

ESTTA Tracking number: **ESTTA745627**

Filing date: **05/11/2016**

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

Proceeding	91207836
Party	Plaintiff Volvo Trademark Holding AB
Correspondence Address	LEIGH ANN LINDQUIST SUGHRUE MION PLLC 2100 PENNSYLVANIA AVENUE NW WASHINGTON, DC 20037-3202 UNITED STATES tm@sughrue.com, llindquist@sughrue.com
Submission	Testimony For Plaintiff
Filer's Name	LEIGH ANN LINDQUIST
Filer's e-mail	tm@sughrue.com, vmullineaux@sughrue.com
Signature	/Leigh Ann Lindquist/
Date	05/11/2016
Attachments	H00124DepositionofMDempeasfiled.pdf(496048 bytes) H00124DepositionofMDempeExhibits1thru3.pdf(5472840 bytes) H00124DepositionofMDempeExhibit4.pdf(1708555 bytes) H00124 Deposition of M. Dempe Exhibit 5 part 1.pdf(5111697 bytes) Deposition of M. Dempe Exhibit 5 part 2.pdf(5558620 bytes) Deposition of M. Dempe Exhibit 5 part 3.pdf(5025744 bytes) Deposition of M. Dempe Exhibit 5 part 4.pdf(4413709 bytes) Deposition of M. Dempe Exhibit 5 part 5.pdf(4880027 bytes) Deposition of M. Dempe Exhibit 5 part 6.pdf(5007222 bytes) Deposition of M. Dempe Exhibit 5 part 7.pdf(4649850 bytes) Deposition of M. Dempe Exhibit 5 part 8.pdf(3399072 bytes) Deposition of M. Dempe Exhibit 5 part 9.pdf(3126929 bytes) Deposition of M. Dempe Exhibits 6 and 7.pdf(4016938 bytes)

CERTIFICATE OF SERVICE

I, Leigh Ann Lindquist, Esquire, hereby certify that on this 11th day of May, 2016, a true and correct copy of the CONFIDENTIAL and non-confidential portions of **TESTIMONY DEPOSITION OF MONICA DEMPE** (without exhibits as those were previously served) has been properly served, via First Class U.S. Mail, postage prepaid and via email to:

MICHAEL STEINMETZ
GARSON SEGAL STEINMETZ AND FLADGATE LLP
164 W 25TH STREET #11R
NEW YORK, NY 10001
UNITED STATES
msmaila@gs2law.com

A handwritten signature in cursive script, appearing to read "Leigh Ann Lindquist".

Leigh Ann Lindquist

1 IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

2 BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

3 _____

4 VOLVO TRADEMARK HOLDING AB,)

5 Opposer,) U. S. Trademark

6 v.) Opposition No:

7 WOLVOL INC.,) 91207836

8 Applicant.)

9 _____)

10

11 DEPOSITION OF MONICA DEMPE

12 Friday, February 5, 2016

13 AT: 1:00 p.m.

14 Taken at:

15 Valea AB

16 Sveavagan 24

17 111 57 Stockholm

18 Sweden

19

20 Court Reporter:

21 Lisa Garforth

22 Accredited Real-time Reporter

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

A P P E A R A N C E S

Asking questions on behalf of both parties:

STEPHANIE PARENTI

VALEA AB

SVEAVAGAN 24

111 57 Stockholm

Sweden

Telephone: +46 854549300

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

W I T N E S S I N D E X

Witness	Page
MONICA DEMPE (sworn)	17
Examination by MS. PARENTI	17
Examination by MS. PARENTI	73

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

E X H I B I T S

EXHIBIT	DESCRIPTION	PAGE
Exhibit 1	Welcome page at volvo.com	24
Exhibit 2	Home page at volvoce.com	25
Exhibit 3	Home page for volvoce.com, North America	25
Exhibit 4	Printout from volvoce.com website: Shippensburg Manufacturing Facility	25
Exhibit 5	VCE brochure, Product Range Guide	26
Exhibit 6	Printout from volvoce.com website: CareTrack: Fleet management made easy	27

1	E X H I B I T S (Continued)		
2			
3	EXHIBIT	DESCRIPTION	PAGE
4	Exhibit 7	Printout from	27
5		volvoce.com website: login	
6		screen for CareTrack	
7			
8	Exhibit 8	CareTrack brochure	28
9			
10	Exhibit 9	CareTrack brochure	28
11			
12	Exhibit 10	VCE brochure Your	28
13		Fleet: On Line	
14			
15	Exhibit 11	VCE CareTrack brochure	29
16		- Technical Guide	
17			
18	Exhibit 12	VCE brochure - Volvo	30
19		Wheel Loaders L250G	
20			
21			
22	///		

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

E X H I B I T S (Continued)

EXHIBIT	DESCRIPTION	PAGE
Exhibit 13	VCE brochure - Volvo Excavators EC140D, EC160D, EC220D	30
Exhibit 14	VCE brochure - Volvo Articulated Haulers A35F, A40F	31
Exhibit 15	Printout from volvoce.com website: Improve your machine with Software Options	33
Exhibit 16	VCE app available at iTunes	33
Exhibit 17	Home page at volvotrucks.com	33
Exhibit 18	Home page for Volvo Trucks United States	34

1	E X H I B I T S (Continued)		
2			
3	EXHIBIT	DESCRIPTION	PAGE
4	Exhibit 19	Printout from	34
5		volvotrucks.com website: Fleet	
6		Management	
7			
8	Exhibit 20	Brochure - Core Values	35
9			
10	Exhibit 21	Volvo Trucks brochure -	36
11		Introducing Remote Diagnostics	
12			
13	Exhibit 22	Driver's Digest -	36
14		Remote Diagnostics	
15			
16	Exhibit 23	Printout from	37
17		volvotrucks.com website: Volvo	
18		Trucks awarded Top Telematics	
19		Industry Honors for Remote	
20		Diagnostics	
21			
22	///		

1	E X H I B I T S (Continued)		
2			
3	EXHIBIT	DESCRIPTION	PAGE
4	Exhibit 24	Printout from	37
5		volvotrucks.com website:	
6		Diagnostics	
7			
8	Exhibit 25	Printout from	38
9		volvotrucks.com website:	
10		Uptime Services	
11			
12	Exhibit 26	Volvo Trucks brochure:	38
13		Volvo Trucks Uptime Services	
14			
15	Exhibit 27	Volvo Trucks brochure:	39
16		VHD 200 / VHD 430	
17			
18	Exhibit 28	eMedia Center Volvo	40
19		Trucks North America	
20			
21	Exhibit 29	Volvo Trucks Loading	41
22		Ramp	

1 E X H I B I T S (Continued)

2

3 EXHIBIT DESCRIPTION PAGE

4 Exhibit 30 Printout from Volvo41

5 Trucks – Volvo Trucks apps

6

7 Exhibit 31 Volvo Trucks iTunes41

8 store page

9

10 Exhibit 32 Volvo Penta home page41

11

12 Exhibit 33 Printout from42

13 volvopenta.com website: Volvo

14 Penta North America

15

16 Exhibit 34 Printout from42

17 volvopenta.com website: Volvo

18 Penta Industrial

19

20 Exhibit 35 Printout from43

21 volvopenta.com website: Glass

22 Cockpit System

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

E X H I B I T S (Continued)

EXHIBIT	DESCRIPTION	PAGE
Exhibit 36	Printout from volvopenta.com website: Glass Cockpit System	43
Exhibit 37	Volvo Penta Brochure: Glass Cockpit	43
Exhibit 38	Printout from volvopenta.com website: Engine monitoring displays	44
Exhibit 39	Volvo Penta Brochure: Trip Computer	44
Exhibit 40	Volvo Penta online store - EVC Control Accesories	44
///		

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

E X H I B I T S (Continued)

EXHIBIT	DESCRIPTION	PAGE
Exhibit 41	Volvo Penta online store - EVC Electronic Monitoring Instruments	44
Exhibit 42	Volvo Penta online store - EVC Senders and Accessories	44
Exhibit 43	Volvo Penta online store - EVC Adaptors and Cables	44
Exhibit 44	Volvo Penta online store - EVC Optional Accessories	45
Exhibit 45	Volvo Cars home page	46
Exhibit 46	Printouts from volvocars.com website, for USA	46
///		

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

E X H I B I T S (Continued)

EXHIBIT	DESCRIPTION	PAGE
Exhibit 47	Printouts from volvocars.com website, new XC90	46
Exhibit 48	Printout from volvopartswebstore.com - Sensus Connect	48
Exhibit 49	Printouts from volvocars.com website - Volvo Service Advantage, Frequently Asked Questions	49
Exhibit 50	Article about Volvo Concept You	50
Exhibit 51	Volvo Cars - Volvo Parts website	51
///		

1 E X H I B I T S (Continued)

2

3 EXHIBIT DESCRIPTION PAGE

4 Exhibit 52 Volvo Cars apps51

5

6 Exhibit 53 Volvo Bus website52

7 printout - Fleet Management

8

9 Exhibit 54 YouTube - Volvo Bus52

10 Telematics

11

12 Exhibit 55 Volvo Bus iTunes52

13

14 Exhibit 56 Volvo Bus online game53

15

16 Exhibit 57 Volvo IT - general54

17 information printout from

18 website

19

20 Exhibit 58 Volvo IT website54

21 printout - Extranet connect

22 service, etc.

1 E X H I B I T S (Continued)

2

3 EXHIBIT DESCRIPTION PAGE

4 Exhibit 59 VIDA Software Ordering54

5

6 Exhibit 60 Volvo IT website -55

7 Telematics solutions

8

9 Exhibit 61 Volvo The Game printout55

10

11 Exhibit 62 Annual report for 201056

12 for Volvo Group

13

14 Exhibit 63 Annual report for 201156

15 for Volvo Group

16

17 Exhibit 64 Annual report for 201257

18 for Volvo Group

19

20 Exhibit 65 Annual report for 201358

21 for Volvo Group

22 ///

1	E X H I B I T S (Continued)		
2			
3	EXHIBIT	DESCRIPTION	PAGE
4	Exhibit 66	2014 second quarter	58
5		info for Volvo Group	
6			
7	Exhibit 67	Volvo v. Sajonian -	66
8		Consent Judgment	
9			
10	Exhibit 68	Volvo v. Machineworks,	66
11		Inc. - Order and Permanent	
12		Injunction	
13			
14	Exhibit 69	Volvo v.	66
15		Volvospare.com - Order	
16			
17	Exhibit 70	Volvo v. Peterson -	67
18		Stipulated Final Judgment	
19			
20	Exhibit 71	WIPO Case No.	67
21		D2013-0355	
22	///		

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

E X H I B I T S (Continued)

EXHIBIT	DESCRIPTION	PAGE
Exhibit 72	WIPO Case No.	67
	D2012-0003	
Exhibit 73	WIPO Case No.	67
	D2008-0735	
Exhibit 74	WIPO Case No.	68
	D2005-0556	
Exhibit 75	WIPO Case No.	68
	D2005-0448	
Exhibit 76	WIPO Case No.	68
	D2002-0445	
Exhibit 77	WIPO Case No.	68
	D2002-0036	

1 (1.10 p.m.)

2 MONICA DEMPE

3 having been duly sworn testified as follows:

4 DIRECT EXAMINATION BY MS. PARENTI:

5 Q. Please state your name and business address.

6 A. It's Monica Dempe, Volvo Trademark Holding AB,
7 care of AB Volvo, 405 08 Gothenburg, Sweden.

8 Q. State your title and describe your current
9 position, your duties and responsibilities in
10 connection with your position with Opposer Volvo
11 Trademark Holding AB?

12 A. Yes, I'm the managing director and trademark
13 manager. I am to deal with the day-to-day management
14 of the company's business which comprises to own,
15 maintain, protect and preserve the Volvo trademark and
16 other trademark rights on behalf of the shareholders,
17 and to license these rights to the shareholders.

18 Q. How long have you held this position?

19 A. Since 1 October 1999.

20 Q. Prior to your current position, briefly
21 summarize your employment history with Opposer Volvo
22 Trademark Holding AB in terms of each position held,

1 how long each position was held and your duties and
2 responsibilities with respect to each position held.

3 A. I have had no prior position with Volvo
4 Trademark Holding AB since the company was formed in
5 1999. Prior to 1999 I was employed as a trademark
6 manager within the legal department of AB Volvo.

7 Q. Based on your employment with Opposer Volvo
8 Trademark Holding AB including your current position,
9 are you familiar with the use of the Volvo trademark,
10 including the sale and advertising of Volvo goods and
11 services in the United States?

12 A. I am familiar with sale and advertising of
13 Volvo goods and services from our colleagues in the
14 U.S. and U.S. companies which are licensed to use the
15 Volvo trademarks in the U.S.

16 Q. Who is the owner of the Volvo trademarks and
17 all registrations for Volvo in the United States?

18 A. Volvo Trademark Holding AB.

19 Q. Has Opposer Volvo Trademark Holding AB ever
20 granted licenses in the United States to anyone to use
21 the Volvo mark?

22 A. Yes.

1 Q. To whom were these licenses granted?

2 A. Most licenses are issued to AB Volvo and to
3 Volvo Car Corporation in relation to their respective
4 businesses in the U.S, including a right for them to
5 sublicense the rights given to their subsidiaries and
6 related companies. AB Volvo has, inter alia, granted
7 sublicenses for the U.S. to Volvo Truck Corporation,
8 Volvo Construction Equipment Corporation, Volvo Penta
9 Corporation, and Volvo Car Corporation has, inter alia,
10 granted sublicenses for the U.S. to Volvo Cars of North
11 America LLC.

12 Q. When were these licenses granted?

13 A. The master licenses were granted in 1999.

14 Q. What goods are sold and what services are
15 rendered in the United States under these licenses?

16 A. Cars, trucks, buses, construction equipment,
17 drive systems for marine and industrial applications,
18 spare parts and accessories for these goods and
19 relevant services connected thereto, including
20 financial and IT services.

21 Q. Does Opposer Volvo Trademark Holding AB
22 exercise quality control over the use of the Volvo mark

1 under these licenses by licensees?

2 A. Yes.

3 Q. Describe the nature of the quality control
4 exercised by Opposer Volvo Trademark Holding AB under
5 these licenses.

6 [--- Confidential ---]

7 [--- Confidential ---]

8 [--- Confidential ---]

9 [--- Confidential ---]

10 [--- Confidential ---]

11 [--- Confidential ---]

12 [--- Confidential ---]

13 [--- Confidential ---]

14 [--- Confidential ---]

15 [--- Confidential ---]

16 [--- Confidential ---]

17 [--- Confidential ---]

18 [--- Confidential ---]

19 [--- Confidential ---]

20 Q. How long has the Volvo trademark been used in
21 the United States by Opposer Volvo Trademark Holding
22 AB, its predecessors in interest, and/or its licensees?

1 A. Since at least the '50s.

2 Q. Has such use been continuous and uninterrupted
3 since it began?

4 A. Yes.

5 Q. On what products has the Volvo mark been used
6 in the United States since such use began?

7 A. The Volvo mark is used on a number of goods and
8 services, including but not limited to the following:
9 cars, trucks, buses, construction equipment, including
10 wheeled and crawler excavators, diggers, articulated
11 haulers, dumpers, dump trucks, scraper haulers, wheel
12 loaders, pipe layers, demolition equipment, waste
13 handlers, motor graders, pavers, compacters, milling
14 equipment, road wideners, material transfer vehicles,
15 and a range of compact equipment such as mini loaders,
16 mini excavators, backhoe loaders and skid steer
17 loaders; drive systems for marine and industrial
18 applications, including marine engines, aircraft
19 engines, engines for industrial and forestry machines,
20 stationary combustion engines, turbines, electric
21 motors; spare parts and accessories for all these
22 goods, including but not limited to filters, valves,

1 pumps, lamps, hubcaps, gear wheels, steering wheels,
2 windshields wipers and electronic equipment; relevant
3 services connected to all these goods, including but
4 not limited to repair and maintenance services,
5 financial warranty and insurance services, rescue
6 services, logistic services; merchandise items
7 including but not limited to caps, hats, bags, belts,
8 scarves, ties, gloves, pens, watches, wallets, tiepins,
9 cups, mugs, toys and scale model vehicles.

10 Q. Are you familiar with the term "Volvo Group"?

11 A. Yes.

12 Q. What is your understanding of the term "Volvo
13 Group"?

14 A. The expression "the Volvo Group" refers to AB
15 Volvo and its companies. Volvo Car Corporation is not
16 a member of the Volvo Group but is a licensee to Volvo
17 Trademark Holding AB.

18 Q. In the United States, what entities are part of
19 Volvo Group?

20 A. The Volvo Group in the U.S. includes, without
21 limitation, Volvo Trucks, Volvo Construction Equipment,
22 Volvo Penta, Volvo Bus, Volvo Financial Services and

1 Volvo IT.

2 Q. What products are sold and what services are
3 rendered in the United States under the Volvo trademark
4 by members of the Volvo Group?

5 A. The Volvo mark is used by the members of the
6 Volvo Group for a number of goods and services,
7 including but not limited to the following: trucks and
8 buses, construction equipment, including wheeled and
9 crawler excavators, diggers, articulated haulers,
10 dumper, dump trucks, scraper haulers, wheel loaders,
11 pipe layers, demolition equipment, waste handlers,
12 motor graders, pavers, compacters, milling equipment,
13 road wideners, material transfer vehicles, and a range
14 of compact equipment such as mini loaders, mini
15 excavators, back hoe loaders and skid steer loaders;
16 drive systems for marine and industrial applications,
17 including marine engines, aircraft engines, engines for
18 industrial and forestry machines, stationary combustion
19 engines, turbines, electric motors; spare parts and
20 accessories for all these goods including but not
21 limited to filters, valves, pumps, lamps, hubcaps, gear
22 wheels, steering wheels, windshields wipers and

1 electronic equipment; relevant services connected to
2 all these goods, including but not limited to repair
3 and maintenance services, financial warranty and
4 insurance services, rescue services, logistic services;
5 merchandise items, including but not limited to caps,
6 hats, bags, belts, scarves, ties, gloves, pens,
7 watches, wallets, tiepins, cups, mugs, toys, scale
8 model vehicles.

9 Volvo Car Corporation and its products and
10 services are not mentioned here since it is not a member of
11 the Volvo Group.

12 Q. Is the Volvo mark registered in the United
13 States?

14 A. Yes.

15 Q. To the best of your knowledge, are all the U.S.
16 Volvo registrations in full force and effect and owned
17 by Opposer Volvo Trademark Holding AB?

18 A. Yes.

19 (Exhibit 1 marked for identification)

20 Q. Identify and describe Exhibit 1.

21 A. It is a printed excerpt from the home page of
22 the volvo.com website.

1 (Exhibit 2 marked for identification)

2 Q. Identify and describe Exhibit 2.

3 A. It's a printed excerpt from the volvoce.com
4 website which lists the countries in which Volvo
5 Construction Equipment operates.

6 (Exhibit 3 marked for identification)

7 Q. Identify and describe Exhibit 3.

8 A. It is a printed excerpt from the home page for
9 the volvoce.com, North America website.

10 Q. Does Volvo Construction Equipment operate in
11 the United States?

12 A. Yes.

13 Q. Does Volvo Construction Equipment have
14 manufacturing facilities in the United States?

15 A. Yes.

16 (Exhibit 4 marked for identification)

17 Q. Identify and describe Exhibit 4.

18 A. It's a printed excerpt from the volvoce.com
19 website and describes Volvo Construction Equipment's
20 Shippensburg manufacturing facility in which Volvo
21 Construction Equipment invested USD 100 million in
22 2011.

1 Q. Has Volvo Construction Equipment invested in
2 the Shippensburg manufacturing facility?

3 A. Yes. Exhibit 4 describes this investment.

4 (Exhibit 5 marked for identification)

5 Q. Identify and describe Exhibit 5.

6 A. It is a Volvo Construction Equipment brochure
7 product range guide.

8 Q. On page 36 of Exhibit 5 there are references to
9 Matris, VCadsPro and CareTrack. What is Matris? What
10 is VCadsProd? And what is CareTrack?

11 A. Matris is a PC based information system that
12 gives a clear picture of how your Volvo machine is
13 being used, as well as its general state. Matris
14 utilizes the information that is continuously
15 registered in the machine's electronic control unit.

16 VCadsPro stands for Volvo computer-aided
17 diagnostic system professional, a tool for analysis and
18 diagnosis, calibration, testing and programming of machines.

19 Tech Tool VCadsPro is a service tool for the
20 service mechanic. VCadsPro has two main features: software
21 programming and tests.

22 The software programming module is used to upgrade

1 or replace the software in the electronic control units of
2 the machines. The rest of the module consists of several
3 separate tests that the mechanic can use when
4 troubleshooting the machine.

5 CareTrack is the Volvo Construction Equipment
6 telematics system that gives access to a wide range of
7 machine monitoring information designed to -- designed to
8 save time and money. CareTrack generates a wide range of
9 reports, including fuel consumption, operational hours and
10 geographical location, via a web portal, as well as sending
11 SMS and email alerts.

12 (Exhibit 6 marked for identification)

13 Q. Identify and describe Exhibit 6.

14 A. It's a printed excerpt from the volvoce.com
15 website, "CareTrack Fleet Management made easy". It
16 describes the CareTrack system.

17 (Exhibit 7 marked for identification)

18 Q. Identify and describe Exhibit 7.

19 A. It's a printed excerpt from the CareTrack
20 volvo.com website, login screen for CareTrack. This is
21 where customers are able to log in to CareTrack and
22 obtain various information about their vehicles.

1 (Exhibit 8 marked for identification)

2 Q. Identify and describe Exhibit 8.

3 A. It's a Volvo Construction Equipment brochure
4 named "CareTrack". As seen in the brochure, CareTrack
5 is standard equipment on new larger Volvo machines, and
6 these new vehicles have a three-year activation with no
7 charge. Older construction equipment vehicles can --
8 can be retrofitted with CareTrack. CareTrack is
9 available in the USA.

10 As further seen from this brochure, Volvo machines
11 are equipped with an integrated GPS receiver modem and an
12 antenna which permits information to be transmitted to
13 a central database.

14 (Exhibit 9 marked for identification)

15 Q. Identify and describe Exhibit 9.

16 A. It's another Volvo Construction Equipment
17 brochure named "CareTrack". On page 5 you will see
18 that users are able to view screens inside a Volvo
19 Construction Equipment vehicle with information tracked
20 by CareTrack.

21 (Exhibit 10 marked for identification)

22 Q. Identify and describe Exhibit 10.

1 A. It is a Volvo Construction Equipment brochure
2 named "Your Fleet: On Line". On the third page of the
3 exhibit you will see that Volvo Construction Equipment
4 machines are equipped with a CareTrack computer and
5 that computer is wired to the machine's onboard
6 systems, giving access to relevant dashboard readings.

7 (Exhibit 11 marked for identification)

8 Q. Identify and describe Exhibit 11.

9 A. It is a Volvo Construction Equipment CareTrack
10 brochure, "Technical Guide A Tour of Online Features".
11 The screens in the brochure are shots from the
12 CareTrack computer software program. The topic of the
13 screen states "CareTrack - Volvo Construction Equipment
14 Telematics System". The Volvo iron mark is also seen
15 on the screen. The brochure details the type of
16 reports that a customer may run using the CareTrack
17 system.

18 Q. Is CareTrack available in the United States on
19 Volvo Construction Equipment vehicles?

20 A. Yes.

21 Q. Is CareTrack comprised of both hardware and
22 software?

1 A. Yes.

2 (Exhibit 12 marked for identification)

3 Q. Identify and describe Exhibit 12.

4 A. It is a Volvo Construction Equipment brochure
5 named "Volvo Wheel Loaders L250G". This is a brochure
6 discussing the features of one of Volvo's wheel loaders
7 which includes a problem-solving Contronics program
8 which is described on page 7 as a computerized system
9 that continuously monitors the machine's operation and
10 performance. This information is displayed on a screen
11 for the driver.

12 You will see on page 18 of the brochure that
13 CareTrack and a three-year subscription to telematics is
14 standard equipment on this wheel loader.

15 Q. Can you identify the information on page 18 of
16 Exhibit 12?

17 A. It is a specification of standard equipment for
18 the Volvo L250G wheel loader.

19 Q. Is CareTrack standard equipment on Volvo wheel
20 loader L250G?

21 A. Yes.

22 (Exhibit 13 marked for identification)

1 Q. Identify and describe Exhibit 13.

2 A. It is a Volvo Construction Equipment brochure
3 named "Volvo Excavator EC140D, EC160D, EC220D". On
4 pages 7 and 9 there is information about the large
5 color monitor which is in the cab of the machine.

6 Q. Can you identify the information on page 22 of
7 Exhibit 13?

8 A. It is a specification of standard equipment for
9 the Volvo EC140D, EC160D and EC220D excavators.

10 Q. Is CareTrack standard equipment on Volvo
11 excavators EC140D, EC160D and EC220D?

12 A. Yes.

13 (Exhibit 14 marked for identification)

14 Q. Identify and describe Exhibit 14.

15 A. It is a Volvo Construction Equipment brochure
16 named "Volvo Articulated Haulers A35F, A40F". On
17 page 6 there is information about the computer
18 programming available on these articulated haulers. On
19 page 13 there is information about operator
20 communication system. This system includes a large
21 color monitor.

22 Q. On pages 12 through 13 of Exhibit 14 there is

1 a discussion about Contronics. What is Contronics?

2 A. It is Volvo Construction Equipment's
3 multifunction software communication system which
4 monitors the Volvo machine's systems and operation.
5 The system includes an instrument panel with -- which
6 has a large color monitor and a keypad which allows
7 easy navigation between different screens and
8 functions.

9 Q. Can you identify the information on page 26 of
10 Exhibit 14?

11 A. It is a specification of standard equipment for
12 the Volvo A35F and A40F articulated haulers.

13 Q. Is CareTrack standard equipment on Volvo
14 articulated haulers A35F and A40F?

15 A. Yes.

16 Q. Other than those Volvo Construction Equipment
17 vehicles identified in Exhibits 12, 13 and 14, are
18 other Volvo Construction Equipment vehicles equipped
19 with CareTrack?

20 A. Yes, all new Volvo Construction Equipment
21 machines are equipped with CareTrack.

22 Q. Does Volvo Construction Equipment offer

1 software options on its vehicles?

2 A. Yes.

3 (Exhibit 15 marked for identification)

4 Q. Identify and describe Exhibit 15.

5 A. It is a printed excerpt from the volvoce.com
6 website, "Improve your machine with Software Options".
7 Volvo Construction Equipment offers a number of
8 software options for its machines. For example, there
9 is the engine auto shutdown, the speed limiter,
10 increased engine protection and engine shutdown timer.

11 (Exhibit 16 marked for identification)

12 Q. Identify and describe Exhibit 16.

13 A. It's a Volvo Construction Equipment apps
14 available at iTunes. There are five apps available,
15 one for iPhones and four for iPads. These apps were
16 developed for Volvo Construction Equipment.

17 Q. Does Volvo Trucks operate in the United States?

18 A. Yes.

19 (Exhibit 17 marked for identification)

20 Q. Identify and describe Exhibit 17.

21 A. It's a printout from the volvotrucks.com
22 website which lists the countries in which Volvo Trucks

1 operates.

2 (Exhibit 18 marked for identification)

3 Q. Identify and describe Exhibit 18.

4 A. It is a printed excerpt from the
5 volvotrucks.com website, home page for Volvo Trucks
6 United States.

7 (Exhibit 19 marked for identification)

8 Q. Identify and describe Exhibit 19.

9 A. It's a printed excerpt from the volvotrucks.com
10 website, "Fleet Management". It contains information
11 about the VolvoLink and Telogis partner services
12 offered by Volvo Trucks. You are able to log into the
13 VolvoLink system at the Volvo Truck site.

14 Q. What is VolvoLink?

15 A. VolvoLink supports a wide range of affordable
16 vehicle and fleet management services which helps
17 staying connected to the trucks and drivers. VolvoLink
18 monitors and manages productivity by tracking vehicle
19 performance, locations, fuel efficiency and more.
20 VolvoLink hardware is standard equipment on all new
21 Volvo Trucks equipped with Volvo engines.

22 Q. What are telematics?

1 A. It is the technology of sending, receiving and
2 storing information via telecommunication devices in
3 conjunction with effecting control on remote objects.
4 Telematics includes but is not limited to GPS
5 technology, integrated with computers and mobile
6 communications technology in automotive navigation
7 systems. It also includes software for programming,
8 telling the telecommunication gateway what to do when.
9 It also provides a truck or bus driver information
10 which also someone at dispatch has identical access to.

11 (Exhibit 20 marked for identification)

12 Q. Identify and describe Exhibit 20.

13 A. It's a Volvo Truck brochure, "Core Values".

14 Q. On the fifth page of Exhibit 20 there's an
15 image at the top of the page. Can you please identify
16 and describe that image?

17 A. It is a picture of a screen displaying the
18 VolvoLink two-way satellite communications system.
19 This screen display reflects how one component of the
20 VolvoLink communication system is viewed by a user.
21 The user is able to read and send messages through the
22 VolvoLink system.

1 (Exhibit 21 marked for identification)

2 Q. Identify and describe Exhibit 21.

3 A. It is a Volvo Trucks brochure, "Introducing
4 Remote Diagnostics". Remote diagnostics includes
5 proactive diagnostic and repair planning assistance
6 with detailed analysis of diagnostic trouble codes;
7 streamlined service procedures, with parts-on-hand
8 confirmation before a truck arrives for service; live
9 dealer and customer communication through Volvo action
10 service; service case communication and documentation
11 between Volvo action service, dealers and customers
12 provided through ASIST.

13 (Exhibit 22 marked for identification)

14 Q. Identify and describe Exhibit 22.

15 A. It is a Volvo Trucks magazine for trucking
16 professionals, Driver's Digest: Remote Diagnostics. In
17 the magazine there's information about the 2012 award
18 that Volvo Trucks won for its remote diagnostics
19 system. There's also information about the creation of
20 the remote diagnostics system. On page 7 it is
21 mentioned that Volvo's remote diagnostics is a standard
22 feature on every Volvo powered VN model highway truck.

1 Q. Beginning on page 22 of Exhibit 22, there is an
2 article entitled "Team Uptime". Can you please
3 describe the nature of that article?

4 A. It is a description of the project to develop
5 Volvo remote diagnostics.

6 (Exhibit 23 marked for identification)

7 Q. Identify and describe Exhibit 23.

8 A. It's a printed excerpt from the volvotrucks.com
9 website, "Volvo Trucks Awarded Top Telematics Industry
10 Honors for Remote Diagnostics". Remote diagnostics won
11 a top telematic award. It was named Best Telematics
12 Service or Solution for Commercial Vehicles at the 10th
13 annual Telematics Update Awards in Detroit.

14 (Exhibit 24 marked for identification)

15 Q. Identify and describe Exhibit 24.

16 A. It is a printed excerpt from the
17 volvotrucks.com website, "Diagnostics". It details the
18 computer diagnostic tools available to test Volvo
19 Trucks. On the first page of the exhibit it details
20 that the premium tech tool is a Windows-based
21 diagnostic application. This software which is offered
22 by Volvo supports all Volvo Trucks from 1998 to the

1 present.

2 (Exhibit 25 marked for identification)

3 Q. Identify and describe Exhibit 25.

4 A. It is a printed excerpt from the
5 volvotrucks.com website, "Uptime Services". Uptime
6 services are intended to insure that Volvo Trucks are
7 serviced in an efficient manner. The uptime services
8 include, among other services, remote diagnostics, 24/7
9 Volvo customer support and ASIST.

10 (Exhibit 26 marked for identification)

11 Q. Identify and describe Exhibit 26.

12 A. It is a Volvo Trucks brochure, "Volvo Trucks
13 Uptime Services". It provides details about the uptime
14 services.

15 Q. What is ASIST, A-S-I-S-T, which is mentioned in
16 Exhibit 26 on page 12?

17 A. ASIST is Volvo Trucks' service management
18 platform which is a simple web-based tool that lets you
19 monitor vehicle status, receive electronic estimates,
20 approve repairs, issue purchase orders and communicate
21 directly with your dealer, regardless of your truck's
22 location.

1 Q. Is the Volvo trademark used with ASIST?

2 A. Yes.

3 (Exhibit 27 marked for identification)

4 Q. Identify and describe Exhibit 27.

5 A. It is a Volvo Trucks brochure, VHD200 and
6 VHD430.

7 Q. On page 11 of Exhibit 27 there is a discussion
8 about Driver Information Display. What is Driver
9 Information Display?

10 A. The Driver Information Display is a computer
11 screen that provides fast access to gauges and key
12 diagnostic information. The display includes incoming
13 and outgoing phone calls as Volvo's standard Bluetooth
14 radio package is integrated into the system.

15 The display can include temperature settings,
16 information about the engine such as coolant level,
17 transmission system information such as transmission tank
18 air pressure, and information about the brake system
19 including air leakage.

20 Q. On page 15 of Exhibit 27 there's a discussion
21 about performance software package. What is the
22 performance software package?

1 A. Performance software package is a function that
2 adapts gear shifts and gear selection to poor driving
3 surfaces and hilly road stretches. It also includes
4 functions that aid starting from a standstill in less
5 than ideal driving conditions.

6 Q. On page 18 of Exhibit 27 there is a discussion
7 about VEST. What is VEST?

8 A. VEST is an abbreviation for Volvo Enhanced
9 Stability Technology which is a collision avoidance
10 system designed to assist drivers in avoiding
11 jackknives and rollovers before they happen and often
12 before a driver is aware that anything is wrong.

13 VEST sensors continuously monitor and react to
14 multiple vehicle parameters and conditions, derating the
15 engine, engaging the engine brake, and applying brakes
16 independently at each wheel end as needed to help the driver
17 safely bring the truck under control.

18 (Exhibit 28 marked for identification)

19 Q. Identify and describe Exhibit 28.

20 A. It's a printed excerpt from the Volvo Trucks
21 eMedia.com website, "eMedia Center Volvo Trucks
22 North America". Consumer can order Volvo computer

1 hardware and software at this site. The exhibit
2 includes pricing for some Volvo computer hardware
3 products and Volvo computer software products.

4 (Exhibit 29 marked for identification)

5 Q. Identify and describe Exhibit 29.

6 A. It's a printed excerpt from the
7 loadingramp.volvotrucks.com website, "Volvo Trucks
8 Loading Ramp". This is an online video game.

9 (Exhibit 30 marked for identification)

10 Q. Identify and describe Exhibit 30.

11 A. It is a printed excerpt from the
12 volvotrucks.com website, "Volvo Trucks apps". There
13 are a number of apps that have been developed by or for
14 Volvo Trucks, including online games.

15 (Exhibit 31 marked for identification)

16 Q. Identify -- identify and describe Exhibit 31.

17 A. It is a printed excerpt from the
18 iTunes.apple.com website, Volvo Trucks iTunes store
19 page. The Exhibit displays the Volvo Trucks apps that
20 are available for download. Fueldrop, for example, is
21 an online game.

22 (Exhibit 32 marked for identification)

1 Q. Identify and describe Exhibit 32.

2 A. It's a printed excerpt from the volvopenta.com
3 website, Volvo Penta home page.

4 Q. Does Volvo Penta operate in the United States?

5 A. Yes.

6 Q. What products does Volvo Penta offer in the
7 United States?

8 A. Engines and complete power systems for marine
9 and industrial applications, spare parts and
10 accessories thereto.

11 (Exhibit 33 marked for identification)

12 Q. Identify and describe Exhibit 33.

13 A. It is a printed excerpt from the volvopenta.com
14 website, "Volvo Penta North America".

15 (Exhibit 34 marked for identification)

16 Q. Identify and describe Exhibit 34.

17 A. It is a printed excerpt from the volvopenta.com
18 website, "Volvo Penta Industrial".

19 Q. What is Volvo Penta Industrial?

20 A. Volvo Penta Industrial offers engines in
21 off-road applications, as well as relevant services
22 connected to all these goods, including but not limited

1 to repair and maintenance services, financial warranty
2 and insurance services.

3 (Exhibit 35 marked for identification)

4 Q. Identify and describe Exhibit 35.

5 A. It's a printed excerpt from the volvopenta.com
6 website, Glass Cockpit System.

7 Q. What is Volvo Penta's Glass Concept System?

8 A. This is the Glass Cockpit System, not the Glass
9 Concept System. It is a system which gives you
10 a clean, easy-to-use dashboard and an enhanced overview
11 and control of both engine and navigation information
12 in one place. Integrated with the boat's systems, it
13 gathers all driver information and displays it in one
14 spot via an easy-to-handle pinch-to-zoom display.

15 (Exhibit 36 marked for identification)

16 Q. Identify and describe Exhibit 36.

17 A. It is a printed excerpt from the volvopenta.com
18 website, "Glass cockpit system". It includes photos of
19 the system. The Volvo Penta mark is seen on the
20 screen. Different size monitors are available.

21 (Exhibit 37 marked for identification)

22 Q. Identify and describe Exhibit 37.

1 A. It is a Volvo Penta brochure, "Glass Cockpit".
2 The first page is a photo of how the screen monitors
3 appear in a boat. A number of screenshots are seen on
4 the second page. The Volvo Penta mark is on the
5 screens.

6 (Exhibit 38 marked for identification)

7 Q. Identify and describe Exhibit 38.

8 A. It is a printed excerpt from the volvopenta.com
9 website, "Engine monitoring displays". The engine
10 monitoring displays come in different sizes and provide
11 information about the boat engine. The Volvo Penta
12 mark is on the hardware.

13 (Exhibit 39 marked for identification)

14 Q. Identify and describe Exhibit 39.

15 A. It is a Volvo Penta brochure, "Trip Computer".
16 The trip computer provides information about trip
17 distance, average speed and fuel consumption, for
18 example.

19 (Exhibit 40 marked for identification)

20 (Exhibit 41 marked for identification)

21 (Exhibit 42 marked for identification)

22 (Exhibit 43 marked for identification)

1 (Exhibit 44 marked for identification)

2 Q. Identify and describe Exhibits 40 through 44.

3 A. Exhibit 40 is a printout from the Volvo Penta
4 online store, "EVC Control Accessories". EVC means
5 electronic vessel control.

6 Exhibit 41 is a printout from the Volvo Penta
7 online store, "EVC Electronic Monitoring Instruments".

8 Exhibit 42 is a printout from the Volvo Penta
9 online store, "EVC Senders and Accessories".

10 Exhibit 43 is a printout from the Volvo Penta
11 online store, "EVC Adaptors and Cables".

12 Exhibit 44 is a printout from the Volvo Penta
13 online store, "EVC Optional Accessories".

14 These exhibits show instrument panels, cables and
15 software that are offered by Volvo Penta. This -- the
16 products Volvo Penta offers includes computer hardware and
17 software, as well as related items such as cables.

18 Q. Who are Volvo Penta customers?

19 A. OEM accounts, dealers, distributors, boat
20 owners and end use customers.

21 Q. What is Volvo Cars' relationship to Volvo
22 Trademark Holding?

1 A. Volvo Car Corporation owns Volvo Trademark
2 Holding AB to 50 percent.

3 Q. What products does Volvo Cars offer?

4 A. Volvo branded cars, parts, components and
5 accessories therefore and services relating thereto.

6 Q. Who are Volvo Cars' customers?

7 A. Buyers of vehicles and businesses selling spare
8 parts for vehicles, both private individuals and
9 companies.

10 Q. Do any Volvo cars have touchscreens?

11 A. Yes, Volvo cars do have touchscreens. The new
12 Volvo XC90 has a touchscreen and is advertised and sold
13 in the U. S.

14 (Exhibit 45 marked for identification)

15 Q. Identify and describe Exhibit 45.

16 A. It is a printed excerpt from the volvocars.com
17 website.

18 (Exhibit 46 marked for identification)

19 Q. Identify and describe Exhibit 46.

20 A. It is a printed excerpt from the volvocars.com
21 website for U. S. A.

22 (Exhibit 47 marked for identification)

1 Q. Identify and describe Exhibit 47.

2 A. It is a printed excerpt from the volvocars.com
3 website, new Volvo XC90, which car is equipped with
4 a touchscreen. The touchscreen controls several
5 different functions and features of the car.

6 Infotainment. All infotainment related
7 functionality is mainly controlled through the touchscreen
8 such as navigation, phone calls, media, including radio,
9 Internet, music, CD or streaming, embedded apps. That is
10 local search, Yelp, Weather, Glympse, TuneIn, as well as
11 other entertainment-related functionality, audio set-up,
12 et cetera.

13 Over the air downloads. The touchscreen is the
14 control center for all SW that can be -- that can be
15 downloaded remotely to the car.

16 Vehicle functions. Most vehicle functions are now
17 controlled by the touchscreen instead of physical buttons.
18 These can be such functions as activation of lane keeping
19 aid, 360-degree camera, speed limit warning or head-up
20 display calibration. The amount of functions depend on the
21 specification of the car.

22 Car settings. Here you can personalize different

1 settings of the car related to both infotainment and
2 connectivity, i.e. Bluetooth pairing, Internet communication
3 and navigation settings, as well as special car-related
4 functionality, i.e. graphical themes of the system, locking
5 behavior and system settings.

6 Climate control. Temperature, fan speed and other
7 climate related functionality is set using the touchscreen.

8 Visualization of seat adjustment. When using the
9 seat adjustment buttons on the side of the seat, the display
10 is used to enable you to select which part to adjust.

11 Owner's manual. A full and interactive user
12 manual can be accessed through the display.

13 (Exhibit 48 marked for identification)

14 Q. Identify and describe Exhibit 48.

15 A. It is printed excerpts from the volvocars.com
16 website, "Volvo Sensus Connect". You can see that
17 there are a number of screens displays for this system.

18 Q. What is Volvo Sensus?

19 A. Volvo Sensus Connect is a feature that allows
20 the customer to connect his or her smartphone, tablet
21 or laptop to the Internet -- Internet through wireless
22 technology in the vehicle. It also allows for features

1 such as Park and Pay, Volvo On Call, Glympse, to be
2 used from the vehicle.

3 Volvo Sensus is the name of our older infotainment
4 system introduced in 2010. Volvo Sensus Connect obviously
5 consists of both hardware and software components.

6 Volvo Sensus Connect is the name of our new and
7 updated infotainment system, introduced in the end of 2013.
8 In this new version apps can be downloaded to the system and
9 much of its content is Cloud-based. The difference between
10 Volvo Sensus and Volvo Sensus Connect are in some parts
11 small. However, in those Cloud-based aspects there are big
12 differences.

13 Q. Are there computers in Volvo cars?

14 A. Yes.

15 (Exhibit 49 marked for identification)

16 Q. Identify and describe Exhibit 49.

17 A. It is a printed excerpt from the volvocars.com
18 website, "Volvo Service Advantage". This Exhibit
19 discusses the Volvo Service Advantage offered by Volvo
20 Cars. Included in this service package are free
21 software updates. Volvo Cars have various computer
22 software programs, and updates for these programs are

1 available at Volvo car dealers.

2 (Exhibit 50 marked for identification)

3 Q. Identify and describe Exhibit 50.

4 A. It is a printed excerpt from the website
5 engadget.com, an article about Volvo Concept You.

6 Q. What was Concept You?

7 A. Volvo Concept You was a concept car that
8 featured, inter alia, intuitive smart pad technology
9 and first class craftsmanship. It was first displayed
10 at the Frankfurt Motor Show in 2011.

11 In the Concept You a number of touchscreens
12 overtook the inside technology and they were used to replace
13 buttons and controls in order to make the driver comfortable
14 with a leather and wood steering wheel, with glass panels
15 with integrated touchscreen.

16 The Concept You control center consisted of four
17 main areas: a digital driver information monitor, a head-up
18 display on the windscreen, a touchscreen in the upper part
19 of the center console and a touchscreen between the two
20 individual rear seats. The center console touchscreen
21 didn't activate until the driver looked -- looked at it.

22 Today's Volvo car vehicles include improved

1 touch-based controls that were developed from the Concept
2 You vehicle.

3 (Exhibit 51 marked for identification)

4 Q. Identify and describe Exhibit 51.

5 A. It is a printed excerpt from the
6 volvopartswebstore.com website. Volvo Trip Computers
7 are available -- available here. These would be
8 replacement parts for Volvo cars.

9 (Exhibit 52 marked for identification)

10 Q. Identify and describe Exhibit 52.

11 A. It is a printed excerpt from the volvocars.com
12 website, Volvo Cars apps. Volvo Cars offers a number
13 of different apps. These include the On Call app.
14 This app allows you to access your vehicle from your
15 iPhone. You can control a number of your car's systems
16 through this app. These apps were developed by Volvo
17 Cars.

18 Q. Does Volvo Bus operated in the United States?

19 Is Volvo Bus ...?

20 A. Yes.

21 Q. Is Volvo Bus operated in the United States?

22 A. Or does/do. The answer is yes.

1 Q. What products does Volvo Bus offer in the
2 United States?

3 A. Volvo Bus offers, via the company Prevost, the
4 9700 Volvo marked coach, parts thereto and related
5 services.

6 (Exhibit 53 marked for identification)

7 Q. Identify and describe Exhibit 53.

8 A. It is a printed excerpt from the volvobuses.com
9 website, "Fleet Management". Volvo Bus, like Volvo
10 Trucks, has a telematics system. The system operates
11 in the same way.

12 (Exhibit 54 marked for identification)

13 Q. Identify and describe Exhibit 54.

14 A. This is a printed excerpt from YouTube.com
15 which describes Volvo Bus telematics. This telematics
16 system provides the bus driver with information about
17 traffic management, fleet management including fuel
18 reports, as well as vehicle management. All of this
19 information is displayed on a computer screen for the
20 bus operator. The computer screen is of course part of
21 the telematics system.

22 (Exhibit 55 marked for identification)

1 Q. Identify and describe Exhibit 55.

2 A. It is a printed excerpt from the
3 iTunes.apple.com website, Volvo Bus iTunes. A number
4 of apps which are available at this iTunes store have
5 been developed by or for Volvo Bus Corporation.

6 (Exhibit 56 marked for identification)

7 Q. Identify and describe Exhibit 56.

8 A. It is a printed excerpt from the
9 news.volvogroup.com website, Volvo Bus online game.
10 This is a Volvo Bus-developed online game.

11 Q. What is Volvo IT?

12 A. Volvo IT is a provider of IT solutions.

13 Q. What products and services does Volvo IT offer?

14 A. Volvo IT offers a broad range of IT services
15 such as application management and operations, IT
16 infrastructure and operations, networking and
17 communications, and project management, as well as
18 desktop collaboration, mobility, telephony, training
19 and support.

20 Q. Does Volvo IT offer goods and services in the
21 United States?

22 A. Which number was that?

1 Q. I'm sorry, 115.

2 A. Yes.

3 Q. Identify and describe Exhibit 57.

4 A. I have to -- can I answer that question again?

5 Q. Sure.

6 A. 115.

7 Q. Does Volvo IT offer goods and services in the
8 United States?

9 A. Volvo IT offers services in the U.S.

10 (Exhibit 57 marked for identification)

11 Q. Okay. And identify and describe Exhibit 57.

12 A. It is a printed excerpt from the volvoit.com
13 website, general information.

14 (Exhibit 58 marked for identification)

15 Q. Identify and describe Exhibit 58.

16 A. It's -- it is a printed excerpt from the
17 volvoit.com website, "Extranet Connect Service",
18 et cetera. Volvo IT provides software products to its
19 clients.

20 (Exhibit 59 marked for identification)

21 Q. Identify and describe Exhibit 59.

22 A. It is a Volvo car brochure, "VIDA Software

1 Ordering".

2 Q. What is V-I-D-A, VIDA?

3 A. VIDA means vehicle information and diagnostics
4 for after sales. It is an electronic service and parts
5 manual for workshops. VIDA is a global tool that
6 supports workshops in repairing and servicing Volvo
7 vehicles by providing service information, parts
8 information, diagnostic fault tracing, software
9 download capability, all integrated into one single
10 application.

11 VIDA works on all networked vehicle system for
12 model year 1999 and later Volvo vehicles. The information
13 is found quickly with the help of instructive navigation and
14 a powerful search engine. VIDA users are sales companies,
15 authorized dealers, independent operators and Volvo Cars
16 internal users.

17 (Exhibit 60 marked for identification)

18 Q. Identify and describe Exhibit 60.

19 A. It is a printed excerpt from the volvoit.com
20 website, "Telematics solutions".

21 (Exhibit 61 marked for identification)

22 Q. Identify and describe Exhibit 61.

1 A. It is a printed excerpt from the YouTube.com
2 website, "Volvo The Game". This game was developed for
3 Volvo Cars.

4 (Exhibit 62 marked for identification)

5 Q. Identify and describe Exhibit 62.

6 A. Annual report for 2010 for the Volvo Group.

7 Q. On the third page of Exhibit 62 there is
8 information titled "net sale development over ten
9 years". What was the net sale difference in that
10 ten-year period for North America?

11 A. It was an 18 percent increase.

12 Q. On numbered page 129 of Exhibit 62 is there
13 an 11-year summary of income -- there is an 11-year
14 summary of income of the Volvo Group. What were net
15 sales in 2000? What were net sales in 2010?

16 A. Yes, the net sales in 2000 were 130,070,000,000
17 Swedish crowns. The net sales in 2010 were
18 264,749,000,000 Swedish crowns.

19 (Exhibit 63 marked for identification)

20 Q. Identify and describe Exhibit 63.

21 A. It's the annual report for 2011 for the Volvo
22 Group.

1 Q. On the third page of Exhibit 63 there is a map
2 of North America. Can you explain the plus 49 percent
3 over the map of North America?

4 A. The plus 49 percent refers to the rise in the
5 net sales for the Volvo Group in North America from
6 2000 to 2011.

7 Q. On page 141 of Exhibit 63 there's an 11-year
8 summary of income for the Volvo Group. What were net
9 sales in 2011?

10 A. Yes. In 2011 net sales were 310,367,000,000
11 Swedish crowns.

12 (Exhibit 64 marked for identification)

13 Q. Identify and describe Exhibit 64.

14 A. Annual report for 2012 for the Volvo Group.

15 Q. On the fourth page of Exhibit 64 there is
16 a world map with the title "Share of net sales by
17 market 2012". What is the share of net sales for
18 North America?

19 A. The share of net sales for North America is
20 23 percent.

21 Q. What were the net sales for 2012 as stated in
22 Exhibit 64 for the Volvo Group?

1 A. The net sales for 2012 for the Volvo Group were
2 303,647,000,000 Swedish crowns.

3 (Exhibit 65 marked for identification)

4 Q. Identify and describe Exhibit 65.

5 A. The annual report for 2013 for the Volvo Group.

6 Q. On the fourth page of Exhibit 65 there is
7 a world map with the title "Share of net sales by
8 market 2013". What was the share of net sales for
9 North America?

10 A. The share of the net sales for North America is
11 23 percent.

12 Q. What were the net sales for the Volvo Group in
13 2013?

14 A. Net sales for the Volvo Group 2013 were
15 272,622,000,000 Swedish crowns.

16 (Exhibit 66 marked for identification)

17 Q. Identify and describe Exhibit 66.

18 A. It's a Volvo Group report on the second quarter
19 2014.

20 Q. What were Volvo Group's sales for the first six
21 months of 2014?

22 A. Volvo Group's sales for the first six months

1 2014 were 138,247,000,000 Swedish crowns.

2 Q. How do the first six months of Volvo Group's
3 sales in 2014 compare to the same time period in 2013?

4 A. The sales increased from 131,100,000,000
5 Swedish crowns for the first six months of 2013 to
6 138,247,000,000 Swedish crowns for the first six months
7 of 2014.

8 Q. Through what trade channels are Volvo products
9 sold in the United States?

10 A. All Volvo products are sold in the U.S. through
11 dealers and distributors. This includes car dealers
12 and distributors, truck dealers and distributors, bus
13 dealers and distributors, and dealers and distributors
14 of construction equipment.

15 Q. Do dealers and distributors of Volvo products
16 in the United States sell other brands?

17 A. Yes, some of them do. However, if we refer to
18 Volvo cars as an example, a majority of the dealers
19 sell only Volvo products or have a separate showroom
20 for the Volvo products.

21 Q. Approximately how many dealers and distributors
22 of Volvo products are there in the United States?

1 construction equipment in the United States?

2 [--- Confidential ---]

3 [--- Confidential ---]

4 [--- Confidential ---]

5 [--- Confidential ---]

6 [--- Confidential ---]

7 [--- Confidential ---]

8 Q. What is the annual sales revenue of Volvo

9 trucks in the United States?

10 [--- Confidential ---]

11 [--- Confidential ---]

12 [--- Confidential ---]

13 [--- Confidential ---]

14 [--- Confidential ---]

15 [--- Confidential ---]

16 Q. How are Volvo products and services advertised

17 and promoted in the United States?

18 A. In virtually every way possible, including but

19 not limited to national and international magazines and

20 newspapers, local and regional television and radio

21 commercial, direct mail, on the Internet, in product

22 and sales brochures, signage, trade shows, dealer

1 meetings and sponsorships such as the Volvo Ocean Race
2 and other events.

3 Volvo dealers also advertise Volvo branded
4 products through local and regional print publications,
5 especially magazines and newspapers, on outdoor billboards,
6 in radio commercials, television commercials and through
7 direct mail. In addition, Volvo dealers have their own
8 website where Volvo branded goods are promoted.

9 Q. What are the annual advertising and marketing
10 expenditures for Volvo products, excluding cars in the
11 United States, from 2009 to the present?

12 [--- Confidential ---]

13 [--- Confidential ---]

14 [--- Confidential ---]

15 [--- Confidential ---]

16 Q. What are the annual advertising and marketing
17 expenditures of Volvo Cars in the United States from
18 2009 to the present?

19 [--- Confidential ---]

20 [--- Confidential ---]

21 [--- Confidential ---]

22 [--- Confidential ---]

1 Q. Do Volvo car dealers and -- excuse me.

2 Do Volvo car dealers advertise Volvo cars in the
3 United States?

4 A. Yes.

5 Q. What are annual advertising expenditures by
6 Volvo car dealers in the United States?

7 [--- Confidential ---]

8 [--- Confidential ---]

9 Q. What are the annual U.S. advertising
10 expenditures in the United States for advertising of
11 Volvo trucks?

12 [--- Confidential ---]

13 [--- Confidential ---]

14 [--- Confidential ---]

15 [--- Confidential ---]

16 [--- Confidential ---]

17 Q. What are the annual advertising and marketing
18 expenditures in the United States for Volvo
19 Construction Equipment?

20 [--- Confidential ---]

21 [--- Confidential ---]

22 [--- Confidential ---]

1 Q. What are Volvo Penta products advertised --
2 where are Volvo Penta products advertised in the United
3 States?

4 A. In Yachting and Motorboating and other marine
5 publications, in Diesel Progress magazine, Aggregates
6 Manager, OEM Off-Highway, Pit & Quarry, Power
7 Engineering, Rental Equipment Register, Rental
8 Management.

9 Q. Where are Volvo cars advertised in the United
10 States?

11 A. In all media including Internet, TV, radio,
12 magazines, including but not limited to Sports
13 Illustrated, GQ, ESPN The Magazine, Fortune, People,
14 Gourmet, Food & Wine, and newspapers including but not
15 limited to The New York Times, Washington Post,
16 Philadelphia Inquirer, Miami Herald, Chicago Tribune
17 and San Francisco Chronicle. There is also product
18 placement in movies.

19 Q. Do members of the Volvo Group regularly attend
20 trade shows in the United States?

21 A. Yes, and so do also Volvo Cars.

22 Q. Which shows?

1 A. Examples of shows are Auto Industry Week in Las
2 Vegas which includes SEMA -- SEMA stands for Specialty
3 Equipment Manufacturers Association -- and AAPEX, which
4 stands for Automotive After Products Expo, and NACE,
5 which stands for International Autobody and Collision
6 Exposition; the Mid-America Trucking Show and the Great
7 American Truck Show, GATS; the NPTC, which stands for
8 National Private Truck Council; Alternative Clean
9 Transportation Expo; ATA MC&E, which stands for
10 American Truckers Association Management Conference &
11 Exhibition; NTTC, which stands for National Tank Truck
12 Carriers; Annapolis Boat Shows; and other boat shows
13 and trade shows of interest to the consumer
14 professional marine industry.

15 Q. Does Volvo sponsor any events or activities as
16 a way to promote its Volvo products and services?

17 A. Yes.

18 Q. What events?

19 A. Ever since Volvo first tapped into the power of
20 sponsorship some 30 years ago, its involvement in
21 tennis, sailing, golf, equestrian events, cycling,
22 skiing and the cultural events has stimulated sales and

1 helped build the Volvo brand and commercial value.

2 The AB Volvo Group and Volvo Car Corporation and
3 its related companies are currently focused on sponsorship
4 in sailing, golf and culture. Our biggest investment is the
5 Volvo Ocean Race.

6 In addition thereto, the three specific golf
7 sponsorship activities includes the Volvo China Open, Volvo
8 Pro Golf Invitational and Volvo World Golf Challenge.

9 Q. Have Opposer Volvo Trademark Holding AB and its
10 predecessors in interest taken steps to challenge other
11 users of trademarks believed to be infringing or
12 resulting in dilution?

13 A. Yes.

14 Q. What steps have been taken to protect the Volvo
15 trademark?

16 A. Warning letters, trademark oppositions, ICANN
17 proceedings against main names, and lawsuits for
18 trademark infringement where necessary. In addition,
19 we maintain a watch service.

20 (Exhibit 67 marked for identification)

21 (Exhibit 68 marked for identification)

22 (Exhibit 69 marked for identification)

1 (Exhibit 70 marked for identification)

2 Q. Identify and describe Exhibits 67 through 70.

3 A. These are agreements or decisions from cases
4 where Volvo enforced its rights against infringers.
5 These represent a sampling of our enforcement efforts.
6 We maintain active watch services and pursue infringers
7 of our mark.

8 Q. Are the civil actions in Exhibits 67 through 70
9 representative of the civil actions that Volvo and its
10 predecessors in interest have filed in the United
11 States District Court?

12 A. Yes.

13 Q. Has Opposer Volvo Trademark Holding AB filed
14 ICANN domain name proceedings against domain names
15 which included Volvo or other similar terms?

16 A. Yes.

17 Q. Have any of these ICANN decisions recognized
18 Volvo as a famous trademark?

19 A. Yes.

20 (Exhibit 71 marked for identification)

21 (Exhibit 72 marked for identification)

22 (Exhibit 73 marked for identification)

1 (Exhibit 74 marked for identification)

2 (Exhibit 75 marked for identification)

3 (Exhibit 76 marked for identification)

4 (Exhibit 77 marked for identification)

5 Q. Identify and describe Exhibits 71 through 77.

6 A. These are copies of some of the reported ICANN
7 decisions holding that Volvo is famous and awarding an
8 infringing domain name to Volvo Trademark Holding AB.

9 Q. Are the ICANN decisions in Exhibits 71 through
10 77 representative of decisions that Volvo has received
11 in ICANN UDRP cases?

12 A. Yes.

13 Q. What is the range of U.S. sales prices for
14 Volvo car and truck parts?

15 [--- Confidential ---]

16 [--- Confidential ---]

17 [--- Confidential ---]

18 [--- Confidential ---]

19 Q. What is the range of U.S. sales prices for
20 Volvo parts for construction equipment?

21 [--- Confidential ---]

22 [--- Confidential ---]

1 Q. What is the range of U.S. sales prices for
2 Volvo Penta parts?

3 [--- Confidential ---]

4 [--- Confidential ---]

5 Q. What are the annual sales for Volvo car parts?

6 A. The annual sales for parts and accessories for

7 [--- Confidential ---]

8 [--- Confidential ---]

9 [--- Confidential ---]

10 [--- Confidential ---]

11 [--- Confidential ---]

12 [--- Confidential ---]

13 Q. What are the annual U.S. sales for Volvo Penta
14 engines?

15 [--- Confidential ---]

16 [--- Confidential ---]

17 [--- Confidential ---]

18 [--- Confidential ---]

19 [--- Confidential ---]

20 Q. What are the annual U.S. sales for Volvo truck
21 parts?

22 [--- Confidential ---]

1 [--- Confidential ---]

2 [--- Confidential ---]

3 [--- Confidential ---]

4 [--- Confidential ---]

5 [--- Confidential ---]

6 [--- Confidential ---]

7 [--- Confidential ---]

8 [--- Confidential ---]

9 Q. What are the annual U.S. sales for Volvo parts
10 for cars, construction equipment, marine engines and
11 trucks combined?

12 A. The combined figures of sales of parts for
13 Volvo cars, Volvo construction equipment, Volvo Penta
14 for all engines, not only for marine engines, and Volvo
15 trucks in the U.S. for the years 2005 until 2014 are as

16 [--- Confidential ---]

17 [--- Confidential ---]

18 [--- Confidential ---]

19 [--- Confidential ---]

20 [--- Confidential ---]

21 [--- Confidential ---]

22 Q. What are the U.S. trade channels for Volvo car

1 parts?

2 A. Volvo car parts are sold through various
3 channels of trade, including authorized dealers,
4 retailers, repair shops, service stations, ordinary
5 consumers, over the counter and over the Internet.

6 Q. What are Volvo parts advertised -- where are
7 Volvo parts advertised and promoted in the United
8 States?

9 A. In trade magazines and in brochures and
10 advertising materials made available through dealers.

11 Q. Who are consumers for Volvo parts for cars,
12 trucks and industrial engines?

13 A. Consumers for Volvo cars and Volvo car parts
14 include ordinary consumers, businesses of any size, and
15 repair and service shops.

16 For Volvo trucks and truck parts, consumers
17 include businesses of any size in a variety of industries,
18 including shipping, timber hauling, machinery transport,
19 refuse and automobile transport.

20 For Volvo construction equipment, consumers
21 include mining, construction, forestry, industrial
22 application, waste handling, container hauling and road

1 building.

2 Volvo Penta Industrial engines are purchased by
3 equipment manufacturers and users of off-road machinery or
4 equipment in many applications such as road building,
5 landscaping, open cast mining and quarrying to port handling
6 equipment and building construction.

7 Volvo Penta marine engine parts are purchased,
8 inter alia, by boat owners.

9 Q. Is there anything else you would like to state
10 about the Volvo mark?

11 A. Electronic equipment is featured in Volvo cars,
12 Volvo buses, Volvo construction equipment and Volvo
13 trucks. Volvo, through its various entities, sells
14 computerized control units and modules containing both
15 hardware and software. Such computerized control units
16 and modules are available in new vehicles and machines
17 and are offered as replacement placement parts.

18 Some Volvo software is installed on vehicles or
19 machines at the factory. Some Volvo vehicles or machines
20 can be retrofitted to have software added. Updates to
21 software are of course available to machines and vehicles
22 equipped to receive such updates.

1 MS. PARENTI: That was the first part.

2 THE WITNESS: Shall we take a short break?

3 MS. PARENTI: Yes, we can take a short break.

4 (2:40 p.m.)

5 (Break taken.)

6 (2:50 p.m.)

7 CROSS-EXAMINATION BY MS. PARENTI:

8 Q. You are here speaking on behalf of Volvo;
9 correct?

10 A. I am here on behalf of Opposer.

11 Q. Okay. I should read the objection before your
12 answer or --

13 A. Yes, you should read the question, then the
14 objection. Then I will answer.

15 Q. I'll begin again.

16 The question is: you are here speaking on behalf
17 of Volvo; correct?

18 Objection: vague. "Volvo" is undefined.

19 A. I am here on behalf of Opposer.

20 Q. And, in your company as Volvo's witness, you
21 have knowledge about the use of the Volvo trip mark as
22 your -- as you testified to earlier; correct?

1 Objection: vague. "Your company", "Volvo's" and
2 "Volvo mark" are undefined.

3 A. In my capacity at Opposer I have knowledge of
4 the use of the Volvo trademarks by members of the Volvo
5 Group and Volvo Cars.

6 Q. Do your duties require you to stay abreast of
7 marks that may potentially be infringed on those marks
8 held by Volvo Trademark Holding AB?

9 Objection: vague. "Duties" and "held" are
10 undefined.

11 A. I do not understand what is meant by "stay
12 abreast of". In my capacity at Opposer I review
13 potentially infringing marks.

14 Q. What level of diligence do you perform when
15 investigating these matters?

16 Objection: vague. "Level of diligence" and "these
17 matters" are undefined.

18 A. I don't know which matters you are asking
19 about.

20 Q. Is there an explicit protocol that you are
21 required to follow upon identifying a potentially
22 infringing mark, or does the company permit you the

1 latitude to take an ad hoc approach to conducting these
2 inquiries.

3 Objection: vague. "The company" and "these
4 inquiries" are undefined.

5 A. In my capacity at Opposer I review potentially
6 infringing marks, often with local counsel.

7 Q. What documentation did you rely upon to answer
8 the direct questions presented to you today?

9 A. The documents which are introduced as exhibits.

10 Q. Who provided/prepared those documents?

11 Objection: vague. "Those documents" are
12 undefined.

13 A. The exhibits which are attached to this
14 deposition were prepared by employees of the Volvo
15 companies in the normal course of their employment.

16 Q. Based on what information were these documents
17 prepared?

18 Objection: vague. "These documents" are
19 undefined.

20 A. Exhibits to this deposition were prepared by
21 employees of the Volvo companies in the normal course
22 of their employment.

1 Q. What steps did you take to verify the
2 information contained in these documents?

3 Objection: vague. "These documents" are
4 undefined.

5 A. I did not verify information contained in the
6 exhibits as the exhibits were prepared by employees of
7 the Volvo companies in the normal course of their
8 employment.

9 Q. Aside from these documents, do you have
10 personal knowledge about the misuses of the Volvo mark;
11 correct?

12 Objection: vague. "These documents", "misuses"
13 and "Volvo mark" are undefined.

14 A. I do not know what you mean by "the misuses of
15 the Volvo mark".

16 Q. And you have personal knowledge of
17 infringements perpetrated upon the Volvo mark; correct?

18 Objection: vague. "Perpetrated" and "Volvo mark"
19 are undefined.

20 A. I do not understand the question.

21 Q. Does "Volvo" have any meaning or is it simply
22 a name?

1 A. "Volvo" means "I am rolling" in Latin.

2 Q. Is it fair to say that the formative "volv" is
3 subjective of common English words such as "revolve" or
4 "evolve"?

5 A. I do not know.

6 Q. You are not aware of anyone misspelling Volvo
7 as Wolvol; is that correct?

8 A. I do not know.

9 Q. If you do, can you provide evidence of such?

10 A. Please see my earlier answer.

11 Q. To the best of your knowledge, Wolvol is not
12 a common typographical error for Volvo; is that
13 correct?

14 A. I do not know.

15 Q. If yes, please provide the basis of this
16 understanding.

17 A. Please refer to my earlier answer.

18 Q. You've never seen Volvo misspelled so that it
19 begins with a "W"?

20 A. Yes, I have.

21 Q. If yes, can you provide evidence of such?

22 A. No.

1 Q. In your years with Volvo, have you ever seen
2 Volvo misspelled as Wolvol?

3 A. In my capacity at Opposer I have seen a lot of
4 misspellings of Volvo, but I cannot recall specifically
5 having seen Volvo misspelled as Wolvol.

6 Q. I apologize. There was an objection to that
7 question. Vague. "Volvo" is undefined.

8 Has this ever occurred at all to your knowledge?

9 A. I do not know.

10 Q. If so, can you provide evidence of such?

11 A. Please refer to my earlier answers.

12 Q. In your years with Volvo, have you ever heard
13 Volvo pronounced as Wolvol?

14 Objection: vague. "Volvo" is undefined.

15 A. In my capacity at Opposer I have to my
16 recollection not heard Volvo pronounced as Wolvol.

17 Q. Has this ever occurred to your knowledge?

18 A. Please refer to my earlier answers.

19 Q. If so, can you provide evidence of such?

20 A. Please refer to my earlier answers.

21 Q. You are not aware of any consumer referring to
22 Volvo as Wolvol, are you?

1 A. No.

2 Q. If so, can you provide evidence of such?

3 A. Please refer to my earlier answer.

4 Q. The second "O" in Volvo is pronounced like the
5 "O" in rope; correct?

6 A. Opposer does not dictate how the public is to
7 pronounce Volvo.

8 Q. In your years with Volvo, have you ever seen
9 Volvo misspelled so it ended in an "L"?

10 Objection: vague. "Volvo" is undefined.

11 A. In my capacity at Opposer I have seen a lot of
12 misspellings of Volvo, but I cannot recall specifically
13 having seen Volvo misspelled ending with an L.

14 Q. If so, can you provide evidence of such?

15 A. Please refer to my earlier answer.

16 Q. In your years with Volvo, have you ever heard
17 Volvo mispronounced so that it began with the sound of
18 the letter "W"?

19 Objection: vague. "Volvo" is undefined.

20 A. Yes.

21 Q. If so, can you provide evidence of such?

22 A. In my experience many people pronounce the "V"

1 sounds as a "W" sound.

2 Q. In your years with Volvo, have you ever heard
3 Volvo mispronounced so that it ended with the sound of
4 the letter "L"?

5 Objection: vague. "Volvo" is undefined.

6 A. In my capacity at Opposer I have heard a lot of
7 mispronunciations of Volvo, but I cannot recall
8 specifically having heard Volvo ending with the sound
9 of the letter "L".

10 Q. If so, can you provide evidence of such?

11 A. Please refer to my earlier answer.

12 Q. And you have no evidence that when Applicant
13 selected the Wolvol mark they were thinking of the
14 Volvo mark in any capacity; correct?

15 Objection: vague. "Volvo mark" is undefined.

16 A. I have no evidence to this effect.

17 Q. You've no knowledge beyond what Applicant
18 stated in discovery of the derivation of the Wolvol
19 mark; correct?

20 A. I have no knowledge about the derivation of
21 Wolvol.

22 Q. And you've no knowledge beyond what Applicant

1 stated in discovery of whether Wolvol has any meaning;
2 correct?

3 A. I have no knowledge about the meaning of
4 Wolvol.

5 Q. You have no evidence that consumers will or do
6 believe that Wolvol has the same meaning as Volvo;
7 correct?

8 A. I have no written documents responsive to this
9 question.

10 Q. If so, can you provide evidence of such?

11 A. Please refer to my earlier answer.

12 Q. You have no evidence that, in fact, Volvo and
13 Wolvol have the same meaning; correct?

14 A. I have no written documents in response to this
15 question.

16 Q. Referring to your discussion of Volvo Group,
17 does each member of the group use the Volvo mark?

18 Objection: vague. "Volvo mark" is undefined?

19 A. The majority of the members of the Volvo Group
20 use the Volvo mark.

21 Q. Who grants them the rights to use the mark?

22 Objection: vague. "The mark" is undefined.

1 A. Opposer grants the Volvo Group and Volvo Cars
2 rights to use the Volvo mark.

3 Q. Under what terms and conditions?

4 A. Rights are given in relation to the Volvo
5 Group's and Volvo Cars' respective businesses.

6 Q. Referring to your response to question 19,
7 which asks what products are sold and what services are
8 rendered in the United States under the Volvo trademark
9 by members of the Volvo Group, the list of items
10 provided thereunder did not provide personal computers;
11 correct?

12 A. I refer you to the answer to that question.

13 Q. Again referring to your response to question
14 19, which asks what products are sold and what services
15 are rendered in the United States under the Volvo
16 trademark by members of the Volvo Group, the list of
17 items provided thereunder did not include any products
18 targeted or marketed at children; correct?

19 A. I refer you to the answer to that question.

20 Q. Referring to your response to question 21 that
21 asks whether, to the best of your knowledge, all the
22 U.S. Volvo registrations are in full force and effect

1 and owned by Opposer, what steps did you take to
2 determine that the registrations were in full force and
3 effect?

4 A. I am responsible for overseeing those trademark
5 registrations and work with my team, the Volvo Group,
6 Volvo Cars, and our trademark council to maintain those
7 registrations.

8 Q. What steps did you take to determine that the
9 registrations are all owned by Opposer?

10 A. The registrations are held in Opposer's name.
11 No steps are required to confirm ownership.

12 Q. What steps did you take to determine that the
13 Volvo mark is used in connection with each and every
14 item or service identified in each of the referenced
15 Volvo registrations?

16 Objection: vague and irrelevant. "Volvo mark" is
17 undefined. There is no counterclaim in this proceeding.

18 A. Opposer maintains its U.S. registrations in
19 accordance with the trademark laws of the United
20 States.

21 Q. With regard to your response to question 22,
22 wherein you explain the websites shown in Exhibit 1

1 link to other Volvo websites, what did you do to
2 confirm these statements?

3 A. I have visited those websites.

4 Q. Did you personally visit the websites shown in
5 Exhibit 1 and link to other websites?

6 A. Yes.

7 Q. If so, when?

8 A. I don't know the dates.

9 Q. What websites did you link to?

10 A. I believe I have answered this question.

11 Q. Can you state how many people have used the
12 links at www.volvo.com to connect to each of the
13 websites shown in the exhibits you provided?

14 A. No.

15 Q. If not, did you endeavor to get that
16 information?

17 Objection: vague. "That information" is
18 undefined.

19 A. No.

20 Q. On average, how many other brands do dealers
21 and distributors of new Volvo products sell?

22 Objection: vague. "Dealers", "distributors" and

1 "Volvo products" are undefined.

2 A. I do not know.

3 Q. On average, how many other brands do dealers
4 and distributors of used Volvo products sell?

5 Objection: vague. "Dealers", "distributors" and
6 "Volvo products" are undefined.

7 A. I do not know.

8 Q. Can Opposer request that a dealer or
9 distributor of new Volvo vehicles not sell or offer
10 certain brands of goods?

11 Objection: vague. "Dealers" and "distributors"
12 are undefined.

13 A. No.

14 Q. Can Opposer request that a dealer or
15 distributor of used Volvo vehicles not sell or offer
16 certain brands of goods?

17 Objection: vague. "Dealers" and "distributors"
18 are undefined.

19 A. No.

20 Q. Has Opposer ever prohibited a dealer or
21 distributor of new Volvo vehicles from selling another
22 brand of products?

1 Objection: vague. "Dealers" and "distributors"
2 are undefined.

3 A. No.

4 Q. Has Opposer ever prohibited a dealer or
5 distributor of used Volvo products from selling other
6 brands -- another brand of products?

7 Objection: vague. "Dealers", "distributors" and
8 "Volvo products" are undefined.

9 A. No.

10 Q. You are not aware of any instance in which
11 a customer has been confused into believing that any
12 one of the non-Volvo brands is associated with Volvo;
13 correct?

14 Objection: incomprehensible and vague. "Any one
15 of the non-Volvo brands" is undefined.

16 A. I do not understand the question.

17 Q. Do you know whether any dealers or distributors
18 of Volvo products in the U.S, whether new or used,
19 offer products under brands that include the letters
20 "W", "V" and "O"?

21 Objection: vague. "Dealers", "distributors" and
22 "Volvo products" are undefined.

1 A. I do not know.

2 Q. Are dealers and distributors prohibited from
3 doing so?

4 Objection: incomprehensible and vague. "Dealers"
5 and "distributors" are undefined.

6 A. I do not know.

7 Q. Do you know whether any dealers or distributors
8 of Volvo products in the U.S, whether new or used,
9 offer products under brands that start with the letter
10 "W"?

11 Objection: vague. "Dealers", "distributors" and
12 "Volvo products" undefined.

13 A. I do not know.

14 Q. Are dealers or distributors prohibited from
15 doing so:

16 Objection: incomprehensible and vague. "Dealers"
17 and "distributors" are undefined.

18 A. I do not know.

19 Q. With respect to your response to questions 33
20 and 34, asking you to identify and describe Exhibits 8
21 and 9, the CareTrack brochures, the CareTrack product
22 does not serve a computing function outside of its

1 application to a vehicle or fleet of vehicles; is that
2 correct?

3 Objection: vague. "Computing function" is
4 undefined.

5 A. I do not understand the question.

6 Q. With respect to your response to question 38,
7 asking whether CareTrack is comprised of both hardware
8 and software, CareTrack is not a personal computer
9 under the common understanding of that term; correct?

10 A. The CareTrack system includes a computer.

11 Q. CareTrack does not provide a learning utility
12 for children and never has been marketed as such;
13 correct?

14 Objection: vague. "Learning utility" is
15 undefined.

16 A. I do not understand the question.

17 Q. In fact, CareTrack is only used in conjunction
18 with heavy machinery; is that correct?

19 A. CareTrack is used in vehicles and machines sold
20 by Volvo Construction Equipment.

21 Q. With respect to your response to question 49,
22 CareTrack is never sold or marketed for its

1 functionality outside of its application to particular
2 Volvo machines and vehicles; correct?

3 Objection: incomprehensible and vague.

4 "Functionality" is undefined.

5 A. I do not understand the question.

6 Q. With respect to your response to question 57,
7 asking what VolvoLink is, the VolvoLink product does
8 not serve a computing function outside of its
9 application to vehicle management; correct?

10 Objection: incomprehensible and vague. "Computing
11 function" is undefined.

12 A. I do not understand the question.

13 Q. The VolvoLink system is not a personal computer
14 under the common understanding of that phrase; correct?

15 A. The Volvo -- the VolvoLink system includes
16 computer hardware and computer software.

17 Q. VolvoLink does not provide a learning utility
18 for children and never has been marketed as such;
19 correct?

20 Objection: vague. "Learning utility" is
21 undefined.

22 A. I do not understand the question.

1 Q. With respect to your response to question 69,
2 asking what ASIST, as mentioned on page 12 of
3 Exhibit 26, the ASIST tool is simply a software add-on;
4 is that correct?

5 Objection. "Software add-on" is undefined.

6 A. I do not understand the question.

7 Q. Is it fair to suggest that ASIST is not, and
8 has not been, marketed to the general public as
9 a personal computer?

10 Objection: vague. "Suggest" is improperly used.

11 A. I do not understand the question.

12 Q. ASIST does not provide functionality outside of
13 its application to parts and vehicles manufactured by
14 Volvo and its affiliates; correct?

15 Objection: incomprehensible and vague.

16 "Functionality" is undefined.

17 A. I do not understand the question.

18 Q. With respect to your response to question 71,
19 which asks about the Driver Information Display, the
20 Driver Information Display does not serve a computing
21 function outside of its application to parts and
22 vehicles manufactured by Volvo and its affiliates;

1 correct?

2 Objection: incomprehensible and vague. "Computing
3 function" and "affiliates" are undefined.

4 A. I do not understand the question.

5 Q. The Driver Information Display can -- the
6 Driver Information Display cannot be easily removed
7 from a particular vehicle and be used as -- excuse me.

8 The Driver Information Display cannot be easily
9 removed from a particular vehicle and be used as
10 a consumer --

11 A. No, "by".

12 Q. "By", okay. Sorry, there's typos.

13 A. It's unclear maybe. Just -- just read it as it
14 is.

15 Q. The Driver Information Display cannot be easily
16 removed from a particular vehicle and be used
17 a consumer to provide the same functionality as
18 a personal computer; correct?

19 Objection: incomprehensible and vague.
20 "Functionality" is undefined.

21 A. I do not understand the question.

22 Q. With respect to your question -- with respect

1 to your response to question 80, which asks what
2 products Volvo Penta offers in the United States, are
3 any of these products personal computers?

4 A. Volvo Penta offers a number of computer
5 products, as I have stated.

6 Q. Are any of the products marketed towards
7 children?

8 Objection: vague. "Products" is undefined.

9 A. I do not understand the question.

10 Q. With respect to your answer to question 95,
11 which asks if Volvo cars have touchscreens, are any of
12 these touchscreens affixed to the automobile in such
13 a way that would allow for their easy removal by the
14 end consumer?

15 A. I do not know how easy it would be for an end
16 consumer to remove a touchscreen in a Volvo car.

17 Q. Do these touchscreens themselves, without the
18 aid of third party devices, provide consumers any
19 functionality outside of the car?

20 Objection: incomprehensible and vague.

21 "Functionality" is undefined.

22 A. I do not understand the question.

1 Q. Are the touchscreens ever sold to consumers
2 individually, outside of their use in conjunction with
3 the automobile, in any way that could be linked --
4 likened to a personal computer?

5 Objection: incomprehensible.

6 A. I do not understand the question.

7 Q. These touchscreens are not provided to Volvo
8 consumers with the intention that they will supplement
9 their personal computer; correct?

10 Objection: incomprehensible.

11 A. I do not understand the question.

12 Q. With respect to your response to question 101,
13 asking if there are computers in Volvo cars, these
14 computers do not work in the same capacity as
15 a personal computer, meaning they do not provide
16 functionality like word processing, spreadsheets and
17 educational games; correct?

18 Objection: vague. "Functionality" is undefined.

19 A. I do not understand the question.

20 Q. Are the computers in Volvo cars available for
21 purchase by consumers to be used for any type of
22 functionality not in conjunction with a Volvo car?

1 Objection: vague. "Functionality" is undefined.

2 A. I do not understand the question.

3 Q. Where would a consumer be able to purchase
4 a computer like those found in Volvo cars?

5 A. Volvo car owners can purchase Volvo genuine
6 parts from Volvo authorized dealers. Volvo car owners
7 do not have to purchase Volvo genuine parts and may
8 purchase such parts on the open market.

9 Q. With respect to your response to question 114,
10 asking what products and services Volvo IT offers, does
11 Volvo IT offer sales and support for personal
12 computers?

13 A. Volvo IT provides support for Volvo Group
14 authorized computers.

15 Q. Does Volvo IT provide the same services one
16 would expect to receive from, for example, Apple's
17 Genius Bar or BestBuy's Geek Squad?

18 Objection: incomprehensible and vague. "Apple's
19 Genius Bar" and "BestBuy's Geek Squad" are undefined.

20 A. I do not understand the question.

21 Q. What percent of Volvo's IT work involves
22 services for computing systems from products associated

1 with and/or manufactured and produced by the entities
2 that make up the Volvo Group?

3 Objection: incomprehensible and compound.

4 A. I do not understand the question.

5 Q. Do you have any evidence that Volvo IT provides
6 services to consumers outside of products associated
7 with and/or manufactured and produced by the entities
8 that make up the Volvo Group and third party offerings
9 designed to function with Volvo Group products?

10 Objection: incomprehensible and compound.

11 A. I do not understand the question.

12 Q. With regards to your response to question 119,
13 there is currently no application for VIDA outside of
14 the ordering and downloading of software to Volvo
15 vehicles using the VIDA all-in-one system; correct?

16 A. I do not know.

17 Q. With respects to the net sales figures provided
18 in Exhibit 62, how did you obtain these numbers?

19 A. This is publicly available information.

20 Q. Do you have any independent knowledge of that
21 number?

22 Objection: vague. "That number" is undefined.

1 A. I do not understand the question.

2 Q. What documents did you receive that allowed you
3 to provide that number?

4 Objection: vague. "That number" is undefined.

5 A. I do not understand the question.

6 Q. Who provided that information?

7 Objection: vague. "That information" is
8 undefined.

9 A. I do not understand the question.

10 Q. Based on what?

11 A. I do not understand the question.

12 Q. Did you do anything to verify that the sales
13 figures you provided are accurate?

14 A. The AB Volvo Group is a publicly traded
15 company. AB Volvo Group's sales figures are reported
16 in accordance with Swedish law.

17 Q. With respect to the 11-year summary of income
18 of the Volvo Group provided in Exhibit 62, how did you
19 obtain these numbers?

20 A. This is publicly available information.

21 Q. Do you have any independent knowledge of that
22 number?

1 Objection: vague. "That number" is undefined.

2 A. I do not understand the question.

3 Q. What documents did you review that allowed you
4 to provide that number?

5 Objection: vague. "That number" is undefined.

6 A. I do not understand the question.

7 Q. Who provided that information?

8 Objection: vague. "That information" is
9 undefined.

10 A. I do not understand the question.

11 Q. Based on what?

12 A. I do not understand the question.

13 Q. Did you do anything to verify that the sales
14 figures you provided are accurate?

15 A. The AB Volvo Group is a publicly traded
16 company. AB Volvo Group's sales figures are reported
17 in accordance with Swedish law.

18 Q. Do you have any independent knowledge of these
19 figures?

20 Objection: vague. "These figures" is undefined.

21 A. I do not understand the question.

22 Q. With respect to your response to question 126,

1 asking you to explain the plus 49 percent over the map
2 of North America, how did you obtain these figures?

3 A. This is publicly available information obtained
4 from the AB Volvo annual report.

5 Q. What documents did you review that allowed you
6 to provide these figures?

7 Objection: vague. "These figures" is undefined.

8 A. I do not understand the question.

9 Q. Who provided that information?

10 Objection: vague. "That information" is
11 undefined.

12 A. I do not understand the question.

13 Q. Based on what?

14 A. I do not understand the question.

15 Q. Did you do anything to verify that the figures
16 provided were accurate?

17 Objection: vague. "The figures" is undefined.

18 A. I do not understand the question.

19 Q. Do you have any independent knowledge of these
20 figures?

21 Objection: vague. "These figures" is undefined.

22 A. I do not understand the question.

1 Q. With respect to question 129, asking you to
2 explain the share of net sales for North America, how
3 did you obtain these figures?

4 A. This is publicly available information obtained
5 from the AB Volvo annual report.

6 Q. What documents did you review that allowed you
7 to provide those figures?

8 Objection: vague. "Those figures" is undefined.

9 A. I do not understand the question.

10 Q. Who provided that information?

11 Objection: vague. "That information" is
12 undefined.

13 A. I do not understand the question.

14 Q. Based on what?

15 A. I do not understand that question.

16 Q. Did you do anything to verify that the figures
17 provided are accurate?

18 Objection: vague. "The figures" is undefined.

19 A. I do not understand the question.

20 Q. With respect to question 130, asking you what
21 the net sales for 2012 as stated in Exhibit 64 for the
22 Volvo Group, how did you obtain these figures?

1 A. This is publicly available information obtained
2 from the AB Volvo annual report.

3 Q. What documents did you review that allowed you
4 to provide those figures?

5 Objection: vague. "Those figures" is undefined.

6 A. I do not understand the question.

7 Q. Who provided that information?

8 Objection: vague. "That information" is
9 undefined.

10 A. I do not understand the question.

11 Q. Based on what?

12 A. I do not understand the question.

13 Q. Did you do anything to verify that the figures
14 provided are accurate?

15 Objection: vague. "The figures" is undefined.

16 A. I do not understand the question.

17 Q. With respect to question 132, asking you about
18 the share of net sales by market 2013, how did you
19 obtain these figures?

20 A. This is publicly available information obtained
21 from the AB Volvo annual report.

22 Q. What documents did you review that allowed you

1 to provide those figures?

2 Objection: vague. "Those figures" is undefined.

3 A. I do not understand the question.

4 Q. Who provided that information?

5 Objection: vague. "That information" is
6 undefined.

7 A. I do not understand the question.

8 Q. Based on what?

9 A. I do not understand the question.

10 Q. Did you do anything to verify that the figures
11 provided are accurate?

12 Objection: vague. "The figures" is undefined.

13 A. I do not understand the question.

14 Q. With respect to question 133, asking you about
15 the share of net sales for the Volvo Group in 2013, how
16 did you obtain these figures?

17 A. This is publicly available information obtained
18 from the AB Volvo annual report.

19 Q. What documents did you review that allowed you
20 to provide those figures?

21 Objection: incomprehensible and vague. "Those
22 figures" is undefined.

1 A. I do not understand the question.

2 Q. Who provided that information?

3 Objection: vague. "That information" is
4 undefined.

5 A. I do not understand the question.

6 Q. Based on what?

7 A. I do not understand the question.

8 Q. Did you do anything to verify that the figures
9 provided are accurate?

10 Objection: vague. "The figures" is undefined.

11 A. I do not understand the question.

12 Q. With respect to question 135, asking you about
13 the Volvo Group sales for the first six months of 2014,
14 how did you obtain these figures?

15 A. This is publicly available information obtained
16 from the AB Volvo quarterly report.

17 Q. What documents did you review that allowed you
18 to provide those figures?

19 Objection: incomprehensible and vague. "Those
20 figures" is undefined.

21 A. I do not understand the question.

22 Q. Who provided that information?

1 Objection: vague. "That information" is
2 undefined.

3 A. I do not understand the question.

4 Q. Based on what?

5 A. I do not understand the question.

6 Q. Did you do anything to verify that the figures
7 provided are accurate?

8 Objection: vague. "The figures" is undefined.

9 A. I do not understand the question.

10 Q. With respect to your response to question 136,
11 what was the methodology used for comparing Volvo
12 Group's sales for the first six months of 2014 to the
13 same time period in 2013?

14 A. This is publicly available information obtained
15 from the AB Volvo annual report and AB Volvo quarterly
16 reports which are prepared in accordance with Swedish
17 law.

18 Q. The figures you've provided today do not
19 demonstrate a meaningful commercial context that would
20 allow one to adequately demonstrate consumer
21 recognition of the Volvo mark; is that correct?

22 Objection: vague. "The figures" is undefined.

1 A. I do not understand the question.

2 Q. With respect to your response to question 144,
3 asking how Volvo products and services are advertised
4 and promoted in the United States, are these products
5 and services ever promoted by retail chains such as
6 BestBuy, Circuit City, PC Richard & Sons or similar
7 entities?

8 A. I do not know.

9 Q. Again, with respect to your response to
10 question 144, it would be fair to characterize these
11 marketing efforts as being directed at adults; correct?

12 A. The Volvo companies offer a wide range of
13 products and services, including toys. For example,
14 Volvo Cars licenses use of the Volvo trademarks to
15 third parties for use in computer games and interactive
16 games. There is online games at volvotruck.com
17 website, not only directed to adults.

18 Q. In the U.S. has Volvo or its predecessors ever
19 objected to the use of a third party mark that began
20 with the letter "W"?

21 Objection: vague. "Volvo" and "predecessors" are
22 undefined.

1 A. I do not know.

2 Q. In the U.S. has Volvo or its predecessors ever
3 objected to a third party mark that ended in "L"?

4 Objection: vague. "Volvo" and "predecessors" are
5 undefined.

6 A. I do not know.

7 Q. In the U.S. has Volvo or its predecessors ever
8 objected to the registration of a third party mark that
9 began with the letter "W" other than Wolvol?

10 Objection: vague. "Volvo" and "predecessors" are
11 undefined.

12 A. I do not know.

13 Q. In the U.S. has Volvo or its predecessors ever
14 objected to the registration of a third party mark that
15 ended with the letter "L" other than Wolvol?

16 Objection: vague. "Volvo" and "predecessors" is
17 undefined.

18 A. I do not know.

19 Q. Is it correct that you have not opposed the
20 registration of Voga, registration number 3,683,520,
21 for passenger automobiles?

22 A. Correct. This registration is held in the name

1 of Ford Motor Company which is a former owner of Volvo
2 Cars. Ford sold Volvo Cars in 2009.

3 Q. Is it correct that you've not opposed the
4 registration of Volage, serial number 77/577,714 for
5 vehicles, namely automobiles and structural parts
6 therefore?

7 A. Opposer did not file an opposition against
8 application serial number 77/577,714.

9 Q. Is it correct that you've not opposed the
10 registration of Volante, registration number 1,344,238,
11 for automobiles and parts therefore?

12 A. Opposer did not file an opposition against what
13 is now registration number 1,344,238.

14 Q. Is it correct that you've not opposed
15 registration of Volito and Design, registration
16 number 3,149,013, for any kind of vehicles or boats?

17 A. Opposer did not file an opposition against what
18 is now canceled registration number 3,149,013.

19 Q. Is it correct that you've not opposed
20 registration of Vollert, registration number 3,701,799,
21 for any kind of vehicles?

22 A. Opposer did not file an opposition against what

1 is now registration number 3,701,799.

2 Q. Is it correct that you've not opposed the
3 registration of Volt, serial number 77/078,768, for
4 motor land vehicles, namely automobiles?

5 A. Opposer did not file an opposition against
6 application serial number 77/577,714.

7 Q. Is it correct that you have not opposed the
8 registration of Volterra, registration
9 number 3,324,906, for motor land vehicles, namely
10 automobiles, sport utility vehicles, trucks and vans?

11 A. Opposer did not file an opposition against what
12 is now canceled registration number 3,324,906.

13 Q. Is it true that in approximately 90 percent of
14 the proceedings in which there was a decision rendered
15 for Volvo on a trademark infringement issue, the
16 respondent actually failed to answer?

17 Objection: vague. "Volvo" is undefined.

18 A. I do not know.

19 Q. You've not opposed the applications for marks
20 beginning with V-0 that are set forth above in the
21 previous questions because you do not believe that the
22 marks in those applications are confusingly similar to

1 Volvo; correct?

2 A. We decide whether or not to oppose a particular
3 application based on a number of factors.

4 Q. Are you aware whether there are any U.S.
5 trademark registrations for marks that begin with W-0
6 for any kind of personal computing device?

7 A. I am not.

8 Q. Are you aware whether there are any U.S.
9 trademark registrations for marks that begin with W-0
10 for any products whatsoever?

11 A. I am not.

12 Q. Is it true that exhibitions -- excuse me.

13 Is it true that Exhibits 67 through 69 and 71
14 through 76 all relate to cases involving defendants who are
15 using marks or domain names that include the word "Volvo"?

16 A. The exhibits speaks -- speak for themselves.

17 Q. Is it true that Exhibit 70 relates to a case
18 involving counterfeit products bearing the Volvo name
19 and logo?

20 Objection: vague. "Volvo name" and "logo" are
21 undefined.

22 A. The exhibit speaks for itself.

1 Q. Is it true that in the United States the
2 Opposer, its predecessors in interest and their related
3 companies have only filed lawsuits based on their
4 rights in the mark Volvo against companies that were
5 using a mark or a name that contained "Volvo"?

6 Objection. "Related companies" is undefined.

7 A. I do not know.

8 Q. Can you identify any civil action where this
9 was not the case?

10 Objection: incomprehensible and vague. "The case"
11 is undefined.

12 A. No.

13 Q. Is it true that in the U.S. Opposer, its
14 predecessors in interest and the related companies,
15 have only filed lawsuits based on their rights in the
16 Volvo mark against companies that were using a mark or
17 a name that contained the letter stream V-O-L-V?

18 Objection: vague. "The related companies" and
19 "Volvo mark" are undefined.

20 A. I do not know.

21 Q. Can you identify any civil action where this is
22 not the case?

1 Objection: incomprehensible and vague. "The case"
2 is undefined.

3 A. No.

4 Q. Please identify all other proceedings in which
5 the Trademark Trial and Appeal Board identified Volvo
6 as a famous mark.

7 A. I do not understand the question.

8 Q. On February 7, 2013, the Trademark Trial and
9 Appeal Board issued its decision on Volvo Trademark
10 Holding AB's opposition to the LOVOL mark being used on
11 heavy machinery produced by Hebei Aulion Heavy
12 Industries Company -- I'm not really sure what these
13 stand for. So the Hebei Aulion Heavy Industries
14 Company. Correct?

15 A. Company limited.

16 Q. Limited?

17 A. Correct.

18 Q. In the LOVOL action, the goods the LOVOL mark
19 was being used on were legally identical to goods
20 produced by the Volvo Group; correct?

21 A. The decision speaks for itself.

22 Q. In the LOVOL action, the channels of trade and

1 classes of purchasers for Volvo and Hebei Aulion Heavy
2 Industries Company Limited were also deemed to be the
3 same; is this correct?

4 A. The decision speaks for itself.

5 Q. Despite these similarities, the Trademark Trial
6 and Appeal Board found that it was unlikely that
7 customers of normal perceptual abilities would mistake
8 one mark for the other, even though the marks were
9 being used on identical goods; correct?

10 A. The decision speaks for itself.

11 Q. Can you identify a single court case in the
12 United States that has found, following trial, that
13 Volvo is a famous trademark?

14 A. I cannot.

15 Q. Is it true that Volvo has entered into
16 settlement agreements with third parties applicable to
17 the United States under which those third parties were
18 prohibited from using the mark Volvo, but were not
19 prohibited from using all marks consisting only of the
20 letters "W", "O" and "V"?

21 Objection: vague. "Volvo" is undefined.

22 A. I do not understand the question.

1 Q. Is it true that Volvo has never obtained
2 a court judgment that prohibited a third party from
3 using any mark that contains the letters "V", "O" and
4 "L"?

5 Objection: vague. "Volvo" is undefined.

6 A. I do not understand the question.

7 Q. In general, in settling a conflict relating to
8 the Volvo mark, do you try to make sure that the
9 settlement agreement includes a statement that the
10 Volvo mark is famous?

11 Objection: vague. "Volvo mark" is undefined.

12 A. Opposer does not have a standard settlement
13 agreement or standard settlement terms.

14 Q. For each of the last five calendar years, what
15 percent of Opposer and its related companies' total
16 revenue was derived from the sale of personal computing
17 devices?

18 Objection: vague. "Related companies" is
19 undefined.

20 A. I do not know.

21 Q. Would it be fair to say that in the United
22 States consumers of Volvo cars and parts are generally

1 owners or dealers of Volvo cars?

2 Objection: compound.

3 A. I do not know.

4 Q. In the United States what percentage of
5 consumers of Volvo products are not owners or dealers
6 of Volvo cars?

7 Objection: compound.

8 A. I don't know.

9 Q. Would it be fair to say that in the United
10 States consumers of Volvo trucks -- truck parts are
11 generally owners or dealers of Volvo Trucks?

12 Objection: compound.

13 A. I do not know.

14 Q. In the U.S. what percentage of consumers of
15 Volvo truck parts are not owners or dealers of Volvo
16 Trucks?

17 Objection: compound.

18 A. I do not know.

19 Q. Would it be fair to say that in the U.S.
20 consumers of Volvo boat parts are generally owners or
21 dealers of Volvo boats or boat engines?

22 Objection: compound.

1 A. I do not know.

2 Q. In the U.S. what percentage of consumers of
3 Volvo boat products are not owners or dealers of Volvo
4 boats or boat engines?

5 Objection: compound.

6 A. I do not know.

7 Q. Would it be fair to say that in the U.S.
8 consumers of Volvo engine parts are generally owners or
9 dealers of Volvo engines?

10 Objection: compound.

11 A. I do not know.

12 Q. In the U.S. what percentage of consumers of
13 Volvo engine products are not owners or dealers of
14 Volvo engines?

15 Objection: compound.

16 A. I do not know.

17 Q. Would it be fair to say that in the U.S.
18 consumers of Volvo construction equipment parts are
19 generally owners or dealers of Volvo construction
20 equipment?

21 Objection: compound.

22 A. I do not know.

1 Q. In the U.S. what percentage of consumers of
2 Volvo construction equipment products are not owners of
3 dealers of Volvo construction equipment?

4 Objection: compound.

5 A. I do not know.

6 Q. Is it true that in most instances when
7 a consumer purchases a Volvo part for a vehicle,
8 engine, construction equipment or boat, that the
9 specific part is chosen by the dealer, not the
10 consumer?

11 Objection: compound.

12 A. I do not know.

13 Q. What percentage of such purchases is this not
14 the case?

15 Objection: vague. "Such purchases" and "the case"
16 are undefined.

17 A. I do not know.

18 Q. In what percentage of sales of Volvo parts does
19 the ultimate consumer see the part?

20 A. I do not know.

21 Q. In what percentage of sales of Volvo parts does
22 the -- does the ultimate consumer see the packaging for

1 the part?

2 A. I do not know.

3 Q. In what percentage of sales of Volvo parts does
4 the Volvo name actually appear on the part itself?

5 A. I do not know.

6 Q. For each of the last five calendar years, what
7 percentage of Opposer and its related companies' total
8 revenue derived from the sale of Volvo products that
9 cost under USD 500?

10 Objection: vague. "Related companies" is
11 undefined.

12 A. I do not know.

13 Q. When purchasing a part or product that is made
14 and/or manufactured by the Volvo Group, the vast
15 majority of consumers would be required to sign
16 contracts; correct?

17 Objection: compound.

18 A. I do not know.

19 Q. It is reasonable to suggest that a consumer
20 purchasing a part or product from Volvo would conduct
21 reasonable due diligence on the product in question to
22 ensure that it fit their needs and was compatible with

1 other products the consumer may already own originating
2 from the Volvo Group?

3 Objection: compound and vague. "Suggest" is
4 improperly used. "Volvo" is undefined.

5 A. I do not understand the question.

6 Q. Volvo's general sales model, which requires
7 trained salespeople to assist consumers, serves to
8 minimalize any possible confusion over products;
9 correct?

10 Objection: vague. "Volvo's" is undefined.

11 A. I do not understand the question.

12 Q. In purchasing products and parts from a Volvo
13 Group dealership or licensed reseller, a consumer would
14 first have to deal with a trained salesperson
15 knowledgeable about Volvo Group products; correct?

16 Objection: compound.

17 A. I do not understand the question.

18 Q. With regards to your response to question 172,
19 asking what the trade channels for Volvo car parts are
20 in the United States, are there any retail chains for
21 consumer goods that sell products made and manufactured
22 by the Volvo Group?

1 Objection: compound and incomprehensible.

2 A. I do not understand the question.

3 MS. PARENTI: That is all the questions.

4 THE WITNESS: Very good. Thank you.

5 (3:41 p.m.)

6 (Whereupon, the deposition concluded at 3:41

7 p.m.)

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CERTIFICATE OF DEPONENT

I, Monica Dempe, hereby certify that I have read the foregoing pages, numbered 17 through 118, of my deposition of testimony taken in these proceedings on Friday, February 5, 2016 and, with the exception of the changes listed on the next page and/or corrections, if any, find them to be a true and accurate transcription thereof.

Signed: _____
Name: Monica Dempe
Date: _____

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CERTIFICATE OF COURT REPORTER

I, Lisa Garforth, an Accredited Real-time Reporter,
hereby certify that the testimony of the witness Monica
Dempe in the foregoing transcript, numbered pages 17
through 118, taken on this 5th day of February, 2016 was
recorded by me in machine shorthand and was thereafter
transcribed by me; and that the foregoing transcript is
a true and accurate verbatim record of the said
testimony.

I further certify that I am not a relative, employee,
counsel or financially involved with any of the parties
to the within cause, nor am I an employee or relative
of any counsel for the parties, nor am I in any way
interested in the outcome of the within cause.

Signed: _____
Name: Lisa Garforth
Date: _____

1 ERRATA SHEET

2 Case Name: Volvo Trademark Holding AB v.
3 Wolvol Inc.

4 Witness Name: MONICA DEMPE

5 Date: 02/05/2016

6 Page/Line From To
7 ___/___ _____

8 Reason: _____

9 ___/___ _____

10 Reason: _____

11 ___/___ _____

12 Reason: _____

13 ___/___ _____

14 Reason: _____

15 ___/___ _____

16 Reason: _____

17 ___/___ _____

18 Reason: _____

19 ___/___ _____

20 Reason: _____

21 ___/___ _____

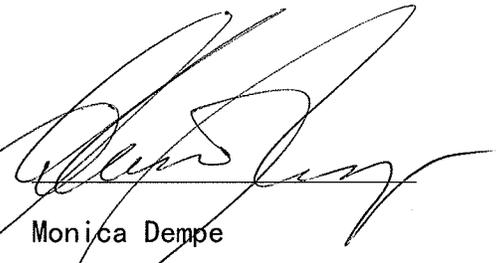
22 Reason: _____

1	Page/Line	From	To
2	___/___	_____	_____
3	Reason:	_____	
4	___/___	_____	_____
5	Reason:	_____	
6	___/___	_____	_____
7	Reason:	_____	
8	___/___	_____	_____
9	Reason:	_____	
10	___/___	_____	_____
11	Reason:	_____	
12	___/___	_____	_____
13	Reason:	_____	
14	___/___	_____	_____
15	Reason:	_____	
16	___/___	_____	_____
17	Reason:	_____	
18			
19	Subscribed and sworn to before		
20	me this ___ day of _____, 2016.		
21		_____	
22		Monica Dempe	

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

CERTIFICATE OF DEPONENT

I, Monica Dempe, hereby certify that I have read the foregoing pages, numbered 17 through 118, of my deposition of testimony taken in these proceedings on Friday, February 5, 2016 and, with the exception of the changes listed on the next page and/or corrections, if any, find them to be a true and accurate transcription thereof.

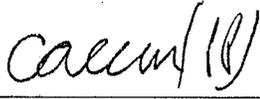
Signed: 
Name: Monica Dempe
Date: 2016-04-13

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

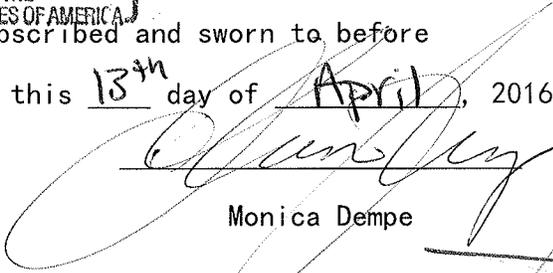
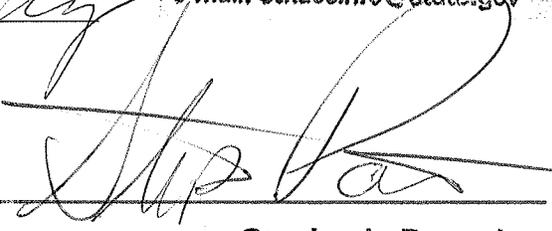
CERTIFICATE OF COURT REPORTER

I, Lisa Garforth, an Accredited Real-time Reporter,
hereby certify that the testimony of the witness Monica
Dempe in the foregoing transcript, numbered pages 17
through 118, taken on this 5th day of February, 2016 was
recorded by me in machine shorthand and was thereafter
transcribed by me; and that the foregoing transcript is
a true and accurate verbatim record of the said
testimony.

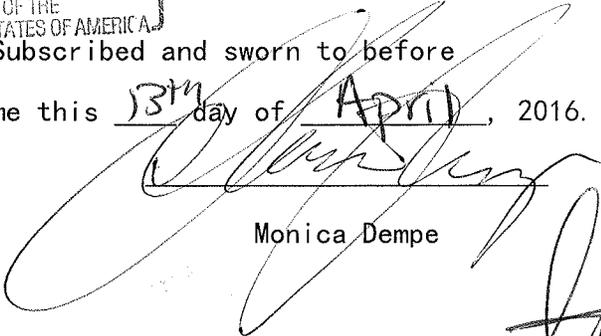
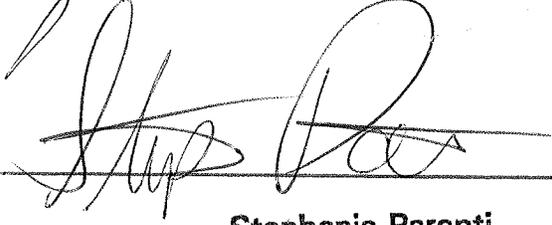
I further certify that I am not a relative, employee,
counsel or financially involved with any of the parties
to the within cause, nor am I an employee or relative
of any counsel for the parties, nor am I in any way
interested in the outcome of the within cause.

Signed: 
Name: Lisa Garforth
Date: Feb. 23, 2016

1		ERRATA SHEET	
2	Case Name:	Volvo Trademark Holding AB v.	
3		Wolvof Inc.	
4	Witness Name:	MONICA DEMPE	
5	Date:	02/05/2016	
6	Page/Line	From	To
7	<u>12 / 9</u>	<u>volvopartswebstore.com</u>	<u>volvocars.com</u>
8	Reason:	<u>misidentified exhibit</u>	
9	<u>18 / 7</u>	<u>employment</u>	<u>employment history</u>
10	Reason:	<u>missing noun</u>	
11	<u>19 / 2</u>	<u>most</u>	<u>master</u>
12	Reason:	<u>misspelling</u>	
13	<u>22 / 7</u>	<u>caps, hats, bags, belts</u>	<u>clothing, caps, hats, bags, belts</u>
14	Reason:	<u>missing word</u>	
15	<u>24 / 5</u>	<u>caps, hats, bags, belts</u>	<u>clothing, caps, hats, bags, belts</u>
16	Reason:	<u>missing word</u>	
17	<u>26 / 10</u>	<u>Vcadsprod</u>	<u>VCadsPro</u>
18	Reason:	<u>incorrect capitalization</u>	
19	<u>28 / 7</u>	<u>Older construction equipment vehicles</u>	<u>Older Volvo Construction Equipment</u>
20	Reason:	<u>missing word</u>	
21	<u>32 / 5</u>	<u>with</u>	<u>delete "with"</u>
22	Reason:	<u>incorrect word</u>	

1	Page/Line	From	To
2	<u>34 / multi</u>	<u>VolvoLink</u>	<u>Volvo Link</u>
3	Reason:	<u>misspelling</u>	
4	<u>35 / multi</u>	<u>VolvoLink</u>	<u>Volvo Link</u>
5	Reason:	<u>misspelling</u>	
6	<u>35 / 3</u>	<u>effecting</u>	<u>affecting</u>
7	Reason:	<u>misspelling</u>	
8	<u>37 / 11</u>	<u>telematic</u>	<u>telematics</u>
9	Reason:	<u>misspelling</u>	
10	<u>50 / 21</u>	<u>locked</u>	<u>looked</u>
11	Reason:	<u>misspelling</u>	
12	<u>51 / 18</u>	<u>operated</u>	<u>operate</u>
13	Reason:	<u>misspelling</u>	
14	<u>51 / 19</u>	<u>Is Volvo Bus</u>	<u>delete "Is Volvo Bus"</u>
15	Reason:	<u>wording not part of question</u>	
16	<u>53 / 19</u>	<u>and support</u>	<u>and support services</u>
17	Reason:	<u>wording missing from answer</u>	
18	KINGDOM OF SWEDEN CITY OF STOCKHOLM EMBASSY OF THE UNITED STATES OF AMERICA. } ss:		
19	Subscribed and sworn to before me this <u>13th</u> day of <u>April</u> , 2016.		
20			
21			
22	Monica Dempe Stephanie Parenti Vice Consul		

AMERICAN EMBASSY
American Citizen Services
 Dag Hammarskjölds väg 31
 115 89 STOCKHOLM
<http://stockholm.usembassy.gov>
 e-mail: stkacinfo@state.gov

1	Page/Line	From	To
2	<u>57 / 7</u>	<u>there's</u>	<u>is there</u>
3	Reason:	<u>grammatical error</u>	
4	<u>66 / 17</u>	<u>main</u>	<u>domain</u>
5	Reason:	<u>misspelling</u>	
6	<u>73 / 21</u>	<u>trip</u>	<u>delete "trip"</u>
7	Reason:	<u>not part of question</u>	
8	<u>73 / 21-22</u>	<u>as your</u>	<u>delete "as your"</u>
9	Reason:	<u>not part of question</u>	
10	<u>77 / 3</u>	<u>subjective</u>	<u>suggestive</u>
11	Reason:	<u>misspelling</u>	
12	<u>82 / 10</u>	<u>provide</u>	<u>include</u>
13	Reason:	<u>incorrect word</u>	
14	<u>89 / multi</u>	<u>VolvoLink</u>	<u>Volvo Link</u>
15	Reason:	<u>misspelling</u>	
16	<u>93 / 3</u>	<u>linked</u>	<u>delete "linked"</u>
17	Reason:	<u>not part of question</u>	
18	CONSUL OF SWEDEN CITY OF STOCKHOLM EMBASSY OF THE UNITED STATES OF AMERICA } SS:		
19	Subscribed and sworn to before		
20	me this <u>13th</u> day of <u>April</u> , 2016.		
21	 _____		
22	Monica Dempe		
 _____ Stephanie Parenti Vice Consul			

AMERICAN EMBASSY
American Citizen Services
 Dag Hammarskjölds väg 31
 115 89 STOCKHOLM
<http://stockholm.usembassy.gov>
 e-mail: stkacinfo@state.gov

EXHIBIT 1

Welcome to Volvo

VOLVO

www.VolvoGroup.com

Explore Volvo Group

www.VolvoCars.com



VOLVO OCEAN RACE

Volvo Ocean Race



VOLVO IN GOLF

Volvo in Golf



Volvo provides transportation related products and services with focus on quality, safety and environmental care. Founded more than 80 years ago, a solid position and reputation worldwide has been built up over the decades. The brand is shared between Volvo Group and Volvo Cars - we welcome you to explore our worlds!

Mobile edition

[privacy](#) | © copyright AB Volvo 2014

EXHIBIT 2



» GLOBAL SITE
or please select your country

ASIA PACIFIC

Australia
Bangladesh
Bhutan
Cambodia
China
Hong Kong
Indonesia
India
Japan
Kazakhstan
Korea
Laos
Malaysia
Mongolia
Myanmar
New Caledonia
New Zealand
Philippines
Singapore
Taiwan
Thailand
Vietnam

Other countries
in Asia Pacific

EUROPE

Albania
Austria
Belarus
Belgium
Bulgaria
Croatia
Cyprus
Czech Republic
Denmark
Estonia
Finland
Former Yugoslav
Republic of
Macedonia
France
Germany
Great Britain
Greece
Hungary

Ireland
Italy
Latvia
Lithuania
Montenegro
Netherlands
Norway
Poland
Portugal
Romania
Russia
Serbia
Slovakia
Spain
Sweden
Turkey
Ukraine

Other countries
in Europe

MIDDLE EAST / AFRICA

Afghanistan
Azerbaijan
Georgia
Iraq
Israel
Kuwait
Lebanon
Oman
Pakistan
Qatar
Saudi Arabia
Syria
Turkmenistan
United Arab Emirates
Yemen

Other countries
in Middle East

Algeria
Angola
Benin
Burkina Faso
Burundi
Cameroon
DRC
Egypt
Ethiopia
Gabon
Ghana
Ivory Coast

Kenya
Liberia
Madagascar
Malawi
Mali
Mauritania
Mauritius
Morocco
Mozambique
Namibia
Nigeria
Republic of Congo
Rwanda
Senegal
Sierra Leone
South Africa
Sudan
Tanzania
Togo
Tunisia
Uganda
Zambia
Zimbabwe

Other countries
in Africa

LATIN AMERICA

Argentina
Bolivia
Brazil
Chile
Colombia
Costa Rica
Dominican Republic
Ecuador
El Salvador
Guatemala
Honduras
Mexico
Nicaragua
Panama
Paraguay
Peru
Venezuela

Other countries in
Central & Latin America

NORTH AMERICA

Canada
United States

Other countries in
North America
& Caribbean

[Login](#) | [Used Equipment](#) | [OEM](#)

EXHIBIT 3

VOLVO CONSTRUCTION EQUIPMENT



[HOME](#) | [PRODUCTS](#) | [PARTS & SERVICE](#) | [USED EQUIPMENT](#) | [TRAINING](#) | [PROMOTIONS & FINANCING](#) | [NEWS & MEDIA](#) | [ABOUT US](#)



Quick access

Million Ton Guarantee



We're so confident in the power and performance of our 7000 series pavers that we guarantee you'll get an incredible one million tons of asphalt laid. You'll get reliable results, ton after ton —

and then some.

Be Fuel Efficient

Sign-up to receive a Volvo Newsletter



Skid steer loaders



Wheel loaders



Backhoe loaders



Excavators



Articulated haulers



Motor graders



Milling equipment



Pipelayers



Demolition equipment



Waste handlers



Pavers



Compactors



Recent updates

Fuel Savings Over the Long Haul

Through the use of Volvo Construction Equipment's CareTrack telematics service, Dubroc Enterprises has been able to save up to 8% on their fuel costs with fuel efficient equipment and monitoring.



Americas News Minute: Community Day

Volvo Construction Equipment held a community open house for Volvo Ce employees and surrounding community members.



NDA Meeting 2014

If you want to see our machine show up close and personal, make sure you check out this video.



One Scoop at a Time

Across the board, SFC Contract Services, Inc. utilizes all their Volvo Construction Equipment to keep the jobsite humming and the project moving forward.



Using CareTrack® to fuel operating decisions

Like any other business Southern Waste Systems and Sun Recycling rely on their equipment to do the job consistently at a high level.



More news...

10/24/2014

Earnings rise on flat sales in Volvo CE's Q3

Volvo CE saw stable market growth in North America dented by a faster decline in China and a loss of momentum in Europe in its third quarter results — while earnings rose strongly in the period, thanks to effective cost control measures and currency tailwinds.

10/23/2014

Volvo C-Series offers premium grading solution

10/7/2014

Volvo Ocean Race 2014/15: A race around the world

9/29/2014

HONEY, I SHRUNK THE WHEEL LOADER

9/17/2014

Volvo stands behind machine quality with Lifetime Frame and Structure Warranty

8/25/2014

Volvo EC350E switches tasks with ease

8/20/2014

Volvo EC480E sets the standard for efficient excavation

7/28/2014

Volvo H-Series wheel loaders deliver lower emissions and fuel consumption in the 18-22 ton class

7/18/2014

312 Volvo Way
Shippensburg, PA 17257
United States
Phone: +1 717 532-9181
Fax: +1 717 530-3408
Email: vceonline@volvo.com



Who better to rely than Volvo Construction Equipment?

Weak China demand offsets mature market growth in

[»More news](#)

Volvo Ocean Race Teaser

»Volvo Construction Equipment meets Volvo Ocean Race. 10 stops. 10 challenges along the way. Join us around the world!



Behind The Design: Lego Technic 42030 Volvo L350F Wheel Loader

»Watch the behind the scenes footage of how this L350G Lego Wheel Loader came to life.



Volvo EC380E Large Tracked Excavator in Action

»Featuring a robust D13 Stage IV/Tier 4 Final engine, a new electro-hydraulic control system and Volvo's unique ECO mode, this heavy-duty excavator delivers improved fuel efficiency and productivity.



Volvo Rotating Pipelayers working in steep slopes

»Watch a video describing how to work safely in steep slopes, with the help of Volvo Rotating Pipelayers!



Site Development Grows Hartford County Business

»Glenn Komer founded Midstate Site Development in 2000 values the small details in Volvo excavators that contributes to added hours of productivity.



EXHIBIT 4

VOLVO CONSTRUCTION EQUIPMENT



HOME | PRODUCTS | PARTS & SERVICE | USED EQUIPMENT | TRAINING | PROMOTIONS & FINANCING | NEWS & MEDIA | **ABOUT US**

Volvo Construction Equipment > About us > Shippensburg facility

- Contact us
- Core values
- Dealer network
- History
- Career
- Rental Sales
- Volvo Group
- Shippensburg facility**
- Shippensburg Customer Video
- Shippensburg Expansion Video
- Volvo Financial Services
- Volvo Ocean Race 2014-2015
- WWF Climate Savers



Press Releases

Volvo facility is ultimate in green innovation

Volvo CE inaugurates expanded manufacturing facility in Shippensburg, PA

Shippensburg Manufacturing Facility

The Shippensburg facility has been committed to producing quality construction equipment for over 30 years. The business was acquired by Volvo CE from Ingersoll Rand in April 2007 for \$1.3 billion USD. A 200,000 square foot expansion was completed in June of 2010 which includes a new assembly hall and materials building.

In March of 2011, Volvo CE invested in a \$100 million USD expansion which brought in wheel loaders and will bring the edition of articulated haulers and excavators in the future. The investment also relocated the Sales team from Asheville, NC to Shippensburg, PA into a new Sales office that is attached to the Operations plant.

Today, the site employs over 1000 employees representing nearly 20 nationalities working in operations, technology, sales and marketing, and customer support.

The facility currently manufactures soil and asphalt compactors, motor graders, pavers and screeds, wheel loaders and milling machines. Operations include welding, large machining, paint, and assembly.

In June 2014 the Volvo CE Customer Center opened in Shippensburg, PA for dealer events and conferences, site events and a chance for customers to test the Volvo machinery in a simulation site.

Shippensburg Customer Visits Video



»Customers and dealers were invited to see firsthand the investment Volvo is making in the North American market.

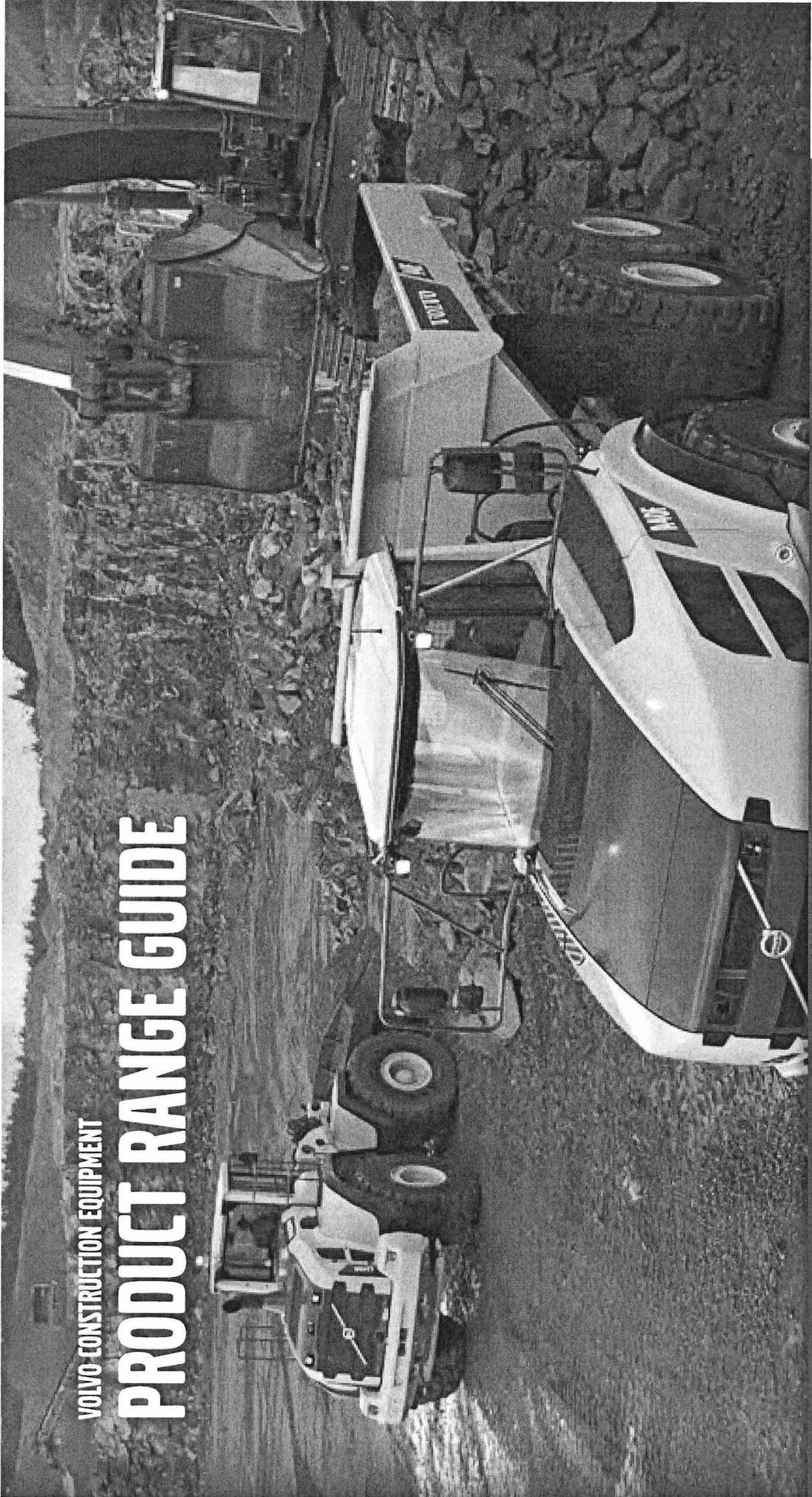
Shippensburg Expansion Video



»Volvo CE officially inaugurates its expanded heavy equipment factory in Shippensburg, Pennsylvania.

EXHIBIT 5

VOLVO CONSTRUCTION EQUIPMENT
PRODUCT RANGE GUIDE



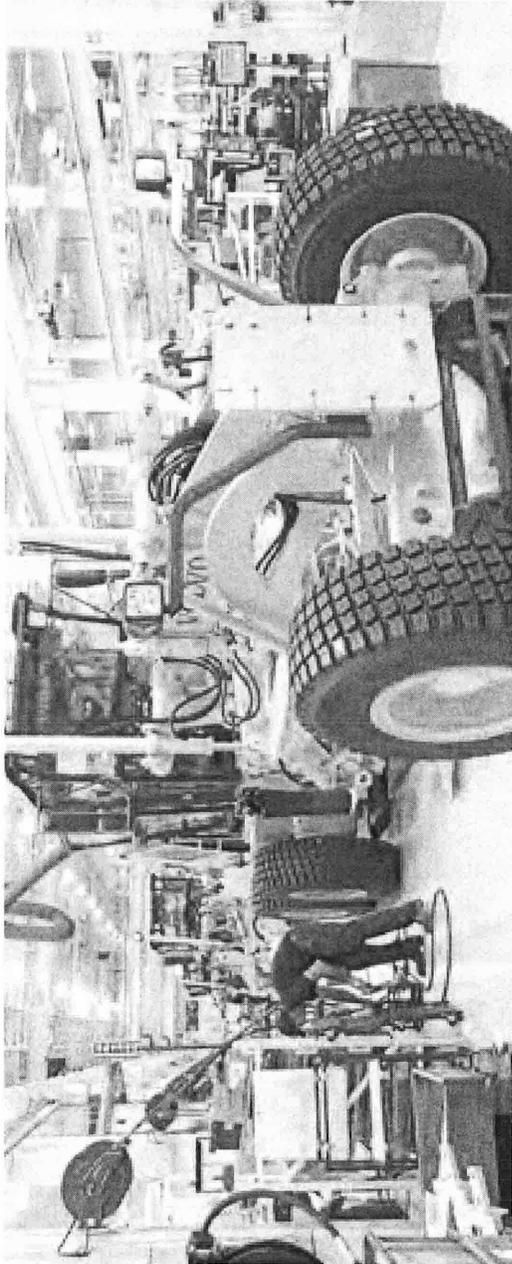
VOLVO CONSTRUCTION EQUIPMENT

QUALITY, SAFETY, ENVIRONMENTAL CARE...

ARTICULATED HAULERS	4	SKID STEER LOADERS AND COMPACT TRACK LOADERS	22
COMPACT WHEEL LOADERS	6	MOTOR GRADERS	24
WHEEL LOADERS	8	SOIL COMPACTORS.....	26
COMPACT AND SHORT RADIUS EXCAVATORS.....	10	ASPHALT COMPACTORS	28
CRAWLER EXCAVATORS	12	ASPHALT PAVERS	30
WHEELED EXCAVATORS	14	MILLING MACHINES.....	33
ULTRA HIGH REACH EXCAVATORS.....	16	VOLVO SUPPORT STRUCTURE.....	35
PIPELAYERS	18	THE VOLVO GROUP	37
BACKHOE LOADERS	20	VOLVO TIMELINE	39



*Volvo Construction Equipment
North America Headquarters*



Shippensburg Manufacturing Facility

Volvo Construction Equipment is one of the largest manufacturers of construction equipment in the world. For decades, the company has dedicated extensive resources to a continuous development and upgrading of its extensive product line – Volvo excavators, articulated haulers, wheel loaders, motor graders, compact wheel loaders and excavators, backhoe and skid steer loaders and road building equipment – compaction, paving, and milling machines. To building centers of excellence for the production of excavators and wheel loaders. To new, state-of-the-art research facilities for the development of next-generation heavy-duty diesel and alternative fuel engines and hybrid power systems for construction equipment that keeps our customers competitive and productive.

The benefits of owning and operating Volvo construction equipment show up everyday on your job site. As productivity increases due to the operation of more efficient equipment, your cost of operation is reduced. Your cost of ownership is reduced when you find that the purchase price of Volvo equipment is a capital investment that does indeed pay dividends throughout its life cycle...and the purchase price is of less consideration as the value of the equipment and its return on your investment becomes apparent.

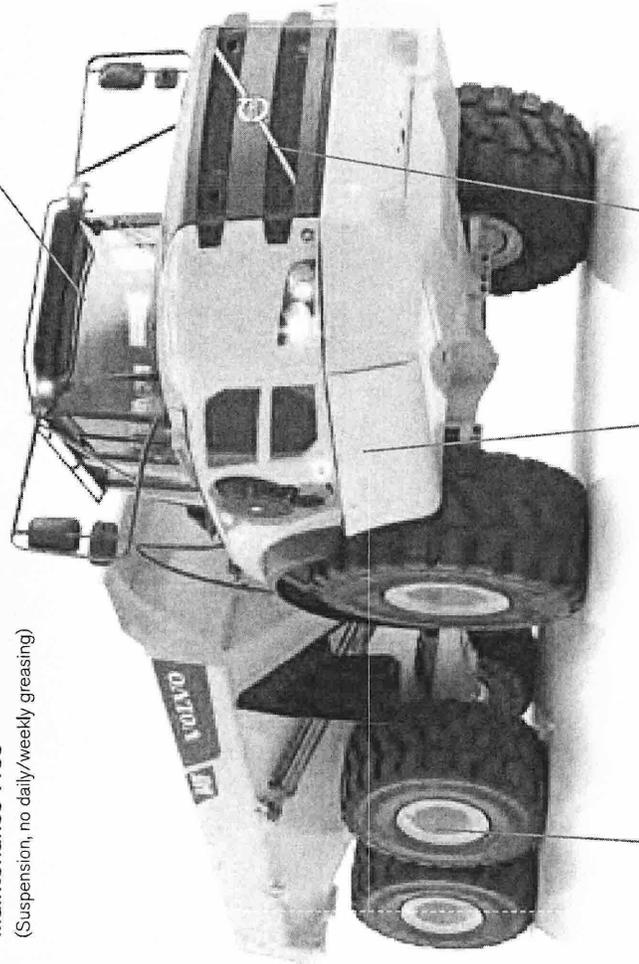


Asheville Demonstration Ground

VOLVO ARTICULATED HAULERS: STANDARD & FULL SUSPENSION

Maintenance-Free
(Suspension, no daily/weekly greasing)

Operator Comfort
(Visibility, environment, steering)



Volvo Axles & Brakes
(All-wheel braking, 100% lock-up differentials)

Volvo Engine
(Durable, reliable & fuel efficient)

Volvo Transmission
(Automatic PowerTronic planetary)

Volvo Engine, Tier 4i

- High-torque at low rpm & highest power to weight ratio (6.2 hp/ton on average)
- High-capacity, variable speed engine cooling fans run as required to keep engine at maximum efficiency
- All Volvo powertrain for high mechanical efficiency

Axles & Brakes

- All wheel braking on all models: dry disc (A25F, A30F), wet disc (A35F/FS, A40F/FS) brakes are smooth & precise for 30% - 50% shorter stops over major competition
- Industry exclusive 100% locking, dog-clutch differentials for maximum torque transfer to wheels

Serviceability

- No daily/weekly maintenance - 250 hour initial service & greasing - quick oil draining/filter replacement due to remote drains & front swing down grill
- Daily service savings add up to ~\$15K per year, per truck
- Maintenance free hitch

Suspension

- Standard suspension haulers feature three-point mounted front suspension and straddle mounted bogie beams on rear axles. 25/30 features gas hydraulic struts.
- Full suspension haulers feature true free-flowing hydraulic oil to and from the hydraulic tank and functions. This is not the traditional closed nitrogen cylinders like the competition. Gains of up to 32% in productivity on rough and dry haul roads!

Transmission

- Industry exclusives, Gear-Skipping Technology (A35F/FS, A40F/FS) & Automatic Traction Control (A25F, A30F, A35F/FS, A40F/FS)

Volvo Care Cab

- Best-in-class cab filtration, air suspension seat (with heat), air-conditioning, CD player, tilt/telescopic steering wheel
- Quiet, spacious, comfortable, with excellent visibility and ergonomically positioned controls
- Monitoring systems include Contronics (constant machine diagnostics), MATRIS (operational information) & CareTrack (GSM/satellite monitoring)

ARTICULATED HAULERS: STANDARD & FULL SUSPENSION

	Engine Gross HP	Engine Max Torque	Engine Displacement	Transmission Make/Model	Transmission Gears	Top Speed	Dropbox Make/Model	Body Payload/Volume	Dump Angle/Body Up/Down
A25F	315 hp (235 kW)	1,505 ft-lb (2,040 Nm)	659 in ³ (10.8 l)	Planetary Volvo PT 1562	6 / 2	33 mph (53 km)	Volvo IL 1 Single Stage	26.5 tons/ 19.6 yd ³	74° 12 / 9
A30F	356 hp (266 kW)	1,505 ft-lb (2,040 Nm)	659 in ³ (10.8 l)	Planetary Volvo PT 1562	6 / 2	33 mph (53 km)	Volvo IL 1 Single Stage	31.0 tons/ 22.9 yd ³	70° 12 / 9
A35F A35F FS	441 hp (329 kW)	1,740 ft-lb (2,360 Nm)	781 in ³ (12.8 l)	Planetary Volvo PT 2509	9 / 3	35.4 mph (57 km)	Volvo IL 2 Single Stage	37.0 tons/ 26.8 yd ³	70° 12 / 10
A40F A40F FS	469 hp (350 kW)	1,862 ft-lb (2,525 Nm)	982 in ³ (16.1 l)	Planetary Volvo PT 2509	9 / 3	35.4 mph (57 km)	Volvo IL 2 Single Stage	43.0 tons/ 31.4 yd ³	72° 12 / 10

	Brakes/Actuation	Retarders	Front Suspension	Rear Suspension	Standard Tires/ (Optional Tires)	Grnd. Press Front Tires	Grnd. Press Rear	GVW	HP/Ton
A25F	6 whl dry-disc/ Air/Oil	Engine/Trans	Gas Hydraulics Three Point	Mech/Rubber Three Point	23.5R25 (750/65R25)	20.9 psi 144 (kPA)	23.1 psi 159 (kPA)	100,440 lbs 45,560 (kg)	6.3
A30F	6 whl dry-disc/ Air/Oil	Engine/Trans	Gas Hydraulics Three Point	Mech/Rubber Three Point	23.5R25 (750/65R25)	17.5 psi 121 (kPA)	21.2 psi 146 (kPA)	112,570 lbs 51,060 (kg)	6.3
A35F A35F FS	6 whl wet-disc/ Oil	Engine	Rubber/Shocks Fully Hydraulic	Mech/Rubber (FS Model)	26.5R25 (775/65R29)	18.4 psi 127 (kPA)	22.8 psi 157 (kPA)	136,686 lbs 61,600 (kg)	6.3
A40F A40F FS	6 whl wet-disc/ Oil	Engine	Rubber/Shocks Fully Hydraulic	Mech/Rubber (FS Model)	29.5R25 (875/65R29)	19.6 psi 135 (kPA)	24.9 psi 172 (kPA)	152,560 lbs 69,200 (kg)	6.1

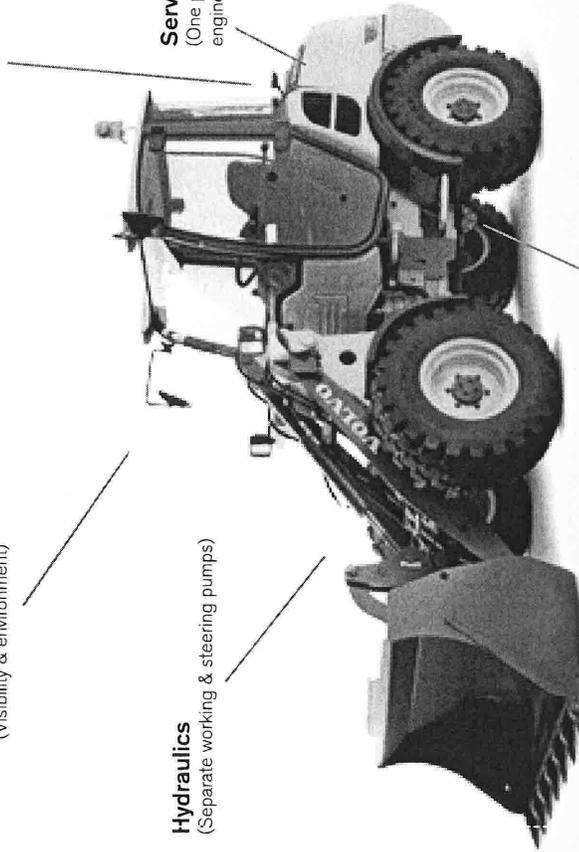
VOLVO COMPACT WHEEL LOADERS

Volvo Engine
(Durable, reliable & fuel efficient)

Operator Comfort
(Visibility & environment)

Hydraulics
(Separate working & steering pumps)

Serviceability
(One piece, lockable engine hood)



Differentials
(100% locking front/rear axle)

Engine

- High torque at low rpm (1600 -1700 rpm) - Volvo D3.6D (L20F/L25F), turbo D3D (L30B/L35B)

Axles & Brakes

- Wear-free hydrostatic braking - first 2/3 of inch/brake pedal de-strokes hydrostatic pump which reduces travel speed and at the same time maintains engine RPM for work hydraulics. Final 1/3 applies service brake.
- Standard operator selectable 100% differential lock in front & rear axles provide maximum traction

Hydraulics

- Separate working/steering pumps. Most competitors use priority valves for steering/working hydraulics - increases lag time when using both functions

Articulating - Oscillating Joint

- Center-point A-O joint features tight turning radius & maximizes stability in uneven terrain

Serviceability

- Ground level service points, pressure test ports, remote fluid drains & easy filter replacements

COMPACT WHEEL LOADERS

	Weight (cab)	Bucket Range	Engine Net HP	Full-turn tip load with bucket	Payload 80% transport position 40° full-turn (with forks) *	Dump Height
L20F	9,945 lbs (4,510 kg)	.85 - 1.25 yds ³ (.65 - .95 m ³)	54 hp (40 kW)	6,175 lbs (2,800 kg)	4,520 lbs (2,050 kg)	8' 3" (2.5 m)
L25F	10,650 lbs (4,830 kg)	1.0 - 1.6 yds ³ (0.85 - 1.2 m ³)	60 hp (44.7 kW)	7,495 lbs (3,400 kg)	5,500 lbs (2,500 kg)	8' 2" (2.5 m)
L30B	12,040 lbs (5,461 kg)	1.2 - 2.1 yds ³ (.9 - 1.6 m ³)	68 hp (50 kW)	8,490 lbs (3,851 kg)	5,500 lbs (2,500 kg)	8' 4" (2.5 m)
L35B	13,710 lbs (6,219 kg)	1.4 - 2.1 yds ³ (1.05 - 1.6 m ³)	75 hp (55 kW)	9,480 lbs (4,300 kg)	5,500 lbs (2,500 kg)	8' 9" (2.6 m)

* On firm, level ground

VOLVO WHEEL LOADERS

Operator Comfort
(Visibility & environment)

Volvo Engine
(Durable, reliable & fuel efficient)

Torque Parallel Linkage
(L45G-L220G: High breakout force & parallel lift versatility)

Modified Z-bar Linkage
(L250G-L350F: High breakout force)



Volvo Axles & Brakes
(Outboard brakes, 100% locking front axle differentials)

Volvo Transmission
(Fully Automatic Power Shift)

Volvo Engine, Tier 4i

- High torque at low rpm (1100-1600 rpm) - load sensing hydraulic pumps provide high flow at low rpm, increases fuel efficiency (ton/gal)
- Reversible, variable-speed engine cooling fan runs as required to keep engine at maximum efficiency, lowers fuel consumption (gal/hr)

Transmission

- Automatic Power Shifting - full auto-shifting & ability to control shifting pattern based on rpm and ground speed, improves cycle times & minimizes fuel consumption

Axles & Brakes

- Industry exclusive forced oil-cooled, outboard-mounted, planetary wet disc brakes with brake wear indicators, lower operating costs - extends brake life
- Selectable 100% differential lock in front axle & a maintenance-free rear axle trunion standard, maximizes traction (diff. lock) and lowers operating costs

Torque Parallel Linkage (L45G - L220G)

- High breakout torque/force & parallel lift at all heights and attachment angles with excellent visibility
- High stability, especially during load & carry due to placement of load closer to front axle. High versatility with Quick Coupler

Volvo Care Cab

- Best-in-class cab filtration, front pillar mounted switches, adjustable seat & tilt/telescopic steering wheel
- Due to overall comfort, operators say they are more productive over a day's shift
- Monitoring systems include Contronics (constant machine diagnostics), MATRIS (operational information) & CareTrack (GSM/satellite monitoring)

Value

- Breather filters on axles, transmission, fuel tank, hydraulic tank provides contaminant free lubrication
- No line boring of frames due to Volvo's exclusive frame joint design- \$30K savings over the competition (30K hrs)

WHEEL LOADERS

	Max. Power at	Engine HP (net)	Maximum Torque at	Maximum Torque net	Breakout Force	Static Tipping Load at Full Turn †	Bucket Range	Operating Weight
L45G*	1800 rpm	98 hp (73 kW)	1450 rpm	299 lbf ft (406 Nm)	13,421 lbf (59.7 kN)	11,547 lbs (5,250 kg)	1.8 - 2.6 yds ³ (1.4 - 2.0 m ³)	19,030 - 20,040 lbs (8.6 - 9.1 t)
L50G*	1900 rpm	114 hp (85 kW)	1450 rpm	345 lbf ft (468 Nm)	15,512 lbf (69 kN)	12,677 lbs (5,750 kg)	2.0 - 3.0 yds ³ (1.5 - 2.3 m ³)	20,745 - 21,800 lbs (9.4 - 9.9 t)
L60G*	1,400 - 1,800 rpm	161 hp (120 kW)	1,400 rpm	605 lbf ft (820 Nm)	18,030 lbf (80.2 kN)	15,570 lbs (7,060 kg)	2.2 - 6.5 yd ³ (1.6 - 5.0 m ³)	24,250 - 29,320 lbs (11.0 - 13.6 t)
L70G*	1,400 - 1,700 rpm	169 hp (126 kW)	1,400 rpm	634 lbf ft (860 Nm)	20,290 lbf (90.3 kN)	17,470 lbs (7,920 kg)	2.4 - 8.4 yd ³ (1.8 - 6.4 m ³)	28,000 - 33,070 lbs (12.7 - 15.5 t)
L90G**	1,400 - 1,700 rpm	173 hp (129 kW)	1,400 rpm	649 lbf ft (880 Nm)	30,470 lbf (135.5 kN)	20,950 lbs (9,500 kg)	2.9 - 9.2 yd ³ (2.2 - 7.0 m ³)	29,000 - 34,600 lbs (14.5 - 17.3 t)
L110G***	1,700 rpm	258 hp (190 kW)	1,400 rpm	920 lbf ft (1,248 Nm)	36,440 lbf (162.1 kN)	25,125 lbs (11,420 kg)	3.5 - 12.4 yd ³ (2.7 - 9.5 m ³)	39,680 - 44,090 lbs (18.0 - 20.0 t)
L120G***	1,700 rpm	268 hp (200 kW)	1,500 rpm	968 lbf ft (1,312 Nm)	36,800 lbf (163.7 kN)	26,690 lbs (12,130 kg)	3.5 - 12.4 yd ³ (2.7 - 9.5 m ³)	39,680 - 44,090 lbs (18.0 - 20.0 t)
L150G***	1,300 rpm	295 hp (220 kW)	1,050 rpm	1,379 lbf ft (1,869 Nm)	45,187 lbf (201.1 kN)	38,493 lbs (17,460 kg)	4.1 - 15.7 yd ³ (3.1 - 12.0 m ³)	50,000 - 55,000 lbs (25.0 - 27.5 t)
L180G***	1,300 rpm	328 hp (245 kW)	1,000 rpm	1,493 lbf ft (2,024 Nm)	50,537 lbf (224.8 kN)	44,114 lbs (20,010 kg)	5.0 - 18.3 yd ³ (3.7 - 14.0 m ³)	58,000 - 61,000 lbs (29.0 - 30.5 t)
L220G***	1,300 rpm	366 hp (273 kW)	1,100 rpm	1,637 lbf ft (2,220 Nm)	51,301 lbf (228.2 kN)	47,972 lbs (21,760 kg)	5.9 - 18.3 yd ³ (4.5 - 14.0 m ³)	70,000 - 73,000 lbs (35.0 - 36.5 t)
L250G***	1,500 rpm	389 hp (290 kW)	1,100 rpm	1,634 lbf ft (2,216 Nm)	65,329 lbf (290.6 kN)	51,676 lbs (23,440 kg)	8.0 - 13.3 yd ³ (6.1 - 10.2 m ³)	74,600 - 79,000 lbs (33,840 - 35,900 kg)
L350F**	1,700 rpm	528 hp (394 kW)	1,400 rpm	1,870 lbf ft (2,530 Nm)	106,770 lbf (474.9 kN)	77,320 lbs (35,072 kg)	8.1 - 16.6 yd ³ (6.2 - 12.7 m ³)	110,230 - 123,460 lbs (50.0 - 56.0 t)

* Machine equipped with attachment bracket and general purpose hook-on buckets with bolt-on edges.

† Machine equipped with standard duty general purpose bucket with bolt-on edges.

** Machine equipped with general purpose pin-on direct mount buckets with bolt-on edges.

*** Machine equipped with pin-on rehandling bucket with bolt-on edge.

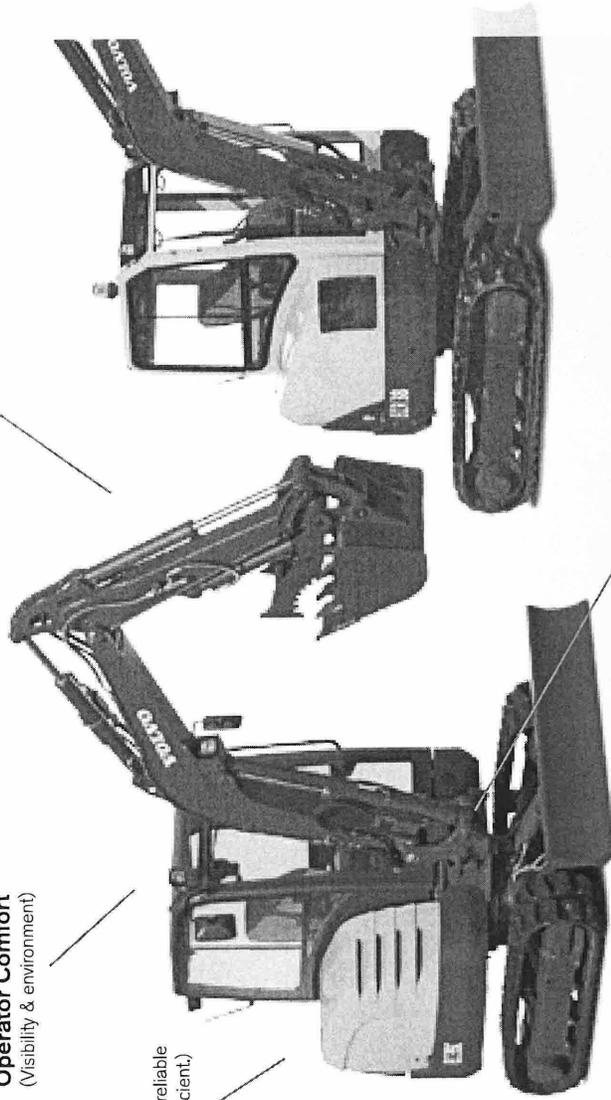
VOLVO COMPACT AND SHORT RADIUS EXCAVATORS

Serviceability
(Safe, easy access to areas)

Hydraulics
(Powerful, versatile & balanced)

Operator Comfort
(Visibility & environment)

Engine
(Durable, reliable & fuel efficient.)



Frame
(Durable, rigid & reinforced)

Volvo Engine

- Volvo Engine: high torque at low rpm (1400 -1600 rpm) Volvo D1.1 (EC20), D1.2 (ECR28), D2.2D (EC35C), D3.1D (EC55C), (1400 -1600 rpm) Volvo D1.6 (ECR38), D3.1D (ECR58), D3.4D (ECR88)

Versatility

- Short radius, fits into tight spaces (*Short Radius Excavators*)

Volvo Care Cab

- Best-in-class cab filtration, adjustable seat, armrests, heating & ventilation adjustments (see brochures for standard/ options)

Serviceability

- Easily accessed hatches and service areas, remote fluid drains & easy filter replacements

Value

- Fuel Efficiency and Operator Comfort #1

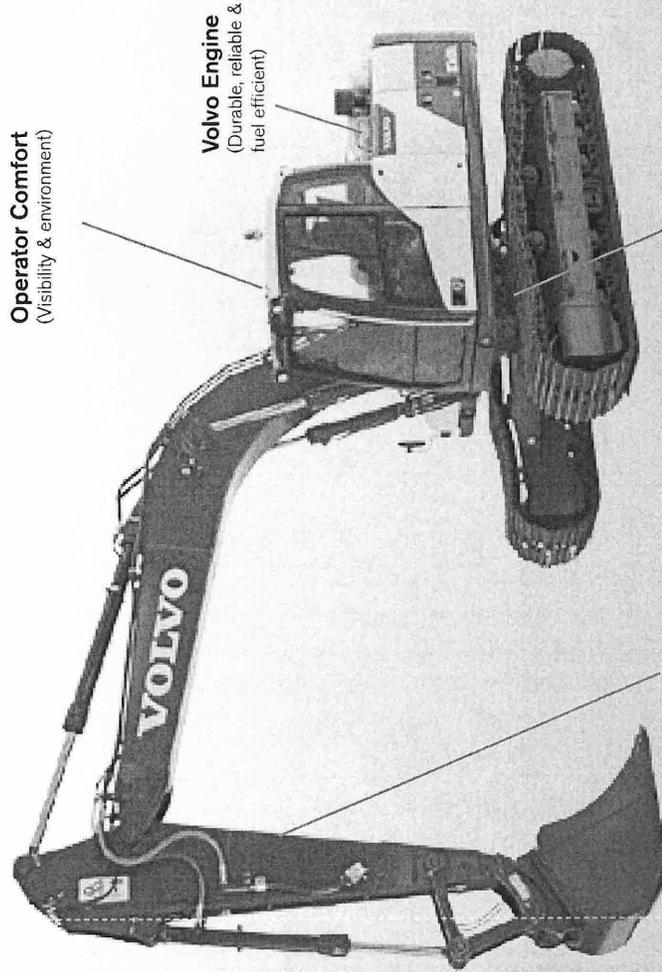
COMPACT AND SHORT RADIUS EXCAVATORS

	WEIGHT				HYDRAULICS			
	Engine	Canopy	Cab	Digging Depth	Breakout Force	Tearout Force	Breakout Force	Tearout Force
EC20C	16.2 hp (11.9 kW)	4,078 lbs (1,850 kg)	4,277 lbs (1,940 kg)	7' 4" (2.3 m)	2,810 lbf (12.5 kN)	4,159 lbf (18.5 kN)	2,810 lbf (12.5 kN)	4,159 lbf (18.5 kN)
EC35C	34.9 hp (26.0 kW)	7,573 lbs (3,435 kg)	7,859 lbs (3,565 kg)	11' 3" (3.4 m)	6,955 lbf (30.9 kN)	5,033 lbf (22.4 kN)	6,955 lbf (30.9 kN)	5,033 lbf (22.4 kN)
EC55C	47.1 hp (35.1 kW)	N/A	12,566 lbs (5,700 kg)	12' 4" (3.8 m)	9,300 lbf (41.4 kN)	6,400 lbf (28.4 kN)	9,300 lbf (41.4 kN)	6,400 lbf (28.4 kN)
	WEIGHT				HYDRAULICS			
	Engine	Canopy	Cab	Digging Depth	Breakout Force	Tearout Force	Breakout Force	Tearout Force
ECR28	18.3 hp (13.4 kW)	6,012 lbs (2,700 kg)	6,219 lbs (2,800 kg)	7' 10" (2.4 m)	3,282 lbf (14.6 kN)	4,429 lbf (19.7 kN)	3,282 lbf (14.6 kN)	4,429 lbf (19.7 kN)
ECR38	27.0 hp (19.9 kW)	7,355 lbs (3,336 kg)	7,561 lbs (3,400 kg)	9' 0" (2.7 m)	4,305 lbf (19.2 kN)	6,463 lbf (28.8 kN)	4,305 lbf (19.2 kN)	6,463 lbf (28.8 kN)
ECR58	50.8 hp (38.0 kW)	N/A	12,963 lbs (5,880 kg)	11' 10" (3.6 m)	6,070 lbf (27.0 kN)	8,768 lbf (39.0 kN)	6,070 lbf (27.0 kN)	8,768 lbf (39.0 kN)
ECR88	56.8 hp (42.0 kW)	N/A	18,629 lbs (8,450 kg)	13' 8" (4.2 m)	9,217 lbf (41.0 kN)	13,623 lbf (59.0 kN)	9,217 lbf (41.0 kN)	13,623 lbf (59.0 kN)

VOLVO CRAWLER EXCAVATORS

Serviceability
(Safe, easy access to areas)

Operator Comfort
(Visibility & environment)



Hydraulics
(Powerful, versatile, balanced & precise)

Frame
(Durable, rigid & reinforced)

Volvo Engine
(Durable, reliable & fuel efficient)

Volvo Engine, Tier 4i

- High power/torque at low rpm hydraulic pumps provide full flow at low rpm
- High-capacity, variable speed engine cooling fans run as required to keep engine at maximum efficiency

Hydraulics

- Work modes match hydraulic speed & power in different applications - heavy, general, fine control, idling
- Boom/arm summation system maximizes power by prioritizing functions - as digging forces increase, flow, at the same pressure, increases to raise hydraulic power

Serviceability

- Easily accessed hatches and service areas, remote fluid drains and easy filter replacements

Frame

- Robotically welded frame is strategically reinforced on both upper and lower structures
- Chrome pins with brass bushings & graphite inserts are used on boom foot and boom cylinders

Volvo Care Cab

- Best-in-class cab filtration, adjustable seat, armrests, air conditioning, excellent visibility & anti-glare LCD color monitor with rearview camera
- Monitoring systems include Contronics (constant machine diagnostics), MATRIS (operational information) & CareTrack (GSM/satellite monitoring)
- ROPS certified cabs ensure a safer working environment

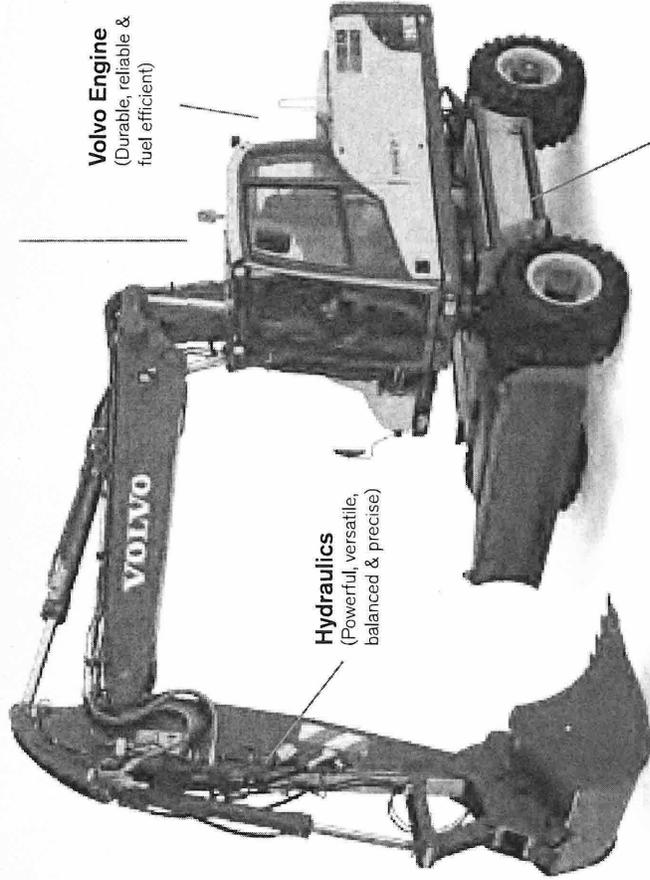
CRAWLER EXCAVATORS

	Engine HP (net) SAE J1349	Bucket Capacity	Lifting Capacity Along Undercarriage at Reach/Height (Standard Configuration)	Reach (max.)	Digging Depth (max.)	Breakout Force SAE J1179	Operating Weight
EC140D	113 hp (84 kW)	0.62 – 1.21 yd ³ (0.48 – 0.93 m ³)	7,900 lbs 20' / 5' ft	27' 5" (8.3 m)	18' 2" (5.5 m)	22,050 lbs (98.1 kN)	28,000 – 33,070 lbs (12.7 – 15.2 t)
ECR145D	113 hp (84 kW)	0.69 – 1.14 yd ³ (0.53 – 0.88 m ³)	7,880 lbs 20' / 5' ft	26' 11" (8.2 m)	18' 1" (5.5 m)	21,700 lbs (96.6 kN)	31,640 – 37,080 lbs (14.4 – 16.8 t)
EC160D	139 hp (104 kW)	0.92 – 1.47 yd ³ (0.70 – 1.12 m ³)	11,240 lbs 20' / 5' ft	29' 6" (9.0 m)	19' 10" (6.0 m)	27,270 lbs (121.3 kN)	36,380 – 43,650 lbs (16.5 – 19.8 t)
EC220D	172 hp (128 kW)	1.08 – 1.86 yd ³ (0.83 – 1.43 m ³)	16,420 lbs 20' / 5' ft	32' 6" (9.9 m)	22' 1" (6.7 m)	34,400 lbs (153.0 kN)	46,300 – 54,230 lbs (21.0 – 24.6 t)
ECR235D	172 hp (128 kW)	1.35 – 1.81 yd ³ (1.03 – 1.38 m ³)	16,830 lbs 20' / 5' ft	31' 11" (9.7 m)	22' 0" (6.7 m)	33,700 lbs (150.0 kN)	52,380 – 60,980 lbs (23.8 – 27.7 t)
EC250D	202 hp (151 kW)	1.37 – 2.39 yd ³ (1.05 – 1.83 m ³)	21,030 lbs 20' / 5' ft	33' 10" (10.3 m)	22' 1" (6.9 m)	41,810 lbs (186.0 kN)	54,230 – 61,730 lbs (24.6 – 28 t)
EC300D	227 hp (169 kW)	1.50 – 2.55 yd ³ (1.15 – 1.95 m ³)	24,300 lbs 20' / 5' ft	35' 3" (10.7 m)	24' 0" (7.3 m)	45,970 lbs (205.0 kN)	66,140 – 73,630 lbs (30.0 – 33 t)
ECR305C	192 hp (143 kW)	1.70 – 2.55 yd ³ (2.43 – 3.64 m ³)	23,870 lbs 20' / 5' ft	34' 11" (10.6 m)	22' 10" (7.0 m)	38,810 lbs (173.0 kN)	74,230 – 81,330 lbs (33.7 – 36.9 t)
EC340D	279 hp (208 kW)	2.32 – 3.07 yd ³ (1.77 – 2.35 m ³)	33,180 lbs 20' / 5' ft	38' 6" (11.0 m)	26' 9" (3.9 m)	54,630 lbs (243.0 kN)	77,240 – 80,370 lbs (35.0 – 36.5 t)
EC380D	279 hp (208 kW)	2.19 – 3.63 yd ³ (1.67 – 2.77 m ³)	33,400 lbs 20' / 5' ft	38' 6" (11.2 m)	26' 9" (3.9 m)	54,630 lbs (243.0 kN)	84,670 – 87,540 lbs (38.0 – 39.8 t)
EC480D	343 hp / (260 kW)	2.32 – 4.97 yd ³ (1.77 – 3.80 m ³)	39,080 lbs 20' / 5' ft	43' 6" (12.0 m)	30' 1" (9.2 m)	64,070 lbs (285.0 kN)	105,000 – 107,000 lbs (47.4 – 49.0 t)
EC700C	424 hp / (316 kW)	3.2 – 8.63 yd ³ (2.43 – 6.60 m ³)	55,820 lbs 20' / 5' ft	43' 3" (13.2 m)	27' 7" (8.4 m)	80,030 lbs (356.0 kN)	158,070 – 158,070 lbs (68.3 – 71.7 t)

VOLVO WHEELED EXCAVATORS

Serviceability
(Safe, easy access to areas)

Operator Comfort
(Visibility & protection)



Volvo Engine, Tier 4i

- High-capacity, variable speed engine cooling fans run as required to keep engine at maximum efficiency
- High torque at low rpm maximizing loading efficiency

Hydraulics

- Advanced mechatronics optimizes power balance by matching hydraulic power to engine power at all times
- Different work modes - Parking, Travel, Working, and Customer Working mode for 100% hydraulic power
- High flow/high pressure auxiliary hydraulics is standard on all wheeled excavators

Serviceability

- Easily accessed hatches & ground level servicing, removable screens, remote drains, easily replaced filters

Undercarriages

- Outboard mounted wet disc brakes increase brake life - Automatic downhill retardation prevents the machine from over speeding & minimizes use of service brakes
- Heavy gauge outriggers & stabilizer blade have a wide stance to maximize stability & minimize surface damage

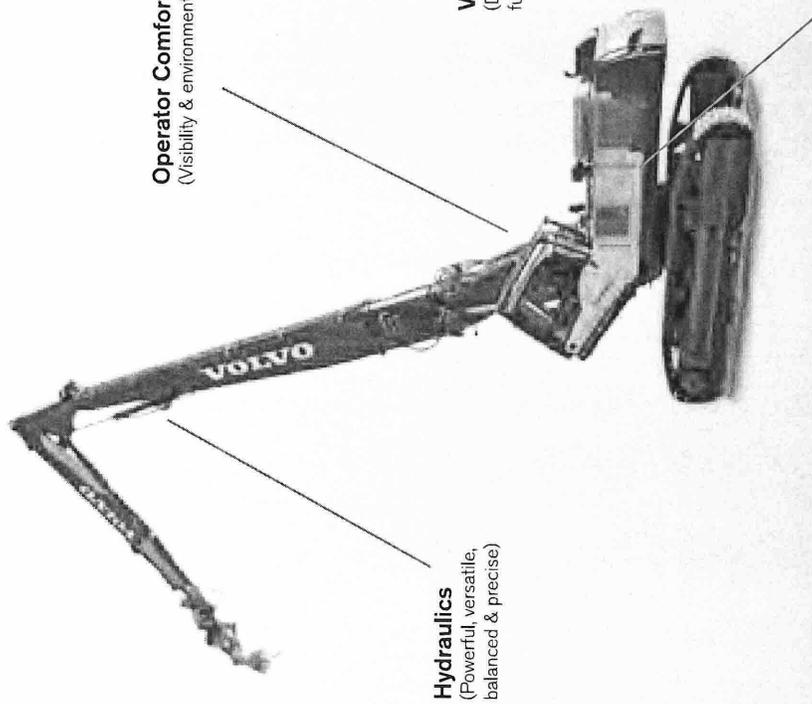
Volvo Care Cab

- Best-in-class cab filtration, adjustable seat, arm rests, air conditioning & anti-glare LCD color monitor with rearview camera (see brochures for further standards/options)
- Monitoring systems include Contronics (constant machine diagnostics), MATRIS (operational information) & CareTrack (GSM/satellite monitoring)
- ROPS certified cabs ensure a safer working environment

WHEELED EXCAVATORS

	Engine HP (net) SAE J1349	Bucket Capacity	Lifting Capacity Along Undercarriage at Reach/Height <small>(Standard Configuration)</small>	Reach (max.)	Digging Depth (max.)	Breakout Force SAE J1179	Operating Weight
EW160D	150 HP (112 kW)	0.82 – 1.21 yd ³ (0.63 – 0.93 m ³)	11,900 lbs 20'/5' ft 5.4 t 6.0 / 1.5 m	30' 1" (9.2 m)	18' 10" (5.8 m)	28,775 lbf (128 kN)	35,715 – 40,125 lbs (16.2 – 18.2 t)
EW180D	169 hp (126kW)	0.88 – 1.34 yd ³ (0.68 – 1.03 m ³)	17,400 lbs 20'/5' ft 7.9 t 6.0 / 1.5 m	31' 4" (9.5 m)	20' 1" (6.1 m)	30,574 lbf (136 kN)	39,900 – 44,750 lbs (18.1 – 20.3 t)
EW210D	169 hp (126 kW)	1.08 – 1.47 yd ³ (0.83 – 1.12 m ³)	18,300 lbs 20'/5' ft 8.3 t 6.0 / 1.5 m	32' 7" (9.9 m)	21' 3" (6.5 m)	33,500 lbf (149 kN)	43,430 – 50,265 lbs (19.7 – 22.8 t)

VOLVO ULTRA HIGH REACH DEMOLITION EXCAVATOR



Operator Comfort
(Visibility & environment)

Hydraulics
(Powerful, versatile,
balanced & precise)

Volvo Engine
(Durable, reliable &
fuel efficient)

Frame
(Durable, rigid & reinforced)

Volvo Engine, Tier 4i

- High power/torque at low rpm hydraulic pumps provide full flow at low rpm
- High-capacity, variable speed engine cooling fans run as required to keep engine at maximum efficiency

Performance Enhancements

- Hydraulic enhancements include increased pump flow, swing and travel cycle times, higher attachment speed
- Durability refinements for main frame, reinforced undercarriage, strengthened reduction gearbox of swing and travel motors
- Hydraulically removable counterweight with extra weight system
- Forward and rearview cameras are standard equipment and enhances job site safety

Serviceability

- Easily accessed hatches and service areas, remote fluid drains and easy filter replacements

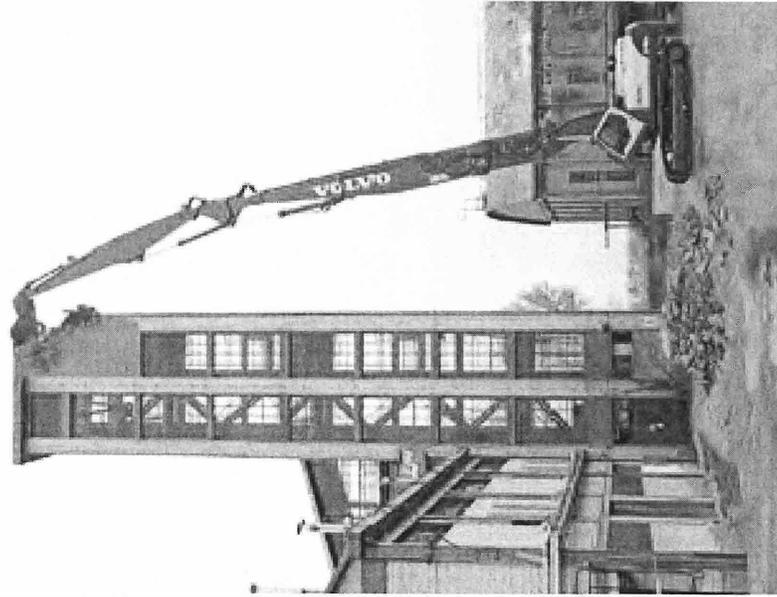
Frame

- Robotically welded frame is strategically reinforced on both upper and lower structures
- Chrome pins with brass bushings & graphite inserts are used on boom foot and boom cylinders

Volvo Care Cab

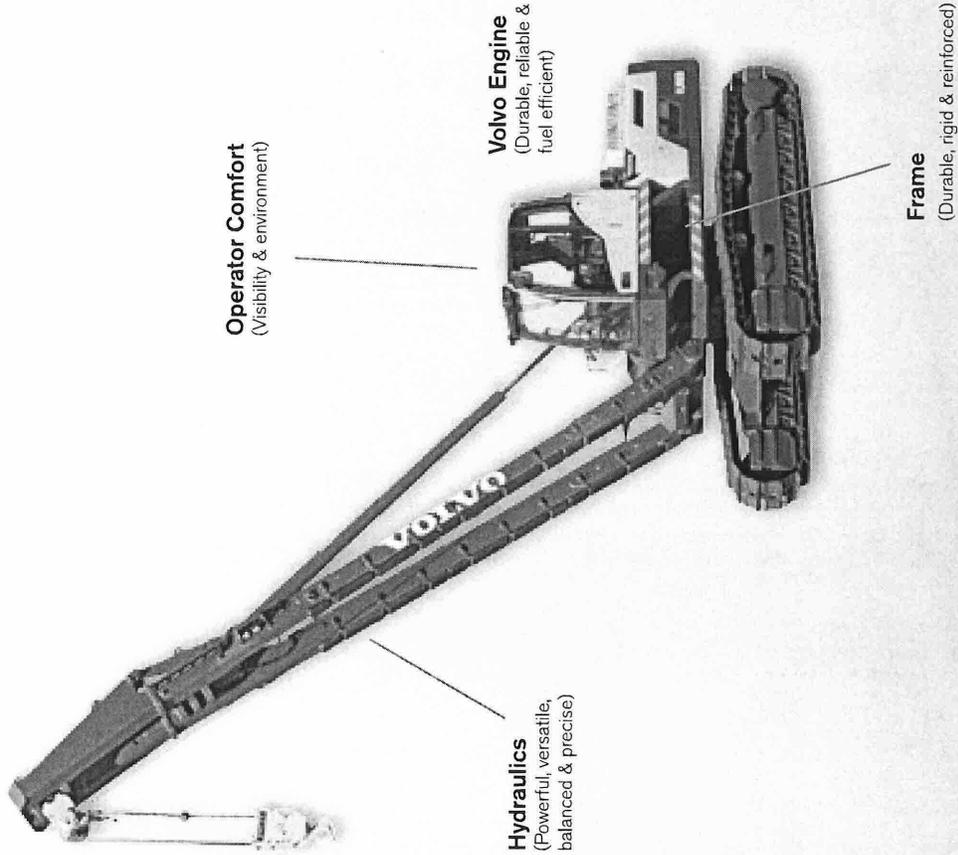
- Best-in-class cab filtration, adjustable seat, armrests, air conditioning, excellent visibility
- Monitoring systems include Contronics (constant machine diagnostics), MATRIS (operational information) & CareTrack (GSM/satellite monitoring)

ULTRA HIGH REACH DEMOLITION EXCAVATORS



	3 Piece Boom			
	Engine HP (net) SAE J1349	Operating Weight	Max Pin Height	Max Tool Weight
EC380DHR	279 hp (208 kW)	97,700 - 105,000 lbs (44.4 - 47.6 t)	69' 2" (21.0 m)	6,600 lbs (3.0 t)
EC480DHR	343 hp (256 kW)	115,910 - 124,720 lbs (52.6 - 56.6 t)	89' 9" (27.4 m)	6,600 lbs (3.0 t)
EC700BHR	424 hp (316 kW)	179,590 - 195,020 lbs (81.5 - 88.5 t)	95' 2" - 105' 0" (29.0 - 32.0 m)	7,700 lbs (3.5 t)

VOLVO PIPELAYERS



Operator Comfort
(Visibility & environment)

Volvo Engine
(Durable, reliable & fuel efficient)

Hydraulics
(Powerful, versatile, balanced & precise)

Frame
(Durable, rigid & reinforced)

Volvo Engine, Tier 4i

- High power/torque at low rpm hydraulic pumps provide full flow at low rpm
- High-capacity, variable speed engine cooling fans run as required to keep engine at maximum efficiency

Hydraulics

- Load Management System – Visually Communicates Load Conditions – Boom Light Bar and In-Cab Display
- Work modes match hydraulic speed & power in different applications - heavy, general, fine control, idling
- Best In Class Lifting Capacity – Handles up to 50 ton tipping capacity

Serviceability

- Easily accessed hatches and service areas, remote fluid drains and easy filter replacements

Frame

- Robotically welded frame is strategically reinforced on both upper and lower structures
- Conversion to Crawler Excavator (Optional Boom Allows Higher Machine Utilization)
- Chrome pins with brass bushings & graphite inserts are used on boom foot and boom cylinders
- Slew Lock (Prevents Rotation of Upper Structure on Steep Slopes Under Heavy Conditions)

Volvo Care Cab

- Best-in-class cab filtration, adjustable seat, armrests, air conditioning, excellent visibility & anti-glare LCD color monitor with rearview camera
- Monitoring systems include Contronics (constant machine diagnostics), MATRIS (operational information) & CareTrack (GSM/satellite monitoring)

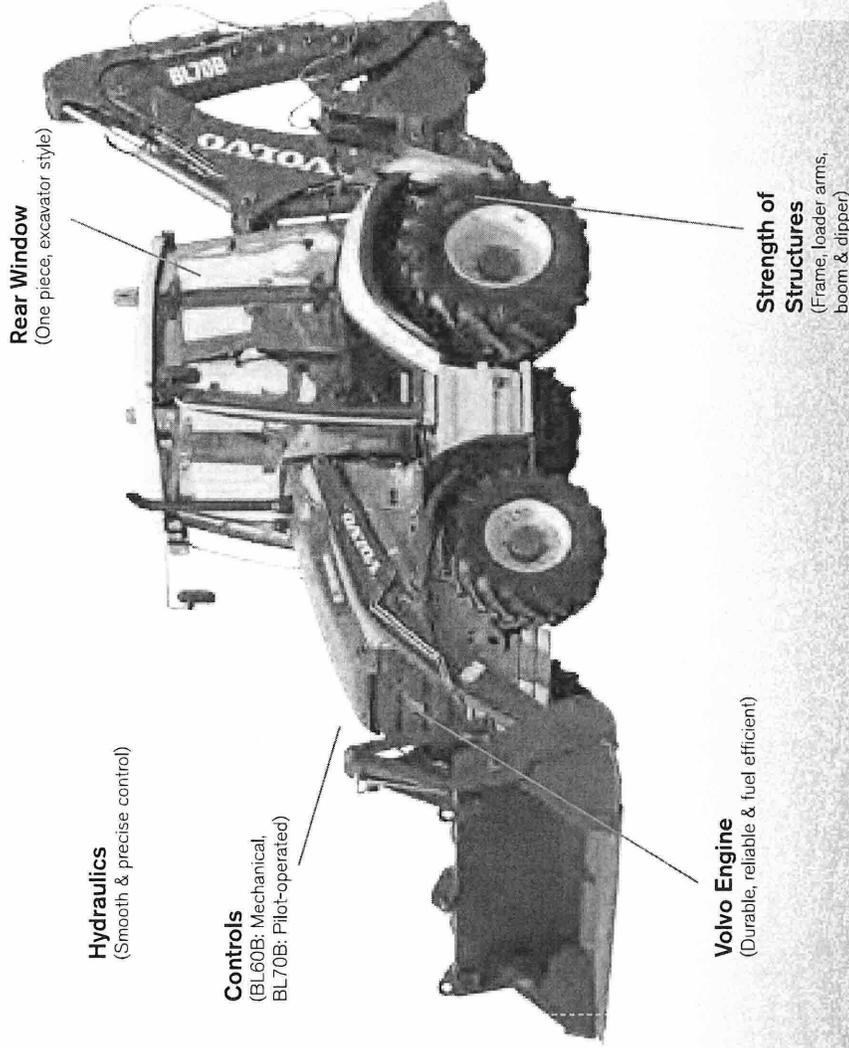
360 Degree Rotation

- High Performance Lifting and Placing

PIPELAYERS

	Engine HP (net) SAEJ1349	Maximum Tipping Capacity	Maximum Rated Capacity	Operating Weight
PL3005D	227 hp (169 kW)	112,000 lbs (51,000 kg)	68,340 lbs (31,000 kg)	78,350 lbs (35,540 kg)
PL4608	315 hp (235 kW)	176,370 lbs (80,000 kg)	110,000 lbs (50,000 kg)	126,708 lbs (57,475 kg)
PL4611	315 hp (235 kW)	242,500 lbs (110,000 kg)	150,000 lbs (68,200 kg)	150,220 lbs (68,140 kg)

VOLVO BACKHOE LOADERS



Transmission

- Fully-automatic powershift transmission features four F/R speeds & kickdown for fast shifting from 2nd to 1st gear (BL70B option), selecting 4th will actuate automatic mode

Hydraulics

- BL70B features closed-center, load-sensing, flow sharing valves coupled with a variable displacement pump which ensures output matching the flow demand

Versatility

- Optional Loader attachment bracket accepts a full line of tools and attachments including multi-purpose buckets, forks, etc

Performance

- Outboard wet disc brakes & planetaries, front & rear cast steel axles with improved axle mounting design
- Industry exclusive high-mounted swing cylinders avoid seal contamination from ground contact & lowers potential damage to backhoe hydraulic hoses
- Volvo's swing casting features massive top & bottom yokes with large pivot bushings
- Hydraulic thumb is functional with extendible dipper

Serviceability

- Ground level servicing, 50 hour grease intervals, tilting oil cooler & full access to hydraulic/transmission coolers
- Maintenance-free extendable dipper

BACKHOE LOADERS

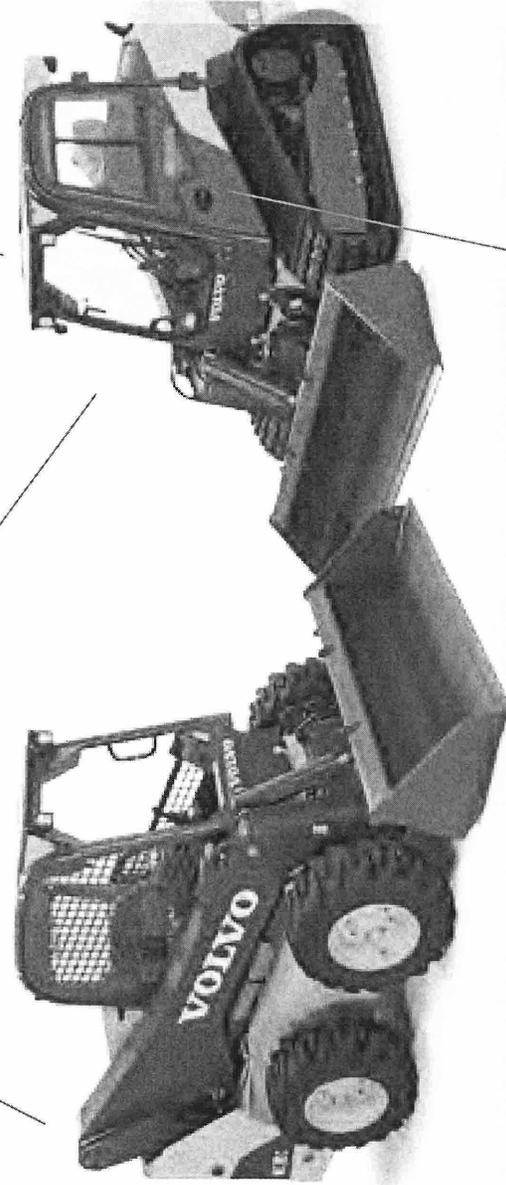
	Engine	Dig Depth	Loader Lift Capacity	Bucket Capacity	Operating Weight
BL60B	83 – 91 hp (62 – 68 kW)	14'7" – 18'1" (5.52 – 5.60 m)	6,258 lbs (3,020 kg)	1.0 yd ³ (0.76 m ³)	17,500 lbs (7,937 kg)
BL70B	91 – 98 hp (68 – 73 kW)	14'11" – 18'4" (4.54 – 5.60 m)	7,320 lbs (3,320 kg)	1.3 yd ³ (1.0 m ³)	19,500 lbs (8,845 kg)

VOLVO SKID STEER LOADERS AND COMPACT TRACK LOADERS

**Vertical & Radial
Lift Offering**

Operator Comfort
(Ergonomics, storage, noise-
sealed and pressurized)

Near 360° Visibility
(Low arm, no mesh on cab
door, no loader arm cross
member)



Side Entry Access

Key Performance
(Levels at those of top 3 competitors:
breakout forces, travel speeds, cycle times, etc)

Performance

- Industry expected options such as: 2-speed, keyless start, radial/vertical path parallel lift, recycling package
- Fuel tank capacities—best in class

Productivity

- Wheeled and tracked machine offering
- ROC's from 1350 lbs. to 3000 lbs.

Volvo Care Cab

- 12 Cab packages available – 4 each on canopy, cab with heat, and cab with HVAC

Serviceability

- Service access is best in class

SKID STEER LOADERS AND COMPACT TRACK LOADERS

	Engine Net HP	Operating Capacity	Operating Weight	Height to Hinge Pin
MC60C	47 hp (35.1 kW)	1,350 lbs (612 kg)	6,067 lbs (2,752 kg)	9' 10" (3.0 m)
MC70C	59 hp (43.9 kW)	1,550 lbs (703 kg)	6,270 lbs (2,844 kg)	9' 10" (3.0 m)
MC85C	59 hp (43.9 kW)	1,750 lbs (794 kg)	6,636 lbs (3,011 kg)	9' 10" (3.0 m)
MC95C	59 hp (43.9 kW)	1,900 lbs (862 kg)	6,894 lbs (3,127 kg)	9' 10" (3.0 m)
MC110C	74 hp (55 kW)	2,250 lbs (1,009 kg)	7,476 lbs (3,391 kg)	10' 5" (3.2 m)
MC115C	74 hp (55 kW)	2,600 lbs (1,179.3 kg)	7,971 lbs (3,615.6 kg)	10' 5" (3.2 m)
MC135C	92 hp (66.9 kW)	3,000 lbs (1,360.7 kg)	8,430 lbs (3,823.8 kg)	10' 5" (3.2 m)
MCT85C	59 Hp (44.7 kW)	1,900 lbs 862 kg)	8,195 lbs (3,717 kg)	9' 11" (3.0 m)
MCT125C	74 hp (55 kW)	2,600 lbs (1,179.3 kg)	10,205 lbs (4,629 kg)	10' 5" (3.2 m)
MCT135C	92 hp (66.9 kW)	3,000 lbs (1,360.7 kg)	10,663 lbs (4,823 kg)	10' 5" (3.2 m)

VOLVO MOTOR GRADERS

Operator Comfort
(Environment, visibility, controls)

Powertrain
(Volvo designed & manufactured)

Frame
(Lifetime warranty/optional)

Front End
(Excellent weight distribution)

Circle/Moldboard
(High downforce)

Volvo Engine, Tier 4i, B Series

- High torque at low rpm (1100-1600 rpm) - load sensing hydraulic pumps provide full flow at low rpm
- Reversible*, variable-speed engine cooling fan runs as required to keep engine at maximum efficiency (*optional)
- Triple power curves provide optimum power at all operating speeds - ability to tailor for specific jobs

Transmission

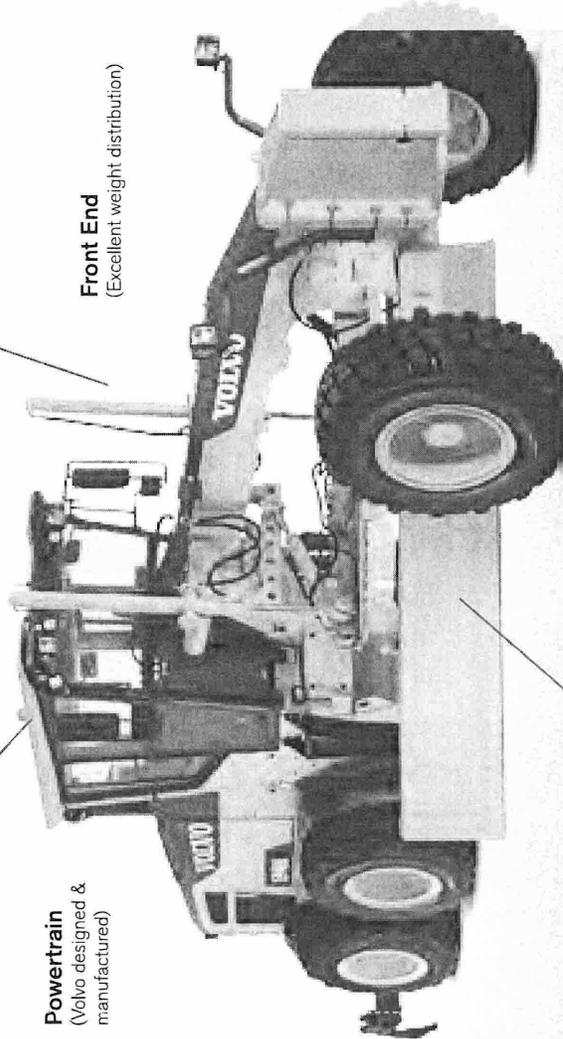
- HTE 840 transmission offers automatic downshifting & shuttle shifting - a feature enabling shifts from F/R & R/F without clutching (8 speeds Forward/4 speeds Reverse)
- HTE 840 Autoshift (optional) & HTE 1160 features multiple operating modes - manual/transport (HTE 1160 - 11 speeds Forward/6 speeds Reverse optional)

Axles & Brakes

- Rear axle differential lock will engage & release using an internal clutch pack with a smoother, faster release
- Four, individual, multiple wet-disc wheel brakes in a dual cross-over system with an electric backup system

Volvo Care Cab

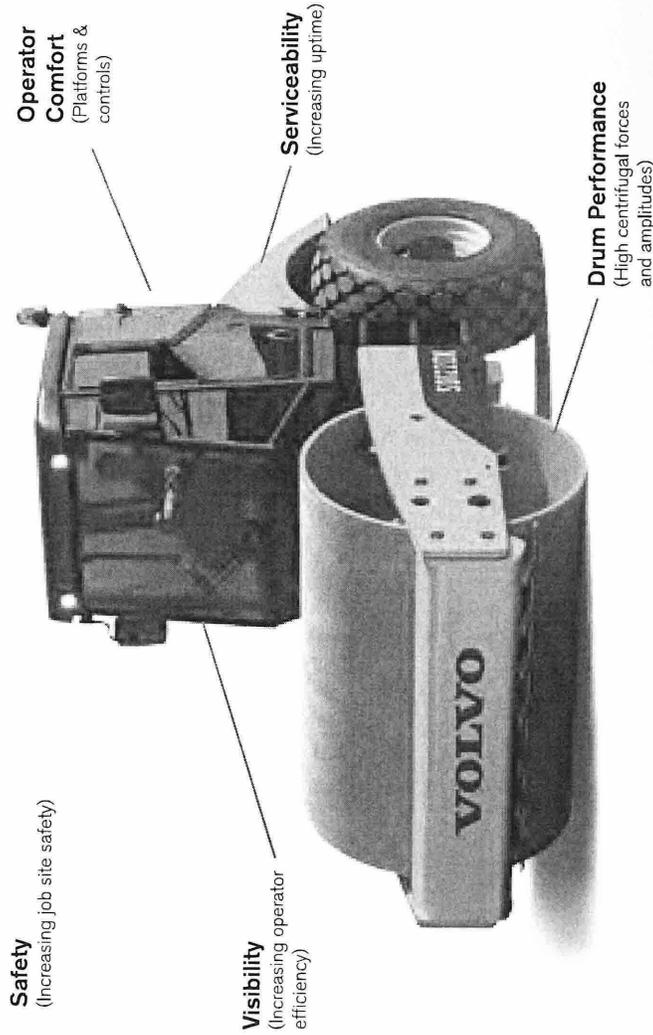
- Reduced shifter movement for repetitive operations - operator simply moves the shifter straight forward or back to change directions
- Monitoring systems include Contronics (constant machine diagnostics), MATRIS (operational information) & CareTrack (GSM/satellite monitoring)
- Optional joystick controls



MOTOR GRADERS

	Engine	Net Engine Power	Operating Weight
G930B	D8H / 8.0 L	160 - 208 hp (119 - 155 kW)	34,520 lbs (15,658 kg)
G940B	D8H / 8.0 L	196 - 232 hp (146 - 173 kW)	35,843 lbs (16,258 kg)
G946B	D8H / 8.0 L	224 - 264 hp (167 - 197 kW) <i>*NOTE: AWD engaged</i>	37,827 lbs (17,158 kg)
G960B	D8H / 8.0 L	224 - 264 hp (167 - 197 kW)	38,709 lbs (17,758 kg)
G970	D9B / 9.4 L	210 - 250 hp (156 - 186 kW)	41,660 lbs (18,900 kg)
G976	D9B / 9.4 L	225 - 265 hp (168 - 198 kW) <i>*NOTE: AWD engaged</i>	43,650 lbs (19,800 kg)
G990	D9B / 9.4 L	225 - 265 hp (168 - 198 kW)	48,720 lbs (22,100 kg)

VOLVO SOIL COMPACTORS



Engine

- Tier III/IV-certified diesel engines are environmentally friendly; meet or exceed EPA standards

Drum Performance

- Multiple frequencies allow precise matching of drum vibration and the natural harmonics of various soils (Except SD25, SD45)
- High centrifugal force promotes fewer passes to obtain maximum density during compaction

Operator Comfort

- Instrument pedestal, adjustable operator seat and ergonomically designed controls - high comfort & visibility to drum edges (see brochures for options/standards)

Serviceability

- Ground level access to daily check points, fuel tank, oil dipstick, and hydraulic filters

Safety

- Spring Applied Hydraulic Release brakes auto-apply if engine stalls or hydrostatic system losses pressure

SOIL COMPACTORS

Operating Weight w/ROPS*		Drum Width	Vibration Frequency	Vibration Centrifugal Force	Operating Weight w/ROPS*		Drum Width	Vibration Frequency	Vibration Centrifugal Force
SD25D	5,650 lbs (2,562 kg)	42" (1.0 m)	2,200 vpm (36,7 Hz)	14,020 lbs (62 kN)	SD100F	25,100 lb (11,383 kg)	84" (2.1 m)	1,870 – 2,019 vpm (31,2 – 33,6 Hz)	46,300 – 59,300 lbs (206 – 264 kN)
SD25F	5,920 lbs (2,685 kg)	42" (1.0 m)	2,200 vpm (36,7 Hz)	12,500 lbs (55.6 kN)	SD105DX	23,700 lb (10,748 kg)	84" (2.1 m)	1,870 – 2,018 vpm (31 – 34 Hz)	46,300 – 59,300 lbs (206 – 264 kN)
SD45D	10,225 lbs (4,638 kg)	54" (1.4 m)	1,900 vpm (32 Hz)	22,500 lbs (99 kN)	SD105F	25,100 lb (11,383 kg)	84" (2.1 m)	1,870 – 2,018 vpm (31 – 34 Hz)	59,000 – 78,000 lbs (267 – 347 kN)
SD45F	11,159 lbs (5,062 kg)	54" (1.4 m)	1,900 vpm (32 Hz)	22,500 lbs (99 kN)	SD116DX	23,930 lb (10,852 kg)	84" (2.1 m)	1,870 – 2,018 vpm (31 – 34 Hz)	47,900 – 61,000 lbs (213 – 271 kN)
SD70D	15,556 lbs (7,056 kg)	66" (1.68 m)	1,850 – 2,025 vpm (30,8 – 33,8 Hz)	23,300 – 32,100 lbs (104 – 143 kN)	SD116F	25,050 lb (11,360 kg)	84" (2.1 m)	1,650 – 2,025 vpm (27,5 – 34 Hz)	59,400 – 61,000 lbs (264 – 271 kN)
SD70F	17,724 lbs (7,586 kg)	66" (1.68 m)	1,850 – 2,025 vpm (30,8 – 33,8 Hz)	30,300 – 38,500 lbs (135 – 171 kN)	SD160DX	35,200 lb (15,964 kg)	84" (2.1 m)	1,850 – 2,025 vpm (30,8 – 33,8 Hz)	59,400 – 76,300 lbs (264 – 339 kN)
SD77DX	16,350 lbs (7,415 kg)	66" (1.68 m)	1,890 – 2,098 vpm (31,5 – 35 Hz)	23,300 – 32,100 lbs (104 – 143 kN)	SD160F	36,400 lb (16,508 kg)	84" (2.1 m)	1,650 – 2,025 vpm (27,5 – 33,8 Hz)	76,200 – 87,000 lbs (339 – 387 kN)
SD77F	17,780 lbs (8,063 kg)	66" (1.68 m)	1,890 – 2,098 vpm (31,5 – 35 Hz)	30,300 – 38,500 lbs (135 – 171 kN)	SD200DX	45,000 lb (20,408 kg)	84" (2.1 m)	1,850 – 1,850 vpm (30,8 – 30,8 Hz)	53,700 – 82,800 lbs (239 – 368 kN)
SD100D	23,100 lbs (10,476 kg)	84" (2.1 m)	1,800 – 2,019 vpm (31,2 – 33,6 Hz)	46,300 – 59,300 lbs (206 – 264 kN)	SD200F	44,500 lb (20,181 kg)	84" (2.1 m)	1,700 – 1,850 vpm (28,3 – 30,8 Hz)	72,600 – 80,800 lbs (323 – 359 kN)

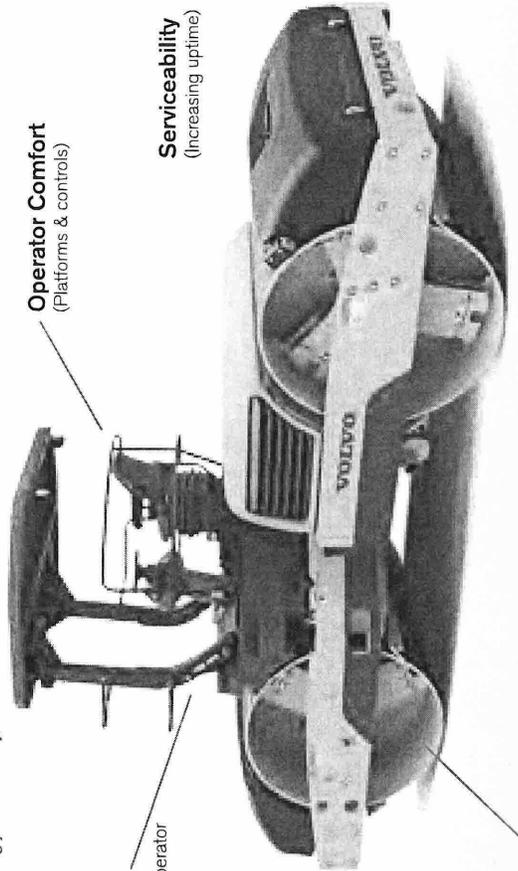
VOLVO ASPHALT COMPACTORS

Safety
(Increasing job site safety)

Visibility
(Increasing operator efficiency)

Operator Comfort
(Platforms & controls)

Serviceability
(Increasing uptime)



Drum Performance
(High centrifugal forces and amplitudes)

Engine

- Tier III/IV-certified diesel engines are environmentally friendly, meet or exceed EPA standards

Drum Performance

- High dynamic forces due to patented drum technology - heavy-duty bearings/high-strength welding withstand forces, drum isolators dampen 95% of vibration to frame
- Eight Amplitude Eccentrics: Volvo's design matches rotation of drum's unbalanced weights to the direction of travel - operator selectable (Volvo models include DD70, 90, 118, 138)

Performance

- Large capacity water tanks with level indicators feature a flow control system designed to optimize water usage

Operator Comfort

- Superior visibility to drum edges & spray nozzles when seated - no neck fatigue/strain, head is inside ROPS
- Center pivot articulated steering increases maneuvering on tight job sites - drums track each other

Safety

- Spring Applied Hydraulic Release brakes auto-apply if engine stalls or hydrostatic system loses pressure
- Visibility - operator can see objects which are 1 meter high and 1 meter away from machine at front/side/rear

ASPHALT COMPACTORS

	Operating Weight w/ROPS*	Drum Width	Vibration Frequency	Vibration Centrifugal Force	Operating Weight w/ROPS*	Drum Width	Vibration Frequency	Vibration Centrifugal Force
CR24	5,742 lbs (2,604 kg)	47" (1.2 m)	4,000 vpm (66,7 Hz)	7,100 lbs (32 kN)	DD90	66" (1.7 m)	1,850 – 2,500 vpm (30,8 – 41,7 Hz)	5,840 – 26,000 lbs (26 – 115,6 kN)
CR30	6,566 lbs (2,978 kg)	52" (1.3 m)	4,000 vpm (66,7 Hz)	7,500 lbs (33 kN)	DD90HF	66" (1.7 m)	2,850 – 3,800 vpm (47,5 – 63,3 Hz)	16,030 – 38,430 lbs (71,3 – 171 kN)
DD14S	3,350 lbs (1,519 kg)	35.4" (0.9 m)	4,000 vpm (66,7 Hz)	3,500 lbs (15.6 kN)	DD112HF	78.7" (2.0 m)	3,000 – 4,200 vpm (50 – 70 Hz)	33,090 – 42,070 lbs (147,2 – 187,1 kN)
DD16	3,570 lbs (1,619 kg)	39.4" (1.0 m)	4,000 vpm (66,7 Hz)	4,000 lbs (17.8 kN)	DD118HF	78.7" (2.0 m)	3,400 vpm (56,67 Hz)	22,980 – 42,680 lbs (102 – 190 kN)
DD25	5,400 lbs (2,450 kg)	39" (1.0 m)	3,300 – 4,000 vpm (55 – 67 Hz)	5,620 – 8,318 lbs (25 – 37 kN)	DD118HFA	78.7" (2.0 m)	3,000 – 4,200 vpm (50 – 70 Hz)	33,090 – 42,070 lbs (147,2 – 187,1 kN)
DD25W	5,725 lbs (2,600 kg)	47" (1.2 m)	3,300 – 4,000 vpm (55 – 67 Hz)	6,295 – 8,992 lbs (28 – 40 kN)	DD132HF	84" (2.1 m)	2,700 – 4,000 vpm (45 – 66,7 Hz)	36,680 – 41,720 lbs (163,2 – 185,6 kN)
DD29	6,335 lbs (2,873 kg)	49.2" (1.25 m)	4,000 vpm (66,7 Hz)	7,100 lbs (32 kN)	DD138HF	84" (2.1 m)	3,200 vpm (53,3 Hz)	21,840 – 42,260 lbs (97,1 – 188 kN)
DD31HF	6,840 lbs (3,120 kg)	49.2" (1.25 m)	4,200 vpm (70 Hz)	8,200 lbs (36 kN)	DD138HFA	84" (2.1 m)	2,700 – 4,000 vpm (45 – 66,7 Hz)	36,680 – 41,720 lbs (163,2 – 185,6 kN)
DD38HF	8,400 lbs (3,809 kg)	54.1" (1.4 m)	4,200 vpm (70 Hz)	8,200 lbs (36 kN)	PT125R	68" (1.7 m)	-	-
DD70	14,875 lbs (6,747 kg)	57" (1.4 m)	3,300 vpm (55 Hz)	8,940 – 17,970 lbs (40 – 80 kN)	PT240R	78.7" (2 m)	-	-
DD70HF	14,875 lbs (6,747 kg)	57" (1.4 m)	4,000 vpm (66,7 Hz)	7,820 – 21,080 lbs (35 – 94 kN)				

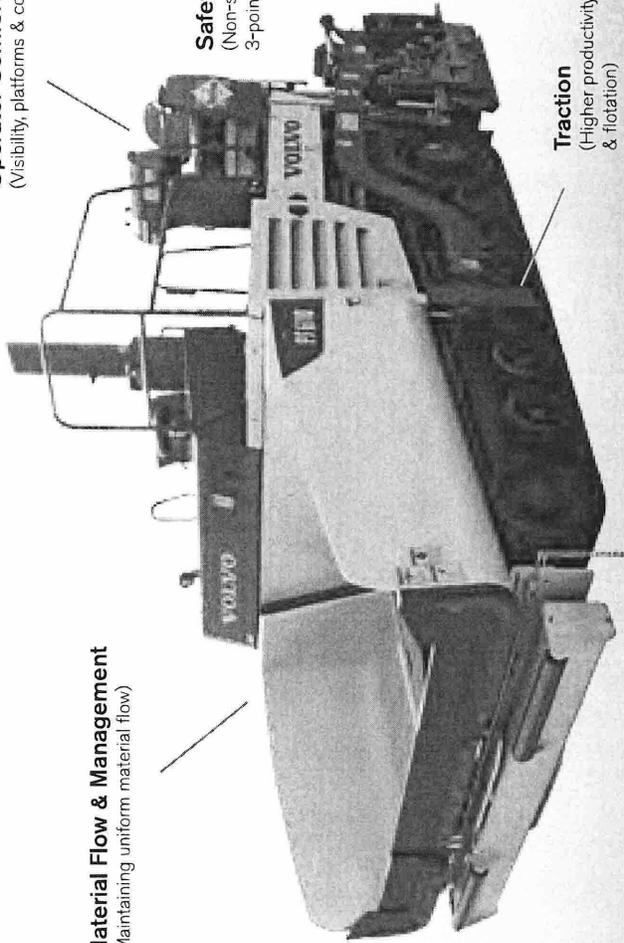
VOLVO ASPHALT PAVERS

Serviceability
(Increasing uptime)

Material Flow & Management
(Maintaining uniform material flow)

Operator Comfort
(Visibility, platforms & controls)

Safety
(Non-slip surfaces,
3-point contact)



Traction
(Higher productivity
& flotation)

Material Management

- Industry exclusive 2-stage hydraulic power tunnels are operated from paver or screed and are synchronized to retract in conjunction with the screed (PF6000s)

Traction & Flotation

- Best-in-class ground contact from undercarriages - track pavers feature multiple pairs of oscillating bogies - PF6160/PF6170 feature independent load cylinders

Serviceability

- Ground level serviceability, pinned engine hoods & removable deck plates provide convenient access to vital electric & hydraulic components

ASPHALT PAVERS

Pavers

	Paving Width	Engine Make/Model	Propulsion Tracked or Wheeled	Paver Weights
PF2181	8.0' - 21.0' (2,4 - 6,4 m)	Cummins QSB 5.9-30T, 158 hp (117,8 kW)	Wheeled	27,295 lbs (12,381 kg)
PF4410	8.0' - 25.0' (2,4 - 7,6 m)	Cummins QSB 5.9-30T, 158 hp (117,8 kW)	Tracked	30,205 lbs (13,700 kg)
PF6110	10.0' - 26.0' (3,1 - 7,9 m)	Cummins QSB 6.7 Tier 3, 205 hp (153 kW)	Tracked	40,066 lbs (18,174 kg)
PF6160	10.0' - 26.0' (3,1 - 7,9 m)	Cummins QSB 6.7 Tier 3, 205 hp (153 kW)	Wheeled	36,122 lbs (16,385 kg)
PF6170	10.0' - 26.0' (3,1 - 7,9 m)	Cummins QSB 6.7 Tier 3, 205 hp (153 kW)	Wheeled	36,422 lbs (16,521 kg)
P7820C	8.4' - 36' (2,5 - 11 m)	Volvo D8H GEE4 Tier 4i 235 hp (175 kW)	Tracked	34,392 lbs (15,600 kg)
P8820C	8.4' - 42.7' (2,5 - 13 m)	Volvo D8H GEE4 Tier 4i 268 hp (200 kW)	Tracked	39,022 lbs (17,700 kg)

Screeds

	Screed Width	Standard Paving Width	Paving Depth Range	Screed Heat Type
Omni 1A	8.0' (2,44 m)	8.0 - 13.13' (2,44 - 4,0 m)	.25 - 8" (6,0 - 203 mm)	Diesel
Omni 318	10.0' (3,05 m)	10.00 - 18.5' (3,05 - 5,64 m)	.25 - 12" (6,0 - 305 mm)	Electric
Omni IIIA	10.0' (3,05 m)	10.00 - 18.00' (3,05 - 5,49 m)	.25 - 12" (6,0 - 305 mm)	Diesel
Omni IIIE	10.0' (3,05 m)	10.00 - 18.00' (3,05 - 5,49 m)	.25 - 12" (6,0 - 305 mm)	Electric
Omni 1000	9.8' (3,0 m)	9.8 - 19.7' (3,0 - 6,0 m)	.25 - 12" (6,0 - 305 mm)	Electric
UltiMat 16	8.0' (2,44 m)	8.0 - 16.0' (2,44 - 4,88 m)	.25 - 8" (6,0 - 203 mm)	Electric
UltiMat 20	10.0' (3,05 m)	10.0 - 20.0' (3,05 - 6,1 m)	.25 - 8" (6,0 - 203 mm)	Electric
UltiMat 200	10.0' (3,05 m)	10.0 - 20.0' (3,05 - 6,10 m)	.25 - 8" (6,0 - 203 mm)	Electric
10' Wedge-Lock	10.0' (3,05 m)	10.0' (3,05 m)	.25 - 12" (6,0 - 305 mm)	Diesel or Electric
10' Wedge-Lock w/ 3/6 Hyd. Extns.	10.0' (3,05 m)	10.0 - 16.0' (3,05 - 4,88 m)	.25 - 12" (6,0 - 305 mm)	Diesel or Electric
8' Wedge-Lock	8.0' (2,44 m)	8.0' (2,44 m)	.25 - 8" (6,0 - 203 mm)	Diesel
8' Wedge-Lock w/ 2.5/5 Hyd. Extns.	8.0' (2,44 m)	8.0 - 13.0' (2,44 - 3,96 m)	.25 - 8" (6,0 - 203 mm)	Diesel

ASPHALT PAVERS

Screeds

	Screed Width	Standard Paving Width	Paving Depth Range	Screed Heat Type
Omni 1A	8.0' (2,44 m)	8.0 – 13.13' (2,44 – 4,0 m)	.25 – 8" (6,0 – 203 mm)	Diesel
Omni 318	10.0' (3,05 m)	10.00 – 18.5' (3,05 – 5,64 m)	.25 – 12" (6,0 – 305 mm)	Electric
Omni IIIA	10.0' (3,05 m)	10.00 – 18.00' (3,05 – 5,49 m)	.25 – 12" (6,0 – 305 mm)	Diesel
Omni IIIE	10.0' (3,05 m)	10.00 – 18.00' (3,05 – 5,49 m)	.25 – 12" (6,0 – 305 mm)	Electric
Omni 1000	9.8' (3,0 m)	9.8 – 19.7' (3,0 – 6,0 m)	.25 – 12" (6,0 – 305 mm)	Electric
UltiMat 16	8.0' (2,44 m)	8.0 – 16.0' (2,44 – 4,88 m)	.25 – 8" (6,0 – 203 mm)	Electric
UltiMat 20	10.0' (3,05 m)	10.0 – 20.0' (3,05 – 6,1 m)	.25 – 8" (6,0 – 203 mm)	Electric
UltiMat 200	10.0' (3,05 m)	10.0 – 20.0' (3,05 – 6,10 m)	.25 – 8" (6,0 – 203 mm)	Electric
10' Wedge-Lock	10.0' (3,05 m)	10.0' (3,05 m)	.25 – 12" (6,0 – 305 mm)	Diesel or Electric
10' Wedge-Lock w/ 3/6 Hyd. Extns.	10.0' (3,05 m)	10.0 – 16.0' (3,05 – 4,88 m)	.25 – 12" (6,0 – 305 mm)	Diesel or Electric
8' Wedge-Lock	8.0' (2,44 m)	8.0' (2,44 m)	.25 – 8" (6,0 – 203 mm)	Diesel
8' Wedge-Lock w/ 2.5/5 Hyd. Extns.	8.0' (2,44 m)	8.0 – 13.0' (2,44 – 3,96 m)	.25 – 8" (6,0 – 203 mm)	Diesel

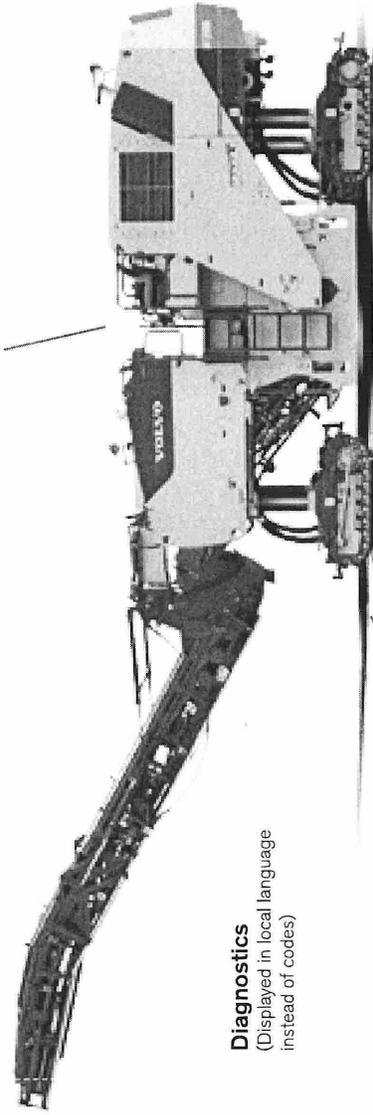
VOLVO MILLING MACHINES

Serviceability

(Displayed in local language instead of codes, walk-in engine compartment)

Operator Comfort

(LCD panels, easy-to-use)



Diagnostics

(Displayed in local language instead of codes)

Three Selectable Milling Speeds

(Maintain milling surface integrity)

Obstacle Detection

(Increasing job site safety)

Drum Performance

- Three distinct engine / drum cutting speeds selectable from the operator control station (MT2000)
- Industry-exclusive Line Manager System offers best in class straight line steering and easier handling (MW500)

Operator Comfort

- Operator consoles incorporate a large, color LCD as standard, to provide the operator with up-to-date machine performance & diagnostic information

Serviceability

- Hinged roof and drop down stairs provide access to "walk-in" engine & hydraulic system (MT2000)
- Operator control panels offer multiple diagnostic screens for troubleshooting machine performance & service
- Error messages are communicated in phrases, rather than codes for easy understanding

Safety

- Obstacle detection system stops machine travel if an object greater than 4" is detected in the track's path while tramming (MT2000)

VOLVO MILLING MACHINES

	Horsepower	Operating Weight	Max Cutting Depth	Max Cutting Width*
MW500	125 hp (93 kW)	20,020 lb (9,100 kg)	8' 3" (210 mm)	19' 8" (500 mm)
MT2000	610 hp (455 kW)	80,930 lb (36,709 kg)	14' 0" (355 mm)	78' 9" (2,000 mm)

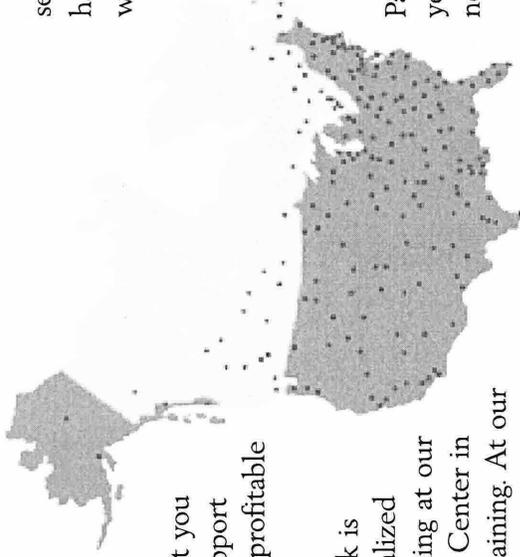
* Optional drum widths available.

VOLVO SUPPORT STRUCTURE

Dealer network

Our dealers are strategically located throughout North America to provide the equipment you need and the parts and service support you demand for a productive and profitable operation.

The strength of our dealer network is enhanced with extensive individualized product and product support training at our state-of-the-art Technical Training Center in Asheville and through hands-on training. At our nearby 75-acre Product Demonstration Center, visitors operate equipment from our entire product line under a variety of simulated working conditions. Both facilities are in use year-round by our dealers and customers – more than 2,000 visit each year.



service personnel and a strong parts distribution network. Volvo dealers have immediate access to hundreds of thousands of parts through a worldwide computerized network...from the North America parts distribution center in Columbus, Ohio, and from other Volvo

Construction Equipment parts facilities around the world. The dealer network also functions as a huge sourcing system for all customers, with each dealer having instant electronic access to the parts inventories of other distributors to fill every need.

Parts support is available 24 hours a day, 7 days a week, 365 days a year. Emergency orders are routinely shipped the same day to arrive the next morning (and sometimes to arrive the same day they are ordered).

VCE Online

Visit the Volvo Construction Equipment Internet Website and change the way you do business. At the speed of point-and-click. www.volvoce.com

Support system

As our product line evolves, so do the product support systems... systems designed to minimize downtime and costs... systems designed to provide essential information on our products.

Our dealer services are fully backed by highly trained regional product sales, marketing and service support personnel, with years of experience in the industry. In addition, all products are supported by trained dealer



[volvocena @ facebook](#)



[volvocena @ youtube](#)



[volvoce_na @ twitter](#)



[volvocena @ flicker](#)

1. Select your equipment.
2. Do a virtual walkaround.
3. Build and price the equipment.
4. Select your Volvo dealer and request a quote.
5. Take delivery and let's work.

MATRIS

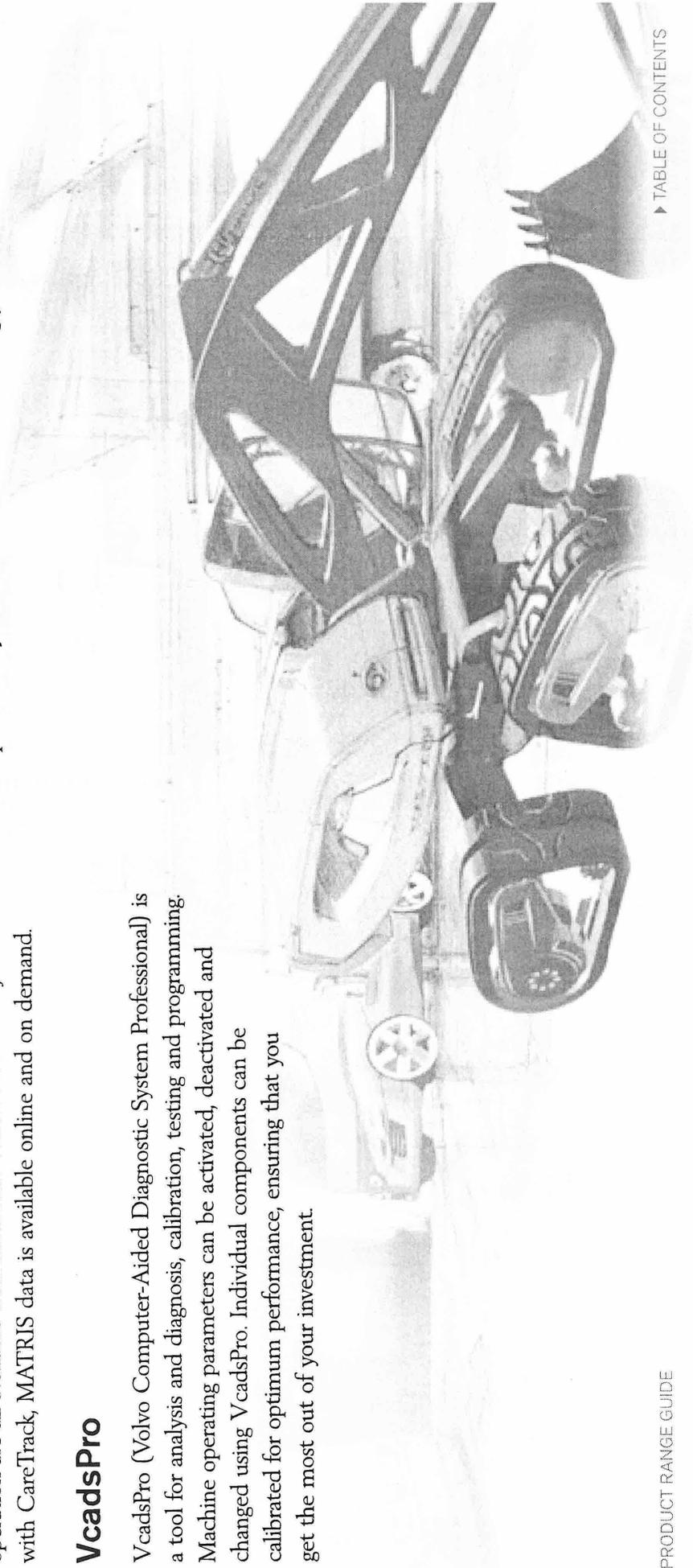
MATRIS (Machine Tracking and Information System) is a PC-based system that provides you with comprehensive machine operation and performance reporting, designed to put you in control of your profitability and efficiency. Information such as idle time, fuel consumption, major component performance and improper machine operation are all available with MATRIS. When used in conjunction with CareTrack, MATRIS data is available online and on demand.

VcadsPro

VcadsPro (Volvo Computer-Aided Diagnostic System Professional) is a tool for analysis and diagnosis, calibration, testing and programming. Machine operating parameters can be activated, deactivated and changed using VcadsPro. Individual components can be calibrated for optimum performance, ensuring that you get the most out of your investment.

CareTrack

CareTrack gives you the ability to track your machines and their operation on a secure web site. See on-screen data like fuel consumption, machine utilization, location on the map, fuel level, service reminders, MATRIS operation data and much more. The information you need to help control expenses and maximize your fleet's productivity is available without even leaving your desk.



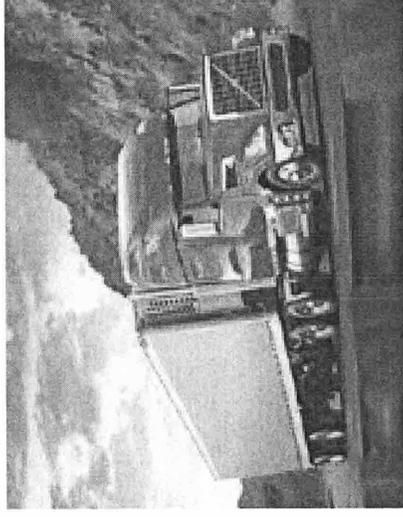
THE VOLVO GROUP

Volvo Construction Equipment is a member of the Volvo Group, companies under the corporate flag of AB Volvo, Sweden, and world-leading manufacturers of trucks, buses, construction equipment, marine and industrial engines and aerospace systems and components and a major provider of comprehensive financial services and insurance.



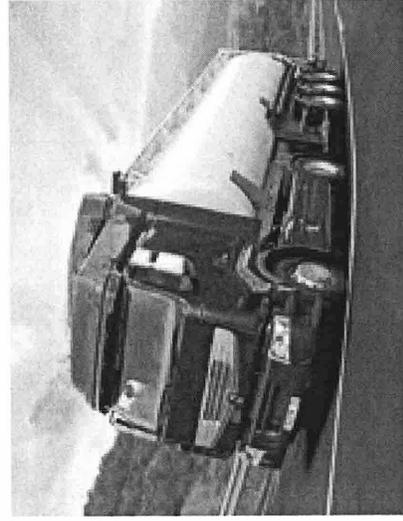
Volvo Construction Equipment

Volvo provides construction equipment – excavators, wheel loaders, articulated haulers, motor graders, backhoe loaders, skid steer loaders, compact excavators, compact wheel loaders and road building machines – to customers in more than 200 countries. Production facilities are located in Europe, Asia, North America and Latin America. Service and spare parts distribution are offered worldwide. Distribution takes place mainly through independent dealers in parallel with a recently launched equipment rental program.



Volvo Trucks

Volvo's truck manufacturing operations began in 1928. Today, Volvo Trucks is the world's second-largest producer of heavy trucks. Vehicles of more than 16 tons account for 90% of total production. Volvo Trucks' products are marketed in more than 130 countries, with most sales in Western Europe and North and South America.



Renault Trucks

Renault Trucks is one of the largest European manufacturers of commercial vehicles, with its origins in the Renault automobile company that was founded in 1895. Renault Trucks offers all types of commercial vehicles, ranging from light trucks for urban distribution services to special vehicles and heavy trucks for long-haul operations.

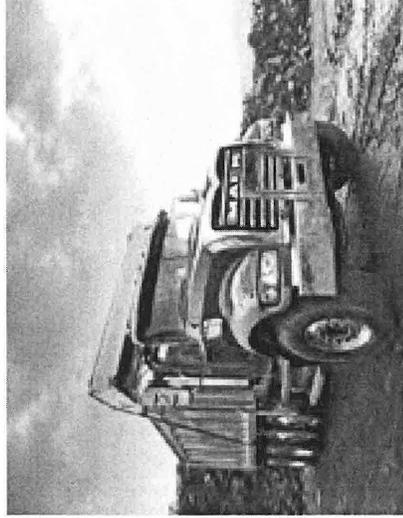


Volvo Penta

Volvo Penta provides engines and complete power systems to customers who produce leisure boats, workboats, power-generating equipment and similar industrial applications. Volvo Penta operates worldwide and has one of the industry's strongest brand names and the largest dealer networks with more than 5,000 dealers globally. The engine program comprises diesel and gasoline engines with power outputs of between 10 and 2,000 hp.

Mack Trucks

Mack Trucks is one of the largest manufacturers of heavy trucks in North America. Mack was founded in 1900, and focused on commercial vehicles from the start. Today, Mack is one of the strongest heavy-truck brands and the indisputable leader in the vocational segment of the North American market. The product program includes heavy and medium-duty trucks, sold and serviced in more than 45 countries worldwide.



Volvo Bus

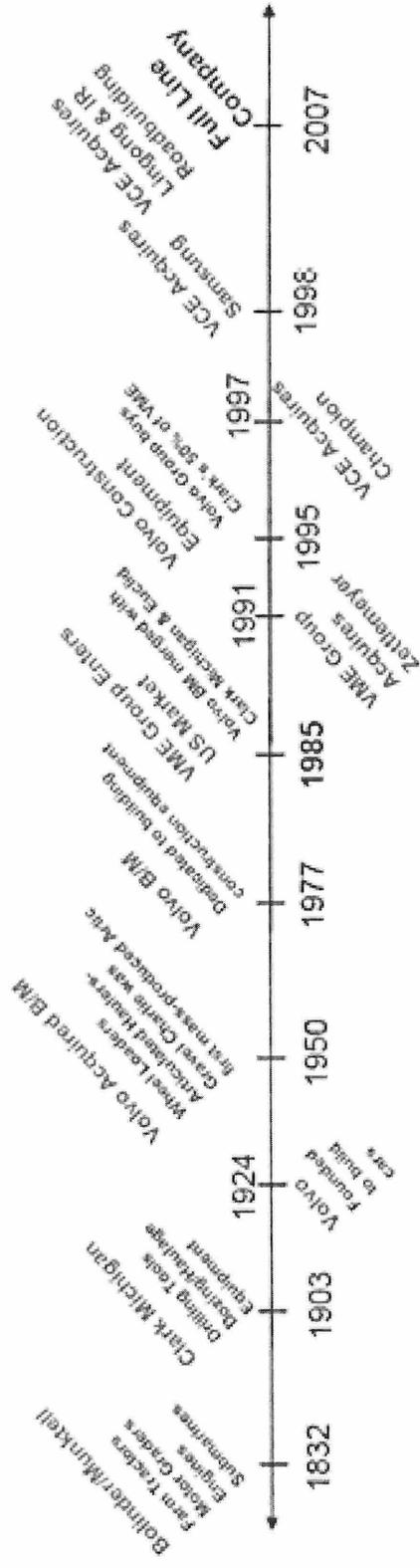
Volvo is the world's second largest bus manufacturer, with a complete range of heavy buses to meet demanding customer requirements for passenger transport solutions. The product range includes complete buses and coaches as well as chassis combined with a comprehensive range of services. Volvo Bus also offers intelligent transport systems in cooperation with Volvo Mobility Systems. Volvo's bus operation has a global presence, with production in Europe, North and South America and Asia.



Volvo Financial Services

Volvo Financial Services (VFS) develops and coordinates Volvo's operations within customer financing, insurance, treasury, real estate and related services. It is focused exclusively on providing financial services to the Group's internal and external customers. Demand for its services had resulted in the increased diversification of its portfolio and product offerings. Financial solutions created by VFS are designed to enhance the long term competitiveness of the Volvo Group and its dealers.





VOLVO CONSTRUCTION EQUIPMENT

Volvo Construction Equipment is different. Our machines are designed, built and supported in a different way. That difference comes from an engineering heritage of over 175 years. A heritage of thinking first about the people who actually use the machines. About how to help them be safer, more comfortable, more productive. About the environment we all share. The result of that thinking is a growing range of machines and a global support network dedicated to helping you do more. People around the world are proud to use Volvo. And we're proud of what makes Volvo different.

Not all products are available in all markets. Under our policy of continuous improvement, we reserve the right to change specifications and design without prior notice. The illustrations do not necessarily show the standard version of the machine.

VOLVO

Volvo Construction Equipment
www.volvoce.com/na

Ref. No. V0E2260069017
Printed in USA 08/12
Copyright © 2012 Volvo

English
USA

EXHIBIT 6

VOLVO CONSTRUCTION EQUIPMENT



HOME | [PRODUCTS](#) | [PARTS & SERVICE](#) | [USED EQUIPMENT](#) | [TRAINING](#) | [PROMOTIONS & FINANCING](#) | [NEWS & MEDIA](#) | [ABOUT US](#)

Volvo Construction Equipment > [Parts & service](#) > [CareTrack](#)

- [Volvo Tooth System](#)
- [Volvo Reman](#)
- [Volvo Hose Service](#)
- [Undercarriage Parts](#)
- [Special promotions](#)
- [Software Options](#)
- [Parts online](#)
- [Lubricants](#)
- [Genuine Volvo Parts](#)
- [Filters](#)
- [Expander bolts](#)
- [Customer Support Agreements](#)
- [Chemicals/DEF](#)
- [Certified refurbishment program](#)
- [CareTrack](#)**
- [Care Kits](#)
- [Care inspections](#)
- [Batteries](#)
- [Service supplies](#)

[Introduction](#) | [CareTrack login](#) | [8 CareTrack Packages](#)



Contact Us

[Contact dealer about CareTrack](#)
[Find your dealer](#)

CareTrack: Fleet management made easy

CareTrack is the Volvo Construction Equipment telematics system that gives you access to a wide range of machine monitoring information designed to save you time and money.

CareTrack generates a wide range of reports – including fuel consumption, operational hours and geographical location – via a web portal, as well as sending SMS/email alerts.

Fleet managers can use CareTrack to proactively manage their wear parts and their service maintenance. The benefits include a reduction in fuel costs, optimized machine and operator performance, and increased uptime.

Stay connected to your machines via remote monitoring and experience new levels of control and efficiency with CareTrack.

Top features of CareTrack include:

Save time



Increase uptime by planning service and maintenance requirements in advance, avoiding potential problems. Dealers can even troubleshoot faults remotely – minimizing your down time.

Save money



Operation reports allow you to monitor idle time – information that gives you the power to reduce fuel consumption, non-productive machine hours and service costs.

Operation

Optimize your fleet and maximize productivity with daily hours/event reports, Utilization reports, and machine-specific reports that are unique to certain product lines. Compare how machines are being used and plan service checks.

Production

Articulated haulers fitted with On Board Weighing technology show the machine's true productivity in tons per gallon of fuel consumed. Data can be used to support operator training, reduce fuel consumption and improve component life.

Anti-theft

Crawler excavators can be fitted with an anti-theft tracking system. Receive email/SMS alerts when a trigger is activated and immobilize/remobilize the machine via the web portal.

Communication

Will you be operating your machines in remote areas where there are no cell towers? Opt for the Communication package and fit your machines with a satellite modem that allows data reporting even in secluded areas.

API (Application Programming Interface)

API enables CareTrack data to be delivered to your own management system. Two options are available depending on the level of information required.

Availability of the packages mentioned above may vary from one country to another. Your Volvo dealer will be happy to provide you with more detailed information.

Infinite opportunities



From fuel consumption data to location and machine usage reports, CareTrack gives you access to a wealth of information – allowing you to get the most out of your machine.

CareTrack standard

Access machine hours and location, manage machine service plans and wear parts via the web portal and see all your machines on one map.

Tracking and status

Geo and time fencing can notify you if a machine goes outside pre-set location and time boundaries. A status report provides access to fuel level, machine location and machine hours.

Find out how CareTrack can improve your efficiency:

CareTrack web portal log in:



»To CareTrack web portal log in

CareTrack brochure



»Download the CareTrack brochure

EXHIBIT 7

VOLVO CONSTRUCTION EQUIPMENT



CARETRACK - VOLVO CONSTRUCTION EQUIPMENT TELEMATICS SYSTEM

Login

E-mail:

Password:

[Reset lost password >>](#)

[Link to CareTrack China >>](#)



[Volvo Construction Equipment](#) [Volvo Trucks](#) [Volvo Buses](#) [Volvo Penta](#) [Volvo Aero](#) [Volvo Financial Services](#)

VOLVOGROUP.COM [privacy](#) | © copyright 2006-2014