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Filing date: **12/23/2011**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91198063
Party	Plaintiff AlpinBreeze LLC
Correspondence Address	MATTHEW H SWYERS THE TRADEMARK COMPANY 344 MAPLE AVENUE WEST, SUITE 151 VIENNA, VA 22180 UNITED STATES mswyers@thetrademarkcompany.com
Submission	Motion to Compel Discovery
Filer's Name	Matthew H. Swyers
Filer's e-mail	mswyers@thetrademarkcompany.com
Signature	/Matthew H. Swyers/
Date	12/23/2011
Attachments	Motion to Compel Discovery.pdf (8 pages)(52896 bytes) Exhibit 1.pdf (14 pages)(403940 bytes) Exhibit 2.pdf (11 pages)(327051 bytes) Exhibit 3.pdf (4 pages)(141956 bytes) Exhibit 4.pdf (38 pages)(2996643 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
The Trademark Trial and Appeal Board**

AlpinBreeze, LLC,	:	
	:	
Opposer,	:	Opposition No. 91198063
	:	
vs.	:	
	:	
Evertec Information Technology Co., LTD.,	:	Serial No.: 77922346
	:	Mark: ALPINBREEZE and design
Applicant.	:	Published: September 7, 2010

MOTION TO COMPEL DISCOVERY

COMES NOW Opposer, AlpinBreeze, LLC, (hereinafter “Opposer”), by and through counsel, The Trademark Company, PLLC, in accordance with § 523 *et seq.* of the TBMP files the instant Motion to Compel Discovery from Evertec Information Technology Co., LTD. (hereinafter “Applicant”) for the grounds set forth below.

Statement of the Facts

On or about January 5, 2011 Opposer instituted the instant proceeding seeking to block the registration of Applicant’s mark and design ALPINBREEZE as more fully identified in Serial No. 77/922,346. On February 14, 2011 Applicant, through counsel, filed its *Answer and Grounds of Defense* and, on April 1, 2011, Applicant’s attorney withdrew as counsel in this instant case, as the Applicant desired to represent himself. On or about October 8, 2011 Opposer served upon Applicant *Opposer’s First Interrogatories to Applicant* as well as *Opposer’s First Request for Production of Documents to Applicant*. See Exhibits 1 and 2.

On or about October 8, 2011 Applicant Served upon Opposer *Answers to Opposer’s First Set of Interrogatories* (hereinafter “Interrogatories”) as well as *Responses to Opposer’s First Requests for Production of Documents* (hereinafter “RFPD”). See Exhibits 3 and 4. Applicant

failed to provide substantive responses to Interrogatories number 2, 3, 5, 7, 11, 12, 13, and did not properly answer Interrogatories 17-30. *See* Exhibit 3. Moreover, Applicant failed to produce a single document in conjunction with *Responses to Opposer's First Requests for Production of Documents* that are relevant to the instant proceeding. *See* Exhibit 4.

On or about November 4, 2011, Opposer attempted, in good faith, to resolve this dispute with the Applicant. *See* Exhibit 5. In this email to the Applicant, counsel for the Opposer asked that the Applicant provide amended responses by November 8, 2011. Opposer allowed Applicant additional time until November 21, 2011 to provide the amended responses and documents applicable to the matter at hand. However, to date no reply from Applicant has been received despite numerous attempts to resolve these deficiencies outside of the Board's presence. As such, Opposer is forced to now file the instant motion so that it may receive complete responses to its discovery requests.

Motion to Compel

Opposer's First Interrogatories to Applicant

Regarding the specifically enumerated Interrogatories Opposer provides as follows:

Interrogatory No. 2: Identify each person who has knowledge of Applicant's selection and adoption of Applicant's Mark and who has knowledge of how it is used and/or intended to be used. To the extent this interrogatory identifies more than ten (10) persons, limit the response to only those persons who possess the most knowledge. *See* Exhibit 1.

Applicant's Reply to Interrogatory No. 2: You-Yi Lin, President of Applicant, Mr. Lin's wife, and friends of the former have knowledge related to selection, adoption, and so forth of Applicant's Mark. *See* Exhibit 3.

Argument in Support of Motion to Compel: Applicant did not provide a substantive response and did not thoroughly identify each person with knowledge of Applicant's selection and adoption of Applicant's Mark and who has knowledge of how it is used and/or intended to be used. Stating, "Mr. Lin's wife and friends of the former" does not fulfill the Opposer's request to "Identify each person".

Interrogatory No. 3: Describe in detail all goods and services formerly and currently being offered by Opposer in conjunction with Opposer's Marks and any goods or services intended to be used in connection with Opposer's Marks in the future identifying the dates on which Opposer first began such use(s) and/or intends to begin such use and the geographic areas in which such use occurred and/or will occur. *See* Exhibit 1.

Applicant's Reply to Interrogatory No. 3: Please see Answer No. 1 that products in Class 9, 11, and 3 are intended to be used with Applicant's Mark as well as future usage, and future dates and geographic areas will depend on the budgets, markets, and customers. *See* Exhibit 3.

Argument in Support of Motion to Compel: Opposer seeks the information in Interrogatory No. 3 as a critical component of the Board's anticipated analysis under *In re E. I. du Pont de Nemours & Co.*, 476 F.2d 1357, 177 USPQ 563 (C.C.P.A. 1973) (issue of likelihood of confusion typically revolves around the similarity or dissimilarity of the marks and the relatedness of the goods or services). Applicant did not provide a substantive response thereto, and the Board cannot apply this response to the *E. I. du Pont* factors in this instant matter.

Interrogatory No. 5: With respect to each good and/or service identified in your response to Interrogatory No. 3, state the annual sales in units and dollars from the date of first use of each such good and/or service. *See* Exhibit 1.

Applicant's Reply to Interrogatory No. 5: The data is not available. Applicant further provides no substantive response thereto. *See* Exhibit 3.

Argument in Support of Motion to Compel: Such information is reasonably calculated to lead to the discovery of admissible evidence at the trial phase of this matter in that Opposer seeks to determine whether or not the Applicant is using its mark in commerce. The Applicant must provide the requested data, a justification as to why such data does not exist, or a suitable objection identifying the relevant grounds as to why the Applicant does not respond to the Interrogatory.

Interrogatory No. 7: For each medium identified in the preceding interrogatory, state the annual expenditure for advertising and promotion since inception. Note that the preceding interrogatory (Interrogatory No. 6) asks Applicant to “describe in detail the manner in which Applicant’s Mark is promoted in the United States, including but not limited to the media and mode of any marketing efforts as well as the geographic regions in which said promotions are conducted.” *See* Exhibit 1.

Applicant's Reply to Interrogatory No. 7: The data is not available. Again, Applicant provides no substantive response thereto. *See* Exhibit 3.

Argument in Support of Motion to Compel: As in the request of Interrogatory No. 5, Opposer is seeking to determine how Applicant is using Applicant’s Mark in commerce, and asking Applicant to provide proof of the same. To respond to this Interrogatory appropriately, the Applicant must provide the requested data, a justification as to why such data does not exist, or a suitable objection identifying the relevant grounds as to why the Applicant does not respond to the Interrogatory.

Interrogatory No. 11: Identify any and all licensees of Applicant's Mark, if any, and in so doing, describe each licensing arrangement and identify each product and/or service offered or sold by each licensee under Applicant's Mark or similar designation. *See* Exhibit 1.

Applicant's Reply to Interrogatory No. 11: Please refer to ANSWER NO. 3. *See* Exhibit 3.

Argument in Support of Motion to Compel: The Opposer is again attempting to ascertain Applicant's use of Applicant's Mark in commerce by inquiring if the Applicant has licensees of Applicant's Mark. The Applicant refers us to the previously vaguely answered question of Interrogatory No. 3. The response, "that products in Class 9, 11, and 3 are intended to be used with Applicant's Mark as well as future usage, and future dates and geographic areas will depend on the budgets, markets, and customers." does not satisfy the question presented in Interrogatory No. 11.

Interrogatory No. 12: Describe in detail all quality control measures adopted and used by Applicant in the oversight of the use of Applicant's Mark by the licensees identified in the preceding interrogatory. *See* Exhibit 1.

Applicant's Reply to Interrogatory No. 12: The data is not available. *See* Exhibit 3.

Argument in Support of Motion to Compel: Yet again, the Applicant is failing to provide a substantive response thereto. Interrogatory No. 12 follows Interrogatory No. 11 in that it is asking the Applicant to provide detailed evidence of licensees of its mark. Merely stating, "The data is not available", will not suffice.

Interrogatory No. 13: Describe in detail any adversarial proceeding or challenge, if any, involving Applicant's Mark, or any similar designation, before the Trademark Trial and Appeal

Board, Bureau of Customs, Federal Trade Commission, or any court or tribunal, including but not limited to any challenge by cease and desist letter to Applicant's Mark. *See* Exhibit 1.

Applicant's Reply to Interrogatory No. 13: The data is not available. *See* Exhibit 3.

Argument in Support of Motion to Compel: The Applicant neglected to answer this question. The Opposer is aware of and actively pursuing matters regarding Applicant's mark before the Trademark Trial and Appeal Board, as well as in other countries.

Furthermore, in Interrogatories 17 through 30, the Applicant either referred the Opposer to look at a previously vaguely answered interrogatory of which did not answer the question at hand, stated again that the data was not available, or, as in Interrogatory No. 30, simply stated, "No." *See* Exhibits 1 and 3.

Clearly, the Applicant is not providing complete disclosure as mandated. The absence of the Applicant's clear and concise answers to the Interrogatories harms the Opposer in obtaining discoverable the facts as permitted in this instant case. The same is also a detriment to the Applicant's ability to effectively defend its position in this instant case by virtue of the fact that the majority of the Applicant's responses told the Opposer little, if nothing about the Applicant's use, design, and ownership of Applicant's Mark.

***Responses to Opposer's
First Requests for Production of Documents***

In brief, no documents were produced that are relevant to this instant proceeding in conjunction with *Responses to Opposer's First Requests for Production of Documents*. *See* Exhibit 4. Many of the documents presents are in non-English language and the translations are not related to the United States case before the TTAB. As such, a specific request-by-request response as to the scope of the documents and things requested to be produced is not warranted.

Opposer merely seeks a blanket order to compel Applicant to produce all relevant materials in reply to Opposer's RFPD.

Conclusion

WHEREFORE Opposer AlpinBreeze, LLC, through counsel, respectfully moves the Board for an Order, pursuant to § 523 *et seq.* of the TBMP, compelling responses to Interrogatories No. 2, 3, 5, 7, 11, 12, 13, and 17-30, as well as to provide documents and other materials responsive to Opposer's RFPD at The Trademark Company's office located in Vienna, Virginia.

DATED this 23rd day of December, 2011.

THE TRADEMARK COMPANY, PLLC

/Matthew H. Swyers/
Matthew H. Swyers, Esquire
344 Maple Avenue West, Suite 151
Vienna, VA 22180
Telephone (800) 906-8626 x100
Facsimile (270) 477-4574
mswyers@TheTheTrademarkCompany.com
Attorney for Opposer

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
The Trademark Trial and Appeal Board**

AlpinBreeze, LLC,	:	
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Opposer,	:	Opposition No. 91198063
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vs.	:	
	:	
Evertec Information Technology Co., LTD.,	:	Serial No.: 77922346
	:	Mark: ALPINBREEZE and design
Applicant.	:	Published: September 7, 2010

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a copy of the foregoing pleading this 23nd day of December, 2011, to be served, via first class mail and email, per agreement, upon:

You-Yi Lin
1F NO. 229 Sihwei Street , Jhubei City
Hsinchu County, 30242
Taiwan
Frans_lin@evertec.asia

/Matthew H. Swyers/
Matthew H. Swyers

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
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AlpinBreeze, LLC,	:	
	:	
Opposer,	:	Opposition No. 91198063
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Applicant.	:	Published: September 7, 2010

OPPOSER'S FIRST SET OF INTERROGATORIES TO APPLICANT

TO: Steven M. Rabin, Rabin & Berdo, P.C., 1101 14th St NW Ste 500, Washington, DC 20005-5633 and You-Yi Lin 1fNo. 229 Sihwei Street , Jhubei City, Hsinchu County, 30242, Taiwan.

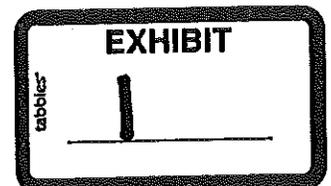
FROM: Matthew H. Swyers, Esq., The Trademark Company, PLLC, 344 Maple Avenue West, Suite 151, Vienna, VA 22180.

COMES NOW Opposer, AlpinBreeze, LLC, (hereinafter "Opposer"), by and through counsel, The Trademark Company, PLLC, in accordance with the applicable Federal Rules of Civil Procedure, propounds the following interrogatories upon Evertec Information Technology Co., LTD. (hereinafter "Applicant") to be answered within the time provided by the applicable rules of court.

DEFINITIONS

A. The term "Applicant" shall mean Evertec Information Technology Co., LTD., and/or any present or former servant, agent, attorney or other representative acting on his behalf.

B. The term "Opposer" shall mean AlpinBreeze, LLC and any present or former officer, director, employee, servant, agent, attorney or other representative acting on its behalf, and shall include any predecessor or successor either within the United States or a foreign country.



C. The term “trademark” or “mark” includes trademarks, service marks, collective marks, certification marks and trade names as defined in 15 U.S.C. § 1127.

D. The term “in the U.S.” shall mean use in interstate and/or intrastate commerce in the United States.

E. The term “Applicant’s Mark” refers to the mark ALPINBREEZE and design as identified in U.S. Trademark Serial No. 77/922,346.

F. The term “Opposer’s Mark” refers to the mark referred to by Opposer in the instant Notice of Opposition.

G. The term “you” shall mean the party or person to whom these interrogatories are propounded, all agents, employees, servants, attorneys, and all other representatives, and persons over whom the person or party to whom these interrogatories are propounded has the right to or does control or direct and activities.

H. The phrase “legal action” shall mean submission of correspondence to the Applicant or any third party not a party to this proceeding requesting that they cease use of a mark, or institution of any legal proceeding in the United States Patent & Trademark Office, state, or federal court or agency.

I. The term “live” shall mean currently registered with the U.S. Patent and Trademark Office and not dead as it applies to abandoned, cancelled, or successfully opposed trademarks.

INTERROGATORIES

INTERROGATORY NO. 1: State in detail the nature of the business, operations, and activities conducted by Applicant.

ANSWER:

INTERROGATORY NO. 2: Identify each person who has knowledge of Applicant's selection and adoption of Applicant's Mark and who has knowledge of how it is used and/or intended to be used. To the extent this interrogatory identifies more than ten (10) persons, limit the response to only those persons who possess the most knowledge.

ANSWER:

INTERROGATORY NO. 3: Describe in detail all goods and services formerly and currently being offered by Applicant in conjunction with Applicant's Mark and any goods or services intended to be used in connection with Applicant's Mark in the future identifying the dates on which Applicant first began such use(s) and/or intends to begin such use and the geographic areas in which such use occurred and/or will occur.

ANSWER:

INTERROGATORY NO. 4: Describe any periods since Applicant's alleged date of first use, as set forth in the preceding paragraph, during which Applicant did not make use of Applicant's Mark.

ANSWER:

INTERROGATORY NO. 5: With respect to each good and/or service identified in your response to Interrogatory No. 3, state the annual sales in units and dollars from the date of first use of each such good and/or service.

ANSWER:

INTERROGATORY NO. 6: With respect to each good and/or service identified in your response to Interrogatory No. 3, describe in detail the manner in which Applicant's Mark is promoted in the United States, including but not limited to the media and mode of any marketing efforts as well as the geographic regions in which said promotions are conducted.

ANSWER:

INTERROGATORY NO. 7: For each medium identified in the preceding interrogatory, state the annual expenditure for advertising and promotion since inception.

ANSWER:

INTERROGATORY NO. 8: Identify the person or persons who, from the date of Applicant's claimed date of first use of Applicant's Mark to the present, has or have been responsible for the marketing and/or promotion of Opposer's goods and services under Applicant's Mark indicating the period during which each person was so responsible.

ANSWER:

INTERROGATORY NO. 9: Identify all advertising agencies, public relations agencies or market research agencies that Applicant has used, participated with or cooperated with in advertising, marketing or promoting the goods/services identified in response to Interrogatory No. 3, and indicate the time period(s) during which such activities were conducted.

ANSWER:

INTERROGATORY NO. 10: With respect to each good and/or service identified in your response to Interrogatory No. 3, describe in detail the channels of distribution by which the goods and/or services of Applicant reach or are expected to reach the ultimate user or consumer.

ANSWER:

INTERROGATORY NO. 11: Identify any and all licensees of Applicant's Mark, if any, and in so doing, describe each licensing arrangement and identify each product and/or service offered or sold by each licensee under Applicant's Mark or similar designation.

ANSWER:

INTERROGATORY NO. 12: Describe in detail all quality control measures adopted and used by Applicant in the oversight of the use of Applicant's Mark by the licensees identified in the preceding interrogatory.

ANSWER:

INTERROGATORY NO. 13: Describe in detail any adversarial proceeding or challenge, if any, involving Applicant's Mark, or any similar designation, before the Trademark Trial and Appeal Board, Bureau of Customs, Federal Trade Commission, or any court or tribunal, including but not limited to any challenge by cease and desist letter to Applicant's Mark.

ANSWER:

INTERROGATORY NO. 14: Identify and describe any and all opinions relating to the Applicant's Mark, including but not limited to Applicant's use of the mark vis-à-vis Opposer's Mark.

ANSWER:

INTERROGATORY NO. 15: Identify and describe any and all investigations, polls, studies, evaluations, analysis, tests, ratings, or surveys relating to Applicant's Mark or Opposer's Mark, including but not limited to Applicant's use of Applicant's Mark.

ANSWER:

INTERROGATORY NO. 16: Identify and describe any and all investigations, polls, studies, evaluations, analysis, tests, ratings, or surveys relating to Applicant's Mark, including but not limited to Opposer's use of Opposer's Mark and/or Opposer's use of Opposer's Mark as it relates and/or otherwise affects Applicant's Mark.

ANSWER:

INTERROGATORY NO. 17: Describe in detail Applicant's awareness and knowledge of Opposer, Opposer's business activities, Opposer's Mark, and/or Opposer's use of Opposer's Mark, prior to as well as subsequent to Applicant's use of Applicant's Mark and filing of its federal trademark applications, and in so doing, state the dates on which each person or persons gained such knowledge or awareness.

ANSWER:

INTERROGATORY NO. 18: Identify the intended and actual class or type of consumers of Applicant's products and services offered and/or sold under or in connection with Applicant's Mark or similar designation.

ANSWER:

INTERROGATORY NO. 19: Identify and describe any instances of actual confusion or mistake with respect to the goods and services sold or offered by Applicant and the goods and services sold or offered by Opposer.

ANSWER:

INTERROGATORY NO. 20: State in detail how Applicant contends it uses Applicant's Mark in interstate commerce.

ANSWER:

INTERROGATORY NO. 21: Has You-Yi Lin or any other member, employee, agent, or servant of the Applicant ever worked, been employed by, or otherwise performed services for the Opposer? If the answer is in the affirmative, please provide the name of the individual, the dates of employment and/or services, and provide a description of the duties performed during the course of said employment and/or services.

ANSWER:

INTERROGATORY NO. 22: Describe any employment agreements between You-Yi Lin and Opposer.

ANSWER:

INTERROGATORY NO. 23: Describe how Applicant created and/or adopted Applicant's Mark. If Applicant did not create Applicant's Mark, identify the person or entity that did.

ANSWER:

INTERROGATORY NO. 24: State in detail the factual and legal basis for the Applicant's denial "...that Opposer is the owner of the underlying Alpinbreeze and Design Mark..." Answer at p. 1, ¶ 1.

ANSWER:

INTERROGATORY NO. 25: State in detail the factual and legal basis for the Applicant's contention that "Applicant's president, Mr. You-Yi Lin, is the rightful owner of the Alpinbreeze Mark and owns the common law copyright rights thereto.." Answer at p. 1, ¶ 1.

ANSWER:

INTERROGATORY NO. 26: State in detail the factual and legal basis for the Applicant's denials of Paragraphs 3, 4, 6, 7, 8, 9, and 10. Answer at pp. 1-2, ¶¶ 3, 4, 6, 7, 8, 9, and 10.

ANSWER:

INTERROGATORY NO. 27: Identify each lay and expert witness Applicant expects to call to testify on its behalf in this matter, and state the subject matter of each such witnesses' expected testimony, and identify each exhibit that Applicant intends to introduce or rely upon in connection with each such witness.

ANSWER:

INTERROGATORY NO. 28: Identify and describe all documents Applicant expects to use, introduce or rely upon at the time of trial in this matter.

ANSWER:

INTERROGATORY NO. 29: Identify all persons who were consulted or participated in the preparation of the answers to these interrogatories.

ANSWER:

INTERROGATORY NO. 30: Has a third-party ever taken legal action against the Applicant regarding the Applicant's use of Applicant's Mark? If so, please set forth, with particularity the following:

1. The name and address of the party against whom the legal action was instituted;
2. the date(s) during which the legal action transpired;
3. a complete description of the legal action taken;
4. if the legal action took place before the United States Patent & Trademark Office or any state or federal court or agency, the name of the entity in which it took place including the proceeding number assigned thereto;
5. a complete description of the allegations included in the legal action;
6. the result of the legal action.

ANSWER:

DATED this 9th day of September, 2011.

THE TRADEMARK COMPANY, PLLC

/Matthew H. Swyers/

Matthew H. Swyers, Esquire

344 Maple Avenue West, Suite 151

Vienna, VA 22180

Telephone (800) 906-8626 x100

Facsimile (270) 477-4574

mshyers@TheTheTrademarkCompany.com

Attorney for Opposer

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
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Opposer,	:	Opposition No. 91198063
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Evertec Information Technology Co., LTD.,	:	Serial No.: 77922346
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Applicant.	:	Published: September 7, 2010

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a copy of the foregoing pleading this 9th day of
September, 2011, to be served, via first class mail and email, per agreement, upon:

STEVEN M. RABIN
RABIN & BERDO, P.C.
1101 14TH ST NW STE 500
WASHINGTON, DC 20005-5633

You-Yi Lin
1F NO. 229 SIHWEI STREET , JHUBEI CITY
HSINCHU COUNTY, 30242
TAIWAN
Frans_lin@evertec.asia

/Matthew H. Swyers/
Matthew H. Swyers

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Opposer,	:	Opposition No. 91198063
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	:	Mark: ALPINBREEZE and design
Applicant.	:	Published: September 7, 2010

**OPPOSER'S FIRST REQUESTS FOR
PRODUCTION OF DOCUMENTS TO APPLICANT**

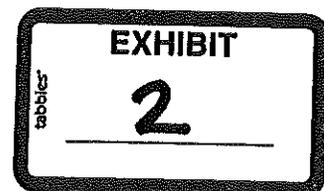
TO: Steven M. Rabin, Rabin & Berdo, P.C., 1101 14th St NW Ste 500, Washington, DC 20005-5633 and You-Yi Lin 1f No. 229 Sihwei Street , Jhubei City, Hsinchu County, 30242, Taiwan.

FROM: Matthew H. Swyers, Esq., The Trademark Company, PLLC, 344 Maple Avenue West, Suite 151, Vienna, VA 22180.

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and TBMP §408, Opposer AlpinBreeze, LLC (hereinafter "Opposer") requests that Applicant Evertec Information Technology Co., LTD. (hereinafter "Applicant") produce and permit Opposer to inspect and copy the Documents (as defined hereinafter) and things designated below at The Trademark Company, 344 Maple Avenue West, Suite 151, Vienna, VA 22180 within the time permitted by the applicable rules.

DEFINITIONS

A. "Documents" includes "things" and is defined in the broadest sense permitted by the Federal Rules of Civil Procedure and the Trademark Rules of Practice, including without limitation, written documents, audio or video recordings, and computer data together with printouts of screen displays. "Documents" includes each writing or record not identical to the original.



B. The term "Applicant" shall mean Evertec Information Technology Co., LTD., and/or any present or former servant, agent, attorney or other representative acting on his behalf.

C: The term "Opposer" shall mean AlpinBreeze, LLC and any present or former officer, director, employee, servant, agent, attorney or other representative acting on its behalf, and shall include any predecessor or successor either within the United States or a foreign country.

D. "Person(s)" means any individual, firm, partnership, corporation, proprietorship, association, governmental body or any other organization or entity.

E. "Concerning" means relating to, referring to, describing, evidencing or constituting.

F. The term "Applicant's Mark" refers to the mark ALPINBREEZE and design as more fully identified in Ser. No. 77/922,346.

REQUESTS FOR PRODUCTION

With respect to any Document specified below for which a claim of privilege or work product is made, please indicate the nature of the Document; identify the name, address, occupation, title and business affiliation of the writer, the addressee and all recipients thereof, the general subject matter to which the Document relates, and its date.

The Documents designated for production are the following:

1. All Documents evidencing, referring, or relating to the selection or adoption by Applicant of Applicant's Mark.

RESPONSE:

2. Documents sufficient to identify each Person who participated or was involved in the selection of Applicant's Mark, and with respect to each Person so identified, the nature and scope of his or her involvement.

RESPONSE:

3. All Documents evidencing, referring, or relating to the applications to register Applicant's Mark by Applicant, and any communication(s) between Applicant or its attorneys and the United States Patent and Trademark Office in connection with Applicant's Mark.

RESPONSE:

4. All Documents evidencing, referring, or relating to measures taken by Applicant to determine the availability of Applicant's Mark at any time, including any investigative or background materials on marks or entities reflected in any trademark search.

RESPONSE:

5. All Documents evidencing, referring, or relating to alternative names, phrases, logos, designs or words considered by Applicant, whether or not adopted, in connection with the process that resulted in the adoption of Applicant's Mark for any products or services of Applicant.

RESPONSE:

6. All Documents evidencing, referring, or relating to Applicant's first use of Applicant's Mark as trademarks or service marks or name in connection with any products, services, or business activities of Applicant.

RESPONSE:

7. All Documents evidencing, referring, or relating to Applicant's use of Applicant's Mark after the first use of Applicant's Mark as trademarks or service marks or name in connection with any products, services or business activities of Applicant.

RESPONSE:

8. All Documents evidencing, referring, or relating to goods or services offered by Applicant under or pursuant to Applicant's Mark.

RESPONSE:

9. All Documents evidencing, referring, or relating to agreements entered into by Applicant with third parties which relate or refer to the use of Applicant's Mark.

RESPONSE:

10. Examples of all advertising, promotional materials, packaging, labeling, data sheets, instructional materials, media documents, or other printed materials evidencing, relating to, or referring to use or promotion of the products or services offered under Applicant's Mark.

RESPONSE:

11. Examples of each screen display, link, frame, window, brochure, advertisement, flyer, business card or promotional material Applicant uses in connection with any products or services offered under Applicant's Mark.

RESPONSE:

12. Documents sufficient to identify the channels of trade through which Applicant distributes products or offers services under Applicant's Mark including, without limitation, documents sufficient to identify the customers, sales agents, dealerships, distributors or other outlets through which an products or services are or have been sold since Applicant's adoption of the Applicant's Marks.

RESPONSE:

13. Documents sufficient to identify the geographic areas in which Applicant's products or services bearing Applicant's Mark are or at any time have been distributed or offered for sale.

RESPONSE:

14. Documents sufficient to identify the persons that have purchased products or services bearing Applicant's Mark.

RESPONSE:

15. Representative examples of price lists and other documents that show the prices, both wholesale, suggested retail, and any other price category utilized by Applicant, at which products or services under Applicant's Mark have been sold or offered for sale.

RESPONSE:

16. Documents sufficient to show Applicant's monthly, if available, or, if not, for each separate period reflected in Applicant's books and records, gross wholesale sales, in dollars and in units, of each of the products or services bearing Applicant's Mark.

RESPONSE:

17. All Documents evidencing, referring, or relating to any sales or marketing plans for products or services sold under Applicant's Mark.

RESPONSE:

18. All Documents evidencing, referring, or relating to any products sold or offered for sale or intended to be offered for sale in the future under Applicant's Mark.

RESPONSE:

19. All Documents evidencing, referring, or relating to the types of purchasers or users of any products or services sold under Applicant's Mark, including, but not limited to, any research or studies related to such purchasers or users.

RESPONSE:

20. All Documents evidencing, referring, or relating to Applicant's expenditures for each advertising or promotional document, medium, or activity used to advertise or promote products or services under Applicant's Mark.

RESPONSE:

21. Documents sufficient to identify the types of purchasers or end users who are or may be expected purchasers or users of any products or services sold under Applicant's Mark in the United States, including, but not limited to, any research or studies related to such purchasers or users.

RESPONSE:

22. Documents sufficient to identify any alleged qualities or advantages of Applicant's products or services sold under Applicant's Mark.

RESPONSE:

23. Documents sufficient to identify any actual or threatened litigation involving trademark infringement or unfair competition claims in which Applicant has been engaged including any opposition or cancellation proceedings before the United States Patent and Trademark Office.

RESPONSE:

24. Copies of any and all settlement, consent, or other agreements entered with third-parties concerning Applicant's enforcement efforts in regard to Applicant's Mark.

RESPONSE:

25. All Documents which relate or refer to all content displayed on any website maintained or used by Applicant which makes any use of Applicant's Mark.

RESPONSE:

26. Each and every document which Applicant will rely upon to establish the claims and defenses set forth in its Answer in this matter.

RESPONSE:

27. All specimens submitted to the USPTO in connection with the applications for Applicant's Mark.

RESPONSE:

28. Each and every document which relates or refers to all bona fide uses of Applicant's Mark.

RESPONSE:

29. All documents referred to in your answers to *Opposer's First Set of Interrogatories to Applicant* not produced in response to another request for production of documents.

RESPONSE:

DATED this 9th day of September, 2011.

THE TRADEMARK COMPANY, PLLC

/Matthew H. Swyers/

Matthew H. Swyers, Esquire

344 Maple Avenue West, Suite 151

Vienna, VA 22180

Telephone (800) 906-8626 x100

Facsimile (270) 477-4574

mswyers@TheTheTrademarkCompany.com

Attorney for Opposer

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
The Trademark Trial and Appeal Board**

AlpinBreeze, LLC,	:	
	:	
Opposer,	:	Opposition No. 91198063
	:	
vs.	:	
	:	
Evertec Information Technology Co., LTD.,	:	Serial No.: 77922346
	:	Mark: ALPINBREEZE and design
Applicant.	:	Published: September 7, 2010

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a copy of the foregoing pleading this 9th day of September, 2011, to be served, via first class mail and email, per agreement, upon:

STEVEN M. RABIN
RABIN & BERDO, P.C.
1101 14TH ST NW STE 500
WASHINGTON, DC 20005-5633

You-Yi Lin
1F NO. 229 SIHWEI STREET , JHUBEI CITY
HSINCHU COUNTY, 30242
TAIWAN
Frans_lin@evertec.asia

/Matthew H. Swyers/
Matthew H. Swyers

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
THE TRADEMARK TRIAL AND APPEAL BOARD**

.....
AlpinBreeze, LLC.

Opposer,

vs.

Evertec Information Technology Co., LTD.

Applicant,
.....

Opposition No. 91198063

ANSWERS TO OPPOSER'S FIRST SET OF INTERROGATORIES

The Applicant, EVERTEC INFORMATION TECHNOLOGY CO., LTD. ("Applicant"), responds to the first set of interrogatories of Opposer, AlpinBreeze, LLC. ("Opposer"), by responding to each enumerated paragraph of the said interrogatory.

ANSWER NO. 1:

Applicant operates business items such as manufacturing and selling products like PC peripherals, consuming electronics, and so on in Class 9, aroma diffuser, humidifier, and so on in Class 11, essential oils in Class 3, and so forth as well as international trade business.

ANSWER NO. 2:

You-Yi Lin, president of Applicant, Mr. Lin's wife, and friends of the former have knowledge related to selection, adoption, and so forth of Applicant's Mark.

ANSWER NO. 3:

Please see Answer No.1 that products in Class 9, 11, and 3 are intended to be used with Applicant's Mark as well as the future usage, and the future dates and geographic areas will depend on the budgets, markets, and customers.

ANSWER NO. 4:

Ms. Samanta Ng of Opposer had discussed with You-Yi Lin of Applicant for many projects to cooperate before creating the company, the Opposer (see also the document of RESPONSE-6-1). Applicant's Mark comes from one of those projects that You-Yi Lin took care of the logo matter (see the contract with



the designer, document of RESPONSE-2-1, and the payment transfer record to designer, document of RESPONSE-2-2).

ANSWER NO. 5:

The data is not available.

ANSWER NO. 6:

Please refer to document of RESPONSE-9-1.

ANSWER NO. 7:

The data is not available.

ANSWER NO. 8:

Please refer to ANSWER NO. 4.

ANSWER NO. 9:

Please refer to documents of RESPONSE-10-1 and RESPONSE-10-2.

ANSWER NO. 10:

The goal of Applicant to reach the ultimate user will be to enter retail store channels.

ANSWER NO. 11:

Please refer to ANSWER NO. 3.

ANSWER NO. 12:

The data is not available.

ANSWER NO. 13:

The data is not available.

ANSWER NO. 14:

Please refer to ANSWER NO. 4.

ANSWER NO. 15:

Please refer to document of RESPONSE-4-2.

ANSWER NO. 16:

Please refer to document of RESPONSE-4-2.

ANSWER NO. 17:

Please refer to ANSWER NO. 4.

ANSWER NO. 18:

Please refer to ANSWER NO. 3.

ANSWER NO. 19:

The data is not available.

ANSWER NO. 20:

Please refer to ANSWER NO. 3.

ANSWER NO. 21:

Please refer to ANSWER NO. 4.

ANSWER NO. 22:

Please refer to ANSWER NO. 4.

ANSWER NO. 23:

Please refer to ANSWER NO. 2, 3, and 4.

ANSWER NO. 24:

Please refer to ANSWER NO. 4.

ANSWER NO. 25:

Please refer to ANSWER NO. 4.

ANSWER NO. 26:

Please refer to ANSWER NO. 4 and 16.

ANSWER NO. 27:

The data is not available.

ANSWER NO. 28:

The data is not available.

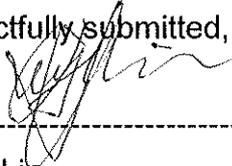
ANSWER NO. 29:

The data is not available.

ANSWER NO. 30:

No.

Respectfully submitted,



Date: October 8, 2011

You-Yi Lin

Evertec Information Technology Co., LTD.

1F., No. 229, Sihwei St., Jhubei City

Hsinchu County, 30242, Taiwan

Tel: 886-2-8286-2866 Fax: 886-2-2848-3458

Email: frans_lin@evertec.asia

.....
CERTIFICATE OF SERVICE

I hereby certificate that a copy of the foregoing **ANSWERS TO OPPOSER'S FIRST SET OF INTERROGATORIES** has been sent to addresses below by air mail from Taiwan on October 8, 2011.

Matthew H. Swyers
The Trademark Co.
344 Maple Ave W Ste 151
Vienna Va 22180, US
Tel: (800) 906-8626

/You-Yi Lin/
You-Yi Lin

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
THE TRADEMARK TRIAL AND APPEAL BOARD

.....
AlpinBreeze, LLC.
Opposer,
vs.
Evertec Information Technology Co., LTD.
Applicant,
.....

Opposition No. 91198063

**RESPONSES TO OPPOSER'S FIRST REQUESTS
FOR PRODUCTION OF DOCUMENTS**

The Applicant, EVERTEC INFORMATION TECHNOLOGY CO., LTD. ("Applicant"), responds to the first requests for production of documents of Opposer, AlpinBreeze, LLC. ("Opposer"), by responding to each enumerated paragraph of the said request for production.

RESPONSE. 1:

Please refer to document of RESPONSE-1-1.

RESPONSE. 2:

Please refer to documents of RESPONSE-2-1 and 2-2.

RESPONSE. 3:

Please refer to documents of RESPONSE-3-1.

RESPONSE. 4:

Please refer to documents of RESPONSE-4-1 and 4-2.

RESPONSE. 5:

Please refer to documents of RESPONSE-5-1.

RESPONSE. 6:

Ms. Samanta Ng of Opposer had discussed with You-Yi Lin of Applicant for many projects to cooperate before creating the company, the Opposer (see also the document of RESPONSE-6-1).



RESPONSE. 7:

Please refer to documents of RESPONSE-7-1.

RESPONSE. 8:

Please refer to documents of RESPONSE-8-1.

RESPONSE. 9:

Please refer to documents of RESPONSE-9-1.

RESPONSE. 10:

Please refer to documents of RESPONSE-10-1 and 10-2.

RESPONSE. 11:

Please refer to documents of RESPONSE-11-1.

RESPONSE. 12:

Please refer to documents of RESPONSE-9-1.

RESPONSE. 13:

Please refer to documents of RESPONSE-9-1.

RESPONSE. 14:

Please refer to documents of RESPONSE-14-1.

RESPONSE. 15:

Please refer to documents of RESPONSE-9-1.

RESPONSE. 16:

The data is not available.

RESPONSE. 17:

Please refer to documents of RESPONSE-9-1.

RESPONSE. 18:

Please refer to documents of RESPONSE-9-1.

RESPONSE. 19:

Please refer to documents of RESPONSE-9-1.

RESPONSE. 20:

Please refer to documents of RESPONSE-10-1, 10-2, and 20-1.

RESPONSE. 21:

Please refer to documents of RESPONSE-14-1.

RESPONSE. 22:

Please refer to documents of RESPONSE-22-1.

RESPONSE. 23:

No.

RESPONSE. 24:

No.

RESPONSE. 25:

Please refer to documents of RESPONSE-9-1.

RESPONSE. 26:

Please refer to documents of RESPONSE-2-1, 2-2, 4-2, and 6-1.

RESPONSE. 27:

Please refer to documents of RESPONSE-3-1, and 27-1.

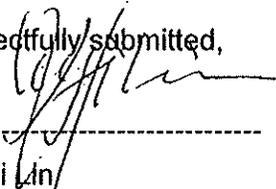
RESPONSE. 28:

Please refer to documents of RESPONSE-1-1.

RESPONSE. 29:

No.

Respectfully submitted,



Date: October 8, 2011

You-Yi Lin

Evertec Information Technology Co., LTD.
1F., No. 229, Sihwei St., Jhubei City
Hsinchu County, 30242, Taiwan
Tel: 886-2-8286-2866 Fax: 886-2-2848-3458
Email: frans_lin@evertec.asia

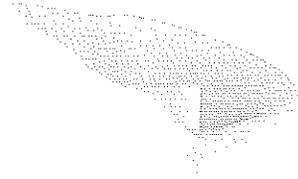
.....
CERTIFICATE OF SERVICE

I hereby certificate that a copy of the foregoing **RESPONSES TO OPPOSER'S FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS** has been sent to addresses below by air mail from Taiwan on October 8, 2011.

Matthew H. Swyers
The Trademark Co.
344 Maple Ave W Ste 151
Vienna Va 22180, US
Tel: (800) 906-8626

/You-Yi Lin/
You-Yi Lin

Response H



alpinbreeze®



Response 21

ALPINBREEZE LOGO 設計合約書

立合約書人 林佑丞 (以下簡稱甲方) 與 林欣怡 (以下簡稱乙方) 合作 Logo 設計 案，經雙方協議訂定合作契約，以茲雙方共同信守。

雙方共同議定條款如下：

一、設計案內容：ALPINBREEZE LOGO 設計 (其細目以附件之設計製作費用估價單為準)。

二、甲方委託乙方擔任本設計案之 ALPINBREEZE LOGO 設計 職務。

三、經雙方同意議定於下列時間完成設計與製作，雙方應共同遵守並控制設計製作之進度與品質。

3-1. 設計稿件交付時間

- (1) 提案完成時間：民國 97 年 12 月 1 日。
- (2) 完稿完成時間：民國 97 年 12 月 31 日。

3-2. 乙方於上述時間範圍內，與甲方溝通協商後，乙方應配合甲方意見為必要之修改。甲方審核稿件時間須自收到稿件時起四日內確定稿件內容；甲方審核稿件時間如逾四日，乙下次交稿時間則依甲方所逾日數順延之；修改次數以三次為限，如超過議定修改之次數，每次修改的改設計費百分之二十。

3-3. 雙方議定，乙方如未按預訂進度交出上述作品，則甲方有權，以一日扣除其平面設計費百分之一為罰金，並累計直到交出作品為止。

四、設計經費總計新臺幣 3,000 元整，甲方須於簽約同時支付新臺幣 1,000 元整之訂金。

五、雙方議定，乙方交付完成品之同時甲方需支付新臺幣 2,000 元之尾款，甲方若有延遲付款之情形，則每延一日需加付設計費百分之一為罰金，並累計直到付清款項為止。

六、乙方設計製作稿件進行中，因天候、製作意見、情事變更或不可歸責乙方之事由等因素而終止時，依下列方式計費且著作權仍歸乙方所有：

- (1) 提案階段：依總金額之 30% 計算。
- (2) 完稿階段：依總金額之 70% 計算。

七、如作業中有大幅修正或追加稿件製作時，交件時間得由雙方另行議定，並另行追加製作費用。

八、本合約書以中華民國為準據法，若因本合約書涉訟，甲乙雙方同意以乙方居住地之地方法院為第一審管轄法院。

十、本合約書正本壹式貳份，甲乙雙方各執存壹份為憑。

立合約書人

甲 方 林佑丞 (簽章)

統一編號：_____

代表人：_____

地 址：台北縣蘆洲市長安街 49 巷 2 弄 2 號 4 樓

電 話：02-82862866

乙 方：林欣怡 (簽章)

統一編號：_____

代表人：_____

地 址：桃園縣中壢市民族路 5 段 435 號

電 話：03-4200912; 0920-557071

中 華 民 國 97 年 12 月 1 日

Response 77



7009.01.05

Assigned Account

日期	摘要	借方	贷方	余额
	张前页			\$14,270.00
97.12.30	博联提	\$4,000.00		\$10,270.00
98.01.01	金融卡	\$3,000.00		\$7,270.00
98.01.05	證券款 遠東銀		\$28,375.00	\$35,645.00
98.01.05	銀行轉	\$3,000.00		\$32,645.00
98.01.05	手續費	\$17.00		\$32,628.00
98.01.05	博联提	\$25,000.00		\$7,628.00
98.01.05	金融卡	\$2,000.00		\$5,628.00
98.01.06	證券款 遠東銀		\$28,375.00	\$34,003.00
98.01.06	金融卡	\$22,000.00		\$12,003.00
98.01.08	博联提	\$10,000.00		\$2,003.00
				\$78,513.00
98.01.13	博联提	\$30,000.00		\$48,513.00
98.01.14	金融卡	\$7,000.00		\$41,513.00
98.01.14	手續費	\$3.00		\$41,507.00
98.01.14	博联提	\$30,000.00		\$11,507.00
98.01.15	金融卡	\$3,000.00		\$8,507.00
98.01.19	證券款	\$5,220.00		\$3,287.00
98.01.20	票代入 折讓款		\$75.00	\$3,782.00
98.01.21	證券款 匯		\$9,053.00	\$12,835.00
98.01.22	證券款	\$3,000.00		\$9,835.00
98.01.26	金融卡	\$2,000.00		\$7,835.00
98.01.28	手續費	\$9.00		\$7,826.00

Response 3-1

註：本契約書所有內容文字請填寫工整

第一聯：法盟留存，第二聯：客戶留存

智慧財產權案件委任契約書

檔號：

委任人(下稱甲方)委託受任人(下稱乙方)辦理 專利 商標 著作權 其他

雙方以誠信原則協議訂定契約內容如下：

一、委辦內容	種別或商品名稱	國別	類別	金額
1	LED 燈泡	台灣	11	100,000
2				
3				
4				
5				

- 二、甲方委辦案件共 二 件，應給付乙方合計新台幣 壹拾萬元 整(含規費、代辦費)，於訂定本契約時一次付清。甲方委託乙方處理前揭案件確屬本身業務需要特別委任乙方處理，訂約後甲方擬撤回委辦，任何已發生費用(含代辦費)仍應全數照付，甲方同意所繳交訂金支付乙方作業費用。若甲方有積欠前開費用或所付票據不兌現，經催繳後仍未繳清，雙方同意視為違約，甲方特別同意乙方逕行具文向該委辦案件受理單位撤回本案。本契約簽訂後，若規費調整，不足部份概由甲方補齊。
- 三、乙方收受甲方前揭費用，負責代撰申請書、說明書、代繪圖示、印刷、繕打等作業，若委辦事項僅為申請事項，其前揭費用不包括請求實審、申復、修正、陳述意見、面詢、註冊、提早公開、異議、再審查、評定、舉發、撤銷、廢止、答辯、訴願及行政訴訟案程序之費用。公告費、證書費及年費需依程序另行委由乙方代繳。前揭委辦費用不含國外代理人案件結案費，甲方應依乙方通知另行支付。
- 四、乙方接受甲方委辦後之作業過程，因甲方因素而必需修改已作業之內容，甲方應另行支付修正費用。
- 五、甲方應依誠信提供乙方承辦案件所需之完整資料及文件，且不得藉故拖延或有虛偽情事，或有變更公司組織、地址、電話、承辦人等相關事項時，應立即主動通知乙方，否則若因而影響案情、延誤法定期限或損害他人權益，概由甲方自行負責。乙方處理本案時，應善盡職務上保密之責，否則應對甲方負擔損害賠償之責。
- 六、乙方於受任後若未按本契約完成代理或代辦責任範圍內之作業時，雙方同意以前揭費用扣除行政規費及稅金後之餘款作為賠償甲方損失之金額，並同意於乙方返還餘款後，本契約書即同時解除並失效。
- 七、雙方同意以台灣台北法院為第一審管轄法院。
- 八、本契約書壹式兩份，經甲乙雙方業務經辦人或代表人簽字或蓋章後生效，雙方各執乙份為憑。
- 九、特約事項：新關王二耳殼案

委任人：集維特科技有限 經辦人：徐林
 地址：台北市信義路四段四一五號六樓之六 電話：02-2345-1960
 網址：www.famost.com.tw 傳真：02-2345-1961
 E-mail：service@famost.com.tw 手機：0912-1234-5678
 東家：集維特 Skype：famost

受任人：法盟國際智慧產權事務所
 地址：11051 台北市信義路四段四一五號六樓之六
 電話：(02) 2345-1960
 E-mail：service@famost.com.tw
 傳真：(02) 2345-1961

中華民國 107 年 11 月 19 日
 ※附件：缺件請打「V」

附件	委任狀	執照	身分證	樣品	圖樣	指定商品	資料表			
缺件										
日期										

契約號	1129019
洽辦人	<u>徐林</u>

管理部流程：

1	2	3	4

本所編號：

備註：

Response 4-2

From: Kenny Lai Cheong
Sent: Tuesday, March 15, 2011 6:30 AM
To: Famost-fd
Cc: Scott Alprin; Tracy Zhang
Subject: Discovery conference (your ref. 1672-F-90191; our ref: FAM 195)

Dear Lilian,

We are writing to let you know that a telephone call occurred today (March 14, 2011) with counsel for the opposer Alpinbreeze LLC. Please note that this telephone call, referred to as a "discovery conference," is required under the rules of the Trademark Trial and Appeal Board (TTAB).

In the call, we agreed to the standard protective order, which allows the parties to share confidential information during discovery.

In addition, opposing counsel inquired if Evertec would agree to abandon its application if Alpinbreeze LLC paid Evertec money. We responded that we would inquire. Therefore, please let us know if your client would abandon its application for an amount of money. If so, how much?

We noted that Evertec owns the copyright in the design of the Alpinbreeze mark. Opposing counsel commented that his client may be willing to abandon its design mark, if it were allowed to reapply under a standard word mark. Please let us know how your client feels about the opposer abandoning its design mark, and reapplying for the mark "Alpinbreeze" as a standard word mark. Thus a potential settlement could be:

- Your client abandons its mark;
- Alpinbreeze LLC abandons its mark and reapplies;
- Alpinbreeze pays Evertec a particular sum of money.

Please let us know if your client is interested in this potential settlement agreement.

Finally, the possibility of the parties agreeing to limited discovery in order to save costs was discussed. Please let us know how your client feels about this.

On the other hand, your client indicated that it may wish to pursue this case until the opposer gives up due to financial reasons. If so, your client may not wish to settle until after the discovery period (or not at all). Please let us know your client's general view on settlement.

We look forward to hearing from you.

Please note that preparing for and taking part in the telephone conference and reporting to you in this e-mail took 0.8 hours. Therefore, please note that today we have added 0.8 hours to your client's account. Please let us know if there is any problem with this.

Best regards,

Kenny Lai Cheong for,
Scott Alprin

阿爾卑斯微風

增添您生活的樂趣與想像空間

alpinbreeze ~ Image & fun for life



 alpinbreeze

Response 5-1

Response 6-1
R-1/17

Frans 說:

hi

Sam-ViewSonic 說:

hello my dear

Sam-ViewSonic 說:

how are you ?

Frans 說:

good..and you?

Sam-ViewSonic 說:

still alive with the typhoon ?

Frans 說:

Frans 說:

my family are alright

Sam-ViewSonic 說:

ok that's cool

Frans 說:

there will be another next week

Sam-ViewSonic 說:

you have to go to work with typhoon ?

Sam-ViewSonic 說:

or stay at home ?

Frans 說:

stay at home...Mike just called me for the digital fram matter

Sam-ViewSonic 說:

and ?

Frans 說:

he told me you have sort out the problem in Netherlands?

Sam-ViewSonic 說:

yes

Sam-ViewSonic 說:

but it was hard and painfull you can beleive me

Frans 說:

so you will be laid off..

Frans 說:

i see

Sam-ViewSonic 說:

laid ?

Frans 說:

won't

Frans 說:

lay off

Sam-ViewSonic 說:

don't understand this word sorry

Sam-ViewSonic 說:

Frans 說:

you won't be forced to resign..

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Sam-ViewSonic 說:

no no

Frans 說:

Sam-ViewSonic 說:

but the dpf we spoke together is not for this deal

Sam-ViewSonic 說:

is for the next one

Frans 說:

yes

Sam-ViewSonic 說:

i hope next year

Frans 說:

yes..Mike mentioned he has talked to ViewSonic's vendor

Sam-ViewSonic 說:

and ?

Sam-ViewSonic 說:

i have another opportunity

Frans 說:

I can also get some vendors if you need for next ones

Sam-ViewSonic 說:

for retailers in switzerland

Sam-ViewSonic 說:

i spoke to www.conforama.ch

Frans 說:

but what is the business model?

Sam-ViewSonic 說:

i don't know

Sam-ViewSonic 說:

there is no business model

Sam-ViewSonic 說:

i just get an important information for the retail business

Sam-ViewSonic 說:

conforama is one of the biggest retailers in europe

Frans 說:

Oh

Sam-ViewSonic 說:

and he told me : 10 " dpf at 99 chf

Sam-ViewSonic 說:

i will buy immediately

Sam-ViewSonic 說:

99 chf = 61 euro street price

Frans 說:

i see

Sam-ViewSonic 說:

it means that if we want to start together business on dpf into retail

Frans 說:

yes

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Sam-ViewSonic 說:

the price for 10 " dpf must be 44 euro

Sam-ViewSonic 說:

retailer purchase price

Sam-ViewSonic 說:

it's quite aggressive

Frans 說:

i see

Sam-ViewSonic 說:

but i think we could provide something like that

Sam-ViewSonic 說:

not impossible

Frans 說:

they want margin of 27%?

Sam-ViewSonic 說:

not

Sam-ViewSonic 說:

61 - 7.6 % vat

Sam-ViewSonic 說:

- 12% (margin retailer)

Sam-ViewSonic 說:

- 3 (recycling tax)

Frans 說:

(61-44)/61=27%

Sam-ViewSonic 說:

i know but the retailer have only 12 % on that 27

Sam-ViewSonic 說:

the rest is vat - recycling tax

Sam-ViewSonic 說:

so if you see an opportunity for 10 " dpf

Frans 說:

how many quantity?

Sam-ViewSonic 說:

with a price delivered in switzerland at 35 euro

Sam-ViewSonic 說:

it depends 500 - 1000 to begin

Sam-ViewSonic 說:

if conforama is interested into this price i can find other

Sam-ViewSonic 說:

retailers

Frans 說:

whose brand?

Sam-ViewSonic 說:

any brands

Sam-ViewSonic 說:

for retail quality is lower

Sam-ViewSonic 說:

and brand is not important

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Sam-ViewSonic 說:

the only thing we must give is 1 year warranty

Sam-ViewSonic 說:

and good design

Sam-ViewSonic 說:

because the guy confirmed me that dpf is really difficult to sell on the retail market

Frans 說:

i see

Sam-ViewSonic 說:

but if we continue to serach

Sam-ViewSonic 說:

we will for sure find 1 time a good opportunity

Sam-ViewSonic 說:

to make money

Sam-ViewSonic 說:

start a new business

Sam-ViewSonic 說:

did you get the price for the pants ?

Frans 說:

not yet..I am chasing them today..should reply to me today but there was typhoon

Sam-ViewSonic 說:

yes no stress

Sam-ViewSonic 說:

i still didn't had time to think about

Sam-ViewSonic 說:

i am quite overbusy

Frans 說:

you mean we need to get the price of euro 35 for the 10'?

Sam-ViewSonic 說:

and i have some problem at viewsonic

Sam-ViewSonic 說:

35 euro deliverred in switzerland yes

Frans 說:

how much is the freight you think?

Sam-ViewSonic 說:

i really have no idea

Sam-ViewSonic 說:

of what is the freight from taiwan to switzerland

Sam-ViewSonic 說:

i think mike know

Frans 說:

yes..he has to know

Frans 說:

$(44-35)/44=20\%$

Sam-ViewSonic 說:

yes

Frans 說:

will you set up a company?

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Sam-ViewSonic 說:

no problem for me

Sam-ViewSonic 說:

first i need to open a small company

Sam-ViewSonic 說:

than open a really company with a capital

Sam-ViewSonic 說:

a real company

Sam-ViewSonic 說:

sorry

Frans 說:

should I start to search vendors tomorrow?

Sam-ViewSonic 說:

to see the price yes

Sam-ViewSonic 說:

you must understand something frans

Frans 說:

yes

Sam-ViewSonic 說:

actually the business is hard

Sam-ViewSonic 說:

and we must inform ourselves of what is possible or not

Sam-ViewSonic 說:

now we search we see we test what is the price needed by the market

Frans 說:

yes..i see

Sam-ViewSonic 說:

if we continue to search we will for sure 1 time

Sam-ViewSonic 說:

get a nice opportunity to start our business

Frans 說:

I need to ask vendors to quote the 10" firstly

Sam-ViewSonic 說:

yes and see if we can find product 10" at this price

Sam-ViewSonic 說:

if yes what is the quality ?

Frans 說:

yes

Sam-ViewSonic 說:

what is the moq

Frans 說:

I will ask them also

Sam-ViewSonic 說:

ok

Sam-ViewSonic 說:

i think we must continue to search to see to compare

Sam-ViewSonic 說:

and 1 time the good opp will arrive

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Frans 說:

yes. I will check some vendors.....so we have three ways to cooperate

Sam-ViewSonic 說:

i time i aslo contacted a company in hong kong

Sam-ViewSonic 說:

company name is puzhen

Frans 說:

1.Lexma 2. dfm 3. pants

Sam-ViewSonic 說:

www.puzhen.com

Sam-ViewSonic 說:

i have all puzhen product at home

Sam-ViewSonic 說:

i am really a fan

Sam-ViewSonic 說:

i contacted them to distribute them in europe

Frans 說:

Sam-ViewSonic 說:

but the guy was not speaking very well english

Sam-ViewSonic 說:

so it was really hard to discuss togheter

Frans 說:

Sam-ViewSonic 說:

i only understood that puzhen was speaking with a distributor in belgium

Sam-ViewSonic 說:

they were before distributed by a german distributor and they stopped their colloboration

Frans 說:

I can also talk to them as they can speak Chinese

Sam-ViewSonic 說:

no instead of producing our products

Sam-ViewSonic 說:

we could maybe find another way with puzhen

Sam-ViewSonic 說:

Sam-ViewSonic 說:

the only thing i am really afraid to is to start production under our name

Sam-ViewSonic 說:

because we need capital and money to start production

Frans 說:

yes

Sam-ViewSonic 說:

if we search a business to distribute chinese product in switzerland

Sam-ViewSonic 說:

we don't need capital

Frans 說:

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maybe we can make money from Lexma firstly as we don't need capital
Sam-ViewSonic 說:

yes but we cannot compare lexma and puzhen products

Sam-ViewSonic 說:

lol

Sam-ViewSonic 說:

Sam-ViewSonic 說:

lexma is into the IT really hard market

Sam-ViewSonic 說:

puzhen is a well known company

Sam-ViewSonic 說:

**all around the world but they don't speak well english so they are not well distributed
in europe**

Frans 說:

i see

Sam-ViewSonic 說:

and puzhen is the perfect product and company to start a business at the momen

Sam-ViewSonic 說:

†

Sam-ViewSonic 說:

because it's aromatherapy products

Frans 說:

i see

Sam-ViewSonic 說:

european pepole like all what is natural and are ready to pay for this

Frans 說:

i see

Sam-ViewSonic 說:

you can maybe call puzhen

Frans 說:

yes.

Sam-ViewSonic 說:

and discuss with them we are a swiss company and looking to distribut them

Sam-ViewSonic 說:

i already buy the puzhen.ch website

Frans 說:

ok..I will do it soon

Sam-ViewSonic 說:

domain name

Sam-ViewSonic 說:

and also puzhen.fr

Sam-ViewSonic 說:

is mine

Frans 說:

oh

Sam-ViewSonic 說:

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Sam-ViewSonic 說:

when i saw a few month ago that the 2 web name was free

Frans 說:

i see

Sam-ViewSonic 說:

i bought them immediately

Frans 說:

so you will distribut firstly in Swiss

Sam-ViewSonic 說:

it's egal for me

Frans 說:

i see

Sam-ViewSonic 說:

i can start anywhere but easiest would be for sure switzerland

Frans 說:

i see

Sam-ViewSonic 說:

so i am looking on business opportunity since many month now

Frans 說:

what do you want me to do with them?

Sam-ViewSonic 說:

if you can i would like that you get a call there and say :

Frans 說:

I will call them tomorrow

Sam-ViewSonic 說:

you were already contacted by my colleague in switzerland few month ago

Sam-ViewSonic 說:

unfortunately she had some difficulties to understand you

Frans 說:

yes

Sam-ViewSonic 說:

you must sell us

Sam-ViewSonic 說:

to them and say that after my last call i engaged you

Sam-ViewSonic 說:

to be my collaborator in china and taiwan for our distribution business

Sam-ViewSonic 說:

and see how are the negociation with the belgian distributor

Sam-ViewSonic 說:

and see if we really cannot distribute puzhen in switzerland

Frans 說:

I see

Sam-ViewSonic 說:

in clear explain to them that we can offer more than the belgian company

Sam-ViewSonic 說:

Sam-ViewSonic 說:

i am sure chinese people will be really happy to work with a company

Pa/in

Sam-ViewSonic 說:

with both people in china and in europe

Sam-ViewSonic 說:

no other distributor on the market can provide this service

Frans 說:

i see...I will call them and keep you informed

Sam-ViewSonic 說:

if you can negotiate something with puzhen

Sam-ViewSonic 說:

we can start tomorrow

Frans 說:

I will call them

Sam-ViewSonic 說:

we already have the we domain name

Sam-ViewSonic 說:

are you a good sales person ?

Frans 說:

should be...by the way, will you make the budget plan for Lexma? I can apply the money for you...

Sam-ViewSonic 說:

yep i still must do that

Sam-ViewSonic 說:

but as said to you

Frans 說:

I may need to get some money from Lexma for our cooperated business..

Sam-ViewSonic 說:

i cannot imagine how we will make money with lexma

Sam-ViewSonic 說:

for sure a few \$ it's possible

Sam-ViewSonic 說:

but our margin on that business is so low

Sam-ViewSonic 說:

how can i win money with 1.5 %

Sam-ViewSonic 說:

on products of 10 \$

Frans 說:

2% for you

Sam-ViewSonic 說:

yes but even 2 %

Sam-ViewSonic 說:

there is something to do for lexma

Sam-ViewSonic 說:

but we will win 5000\$ per year

Frans 說:

UMD in Spain used to buy from Genius-another company for US\$10M a year..

Sam-ViewSonic 說:

give me the genius website please

Frans 說:

one moment

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Frans 說:

http://www.geniusnet.com.tw/geniusOnline/online.portal;jsessionid=LjnRlJv81Qzwvt0W4tLWVLJMhz43L9n5yT8Q52TNVJNZ10D1Tvzi3!274241307?_afpb=true&_pageLabel=homePage&_idcaPortlet_actionOverride=%2Fportlets%2FhomeArea%2Fidca%2Fbegin&test=default

Frans 說:

but Genius products are more expensive

Sam-ViewSonic 說:

how many employee ?

Frans 說:

around 4000 including factories

Sam-ViewSonic 說:

ok

Frans 說:

I worked for Genius before

Sam-ViewSonic 說:

ok so what i can see is that

Frans 說:

they sell around US\$20M in Ukraine

Sam-ViewSonic 說:

eastern country are not a reference

Sam-ViewSonic 說:

that's other market

Frans 說:

their biggest customer is Buro in Russia

Sam-ViewSonic 說:

new born market

Sam-ViewSonic 說:

yes but by viewsonic it's the same

Sam-ViewSonic 說:

eastern country are young market

Frans 說:

they sell minisaturm in German

Sam-ViewSonic 說:

you cannot compare

Sam-ViewSonic 說:

yep

Sam-ViewSonic 說:

they have a hotline

Sam-ViewSonic 說:

in düsseldorf

Sam-ViewSonic 說:

service center

Sam-ViewSonic 說:

they are more diversified

Sam-ViewSonic 說:

graphic tablets

Frans 說:

yes...

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Sam-ViewSonic 說:

they are already well refereced into the european press

Sam-ViewSonic 說:

i saw on their website that pc mazagine tested their products

Frans 說:

yes

Sam-ViewSonic 說:

so that means clearly that genius in europe is considered as a brand

Sam-ViewSonic 說:

lexma will be considered as no name products

Frans 說:

but they are weak in western Europe

Frans 說:

understood

Sam-ViewSonic 說:

so it's exctly like viewsonic in france

Sam-ViewSonic 說:

well known company

Sam-ViewSonic 說:

also in eastern country

Sam-ViewSonic 說:

germany - switzerland - austria viewsonic is a no name company

Frans 說:

understood it is a little bit difficult to build their brand

Sam-ViewSonic 說:

not a little my dear

Sam-ViewSonic 說:

it's viewsonic's main problem

Frans 說:

understood

Sam-ViewSonic 說:

ok

Sam-ViewSonic 說:

so when i start for lexma

Frans 說:

yes

Sam-ViewSonic 說:

i will have exactly the same problem

Sam-ViewSonic 說:

as by viewsonic but it's even worse

Frans 說:

understood

Sam-ViewSonic 說:

because lexma is really not kno n

Frans 說:

i see

Sam-ViewSonic 說:

and the sitaution of lexma is even worse than viewsonic because there is no company like

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logitech into the monitor business

Frans 說:

maybe we can start from products with lower prices

Sam-ViewSonic 說:

there is already plenty of no name cheap brand

Frans 說:

i see

Sam-ViewSonic 說:

just to give you an example

Sam-ViewSonic 說:

please go on www.digitec.ch

Sam-ViewSonic 說:

biggest internet retailer in switzerland

Sam-ViewSonic 說:

please go on the website

Sam-ViewSonic 說:

than on the top you click on english

Frans 說:

I think you are smart..may generate a way to enter ..

Sam-ViewSonic 說:

for the language

Sam-ViewSonic 說:

i can do all

Sam-ViewSonic 說:

but please go to www.digitec.ch

Sam-ViewSonic 說:

than you click on english on the top of the main page

Frans 說:

yes

Sam-ViewSonic 說:

ok than on the left you click into the menu on peripherals

Sam-ViewSonic 說:

than mice

Sam-ViewSonic 說:

and than you see all the brand name into the list

Sam-ViewSonic 說:

please let me know if you know sharkoon ?

Frans 說:

Labtec is Logitech's second brand with lower prices

Frans 說:

no

Sam-ViewSonic 說:

nzxt gaming ?

Sam-ViewSonic 說:

ocz?

Sam-ViewSonic 說:

razer ?

Sam-ViewSonic 說:

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revoltec ?

Sam-ViewSonic 說:

saitek ?

Sam-ViewSonic 說:

silverstone ?

Sam-ViewSonic 說:

zalman ?

Sam-ViewSonic 說:

i never heard something about these brand but i live in switzerland

Frans 說:

i see..

Frans 說:

similar situation in Hong Kong

Sam-ViewSonic 說:

there is actually 25 brands by digitec

Frans 說:

they have two brands which are Logitech and Microsoft

Frans 說:

understood

Sam-ViewSonic 說:

25 brands on a country of 7 mio person

Sam-ViewSonic 說:

only by 1 etailer

Sam-ViewSonic 說:

we know that logitech is taking 80<% of the market

Frans 說:

you can also try France or Germany

Sam-ViewSonic 說:

than dell - hp 15 %

Sam-ViewSonic 說:

than 5 % are fore hama - nzxt - ocz - saitek - sharkoon - silvestone

Frans 說:

or even North europe

Sam-ViewSonic 說:

it's the same situation

Sam-ViewSonic 說:

in france i can say that's even worse

Frans 說:

understood

Sam-ViewSonic 說:

germany is even even worst than germany

Sam-ViewSonic 說:

than france sorry

Frans 說:

i see

Sam-ViewSonic 說:

so i can sell to digitec

Sam-ViewSonic 說:

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no problem i can sell all

Sam-ViewSonic 說:

but how many ?

Sam-ViewSonic 說:

1000 mouse per year ?

Sam-ViewSonic 說:

2000 mouse per year ?

Sam-ViewSonic 說:

10k mouse per year ?

Sam-ViewSonic 說:

10 000 x 10\$ = 100 k \$ x 1.5 % = 1500 \$

Frans 說:

I don't know...but I trust your abilities

Sam-ViewSonic 說:

yes but even if i could sell 10000 mouse per year to digitec

Sam-ViewSonic 說:

it's impossible but even if i could do this

Sam-ViewSonic 說:

i will win 1500 \$

Sam-ViewSonic 說:

Frans 說:

they also have keyboards/Hub/speakers...

Sam-ViewSonic 說:

keyboard - speaker as well

Sam-ViewSonic 說:

please click on the left on keyboard desktop

Sam-ViewSonic 說:

and just under on pc speakers

Sam-ViewSonic 說:

razer revolttec roline saited trust zboard

Sam-ViewSonic 說:

Sam-ViewSonic 說:

you know what i mean frans ?

Frans 說:

I understood this situation..we have hundreds of brands in Taiwan

Sam-ViewSonic 說:

so it's the same

Sam-ViewSonic 說:

here but we are here on a very old market

Sam-ViewSonic 說:

most of the consumer already bought no name brand 1 x 2 x 3x

Frans 說:

but I think channels are also the keys

Sam-ViewSonic 說:

channels you mean reseller ?

Sam-ViewSonic 說:

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reseller at the corner of the street ?

Frans 說:

channels to sell products

Frans 說:

all the channels

Sam-ViewSonic 說:

so for me there is clearly 3 channels

Frans 說:

yes

Sam-ViewSonic 說:

1. e-tail = internet resellers
2. retail = all retail shop
3. resellers = small computer shop

Sam-ViewSonic 說:

by e-tail the mice price is maximum 2 - 3 \$

Sam-ViewSonic 說:

2. retail = digitec is a reference

Frans 說:

you have got almost all channels...

Sam-ViewSonic 說:

3. resellers = business is taken by dell & hp

Sam-ViewSonic 說:

here by resellers the market share of dell & hp is more than 80 %

Frans 說:

I see...can you find bigger distributors?

Sam-ViewSonic 說:

99% of the time if the customer go to the reseller at the corner of the street to buy a computer from dell & hp. He get automatically a mice and keyboard

Sam-ViewSonic 說:

or his mice is broken >> reseller said ok i give you one for free

Frans 說:

i see

Sam-ViewSonic 說:

or the customer want to have a special mice : he bought logitech because the price is not important

Sam-ViewSonic 說:

viewsonic had for 1 year 10000 mice in stock

Sam-ViewSonic 說:

and keyboard

Frans 說:

i see

Sam-ViewSonic 說:

we get an e-mail from the VP sales 3 month ago : please give these mice and keyboard for free to your customer we loose money with this stock

Sam-ViewSonic 說:

Frans 說:

Genius sells to distributors

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Sam-ViewSonic 說:

yes like viewsonic

Frans 說:

I am curious how UMD in Spain could buy US\$10M from it

Sam-ViewSonic 說:

spain is a special market

Sam-ViewSonic 說:

spain is onw of the youngest market in europe with italy

Frans 說:

i see

Frans 說:

do you have relations to these two markets?

Sam-ViewSonic 說:

because the people there are really poor and the internet access boom was done around 10 years after germany - uk - switzerland

Sam-ViewSonic 說:

no i don't

Sam-ViewSonic 說:

have relation in spain or in italy

Sam-ViewSonic 說:

italy is vey dangerous market

Sam-ViewSonic 說:

because all work with backchich

Sam-ViewSonic 說:

corruption

Frans 說:

i see

Sam-ViewSonic 說:

actually the internet penetration in italy is less than 40% of the population

Frans 說:

i see

Sam-ViewSonic 說:

in germany - switzerland we arrive now at 90%

Sam-ViewSonic 說:

france start to recover his late with now around 80% of the population

Frans 說:

i see

Sam-ViewSonic 說:

ok so all this to explain that

Frans 說:

i see

Sam-ViewSonic 說:

1. i can sell mice but not 10k the first year

Frans 說:

yes

Sam-ViewSonic 說:

2. i will need big marketing budget

Sam-ViewSonic 說:

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3. incredible low price

Sam-ViewSonic 說:

and if i can sell the first year 10 k units mice i will win 1500 \$

Frans 說:

we can try and discuss these matters

Sam-ViewSonic 說:

yes i am open and i can sell all

Sam-ViewSonic 說:

but you must understand that i am looking on a more interesting business

Sam-ViewSonic 說:

also

Frans 說:

Now we have four ways to cooperate

Sam-ViewSonic 說:

no if you wait on lexma to earn money i think you will be die before to be rich

Sam-ViewSonic 說:

Frans 說:

1.Lexma 2.dfm 3.pants 4. the HK company business

Sam-ViewSonic 說:

no by my personal opinion

1. puzhen 2. pants 3. dfm 4. lexma

Sam-ViewSonic 說:

in terms of rentability

Frans 說:

I don't mind if we can make money

Sam-ViewSonic 說:

oh ?

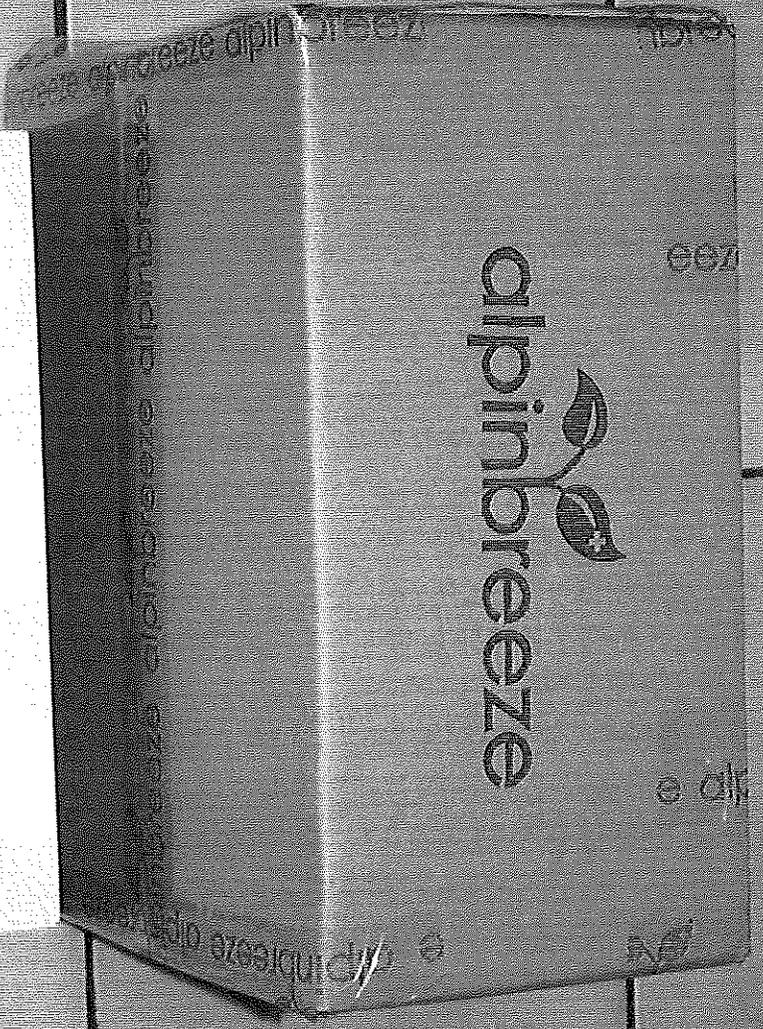
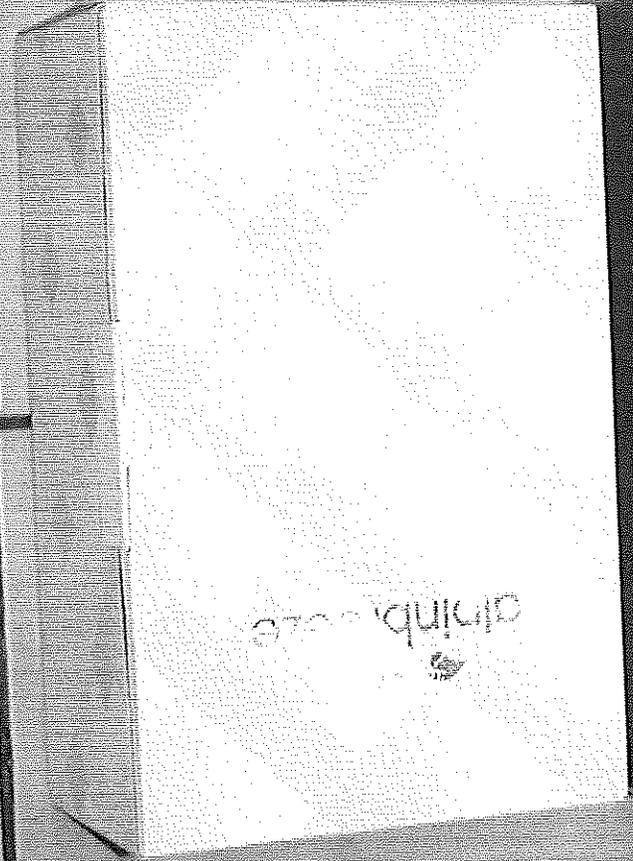
Sam-ViewSonic 說:

what you mind ?

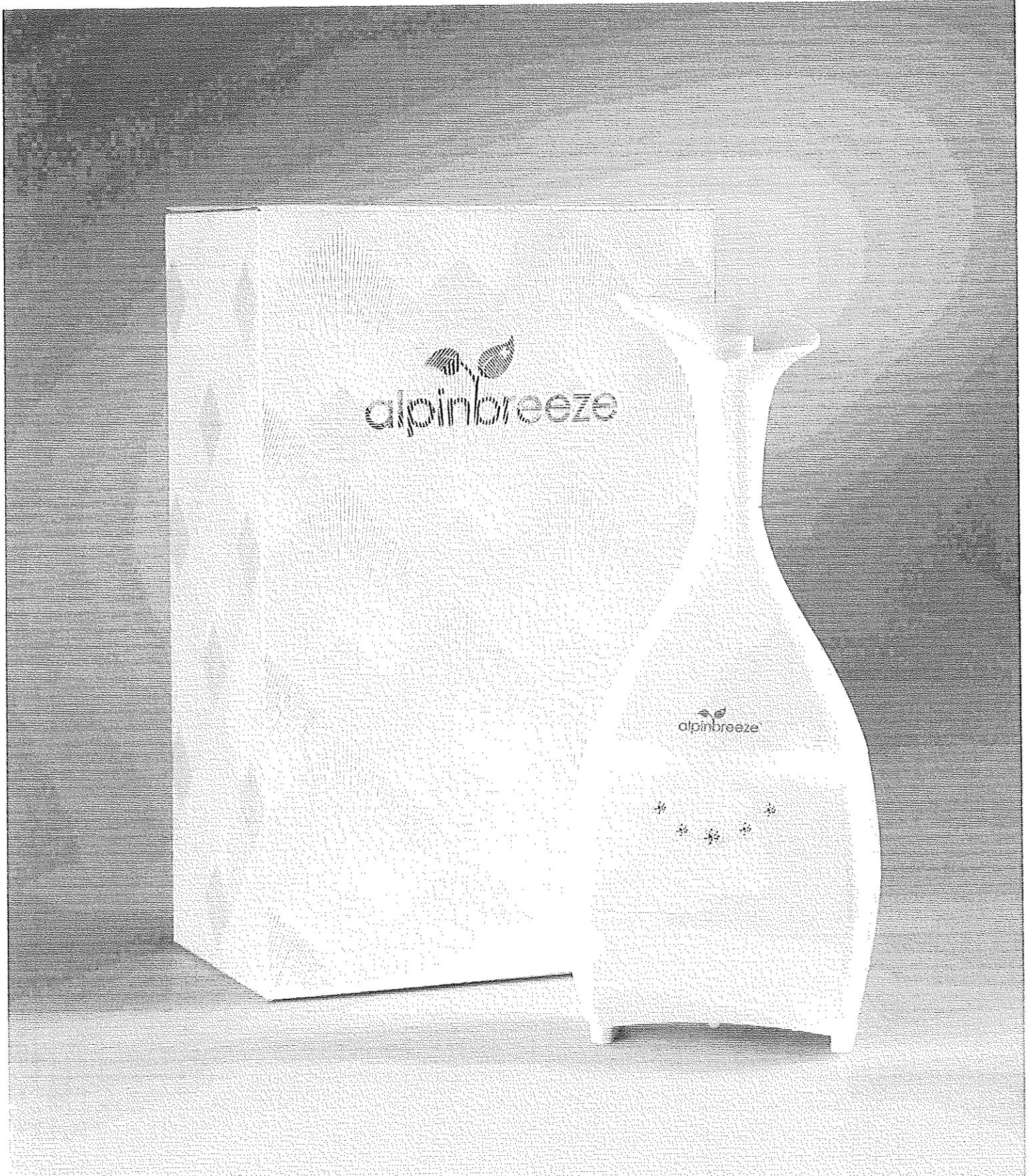
by my opinion puzhen deliver Nature&decouverte in direct business

with nature & decouverte i accept to only take 2 - 5% on the deal

Response 71



Response 81



alpinbreeze

alpinbreeze



Response 9-1

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Alpinbreeze

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Avg. Customer Review

★★★★★ & Up (1)

★★★★ & Up (4)

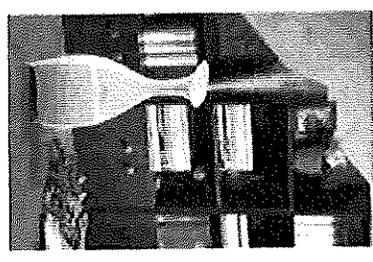
★★★ & Up (4)

★★ & Up (4)

Home & Kitchen > Alpinbreeze

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1



Alpinbreeze Ultrasonic Aromatherapy Diffuser/humidifier
[1 new from \\$149.00](#)

★★★★★ (1)

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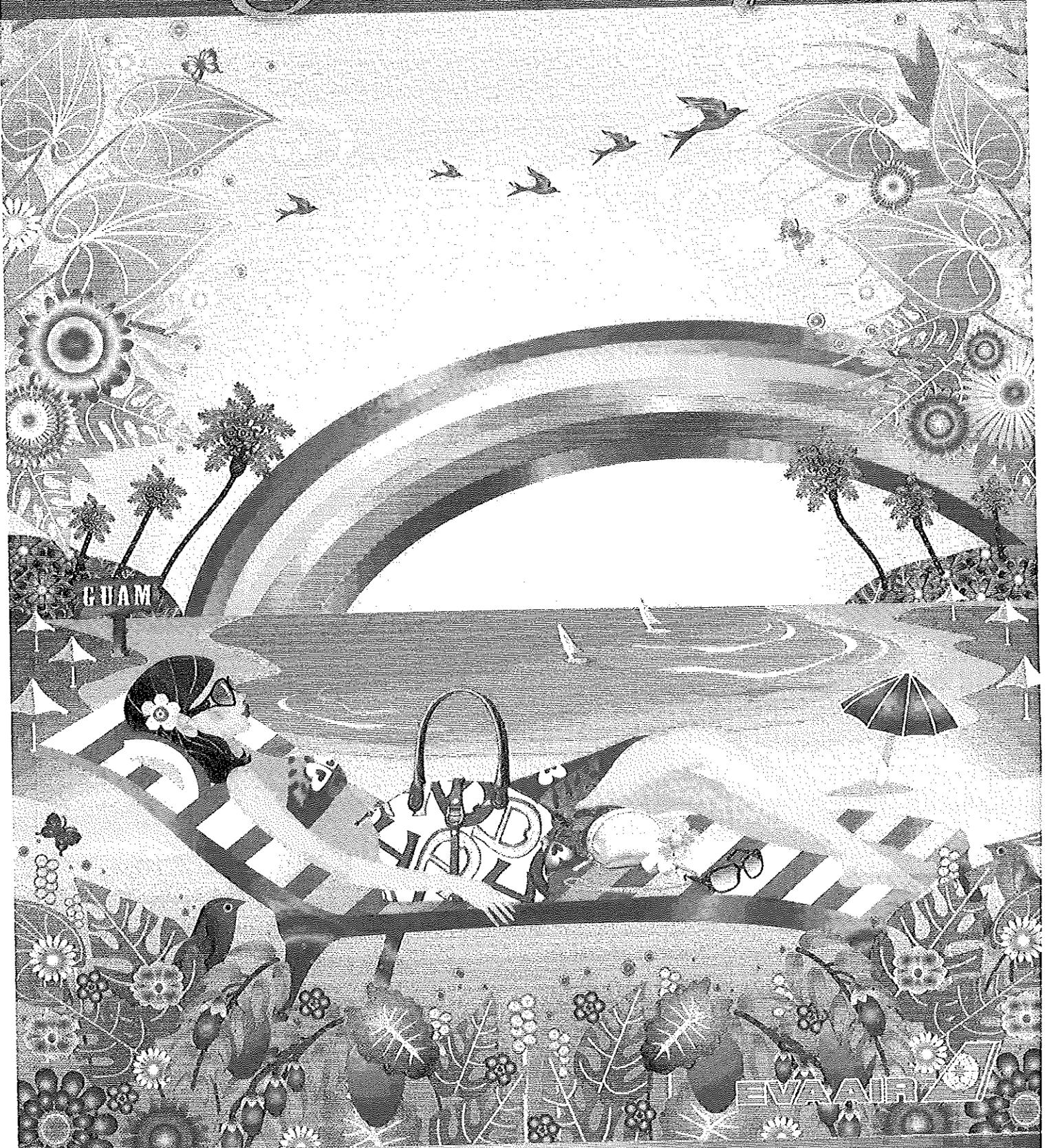
EVA

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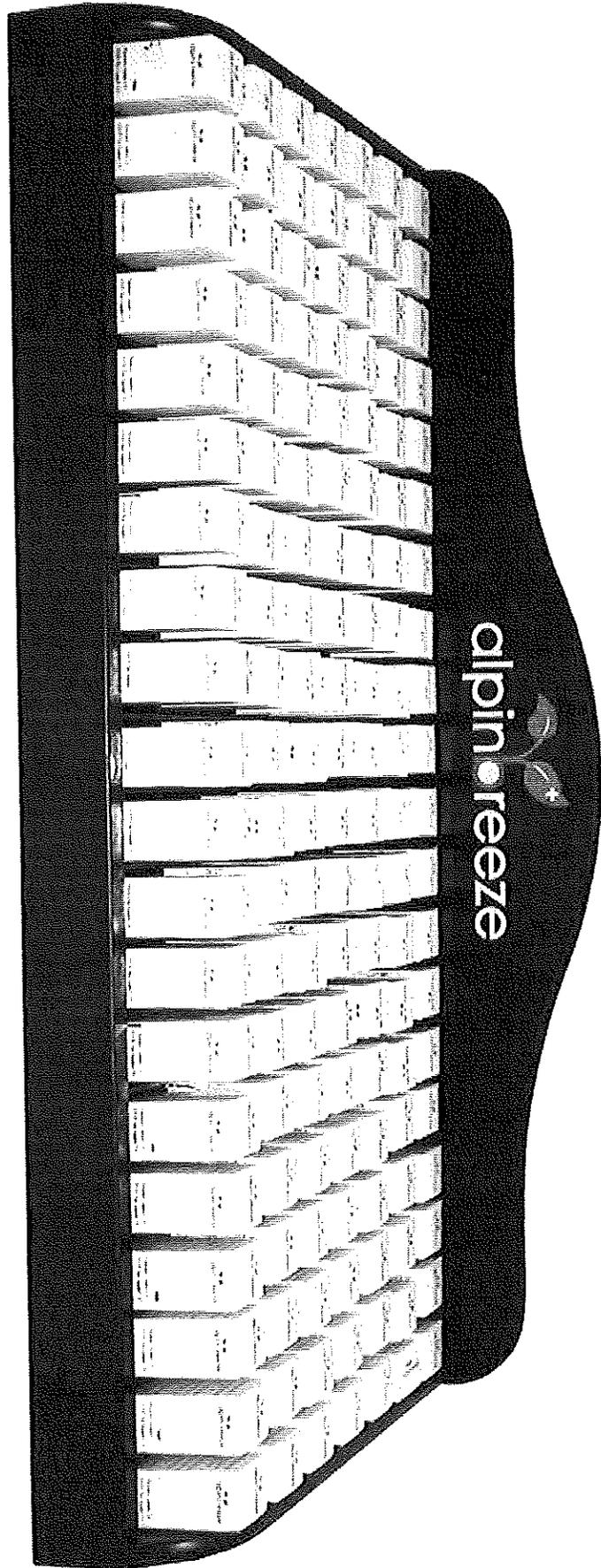
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By Concept Beyond



EVA AIR

Response 11-1



Customer Reviews

1 Review

5 stars:	(2)	Average Customer Review
4 stars:	(0)	★★★★★ (1 customer review)
3 stars:	(0)	
2 stars:	(0)	
1 star:	(0)	

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★★★★★ **Such a masterpiece!**, April 30, 2011

By **every** - See all my reviews

Amazon Verified Purchase (What's this?)

This review is from: **Alpinbreeze Ultrasonic Aromatherapy Diffuser/humidifier**

I love love love this aroma diffuser because it is exactly what I've been looking for. I've tried a few cheaper ones in the past and you guessed it - they don't last long. Since this diffuser comes with one year warranty, I feel comfortable enough to give it a try.

I actually just ordered it (for work) the other day. Already it showed up at my office today! I don't know if it is the aroma (lavender - the essential oil that came with the package) that made me feel so good about my day or it was just the beautiful shape of a white calla lily that really has pleased my eye - I am falling in love with this little device!

Something worth noting is that it has two different operative modes that allow me to either put it on for 3 straight hours or on for 30 seconds/off for 30 seconds for 6 hours - I thought that was such a brilliant idea! I have tried out both and personally I think I like the 30 seconds on and off better. Since I work from 9 to 6

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FM: 長榮航空公司

DATE: Aug. 20, 09

物品開發課

林佑蓉

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FAX: 03-3510018

TEL: 03-3515930

FAX:

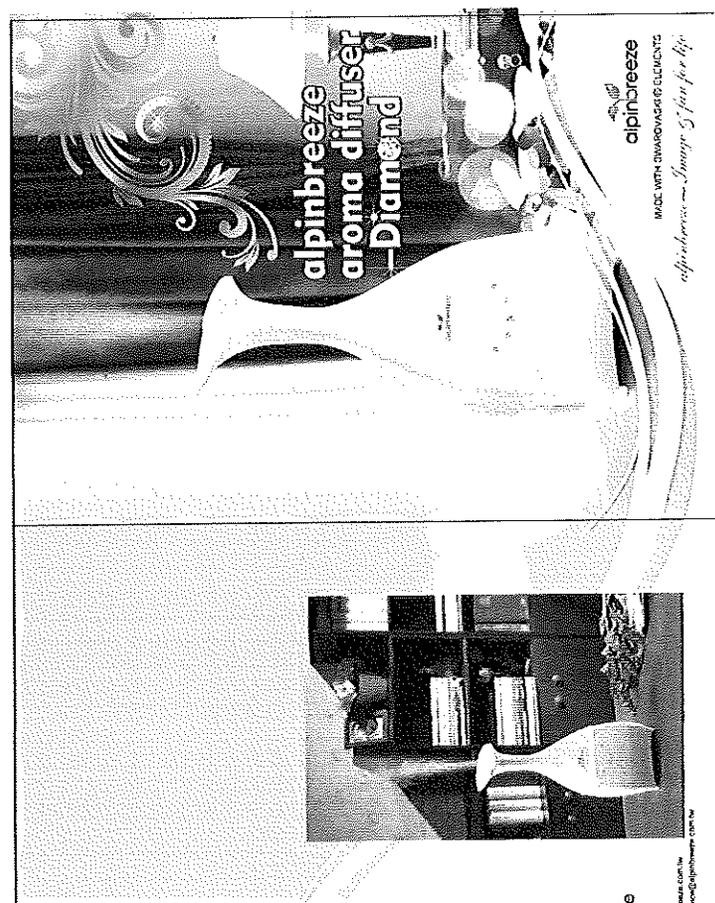
Response
201

敬啟者

主旨: 長榮樂 e 購商品刊登費用收費標準

說明:

- 一、長榮航空【郵購單行本型錄】將自 2009 年 9 月創刊，主要通路將擴及機場櫃檯、貴賓室、票務櫃檯或立榮航空班機、本公司集團飯店等，以增加商品販售機會拓展行銷通路。
- 二、自 2009 年 9 月 1 日起，長榮樂 e 購商品於各型錄刊登收費新標準如下：
 - (1)刊登【郵購單行本型錄】每一品項收取 NT\$1,000/期(一期為二個月)，系列產品同款不同色系時，則一期加收 NT\$100 上架費，同時當期免費提供該項產品於網站上刊登。
 - (2)刊登機上【SKY SHOP 購物誌】每一品項 NT\$16,000/期(一期為二個月)，系列產品同款不同色系時，則一期加收 NT\$1,000 上架費，同時當期免費提供該項產品於網站上刊登。
 - (3)郵購商品於長榮樂 e 購網站刊登販售，不收取上架費用。
 - (4)長榮樂 e 購網路橫幅促銷廣告
長榮樂 e 購首頁每幅每月收取 NT\$3,000 刊登費用，若委託製作，則以當時報價為基準。
 - (5)因橫幅廣告及各型錄可刊登版面及數量有限，本公司保留接受商品刊登及雜誌版面編輯的權利。



alpinbreeze aroma diffuser -Diamond

alpinbreeze
MADE WITH SWAROVSKI'S ELEMENTS
alpinbreeze - the Sange 5 fan for life

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alpinbreeze aroma diffuser – Diamond

(Aromatherapy diffuser – Humidifier)

Design Features: This diffuser, designed by using, sense of beauty from china flower, has a nozzle in the middle that makes a concept of what a flower looks like in autumn and past.

1. Both left and right sides, having winding edges, look like water drops that appears an image of honeydew dripping from top opening of aroma diffuser, and further, it creates a visual effect of extraordinary precious sensation from Nature and diffusing it all around.
2. The aroma diffuser shows chic and elegant by its pearl and lustrous outer covering as well as the LCD lights in the middle.
3. The front side of aroma diffuser plays an MADE WITH SWAROVSKI'S ELEMENTS. The shape of combination looks like a shining necklace and also likes your smile, greeting the glorious future.

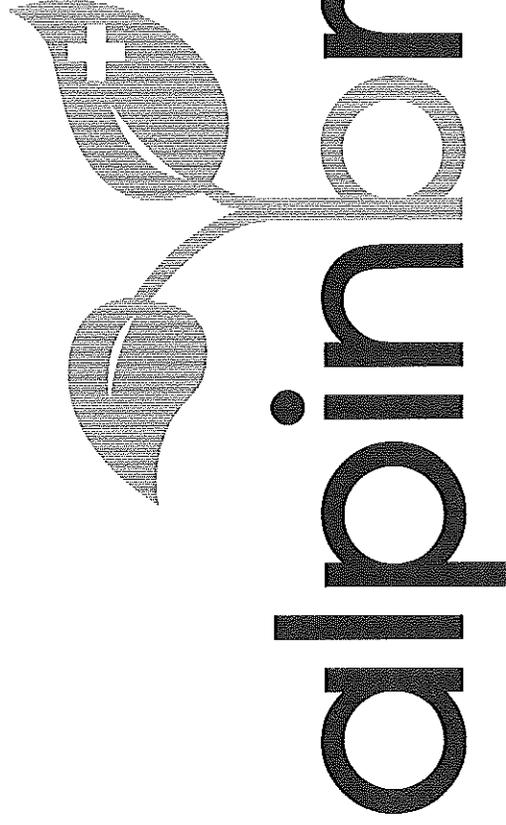
Product Features:

1. Using this machine to diffuse essential oils can naturally clean the air and help to improve quality of your life
2. To diffuse essential oils by this ultrasonic diffuser makes a "Fragrance" environment that makes people reduce their stress and anxiety
3. The air is drier under air-conditioned environment. Using this diffuser can help to regulate humidity around you to avoid dry skin
4. This machine is designed by double-protection technologies (the water level probe and water conservation technologies)
5. Its ultrasonic oscillation with vibrational frequency of 2.6 million times per second makes essential oils to spread more widely
6. To diffuse essential oils by the diffuser is more safe and healthy than conventional therapy way of combustion heating oils, which maybe easier to destroy the molecular structure of essential oils
7. Friendly design of three operational modes makes people easily to operate .
8. Low electricity consumption .
9. This diffuser builds a special over current protector for you to use more safely
10. It has a color manual to read friendly and provides a free water cup.

Specifications:

Input : 100-240 V, 50-60 Hz
Output : DC24V, 750 mA
Power consumption: about 4W
Size : 120 x 90 x 230 mm
Weight : 350 g

Response 221



Response
2/1