff hereby demands a trial by jury on all triable issues.

MLG AUTOMOTIVE LAW, APLC

Dated: January 4, 2016

By: /s/ Jonathan A. Michaels
Jonathan A. Michaels, Esq.
Kathryn J. Harvey, Esq.
Kianna C. Parviz, Esq.
Attorneys for Plaintiff Henrik Fisker

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EXHIBIT A



HENRIK FISKER DEBUTS NEW AMERICAN SUPER CAR "THE FORCE 1"

AT THE 2016 NORTH AMERICAN INTERNATIONAL AUTO SHOW ON JANUARY 12

Henrik Fisker, the founder of Henrik Fisker Design, will be taking the wraps off a new sports car, The Force 1, at a press conference at the 2016 North American International Auto Show (NAIAS) on the main show floor on January 12, at 10:05 a.m.

This high-performance automobile is an American take on a super sports car featuring powerful, dramatic sculptural exterior styling, Ultra Thin Ventilated (UTV) laser blade tail lamps and a luxurious contemporary interior for two people. The body on the limited edition auto is all carbon fiber sitting on 21" wheels with high performance Pirelli P Zero tires, controlled by a unique new active suspension.

Priced just under \$300,000, The Force 1 is the only American sports car in this price category. The car will be front/mid engine, featuring one of the world's highest output natural aspirated engine in a road car, driven by the rear wheels either by a six-speed manual or optional paddle shift auto box. "I believe there is room in the market for a daily driver that embodies all the attributes of the best track racing car, and the comfort of a luxurious sports car" said Fisker. "Extreme power, great aesthetics and pristine handling make for a superior ride in Force 1, an American Super Car."

The car has been in development for the latter part of 2015 with an acclaimed American race car driver and his team. Force 1 will be manufactured in Michigan/USA with a production of up to 50 units starting in April 2016.

Fisker is noted as the international designer for some famous iconic, exotic and collectable cars. He is best known for his BMW Z8, Aston Martin DB9, Aston Martin V8 Vantage, as well as the Artega GT, Fisker Karma Hybrid, Mustang Rocket and the Viking motorcycle, among others.

His company, Henrik Fisker Design, founded in 2013, is an industrial design house that works across numerous categories including luxury travel, automotive, architectural design, furniture, smart devices, consumer products and technology.

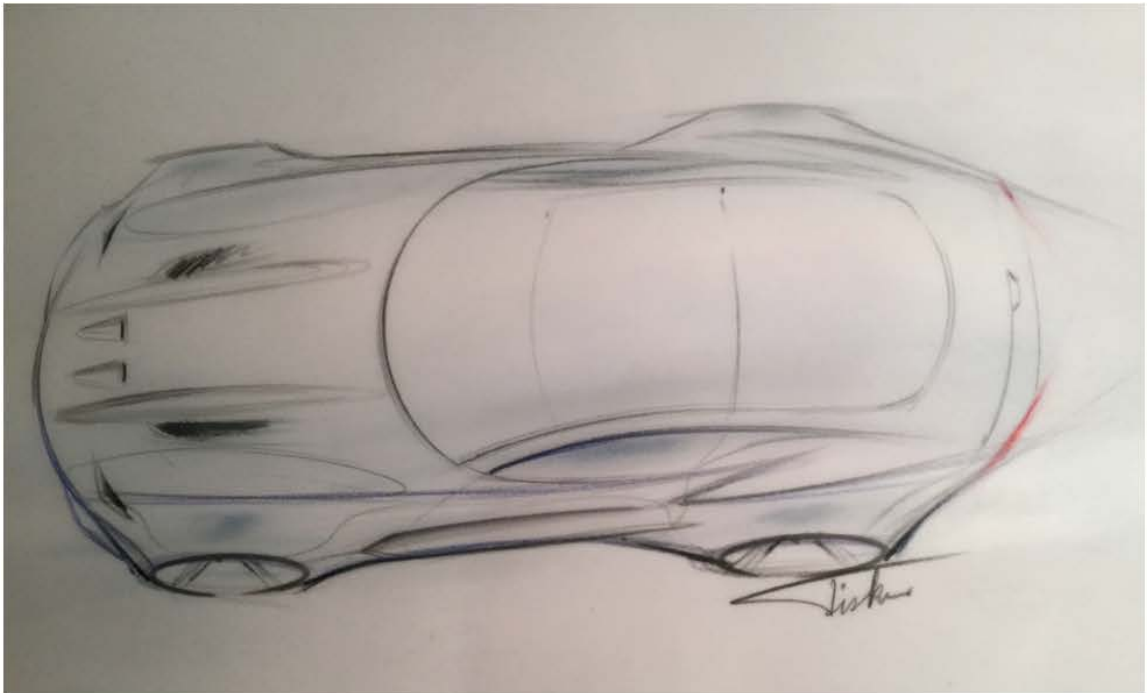
[Redacted]

About Henrik Fisker

Henrik Fisker is an entrepreneur and one of the world's leading automotive designers. Previously Fisker founded Fisker Automotive in 2007, where he launched the world's first premium plug-in hybrid, the Fisker Karma. Best known among his creations are BMW Z8, Aston Martin DB9 and Aston Martin V8 Vantage. Among his latest creations is also the Lauge Jensen Viking motorcycle and Mustang Rocket. Originally from Denmark, Fisker is now based in Los Angeles, and is the Founder of HF Design, a design

and technology company with various automotive, technology and consumer product ventures underway in Europe, Asia as well as North America. More information can be found at www.henrikfisker.org.

###



CAPTION: Henrik Fisker's initial design rendering for The Force 1, a high-performance automobile debuting on January 12 at 10:05 a.m. at the 2016 North American International Auto Show in Detroit.

EXHIBIT B

Kelly^{IP}
www.kelly-ip.com

David M. Kelly
(202) 808-3571
david.kelly@kelly-ip.com

December 23, 2015

[Redacted]

VIA EMAIL &
FEDEX

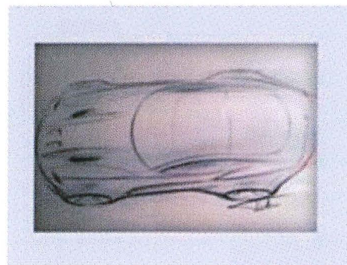
RE: Fisker's Force 1 Car

[Redacted]

I hope all is well with you.

I am writing on behalf of Aston Martin regarding a new issue with Mr. Fisker and his businesses (collectively "Fisker"). I am contacting you on the assumption that you are still representing Fisker. If you no longer represent Fisker, please let me know immediately as this matter is time sensitive and we will contact Fisker directly.

Specifically, I am writing regarding a recent article about Fisker preparing to unveil a new car—the Force 1—at the 2016 North American International Auto Show aka the Detroit Motor Show starting on January 11, 2016 <http://www.techtimes.com/articles/116222/20151214/fisker-unveil-new-300-000-super-car-force-1-detroit.htm>). A sketch of the car from the article is shown below:

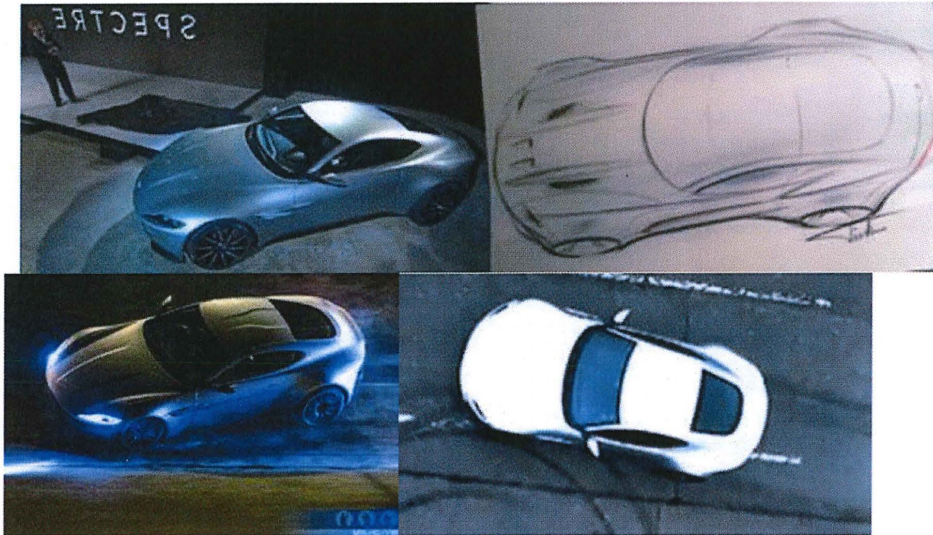


The car depicted above is of concern to Aston Martin because it is strikingly similar to several of Aston Martin's cars, including the DB10 car (the James Bond car). For example, this striking similarity is obvious from the side-by-side comparison of the Fisker sketch and the DB10 cars shown below on the left (the DB10 photograph on the left has "reversed polarity", i.e., the car is reversed so the car is facing the same direction as Fisker's for an appropriate comparison):

{487036;v1 }
Kelly IP, LLP
1919 M Street, NW | Suite 610 | Washington, DC | 20036
Phone | (202) 808-3570 | Fax | (202) 354-5232

[Redacted]

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Not surprisingly, there have been numerous comments in the press and by enthusiasts about the obvious similarities between Fisker's new car and Aston Martin's cars, including the examples below:

- <http://www.techtimes.com/articles/116222/20151214/fisker-unveil-new-300-000-super-car-force-1-detroit.htm>

"Many car outlets across the Internet believe that Fisker's sketch of The Force 1 closely resembles the Aston Martin with its long front and short back."

- <http://www.autoexpress.co.uk/car-news/93780/henrik-fisker-to-unveil-new-car-at-detroit-motor-show>

"The sketch released certainly has shades of Aston Martin about its shape, with a long nose, short tail, and wide tracks front and rear. Fisker says the body will be all carbon-fibre, and sit on 21-inch wheels. It also features Ultra Thin Ventilated laser blade tail lamps."

Comments

"Phil • a day ago

Good timing, since the new StarWars film is just out. May The Force 1 be with you (and your thick wallet). I like Fisker's spirit. He keeps on fighting, after seeing his Karma bomb, the Artega become extinct and after being reprimanded by Aston Martin for using the Aston badge on his remake of the DB9.

David Pickles Phil • 14 hours ago

looks like he hasn't learned his lesson that drawing has a lot of the v12 vantage in it."

Kelly IP, LLP

1919 M Street, NW | Suite 610 | Washington, DC | 20036
Phone | (202) 808-3570 | Fax | (202) 354-5232

[Redacted]

Page 3

• <http://www.carscoops.com/2015/12/fisker-bringing-force-1-supercar-to.html>

"It is claimed that the Fisker Force 1 has been developed with a yet-unnamed American race car driver and that up to 50 examples could be produced in Michigan from April next year. A single teaser image of the car reveals that the vehicle will be front-engined, include dramatically flared wheel arches and from the top, bares similarities to the Aston Martin One-77."

We do not know what the final version of Fisker's Force 1 vehicle will look like, but we trust that Fisker will make changes to his vehicle sufficient to avoid appropriation of Aston Martin's trademarks, trade dress, and designs, especially given the widespread commentary about how "Aston Martin" the Force 1 looks

[Redacted]

Please provide written assurances immediately that Fisker will either: [1] not show or display the version of the Force 1 vehicle shown in the above sketch (in any form, including prototypes and sketches) at the upcoming Detroit Auto Show starting on January 11, or [2] will make design changes to the Force 1 vehicle before that Show to avoid conflict with Aston Martin's rights. As Fisker knows, Aston Martin will not hesitate to protect its valuable rights if necessary.

[Redacted]

Sincerely,

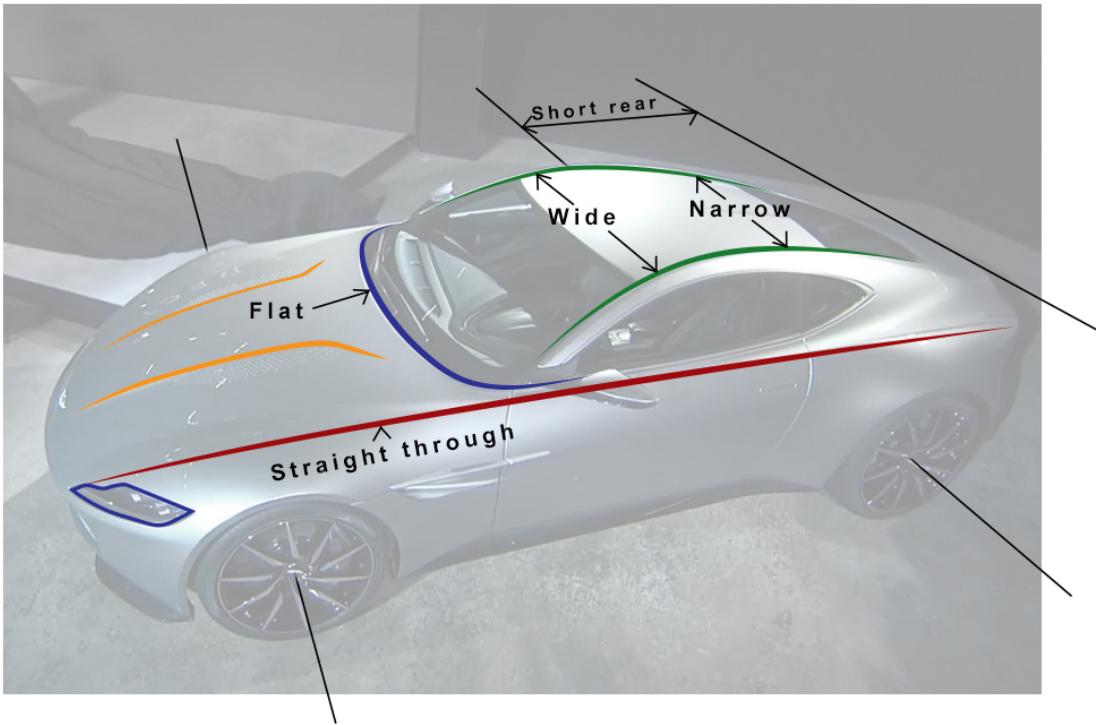


David M. Kelly

cc: Aston Martin

EXHIBIT C

ASTON MARTIN



FORCE 1

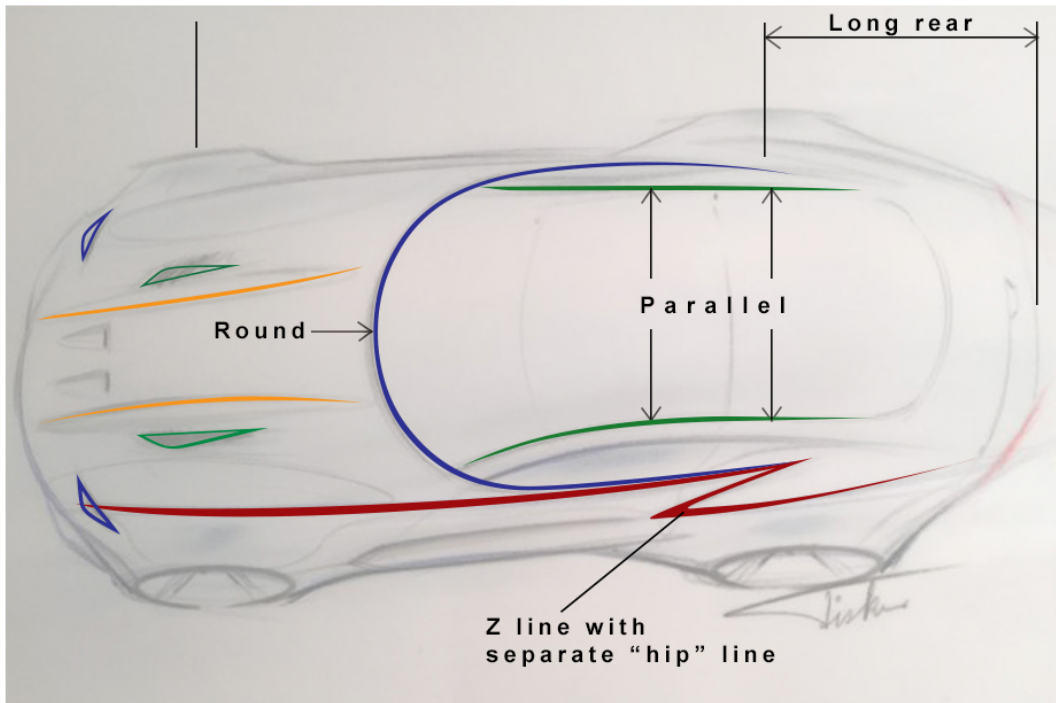


EXHIBIT D



ASTON MARTIN V8 VANTAGE



JAGUAR F-TYPE



CHEVROLET CORVETTE