

**LEONE & LEONE**  
ATTORNEYS AT LAW  
637 MASSACHUSETTS AVENUE  
ARLINGTON, MA 02476-5076

RECEIVED  
SELECT BOARD OFFICE  
ARLINGTON, MA 02476

2019 DEC -9 PM 2:22

DAVID A. LEONE  
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December 9, 2019

Arlington Select Board  
730 Massachusetts Ave.  
Arlington, MA 02476

Re: Paramveer Corporation d/b/a Punjab  
485 Massachusetts Ave, Arlington, MA 02474

Samar Group LLC d/b/a Rangla Punjab  
444 Massachusetts Ave, Arlington, MA 02474

Dear Members of the Select board:

As you are aware, we represent Paramveer Corporation d/b/a Punjab 485-487 Massachusetts Avenue, Arlington, MA 02474. Punjab has been in operation in Arlington Center for over twenty years and has established itself as one of the premier Indian/Punjabi restaurants in the area. Paramveer Corporation has a Massachusetts Registered Trademark/Service Mark, for the words Punjab Celebrating Indian Cuisine.

At the time of the licensing hearing for Samar Group LLC., Paramveer Corporation strongly objected to the proposed name, and the use of the word Punjab in any connotation in its name. The use by Samar Group LLC of the name is construed by our client as an intentional and deliberate attempt to trade upon the name and good will of Paramveer Corporation's restaurant, Punjab, which is directly across the street.

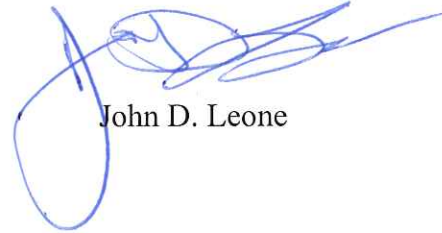
It is necessary to make the Board aware that Samar Group LLC. appears to be in operation, as one is able to purchase food from them, despite the fact that the Board of Health has stated that they have not been granted the proper licenses. Additionally, the food delivery service, Doordash, lists the address for Samar Group, LLC. as 485 Massachusetts Ave, Arlington, MA 02474, the address of Paramveer Corporation d/b/a Punjab. This is of course causing disruption of our client's business when drivers show up and there is no delivery order for them and it is direct proof that they are in fact trading upon name and good will of Paramveer Corporation to its detriment. This is exactly the situation that my clients feared at the time of the license hearings.

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Arlington Select Board  
Re: Paramveer Corporation d/b/a Punjab  
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We request that the Board take all necessary action to determine the actual status of Samar Group LLC d/b/a Rangla Punjab and their Town of Arlington licenses. We look forward to hearing from you on this matter.

If you have any questions, please feel free to contact the undersigned.

VERY TRULY YOURS  
LEONE & LEONE



John D. Leone

enc  
cc: Paramveer Corporation

Samar Group LLC  
Mandeep Singh and Kashmir Singh  
11 Fuller Street  
Everett, Ma 02149

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December 9, 2019

Tony Xu, President  
Door Dash, Inc.  
901 Market Street  
San Francisco, Ca 94103

Re: Paramveer Corporation d/b/a Punjab  
485 Massachusetts Ave, Arlington, MA 02474

Samar Group LLC d/b/a Rangla Punjab  
444 Massachusetts Ave, Arlington, MA 02474

Dear Mr. Xu:

We represent Paramveer Corporation d/b/a "Punjab" at 485 Massachusetts Avenue, Arlington, MA 02474. Punjab has been in operation in Arlington Center for over twenty years and has established itself as one of the premier Indian/Punjabi restaurants in the greater Boston Mass. area.

Samar Group LLC use of the name "Rangla Punjab" is construed by our client as an intentional and deliberate attempt to trade upon the name and good will of Paramveer Corporation's restaurant, Punjab, which is directly across the street.

Doordash, lists the address for Samar Group, LLC. as 485 Massachusetts Ave, Arlington, MA 02474 the address of Paramveer Corporation d/b/a Punjab. This is of course causing disruption of our client's business when your drivers show up and there is no delivery order for them and it is direct proof that they are in fact trading upon name and good will of Paramveer Corporation to its detriment. The following are copied directly off your website and attached are pictures of drivers' screen shots.

"Delivered from: Rangla Punjab at Punjab, 485 Massachusetts Ave, Arlington, MA 02474, USA  
444 Massachusetts Ave, Arlington, MA 02474"

"Delivered from Punjab at 485 Massachusetts Avenue, Arlington, MA 02474, USA"

December 9, 2019

Doordash, Inc

Re: Paramveer Corporation d/b/a Punjab

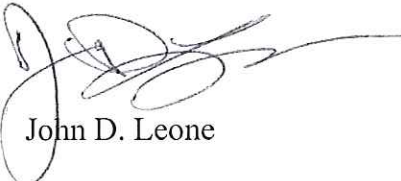
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Your actions in misidentifying the delivery locations and sending your drivers to our clients location is causing harm to our clients reputation and business. We demand that the Doordash Inc., immediately take all necessary action to correct the address of Samar Group LLC d/b/a Rangla Punjab to its actual address 444 Massachusetts Ave, Arlington, MA 02474 and cease cross referencing our client with Samar group, LLC.

We look forward to hearing from you on this matter.

If you have any questions, please feel free to contact the undersigned.

VERY TRULY YOURS  
LEONE & LEONE



John D. Leone

enc

cc: Paramveer Corporation

Samar Group LLC  
Mandeep Singh and Kashmir Singh  
11 Fuller Street  
Everett, Ma 02149

Arlington Select Board  
730 Massachusetts Ave.  
Arlington, MA 02476

Registered Agent Solutions, Inc.  
44 School Street  
Suite 325  
Boston Ma Zip: 02108

Door Dash, Inc.  
Legal Department  
901 Market St., Suite 600  
San Francisco Ca 94103



# Current Dash

1 order

Invite Friends

Pick up at  
**Rangla Punjab**

Pickup for Andrea B.

## Rangla Punjab

Punjab, 485 Massachusetts Ave, Arlington, MA 02474,...

Ready around 5:04 PM

Andrea B.

CONTACT

2 items

1x Paneer Pakora

1x Palak Paneer

BACK

RETURN TO TASK



5:09

82%

Current Dash  
1 order

Invite Friends

Pick up at  
Rangla Puniab

Pickup for Lisa C.

Rangla Punjab

Punjab, 485 Massachusetts Ave, Arlington, MA 02474,...

Ready around 4:53 PM

Lisa C.  
5 items

CONTACT

1x Plain Parantha

1x Vegetable Pakora (5)

1x Aloo Tikki (2)

1x Chicken Tikka Masala

1x Chrimp Korma

BACK

RETURN TO TASK