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

Proceeding	92049973
Party	Defendant Ectaco Inc.
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# EXHIBIT 37

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

ABBYY SOFTWARE LTD.

Cancellation No. 92049973

Petitioner.

PETITIONER'S RESPONSES TO REGISTRANT'S REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS

V.

ECTACO INC.

Registrant.

Mark: LINGVOSOFT Reg. No. 3,015,325

SET NO. ONE

Reg. Date: November 15, 2005

PROPOUNDING PARTY: REGISTRANT ECTACO INC.

RESPONDING PARTY: ABBYY SOFTWARE LTD.

SET NO. ONE

### I. PREFATORY STATEMENT.

A. Responding Party is not the drafter of these responses, and accordingly, may not express or convey the substance of any response herein as it is specifically worded by the drafter, or have personal knowledge of the intention of the drafter with respect to the meaning certain phrases or words, particularly those having legal significance.

B. The responses herein and document production are based on Responding Party's best recollection at the time that they are providing these responses to the drafter of said responses and are based only on the discovery which had been provided to Responding Party up to this time. This response is not intended to be exhaustive and may change based upon the recollection or discovery of new or different information, or a

change in the Responding Party's understanding of the facts or law in the course of its preparation for trial.

C. Responding Party reserves the right, without assuming any duty or obligation to do so, to amend or supplement their responses or production if new or different information, or documents or things that refresh or correct their recollection, are provided to them at a later time.

D. These responses are not intended to be a substitute for live testimony.

#### II. GENERAL OBJECTIONS.

A. Responding Party reserves the right to make any and all objections to each interrogatory on grounds that would require the exclusion of any statements, documents, or materials herein, if any demand were made of same: (a) in any judicial proceeding; (b) as if any statement was made by a witness present and testifying in court; or (c) if documents or materials were sought by demand to be introduced as evidence or presented in court, all of which objections and grounds are reserved and may be interposed at that time.

B. Responding Party specifically objects to each and every request which calls for any document or information which is privileged and/or attorney work product, including without limitation to requests which call for documents containing, referencing or relating to any legal opinions, analyses and/or impressions of any of the Responding Party's attorneys, communications between attorney and client, information relating to any expert not yet designated for trial, or which call for Responding Party's attorneys to analyze or interpret documents for the Propounding Party.

C. Responding Party specifically objects to each and every request which calls for any document or information which is confidential, protected by the right to privacy, trade secret, protected by the right of privacy and/or proprietary, including without limitation to business and financial documents and employee documents.

D. Responding Party specifically objects to each and every request which is unduly burdensome, including without limitation by calling for Responding Party to review, compile, analyze or sort vast amounts of information, to spend a significant amount of time analyzing or interpreting documents for Propounding Party, to access and search through hard-drives or other sources which would cause Responding Party to incur a significant expense or burden, or to do anything in excess of what is required by law, or is otherwise objectionable.

E. Responding Party further specifically objects to each and every request to the extent that they call for her to respond on behalf of any person or entity other than itself.

F. Responding Party does not waive any such objections by their production of any such documents or information, inadvertent or otherwise.

#### III. RESPONSES.

#### **REQUEST NO. 1:**

All documents concerning Petitioner's consideration, acquisition, selection, adoption and decision to use and register Petitioner's Mark, including, but not limited to communications, memoranda, investigations, database searches, trademark search reports, studies, focus groups, surveys, inquiries, licenses, assignments and minutes of meetings.

#### **RESPONSE NO. 1:**

Responding Party objects on the grounds of Attorney-client privilege<sup>1</sup> and Attorney work-product<sup>2</sup>. Responding Party also objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery<sup>3</sup>.

Responding Party also objects to extent that the request asks for information not in its possession or custody, violative of the privacy rights of the Responding Party or third parties, and/or is a trade-secret, proprietary or otherwise commercially sensitive information.

Responding Party adds that its mark is not at issue, and Propounding Party itself has not produced any such documents in its document production.

Subject to and without waiving any objections, Responding Party responds that by reference<sup>4</sup> to its documents (meaning herein and throughout as referring to its document production) relating to the mark, including as to its assignments and transfers of rights to

<sup>&</sup>lt;sup>1</sup> This objection is being made, to this request and hereinafter, to the extent that the request may be construed to ask for communications between attorney and client or otherwise privileged documents or information.

<sup>&</sup>lt;sup>2</sup> This objection is being made, to this request and hereinafter, to the extent that the request seeks the any attorney work-product, including without limitation to attorney analysis, compilation, impressions, conclusions, or investigation.

<sup>&</sup>lt;sup>3</sup> This objection is being made, to this request and hereinafter, to the extent that the request was not reasonably tailored or particularized, and calls for the production of documents which are not relevant to action at hand, nor likely or reasonably calculated to lead to admissible evidence. Propounding Party has also provided no basis as to why such documents would have any applicability in this proceeding. Furthermore, the request also imposes an unfair and unreasonable burden on the Responding Party that is not outweighed by the probative value of what is requested.

<sup>&</sup>lt;sup>4</sup> Responding Party's reference to documents that it is producing, throughout these responses, is not intended to be exhaustive. Rather, Responding Party only means to indicate that the cited documents are among documents which may be responsive. Responding Party objects, on the grounds of attorney work-product, to having to compile, analyze or organize documents for the Propounding Party.

the mark, and further that search and inquiry is continuing with respect to additional responsive non-objectionable documents.

#### **REQUEST NO. 2:**

All documents referring to written statements or opinions sent to or received by Petitioner from or to experts or non-experts in connection with Petitioner's Mark, including but not limited to determining availability for use and registration in the U.S.

#### **RESPONSE NO. 2:**

Responding Party objects on the grounds of Attorney-client privilege and Attorney work-product. Responding Party also objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects to extent that the request asks for information not in its possession or custody, violative of the privacy rights of the Responding Party or third parties, and/or is a trade-secret, proprietary or otherwise commercially sensitive information.

As above, Responding Party adds that its mark is not at issue.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark, including those related to marketing (P00061 – P00114), a research report, awards (P00061 – P00066), and documents in connection with legal proceedings in Russia (P00115 – P00140), and adds that its search and inquiry is continuing with respect to additional responsive non-objectionable documents.

#### **REQUEST NO. 5:**

All documents concerning the mark LINGVO as set forth in U.S. Trademark Application Serial No. 77/357,275.

#### **RESPONSE NO. 5:**

Responding Party objects on the grounds of Attorney-client privilege and Attorney work-product. Responding Party also objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects to extent that the request asks for information not in its possession or custody, violative of the privacy rights of the Responding Party or third parties, and/or is a trade-secret, proprietary or otherwise commercially sensitive information.

Responding Party also objects to producing documents already submitted to the USPTO, or is otherwise publicly available, or which has been exchanged between the parties, as such documents would also be accessible to the Propounding Party, or is already in their possession.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark, and adds that search and inquiry is continuing with respect to additional responsive non-objectionable documents.

#### **REQUEST NO. 6:**

Documents which evidence the first use of Petitioner's Mark in commerce:

A. By Petitioner itself.

B. By all predecessors of Petitioner.

#### **RESPONSE NO. 6:**

Responding Party objects on the grounds of Attorney-client privilege and Attorney work-product. Responding Party also objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects to extent that the request asks for information not in its possession or custody, violative of the privacy rights of the Responding Party or third parties, and/or is a trade-secret, proprietary or otherwise commercially sensitive information.

Responding Party also objects to producing documents already submitted to the USPTO, or is otherwise publicly available, or which has been exchanged between the parties, as such documents would also be accessible to the Propounding Party, or is already in their possession.

Responding Party adds that the Propounding Party itself has not fully complied with its obligation to produce documents bearing on the use of its mark, such as invoices and other financial information, in spite of its representation to do so after the implementation of a protective order, and should be estopped from being able to ask for the same documents from Petitioner.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark,

including those related to its sales of Lingvo products, marketing (P00061- P00114), awards (P00061 – P00066), awards, licensing agreements for the Lingvo products, and adds that its search and inquiry is continuing with respect to additional responsive non-objectionable documents.

#### **REQUEST NO. 7:**

All documents sufficient to identify each and every different kind of product sold or distributed bearing Petitioner's Mark.

#### **RESPONSE NO. 7:**

Responding Party also objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects to extent that the request asks for information not in its possession or custody, violative of the privacy rights of the Responding Party or third parties, and/or is a trade-secret, proprietary or otherwise commercially sensitive information.

Responding Party also objects to producing documents already submitted to the USPTO, or is otherwise publicly available, or which has been exchanged between the parties, as such documents would also be accessible to the Propounding Party, or is already in their possession.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark, including those related to its marketing (P00061 – P00114), awards (P00061 – P00066), box shots (P00001 – P00060), agreement for licensing and distribution of Lingvo

products, and adds that its search and inquiry is continuing with respect to additional responsive non-objectionable documents.

#### **REQUEST NO. 8:**

Representative specimens of products, labels, packaging, containers, brochures, pamphlets, signs, banners, advertising, and all other documents and materials which show all manners, forms and formats in which Petitioner's Mark is currently, and has previously been, depicted.

#### **RESPONSE NO. 8:**

Responding Party also objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects to extent that the request asks for information not in its possession or custody.

Responding Party also objects to producing documents already submitted to the USPTO, or is otherwise publicly available, or which has been exchanged between the parties, as such documents would also be accessible to the Propounding Party, or is already in their possession.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark, including those related to its marketing (P00061 – P000114), box shots (P00001 – P00060), and adds that its search and inquiry is continuing with respect to additional responsive non-objectionable documents.

#### **REQUEST NO. 9:**

All documents concerning any plans by Petitioner to expand the line of goods bearing Petitioner's Mark.

#### **RESPONSE NO. 9:**

Responding Party objects on the grounds of Attorney-client privilege and Attorney work-product. Responding Party also objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects that the request asks for information violative of the privacy rights of the Responding Party, and is a trade-secret, proprietary and otherwise commercially sensitive information.

Responding Party adds that the Propounding Party itself has produced no such documents themselves, and it would be unfair to require Petitioner to disclose any such plans, if any exists, to the Propounding Party.

## **REQUEST NO. 10:**

All documents concerning the quality of Petitioner's Goods (as defined in Interrogatory No.7, served concurrently).

## **RESPONSE NO. 10:**

Responding Party also objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects to extent that the request asks for information not in its possession or custody, violative of the privacy rights of the Responding Party or

third parties, and/or is a trade-secret, proprietary or otherwise commercially sensitive information.

Responding Party also objects to producing documents which is publicly available, as such documents would also be accessible to the Propounding Party, or is already in their possession.

Responding Party adds that the quality of Petitioner's goods is not at issue.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark, including those related to awards (P00061 – P00066), and adds that its search and inquiry is continuing with respect to additional responsive non-objectionable documents.

#### **REQUEST NO. 11:**

Representative advertisements in newspapers, magazines, flyers, other publications, radio, television, Internet web pages, other electronic media, and all marketing and promotional materials featuring Petitioner's Mark.

#### **RESPONSE NO. 11:**

Responding Party also objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects to extent that the request asks for information not in its possession or custody.

Responding Party also objects to producing documents which is publicly available, as such documents would also be accessible to the Propounding Party, or is already in their possession.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark, including those related to its marketing (P00061 – P00114), and adds that search and inquiry is continuing with respect to additional responsive non-objectionable documents.

#### **REQUEST NO. 12:**

All catalogs where the goods offered by Petitioner under Petitioner's Mark are advertised, promoted, offered for sale or sold.

#### RESPONSE NO. 12:

Responding Party also objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects to extent that the request asks for information not in its possession or custody.

Responding Party also objects to producing documents which is publicly available, as such documents would also be accessible to the Propounding Party, or is already in their possession.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark, including those related to its marketing (P00061 – P00114), and adds that its search and inquiry is continuing with respect to additional responsive non-objectionable documents.

#### **REQUEST NO. 13:**

All documents concerning the chain of title for Petitioner's Mark.

#### **RESPONSE NO. 13:**

Responding Party objects on the grounds of Attorney-client privilege and Attorney work-product. Responding Party also objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects to extent that the request asks for information not in its possession or custody.

Responding Party adds that the Propounding Party has not itself produced any such documents, and it would be unfair to require Responding Party to produce such documents.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark, including those related to the registration, assignment or transfer of the mark, and adds that its search and inquiry is continuing with respect to responsive non-objectionable documents.

#### **REQUEST NO. 14:**

All consumer and marketing surveys, studies, focus group reports, and other research concerning Petitioner's Mark.

#### **RESPONSE NO. 14:**

Responding Party objects on the basis of Attorney work product. Responding Party also objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects to extent that the request asks for information not in its possession or custody, violative of the privacy rights of the Responding Party or third parties, and/or is a trade-secret, proprietary or otherwise commercially sensitive information.

선생님들이 중국에 가득하게 되었다. 여러 아이들은 사람들이 사용하다는 이 사용하는 것으로 보는 사람들이 되는 것이 되었다. 그는 사람들이 아스 사용하는 이 없는 것으로 했다.

As above, Responding Party adds that its mark is not at issue.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark, including those related to a research report, and also responds that search and inquiry is continuing with respect to additional responsive non-objectionable documents.

#### **REQUEST NO. 15:**

All press releases concerning Petitioner's Mark.

#### RESPONSE NO. 15:

Responding Party objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects to extent that the request asks for information not in its possession or custody.

Responding Party also objects to producing documents which is publicly available, as such documents would also be accessible to the Propounding Party, or is already in their possession.

As above, Responding Party adds that its mark is not at issue.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark,

including those related to its press releases (P00099 – P00111), and also responds that its search and inquiry is continuing with respect to additional responsive non-objectionable documents.

#### **REQUEST NO. 16:**

All news articles concerning Petitioner's Mark.

#### **RESPONSE NO. 16:**

Responding Party objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects to extent that the request asks for information not in its possession or custody.

Responding Party also objects to producing documents which is publicly available, as such documents would also be accessible to the Propounding Party, or is already in their possession.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark, including those related to its awards, and adds that its search and inquiry is continuing with respect to responsive non-objectionable documents.

#### REQUEST NO. 17:

All complaints and other correspondence and communications sent by consumers, competitors, or the government concerning:

A. Petitioner's Mark

#### B. Petitioner's Goods.

#### **RESPONSE NO. 17:**

Responding Party objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects to extent that the request asks for information not in its possession or custody.

Responding Party also objects that the request asks for information violative of the privacy rights of the Responding Party, and is a trade-secret, proprietary and otherwise commercially sensitive information.

Responding Party adds that their goods nor mark are not the subject of this proceeding, and the documents requested have no applicability herein.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark, including those related to awards for Lingvo products and to legal proceedings in Russia concerning the mark, and adds that its search and inquiry is continuing with respect to responsive non-objectionable documents.

#### **REQUEST NO. 18:**

All correspondence written or sent by Petitioner or on Petitioner's behalf to consumers or potential consumers concerning Petitioner's Mark.

#### **RESPONSE NO. 18:**

Responding Party objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects to extent that the request asks for documents not in its possession or custody.

Responding Party also objects that the request asks for information violative of the privacy rights of the Responding Party, and is a trade-secret, proprietary and otherwise commercially sensitive information.

Responding Party adds that their goods nor mark are not the subject of this proceeding, nor is such correspondence.

#### REQUEST NO. 19:

If the answer to Interrogatory 19A is anything other than unequivocally negative, identify and produce a copy of each document supporting a showing that the Petitioner's Mark is fanciful.

#### **RESPONSE NO. 19:**

Responding Party objects on the grounds of Attorney-client privilege and Attorney work-product.

Responding Party objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects to extent that the request asks for documents not in its possession or custody.

Responding Party also objects to producing documents already submitted to the USPTO, or is otherwise publicly available, or which has been exchanged between the parties, as such documents would also be accessible to the Propounding Party, or is already in their possession.

Responding Party adds that their goods nor mark is not the subject of this cancellation proceeding.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark, including those related to definitions or search results for "Lingvo" and language, and a research report, and also responds that its search and inquiry is continuing with respect to responsive non-objectionable documents.

#### **REQUEST NO. 20:**

If the answer to Interrogatory 20A is anything other than unequivocally negative, identify and produce a copy of each document supporting a showing that the Petitioner's Mark is distinctive.

#### **RESPONSE NO. 20:**

Responding Party objects on the grounds of Attorney-client privilege and Attorney work-product.

Responding Party objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects to extent that the request asks for documents not in its possession or custody.

Responding Party also objects to producing documents already submitted to the USPTO, or is otherwise publicly available, or which has been exchanged between the parties, as such documents would also be accessible to the Propounding Party, or is already in their possession.

Responding Party adds that their goods nor mark is not the subject of this cancellation proceeding.

Without waiving any objections, Responding Party produces dictionary entries or search results for "Lingvo", a research report, and also responds that search and inquiry is continuing with respect to responsive non-objectionable documents.

#### **REQUEST NO. 21:**

Identify and produce all documents and things concerning the intended meanings or connotations of Petitioner's Mark.

#### **RESPONSE NO. 21:**

Responding Party objects on the grounds of Attorney-client privilege and Attorney work-product.

Responding Party objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects to extent that the request asks for documents not in its possession or custody.

Responding Party also objects to producing documents already submitted to the USPTO, or is otherwise publicly available, or which has been exchanged between the parties, as such documents would also be accessible to the Propounding Party, or is already in their possession.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark,

including those related to its use of the mark on its products, and adds that its search and inquiry is continuing with respect to responsive non-objectionable documents.

#### **REQUEST NO. 22:**

Identify and produce a copy of each document concerning Petitioner's selection and adoption of Petitioner's Mark.

#### **RESPONSE NO. 22:**

This response is duplicative of Request No. 1; therefore, Responding Party hereby restates and incorporates by reference all of its response and objections to Request No. 1 stated above.

#### **REQUEST NO. 23:**

If the answer to Interrogatory 24A is negative, identify and produce a copy of each document supporting the showing that the English word "language" is not a translation of the term LINGVO.

#### **RESPONSE NO. 23:**

Responding Party objects on the grounds of Attorney work-product. Responding Party objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery. Responding Party also objects to extent that the request asks for documents not in its possession or custody.

Responding Party also objects to producing documents already submitted to the USPTO, or is otherwise publicly available, or which has been exchanged between the

parties, as such documents would also be accessible to the Propounding Party, or is already in their possession.

Responding Party adds that their goods nor mark is not the subject of this cancellation proceeding.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark, including those related to definitions or search results for "Lingvo" and language, a research report, and also responds that its search and inquiry is continuing with respect to responsive non-objectionable documents.

#### **REQUEST NO. 24:**

If the answer to Interrogatory 25A is negative, identify and produce a copy of each document supporting the showing that the term LINGVO is not a non-English equivalent of the term "language."

#### **RESPONSE NO. 24:**

Responding Party objects on the grounds of Attorney work-product. Responding Party objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery. Responding Party also objects to extent that the request asks for documents not in its possession or custody.

Responding Party also objects to producing documents already submitted to the USPTO, or is otherwise publicly available, or which has been exchanged between the parties, as such documents would also be accessible to the Propounding Party, or is already in their possession.

Responding Party adds that their goods nor mark is not the subject of this cancellation proceeding.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark, including those related to definitions or Internet search results for "Lingvo" or language, and adds that its search and inquiry is continuing with respect to responsive non-objectionable documents.

#### **REQUEST NO. 25:**

If the answer to Interrogatory 26A is negative, identify and produce a copy of each document supporting the showing that the term LINGVO is not related to linguistics and/or language arts.

#### **RESPONSE NO. 25:**

Responding Party objects on the grounds of Attorney work-product. Responding Party objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery. Responding Party also objects to extent that the request asks for documents not in its possession or custody.

Responding Party also objects to producing documents already submitted to the USPTO, or is otherwise publicly available, or which has been exchanged between the parties, as such documents would also be accessible to the Propounding Party, or is already in their possession.

Responding Party adds that their goods nor mark is not the subject of this cancellation proceeding.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark, including those related to the Lingvo products, such as its box shots, descriptions of its features, etc., and adds that its search and inquiry is continuing with respect to responsive non-objectionable documents.

#### **REQUEST NO. 26:**

All documents and things, including, but not limited to purchase orders, invoices, shipping documents and business records sufficient to identify all retail outlets where Petitioner's Goods are currently and have previously been sold.

#### RESPONSE NO. 26:

Responding Party objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects to extent that the request asks for information not in its possession or custody, violative of the privacy rights of the Responding Party or third parties, and/or is a trade-secret, proprietary or otherwise commercially sensitive information.

Responding Party adds that the Propounding Party itself has not produced similar documents bearing on the sales of products bearing its mark, in spite of its agreement to do so after the implementation of a protective order, and should be estopped from being able to ask for the same documents from Petitioner.

As above, Responding Party adds that its mark is not at issue.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark, including those related to the sales of Lingvo products, and adds that its search and inquiry is continuing with respect to additional responsive non-objectionable documents.

#### **REQUEST NO. 27:**

All documents and things sufficient to identify the amount of Petitioner's annual sales of Petitioner's Goods from the date of first sale to the present.

#### **RESPONSE NO. 27:**

Responding Party objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects to extent that the request asks for information not in its possession or custody, violative of the privacy rights of the Responding Party or third parties, and/or is a trade-secret, proprietary or otherwise commercially sensitive information.

As above, Responding Party adds that its mark is not at issue.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark, including those related to sales of Lingvo products, and adds that its search and inquiry is continuing with respect to additional responsive non-objectionable documents.

### **REQUEST NO. 28:**

All documents and things sufficient to identify the amount of Petitioner's annual expenditures for advertising and promoting Petitioner's Goods from the date of first advertisement or promotion to the present.

#### **RESPONSE NO. 28:**

Responding Party objects on the basis of Attorney work-product, and also that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects to extent that the request asks for information not in its possession or custody, violative of the privacy rights of the Responding Party or third parties, and/or is a trade-secret, proprietary or otherwise commercially sensitive information.

As above, Responding Party adds that its mark is not at issue.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark, including those related to its expenditures, and adds that its search and inquiry is continuing with respect to additional responsive non-objectionable documents.

#### **REQUEST NO. 29:**

All licenses between Petitioner and any third party concerning Petitioner's Mark.

#### RESPONSE NO. 29:

Responding Party objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects to extent that the request asks for information not in its possession or custody, violative of the privacy rights of the Responding Party or third parties, and/or is a trade-secret, proprietary or otherwise commercially sensitive information.

Responding Party adds that the Propounding Party has not itself produced any such documents, and it would be unfair to require Responding Party to produce such documents.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark, including those related to the licensing of the mark and Lingvo products, and adds that its search and inquiry is continuing with respect to additional responsive non-objectionable documents.

#### **REQUEST NO. 30:**

All assignments between Petitioner and any third party concerning Petitioner's Mark.

#### **RESPONSE NO. 30:**

Responding Party objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects to extent that the request asks for information not in its possession or custody, violative of the privacy rights of the Responding Party or third parties, and/or is a trade-secret, proprietary or otherwise commercially sensitive information.

Responding Party adds that the Propounding Party has not itself produced any such documents, and it would be unfair to require Responding Party to produce such documents.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark, including those related to assignments of the mark, and adds that its search and inquiry is continuing with respect to additional responsive non-objectionable documents.

#### **REQUEST NO. 31:**

All agreements or contracts between Petitioner and any third party concerning Petitioner's Mark.

#### **RESPONSE NO. 31:**

Responding Party objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects to extent that the request asks for information not in its possession or custody, violative of the privacy rights of the Responding Party or third parties, and/or is a trade-secret, proprietary or otherwise commercially sensitive information.

Responding Party adds that the Propounding Party has not itself produced any such documents, in spite of being required to do so, and it would be unfair to require Responding Party to produce such documents.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark,

including those related to agreements for Lingvo products and its mark, and adds that its inquiry is continuing with respect to additional responsive non-objectionable documents.

#### **REQUEST NO. 32:**

All documents and things sufficient to identify the wholesale and retail price of each of Petitioner's Goods.

#### **RESPONSE NO. 32:**

Responding Party objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects to extent that the request asks for information not in its possession or custody, violative of the privacy rights of the Responding Party or third parties, and/or is a trade-secret, proprietary or otherwise commercially sensitive information.

Responding Party also objects to producing documents which are publicly available, or which has been exchanged between the parties, as such documents would also be accessible to the Propounding Party, or is already in their possession.

Responding Party adds that the Propounding Party has not itself produced any such documents, and it would be unfair to require Responding Party to produce such documents.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark, including those related to sales of Lingvo products, and responds that search and inquiry is continuing with respect to additional responsive non-objectionable documents.

#### **REQUEST NO. 33:**

All documents in Petitioner's possession or control concerning Registrant or Registrant's Mark.

### **RESPONSE NO. 33:**

Responding Party objects on the grounds of Attorney work-product. Responding Party also objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects to producing documents already submitted to the USPTO, or is otherwise publicly available, or which has been exchanged between the parties, or is already in Propounding Party's possession, as such documents would also be accessible to the Propounding Party, or is already in their possession.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark, including those related to legal proceedings in Russia, and also by reference to documents produced by Registrant already in its possession are responsive, as well as its own published information concerning its company and its products, and adds that its search and inquiry is continuing with respect to additional responsive non-objectionable documents.

### **REQUEST NO. 34:**

All documents concerning any actual confusion between Petitioner's Mark and Registrant's Mark.

#### **RESPONSE NO. 34:**

Responding Party objects on the grounds of Attorney work-product. Responding Party also objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark, including those related to the Lingvo products, such as its marketing (P00061 – P00114) and boxshots, as well as by reference to similar documents concerning Registrant's mark, and adds that its search and inquiry is continuing with respect to additional responsive non-objectionable documents.

#### **REQUEST NO. 35:**

All documents concerning any communication, whether oral or in writing, received by Petitioner from any person or company which suggests, implies, or infers that Registrant or Registrant's Mark may be connected or associated with Petitioner or Petitioner's Mark.

#### **RESPONSE NO. 35:**

Responding Party objects on the grounds of Attorney work-product. Responding Party also objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark, including those related to Internet search results for "Lingvo", as well as to documents

showing the products of the parties which bear their respective marks, and adds that its search and inquiry is continuing with respect to additional responsive non-objectionable documents.

#### **REQUEST NO. 36:**

All documents concerning each instance where Petitioner objected to any other person's use of a mark believed by Petitioner to be confusingly similar to Petitioner's Mark, including, but not limited to protest letters, replies and settlement agreements.

#### RESPONSE NO. 36:

Responding Party objects on the grounds of Attorney-client privilege and Attorney work-product. Responding Party also objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects to producing documents already submitted to the USPTO, or is otherwise publicly available, or which has been exchanged between the parties, as such documents would also be accessible to the Propounding Party, or is already in their possession.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark, including those related to legal proceedings in Russia (P00115 – P00140), as well as to documents filed in this proceeding, and adds that its search and inquiry is continuing with respect to additional responsive non-objectionable documents.

#### **REQUEST NO. 37:**

If the answer to Interrogatory No. 30A is other than unequivocal affirmative, identify and produce copies of all documents supporting the showing that the term LINGVO is not generic when used in connection with Petitioner's Goods.

#### **RESPONSE NO. 37:**

Responding Party objects on the grounds of Attorney work-product. Responding Party also objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark, including those related to definitions or search results for "Lingvo" or "language", a research report, as well as by reference to documents filed with the USPTO concerning its mark, and adds that search and inquiry is continuing with respect to responsive non-objectionable documents.

#### **REQUEST NO. 38:**

A. If the answer to Interrogatory No. 27A is negative, identify and produce copies of all documents supporting the showing that the term LINGVO is not descriptive when used in connection with Petitioner's Goods.

B. If the answer to Interrogatory No. 27C is affirmative, identify and produce copies of all documents supporting the showing that Petitioner's LINGVO Mark has acquired a secondary meaning.

#### **RESPONSE NO. 38:**

Responding Party objects on the grounds of Attorney work-product. Responding Party also objects that the request is extremely overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the mark, including those related to definitions or search results for "Lingvo" or "language", a research report, awards for Lingvo products, as well as by reference to documents filed with the USPTO concerning its mark, and adds that its search and inquiry is continuing with respect to responsive non-objectionable documents.

### **REQUEST NO. 39:**

Copies of each original foreign trademark application and each foreign trademark registration identified in response to Interrogatory No. 28B.

#### **RESPONSE NO. 39:**

Responding Party objects that the request is overbroad, unduly burdensome, vague and ambiguous, and outside the scope of permissible discovery.

Responding Party also objects to producing documents which is publicly available, or which has been exchanged between the parties, as such documents would also be accessible to the Propounding Party, or is already in their possession.

Responding Party also objects to extent that the request asks for documents not in its possession or custody.

Subject to and without waiving any objections, Responding Party responds by reference to its production of non-objectionable documents relating to the registration of

its mark (P00141 - P00177), and adds that its search and inquiry is continuing with

respect to responsive non-objectionable documents.

**REQUEST NO. 40:** 

All documents not otherwise produced in response to any of the foregoing

requests which are identified in Petitioner's interrogatory responses or which were relied

upon in preparing Petitioner's interrogatory responses or upon which Petitioner intends to

rely upon in this proceeding.

**RESPONSE NO. 40:** 

Responding Party objects on the grounds of Attorney-client privilege and

Attorney work-product. Responding Party also objects that the request is extremely

overbroad, unduly burdensome, vague and ambiguous, and outside the scope of

permissible discovery.

Responding Party also objects to extent that the request asks for information not

in its possession or custody.

Subject to and without waiving any objections, Responding Party responds by

reference to its production of non-objectionable documents relating to the mark and

Lingvo products, as well as to documents produced by Registrant, filed in the USPTO

proceeding concerning its mark, and adds that its search and inquiry is continuing with

respect to responsive non-objectionable documents.

As to the objections -

Date: November 6, 2009

Merit Law Group PC

Roy Ching, Esq.

Attorney for Petitioner ABBYY Software Ltd.

- 34/35 -

## **CERTIFICATE OF SERVICE**

It is hereby certified that a copy of the PETITIONER'S RESPONSES TO REGISTRANT'S REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS was served upon counsel for Registrant this 6<sup>th</sup> day of November, 2009, by e-mail and Fedex, addressed as follows:

ANNA VISHEV
OSTROLENK FABER LLP
1180 Avenue of the Americas
New York, New York 10036-8403
AVishev@ostrolenk.com

Roy Chins

# EXHIBIT 23

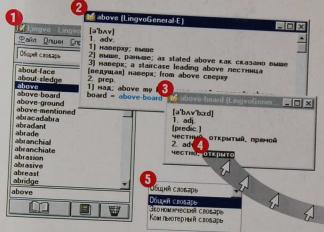




Представьте себе, что все словари с вашей полки кто-то ввел в компьютер и снабдил удобной и быстрой системой поиска слов... Теперь у вас появилась возможность получить



LINGVO осуществляет моментальный перевод слов и словосочетаний с экрана и клавиатуры в любой момент работы компьютера.



Сквозной просмотр по словарям

Перевод слов

и словосочетаний с экрана и клавиатуры в любой момент работы компьютера.

Большой англо-русский русско-английский **Словарь LINGVO**. В поставку входит программная

оболочка и 5 словарей. Возможна профессиональная поставка с 18-ю словарями по различным областям знаний, содержащими в общей сложности более 360 тысяч слов. Программа позволяет моментально получить перевод слова или словосочетания. выделенного в текстовом редакторе или введенного с клавиатуры, создавать свои словари, каталоги и справочники, вставлять перевод в редактируемый текст и многое другое.

Возможность автоматического внесения перевода в редактируемый текст увеличивает скорость перевода текстов и позволяет избежать ошибок при наборе. включает в себя поиск слова по всем словарям и установку приоритетов словарей.

Утилита создания собственных словарей с использованием языка DSL позволяет включать в пользовательские словари информацию о синонимах, антонимах, областях знания, морфологии, ударениях, правилах переноса и прочем. Язык DSL может быть использован и для создания справочников и каталогов. Эти возможности делают LINGVO хорошим помощником для всех, кто работает на компьютере.

Простота в использовании. Словарь LINGVO не требует специальных навыков работы с компьютером, поэтому с ним могут работать не только опытные пользователи, но и те, кто только начинает осваивать компьютер

LINGVO® LINGVO— это одна из первых российских программ для массового пользования. За 7 лет, прошедших с момента выхода первой версии, программа завоевала признание пользователей. Продолжая работать над системой, мы включили в новую версию большой англо-русский русско-английский словарь на 100 000 слов, разработанный сотрудниками отдела лингвистики нашей фирмы.

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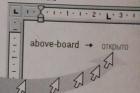
Поиск слова по любой фор искать

LINGVO приводит слово к начальной форме, а затем осуществляет поиск по сем словарям.

Подробный перевод слова появится у вас на экране через долю секунды осле нажатия «горячих» клавиш. Транскрипция, приведенная в словаре, поможет избежать ошибок в произношении

Перекрестные ссылки между словарными статьями, позволяющ «углубиться» в перевод.

Microsoft Word



Поддержка технологии Drag&Drop. Теперь вы можете легко вставить пере в редактируемый текст, перетащив его мышью из окна LINGVO.

Список словарей, которые сейчас подключены к LINGVO. Это ваша «электронная книжная полка». Вы также можете приобрести словари по другим предметным областям. Спросите у продавца дополнительный комплект словарей LINGVO.

#### ОТЛИЧИЯ LINGVO 5.0 OT LINGVO 4.0

Новый большой англо-русский русско-английский словарь на 100 тысяч слов

Транскрипция\*

Поддержка Drag&Drop

Поиск слова по любой его форме

Более удобный интерфейс

Добавление новых слов в режиме

4 10 10 10 10

\* Отличие LINGVO 4.5 or LINGVO 4.0



Получение текста вложенной статьи (подстатьи). Ссылка

Перевод слова из карточки.....

Постоянная карточка..... 

Закрытие карточки..

Lingvo. Руководство пользователя

© BIT Software, Inc., 1989-1996. Все права защищены.

Никакая часть настоящего Руководства ни в каких целях не может быть

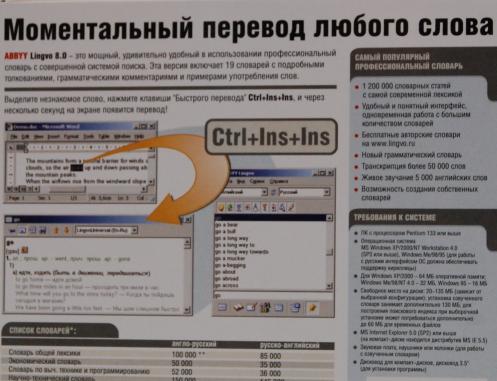
воспроизведена или передана в какой бы то ни было форме и какими

бы то ни было средствами, будь то электронные или механические, включая фотокопирование и запись на магнитные носители, если на то

охране программ для ЭВМ и баз данных".

нет письменного разрешения фирмы "Бит".

# EXHIBIT 25



125 000

70 000

20 000

количество словарных статей

количество грамматических тем

писок словарей с указанием авторских прав приведен в руководстве попьзователя

50 000

50 000

5 000

16 000

Политехнический словарь

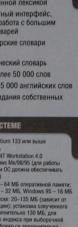
Словарь по нефти и газу Медицинский словарь

Краткий озвученный словарь

Юридический словарь

Грамматический словарь

Тезаурус деловой лексики



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д.41, стр.1. Тел.: +7 095 234-4400, sales@abbyy.ru www.lingvo.ru, www.abbyy.ru, part # 736r

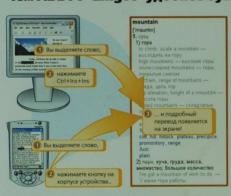
105264, Россия, Москва, ул. Парковая 9-я

## **ABBYY** Электронный словарь

**Тир изменился.** Теперь решающая сила – не капитал или земля, а человек и его знания. Управлять своей жизнью и миром вокруг ты можешь только владея информацией. Обладание этим ресурсом дает уверенность и свободу.

Открой этот мир - как книгу. Открой его вместе с Lingvo!

#### Чем ABBYY® Lingvo® удобнее бумажного словаря?



#### **ABBYY® Lingvo®**

- Переводит слова в 15 раз быстрее.
- Производит поиск во всех словарях одновременно.
- "Узнает" слово по любой форме и понимает, например, что, "thought" - это глагол "think" в прошедшем времени.
- Замечает, что слово написано с ошибкой, и предлагает правильные варианты его написания.
- Может искать слова по всему тексту словаря, включая примеры использования (полнотекстовый поиск).
- Вместе с Lingvo вы сможете создать свой собственный словарь!



#### Список споварей

список словареи		
Английское направление	анг-рус	с/рус-анг
<b>*</b> Словарь общей лексики	100 000	85 000
Экономический словарь	50 000	35 000
Словарь по выч. технике и программированию	52 000	36 000
Научно-технический словарь	150 000	145 000
Политехнический словарь	200 000	125 000
Медицинский словарь	50 000	70 000
Юридический словарь	50 000	20 000
Грамматический словарь 500	грам. тем	
Словарь по нефти и газу	52 000	35 000
*Словарь современной разговорной лексики	16 000	
ЖЛингвострановедческий словарь. Великобритания	10 000	
Компактный словарь общей лексики для КПК	50 000	50 000
Немецкое направление	нем-рус	/рус-нем
<b>*</b> Словарь общей лексики	180 000	150 000
Словарь наиболее употребительных слов	20 000	
Экономический словарь	50 000	30 000
Политехнический словарь.	110 000	95 000
Медицинский словарь	55 000	40 000
Юридический словарь	46 000	20 000
Словарь по химии и хим. технологии	56 000	40 000
Французское направление		с/рус-фр
<b>*</b> Словарь общей лексики	200 000	200 000
Технический словарь	80 000	55 000
Юридический словарь	35 000	20 000
Словарь по химии и хим. технологии	65 000	55 000
Испанское направление	исп-ру	с/рус-исп
*Словарь общей лексики	150 000	200 000
Итальянское направление	ит-р	ус/рус-ит
*Словарь общей лексики	25 000	25 000
Политехнический словарь	90 000	110 000
Русское направление	THE REAL PROPERTY.	рус-рус
Споварь синонимов деловой лексики (тезаурус)	16 000	

и еще более 100 бесплатных словарей на сайте www.LingvoDA.ru

В состав Lingvo входит 49 словарей известных авторов: М. Цвиллинга. О. Москальской, Е. Лепинга, Л. Щербы, Б. Нарумова, Г. Туровера, В. Гака, К. Ганшиной и др. В таблице указано количество словарных статей в каждом словаре. Значком \* отмечены обновленные и новые словари. Подробная информация о словарях и их авторах приведена в "Руководстве пользователя" и на сайте www.Lingvo.ru

OHYCH!

Фирменный подарок от АВВҮҮ. Бесплатное обновление после выхода версии с поддержкой Palm.



\* По результатам ежегодных опросов, проводимых журналом Мир ПК, с 1999 по 2002 гг. словарь ABBYY Lingvo

занимал 1 место по популярности в категории "Электронные словари и системы перевода". Число пользо и системы перевода". вателей Lingvo (более 4 000 000) получено по данным аналитической группы компании АВВҮҮ.

## ABBYY.

Электронный словарь



**Мир изменился.** Границы стали прозрачнее. Мы хотим понимать и быть понятыми имар измевился. Границы стали прозрачнее. Иы хотим понимать и быть понятыми в любой стране земного шара. Мы хотим заводить друзей на всех континентах, учиться в зарубежных университетах, вести бизнес на международных рынках. С **АВВҮҮ Lingvo** окружающий мир становится дружелюбнее, общение – проще, учеба – эффективнее. **Открой этот мир с Lingvo!** 

## Точный перевод любого слова



- Более 10 млн. переводов и 4.5 млн. словарных статей
- Современная, постоянно обновляемая лексика (31 новый и 7 обновленных словарей)
- Подробные словарные статьи включают переводы, толкования, синонимы
- Поиск слов и словосочетаний по всему тексту словарей
- 25 000 слов, озвученных дикторами из Великобрита-нии и Германии
- Возможность создания собственных словарей
- Непревзойденное удобство интерфейса
- Включает версии для карманных компьютеров Pocket PC и Palm™

Английский язык		
Словарь общей лексики. АВВУУ 2004	анг-рус	рус-анг
• Страноведческий словарь «Американа II». Г. Чернов, М. Васянин и др., 2004	100 000	85 000
Страноведческий словарь. Великобритания. А. Рум. 2003	21 000	
«Словарь по патентам и товарным знакам. С. Глядков, 2004	10 000	
<ul> <li>Маркетинг и торговля. Толковый словарь. Экономич. школа, АВВҮҮ, 2004</li> <li>Толковый словарь. Толковый словарь.</li> </ul>	11 000	12 000
Толковый словарь терминов по ВТ, Интернету и программированию.     Пройдаков П. Терринов 3.2004	12 000	
	12 500	15 000
+26 тематических словарей: Современная разговорная лексика. Юриспруден		

Оинансовый менедхмент», Финансовые рынки» "руклатерский учет и аудит», Менеденция, Зкономика, труда», Выт техника и программирование», Телекоммуникации», Наука и техника», политекнические, Машиностроение», Медицина, Биология», Нефты и св. )рымматика антилийского завых Немецкий двых

Немецкти язык
Споварь общей пексики. Ред. О. Москальская/М. Цвиллинг, 2003
180 000
150 000
Экономика, политекнические, Автомобильная техника и автосервис\*, Медицина, Химия
и изм. технологии, Пищевая промышленность и кулинарная обработка\*
Французский взык

Словарь общей лексики. В. Гак, К. Ганшина/Л. Щерба и др., 2003	Фр-рус	рус-фр
+8 тематических словарей: Юриспруденция, Техника, Медицина*, Химия и хим. т Итальянский язык	200 000	200 000
	ехнологии	
<ul> <li>Большой словарь общей лексики. Г. Зорько, 2004</li> </ul>	ит-рус	рус-ит
Словарь общей лексики. В. Ковалев, 2003	300 000	
+6 тематических словарей: политехнические, Автомобили*, Медицина*	25 000	25 000
Испанский язык	Line West	

ей лексики. Б. Нарумов/Г. Туровер, 2003 200 000 200 000 16 000 . и еще более 100 бесплат

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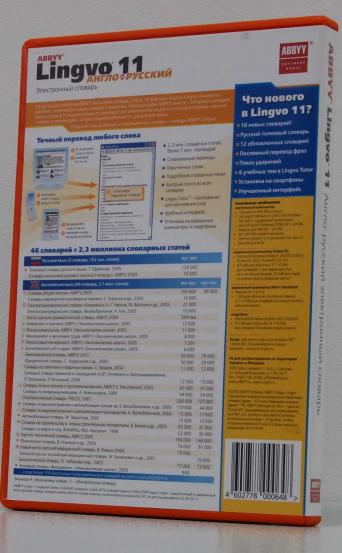


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для карманного ПК Palm Handh







антло ≈русский англо — английский немецко = русский французско нь русский итальянско на русский истанско ≈ русский китайско - русский турецко - русский латинско - русский украинско = русский украинско = английский

русско – русский



молодых и серьёзных лексикографов. Это окно в быстро меняющийся мир, возможность увидеть жизнь слова и почувствовать закономерности его перевода. ABBYY Lingvo – хороший помощник и для



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