

TTAB

January 3, 2012

To:
UNITED STATES PATENT AND TRADEMARK OFFICE
Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451

77855572

Opposition No. 91198660
Broadcom Corporation v. Broadchip Technology Group Led.

Dear Yong Oh (Richard) Kim:

We have received the letter from you dated December 13, 2011 that the proceedings were suspended pending disposition of opposer's motion (filed November 23,2011) to compel.

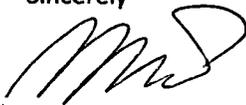
We write this letter to you to claim that opposer's motion to compel is not reasonable and respectfully request not to grant their motion. We have the following reasons:

1). Broadchip Technology Group Ltd.'s main business operation is in China, if opposer want to do the oral deposition to BROADCHIP's employees, they have to go to China, or they have to pay all the cost for BROADCHIP's employees to go to USA.

2) Kathy Geng, she is just the temporary contact person in USA for this case, we think it is not appropriate to do the oral deposition to her. Pursuant to Federal Rule of Civil Procedure 30(b)(6), we have already designated Zhongwei (Jerry) Dai as the person to testify on behalf of BROADCHIP with respect to all of opposer's questions.

3) We have already told them that we will provide the documents they required to them soon since it will take some time to answer all their current questions. We are willing to answer all their reasonable questions.

Sincerely



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01-10-2012