

September 9, 2013

TTAB

To :

United States Patent and Trademark Office
Trademark Trial and Appeal Board
P.O. Box 1451
Alexandria, VA 22313-1451

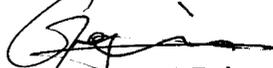
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Opposition No. 91198660
Broadcom Corporation vs. Broadchip Technology Group Ltd.

Dear Yong Oh (Richard) Kim:

We have received the notice from you that the case has been resumed. We fully respect your decision and will answer all the reasonable questions from the Opposer. But due to my duty post is in China right now, please consider to let the Opposer to do the interrogatories and investigation through paper (e-mail). If they want to do the oral interrogatories, either they come to China or they have to pay the travel cost for me to go to US. We just provided them the answers to their interrogatories recently. Thanks.

Sincerely yours,



Zhongwei(Jerry) Dai
Broadchip Technology Group Ltd.
33 Le Shan Road, Building # 1, Suite 305
Shanghai, P.R.China
Tel: 01186-21-64472385
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Email: jdai@broadchip.com



09-13-2013

Answers to Interrogatories from Opposer

1. Interrogatory No. 1: The English language is the world wide used language for communications. Even we are targeting the ASIA marketing right now, the English language is the basics for communications with customers. Of course, we will enter into European and US market in the future if the condition permits.
2. Interrogatory No. 2: Some of the founders are from Silicon Valley where we come up with the idea of setting up a fables design house in China.
3. Interrogatory No. 3: JERRY DAI
4. Interrogatory No. 4: We first know Opposer and Opposer's Mark in 1999 when it went IPO.
5. Interrogatory No. 5: We set up Broadchip Semiconductor Inc. In 2010, 2 officers: Jerry Dai and Wen Geng. No operation so far.

6. Interrogatory No. 6:

Jerry Dai: MSEE from Texas A&M University,
2007- Now, CEO, Broadchip Technology
2005-2007, Design Director, Pericom Technology, USA
1999-2005, Principle MTS, Maxim Integrated Products, USA
1997-1999, Senior Design Engineer, AKM, USA

Kathy Geng: MBA from California State University
2007 – Now, Secretary/Finance/HR, Broadchip Technology

Dr. Robin Luo PH.D TSINGHUA UNIVERSTY, CHINA
--- Marketing&AE
2009- Now, Senior Marketing and AE Director, Broadchip
2005-2007, FAE Director, Pericom Technology, USA
2001-2005, FAE Manager, Zarlink Semiconductor, USA

Mr. Andrew Chan: MS, Santa Clara University
--- Engineering (ASIC)
2010 - Now, Senior Design Director, Broadchip
2001- 2010, Principle MTS, Maxim Integrated Products, USA
1997-2001, Senior Design Engineer, Phillips Semi, USA

Mr. Eric Yu: BSEE, ZheJiang University, China
--- Sales
2012 - Now, Senior Sales Director, Broadchip
2007 - 2012, Senior Sales Manager, MEMSIC, China
2003- 2007, Sale manager, Power Integration, China

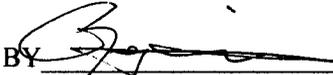
7. When we first apply for trade mark in China. Our advisor suggested us to register the trade mark in US to protect our trade mark in US and world wide.
8. That address is used for registering the BROADCHIP SEMICONDUTOR INC.
9. It is owned by ZHONGWEI DAI. It is a rental property.

10. Don't know this address
11. It is the personal mail box for ZHONGWEI DAI and WEN GENG
12. Don't know this phone number.
13. BROADCHIP SEMICONDUCTOR INC. intent to use for future business
14. We paid the advisor in US to file the document. We don't review any third party US trade mark applications and registration. The advisor may review them.
15. The opposer's RD department contacted us to use our product and we provide the sample to them.
16. 广芯电子技术（上海）有限公司 ---- Registered in Shanghai, China
BROADCHIP TECHNOLOGY GROUP LTD. --- Registered in BVI
BROADCHIP SEMICONDUCTOR INC. --- Registered in US
17. JERRY DAI: US citizen
Wen Geng US citizen
Hong Xu China
Xi Zhao China
18. ZHONGWEI(JERRY) DAI , WEN(KATHY) GENG --- Husband and wife.
19. 14595 W. Lisbon Lane, Surprise, Arizona -- ZHONGWEI(Jerry) Dai
1008 Strayer Dr. San Jose, CA 95129, ZHONGWEI(JERRY) DAI , WEN(KATHY) GENG
20. 广芯电子技术（上海）有限公司 ---- Registered in Shanghai, China
BROADCHIP TECHNOLOGY GROUP LTD. --- Registered in BVI
BROADCHIP SEMICONDUCTOR INC. --- Registered in US
21. We keep developing the innovative analog and mixed-signal Integrated Circuits products which may be used by the customers in US.
22. Some customers are contacting us directly to use our products like the OPPOSER, QUALCOMM, TI, etc. We are providing the samples to them.
23. No operation so far in US at the date of filing Application
24. 广芯电子技术（上海）有限公司: 33 LESHAN ROAD, SUITE 305, SHANGHAI, CHINA
BROADCHIP SEMICONDUCTOR INC.: 1008 Strayer Dr. San Jose, CA 95129
BROADCHIP TECHNOLOGY GROUP LTD.
25. We provided samples to US customers: OPPOSER, QUALLCOMM etc.
26. All of them are just family visit.
27. We applied our trade-mark to the US Trademark Office to protect our trademark and for future use.
28. August 1, 2007 is the date for our office opening in Shanghai.
29. We ship some samples to US customers as of Opposer and Qualcomm etc.
30. We first got inquiry from Opposer's RD group about our product to be used in Opposer's system reference design. Later we provide some free samples to them. The reference design finally went to their customers.
31. Please see the answer to interrogator No. 30, the Opposer exposed our trademark and product to the third party and customer in the US. We don't know their name.
32. We ship our products to the customers in Asia, mostly in China. We don't know if there products be shipping to US or any other places. They don't disclose their end-customers to us.
33. We don't do any promotion and advertisement so far in US

34. We registered the websites www.broadchip.com through www.yahoo.com
35. We pay the advisor to do the filing. We don't do any of these conductivities.
36. We promoted our products through our websites, through the Chinese magazine in China and through the distributors
37. We sell our products through distributors: ASIACOM, MORSUN, etc..
38. We don't have detail number of units sold so far. We don't have any sales and revenue from US market as we know so far.
39. Chinese magazine, website, etc.
40. At that time, we no longer hired the lawyer to handle the situation. We have to have more time to answer all these questions.
41. Apply for trade mark and register the company BROADCHIP SEMICONDUCTOR INC
42. So far, provide samples to US customers, no sales yet in US.
43. No distributors in US so far.
44. We are developing the broad range of analog and mixed signal IC chipsets. That comes up with the name BROADCHIP, and we are keeping working on this target.
45. We are developing the broad range of high performance and high quality analog and mixed signal IC chipsets. That kind product might be used by the customers in US. Since US the most important market in the world.
46. So far haven't do any of these activities.
47. We haven't have any channels doing these activities
48. No so far
49. We get the notice from Trademark office about the opposition and we hired Landrum & Company, Inc to handle the case. Later on we can not support all the costs for this case. So we decide to handle the case by ourselves. Jerry Dai is the person to have the knowledge and all the documents relating thereto.
50. BROADCHIP TECHNOLOGY GROUP LTD. is the holding company. 广芯电子技术(上海)有限公司 is the entity for main operation. Broadchip Semiconductor Inc. is registered under Jerry Dai's name for future use.

Respectfully Submitted

Broadchip Technology Group Ltd

BY 

Zhongwei (Jerry) Dai

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Shanghai, China, 200030

86-21-64472385