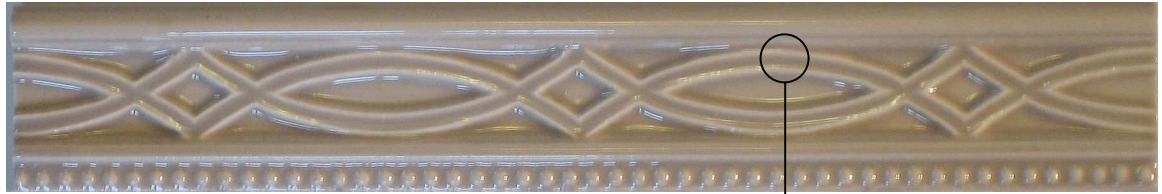
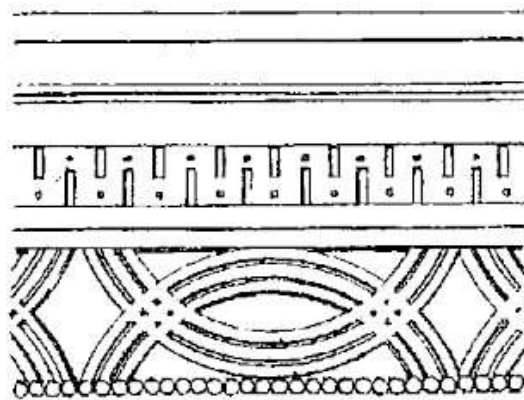


Analysis: TREILLAGE

In my opinion, Plaintiff's Treillage product is not an original design, but a precise re-use of a historic ornamental motif: the diamond-oval, in a continuous band. With generic architectural details above and below, commonly used in tiles / designs of this sort.



Plaintiff's Treillage Design

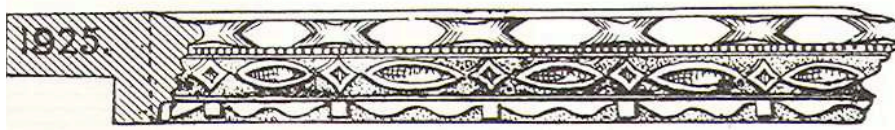


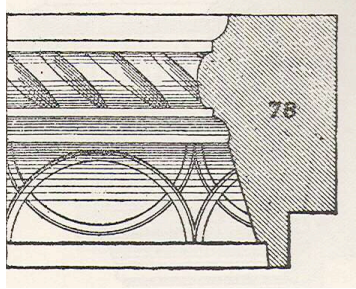
Channel relief

Plaintiff's cited inspiration for Treillage design, from Stephen Calloway: The Elements of Style, A Practical Encyclopedia of Interior Architectural Details from 1485 to the Present, 2002.

Prior exact image of motif exists in common pattern books

While the above image may have provided inspiration, it was not Plaintiff's only input. These wooden molding details from a 1910 catalog are virtually identical to the Treillage design and would enable its precise execution.

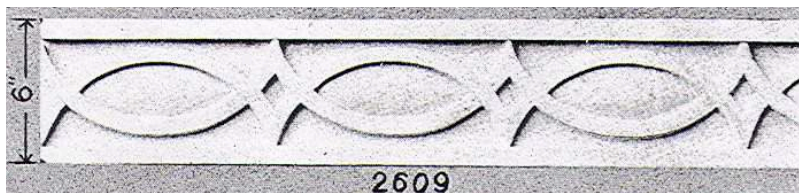




2 examples of diamond-oval motif from 1910 Morell Catalog, *Victorian Wooden Molding and Frame Designs*. This book is in the Plaintiff's library.

Identical designs were mass-produced in the early 20th century, for architectural ornament and for tile borders.

The diamond-oval motif, rendered in virtually identical relief to plaintiff's design, has been a common mass-produced architectural ornament. Note the channel relief in the second example, identical to channel in Plaintiff's Treillage design.



Decorators Supply Company 1917



Channel relief as in plaintiff's design

Architectural Decorating Company 1915

Also show this image in 1/2 - it really is the exact image.

The diamond-oval motif has also been a popular tile border, mass-produced within the tile industry over the last century.

