

ESTTA Tracking number: **ESTTA611895**

Filing date: **06/24/2014**

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

Proceeding	92056816
Party	Plaintiff Google Inc.
Correspondence Address	JANET L CULLUM COOLEY LLP 1299 PENNSYLVANIA AVE NW, STE 700 WASHINGTON, DC 20004 UNITED STATES kkrajeck@cooley.com, trademarks@cooley.com
Submission	Motion to Compel Discovery
Filer's Name	Brendan J. Hughes
Filer's e-mail	bhughes@cooley.com, kkrajeck@cooley.com, jcullum@cooley.com, trademarks@cooley.com
Signature	/Brendan J. Hughes/
Date	06/24/2014
Attachments	Motion and Declarations - Redacted.pdf(1312547 bytes) Krajeck Declaration Exhibits A-C.pdf(115221 bytes) Krajeck Declaration Exhibits D-E.pdf(1944463 bytes) Krajeck Declaration Exhibits F-H.pdf(5976956 bytes) Krajeck Declaration Exhibits I-AA.pdf(5428582 bytes)

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

Google Inc.,)	Cancellation No.: 92056816
)	
Petitioner,)	Registration No.: 3,360,331
)	Mark: CHROME
v.)	Issued: December 25, 2007
)	
VIA Technologies, Inc.,)	Registration No.: 3,951,287
)	Mark: CHROME
Registrant.)	Issued: April 26, 2011
_____)	

MOTION TO COMPEL DISCOVERY AND FOR AN EXTENSION OF DEADLINES

Pursuant to 37 CFR § 2.120(e), Petitioner Google Inc. (“Google”) hereby moves to compel Registrant VIA Technologies, Inc. (“Registrant”) to fully satisfy its discovery obligations and make a 30(b)(6) witness available to testify regarding Registrant’s discovery efforts well in advance of any other depositions Google will conduct. In addition, Google requests a 60-day extension of all deadlines. As set forth in detail below, and in the accompanying Declarations of Brendan J. Hughes (“Hughes Declaration”) and Katie Krajeck (“Krajeck Declaration”), Google has made several good faith efforts to resolve these discovery disputes with Registrant to no avail.

I. INTRODUCTION

Registrant has substantially prejudiced Google’s ability to prosecute this cancellation action by repeatedly failing to satisfy Registrant’s discovery obligations.

Google served document requests and interrogatories on Registrant nearly one year ago. Despite the fact that Registrant agreed to produce certain categories of highly relevant materials – including documents and communications reflecting Registrant’s use of the CHROME mark on the goods and services identified in its trademark registrations – Registrant’s production to date

contains fewer than twenty relevant email strings. Indeed, Registrant's entire production contains no emails dating earlier than April 2005, no emails from the years 2006, 2007, or 2010, and no emails from the year 2013 that refer to Registrant's use of the CHROME mark. These are significant gaps given Registrant's claims that it has consistently used the CHROME mark since 2001 on a wide variety of goods and services, and are evidence of the inadequacy of Registrant's document preservation, collection, review and production. Similarly, in response to Google's Interrogatory No. 4, Registrant refuses to identify with specificity the goods and services in connection with which its CHROME mark has been or is currently being used – the key issue in this cancellation proceeding.

During the course of discovery, Google met and conferred with Registrant numerous times about Registrant's discovery deficiencies. Registrant's attorneys repeatedly requested additional time for Registrant to satisfy its obligations, and even expressed their own frustration with Registrant's discovery efforts and delay. It became apparent during the meet and confers that Registrant, a Taiwanese entity that may not understand its discovery obligations under United States law, was searching for potentially responsive documents with very little to no supervision by outside counsel.

In an effort to avoid unnecessary motion practice and in the spirit of compromise, Google consented to four extensions – totaling 180 days – of the deadlines in order to accommodate Registrant. In exchange for Google's consent to the last requested extension of 30 days, Registrant agreed to complete its document production and satisfy its written discovery obligations no later than May 30, 2014. Registrant broke its promise. Instead of satisfying its discovery obligations by May 30, Registrant belatedly produced nearly 1,000 pages of additional documents on June 11, 2014, twice amended its interrogatory responses on June 11 and June 17,

2014, and disclosed four witnesses in amended initial disclosures served on June 17, 2014 – less than 10 days prior to the close of the discovery period. Despite this flurry of last-minute activity, Registrant’s document production and interrogatory responses remain deficient, and fail to demonstrate the complete universe of goods and services on which the CHROME mark has been used or the time period of such use.

Given the deficiencies in Registrant’s production and the prior statements of Registrant’s own attorneys questioning the efforts of their client, Google requested that Registrant produce a 30(b)(6) witness to testify regarding Registrant’s discovery efforts in advance of any other depositions Google will conduct. Registrant characterized the request as “unreasonable” and also refused to consent to a 60-day extension of the discovery period to allow Google to thoroughly review the new documents and discovery responses produced since May 30, 2014 and to conduct depositions (unless Google agreed to onerous discovery limitations). Thus, after waiting until the final days of the discovery period to attempt to cure its discovery deficiencies, and despite Google’s repeated willingness to extend deadlines throughout this proceeding to assist Registrant, Registrant is now unreasonably denying Google the courtesy of an extension, and has predicated any such extension on Google’s agreement to curtail discovery going forward.

Google cannot effectively prosecute this action in the absence of the entire universe of relevant documents possessed by Registrant, complete interrogatory responses from Registrant, and time to review these materials and depose all relevant witnesses. In order to move this case forward in a timely fashion, and given the glaring discovery deficiencies described in detail in Section III below, Google seeks an order compelling Registrant to: (1) produce a 30(b)(6) witness to testify regarding its document preservation, collection, review, and production efforts well in advance of any other depositions; (2) produce all responsive, non-privileged documents

and communications that Registrant previously agreed to search for and collect; and (3) answer Google's Interrogatory No. 4 (which requests a detailed description of the goods and/or services with which the CHROME mark has been or is currently being used) fully and completely in writing. In addition, Google requests that the Board extend the discovery period by 60 days upon disposition of this motion, and reset all other deadlines accordingly.

II. PROCEDURAL & FACTUAL BACKGROUND

On February 19, 2013, Google filed a Petition for Cancellation of Registrant's U.S. registrations for the CHROME mark, U.S. Registration Nos. 3360331 and 3951287 (the "Subject Registrations"). As the basis for cancellation, Google alleges that Registrant: (1) has not used the CHROME mark in commerce on or in connection with some or all of the goods and services identified in the Subject Registrations; (2) was not using the CHROME mark in commerce on or in connection with some or all of the goods and services identified in the Subject Registrations when it filed its Statements of Use or Combined Declarations of Use & Incontestability for the Subject Registrants; and/or (3) has abandoned the CHROME mark for some or all of the goods and services identified therein. (Pet. for Cancellation, Cancellation No. 92056816 (Feb. 19, 2013)).

Google has repeatedly requested that Registrant produce documents and respond to interrogatories relevant to the claims and defenses in this action, with little success. (*Id.* at ¶¶ 13-33, Exs. K-V.) The timeline and details of Google's discovery efforts are as follows.

On July 2, 2014, Google served document requests and interrogatories on Registrant. (Krajeck Dec. ¶¶ 2-3, Exs. A & B.) On August 6, 2014, Registrant served its responses, agreeing to produce a number of categories of documents including, among others, electronic communications reflecting registrant's use of the CHROME mark on the goods and services

identified in the Subject Registrations. (*Id.* at ¶ 4, Ex. C.) Registrant failed, however, to provide responses to numerous key interrogatories. In particular, Registrant objected on the grounds of undue burden and irrelevance to Interrogatory No. 4, and provided no response to Google's request for a detailed description of "all goods and/or services with which the CHROME MARKS have been or are currently being used." (*Id.* at ¶ 5, Ex. D, at pp. 5-6.)

The parties met and conferred to discuss Registrant's responses on August 26, 2013. (Krajeck Dec. ¶ 13.) During the meeting, Registrant promised to provide supplemental interrogatory responses, and to use its best efforts to answer each interrogatory as fully and as accurately as possible. (*Id.*) On September 9, 2014, Registrant served an amended set of responses to Google's Interrogatories ("Registrant's First Amended Interrogatory Responses"). (*Id.* at ¶ 6, Ex. E.) In Registrant's First Amended Interrogatory Responses, Registrant evasively supplemented its response to Interrogatory No. 4 by noting that "[t]he CHROME MARKS have been and/or are currently being used on a wide variety of multi-media and computer related products, including but not limited to graphics/video related products." (*Id.* at Ex. E, at p. 7.) Registrant listed a few particular products, but also stated generally, on information and belief, that its CHROME mark has and is being used in connection with each of the goods and services identified in the Subject Registrations. (*Id.* at Ex. E, at pp. 7-8.) Registrant, however, failed to describe in detail or name each of the particular products with which it had used or uses the CHROME mark. (*Id.*)

In an effort to obtain complete interrogatory responses and discuss Registrant's production of responsive documents, counsel for Google met and conferred via telephone with Registrant's attorneys on November 6, 2013. (Krajeck Dec. ¶ 14.) Counsel for Google also agreed to a consent motion to extend the discovery period in order to allow Registrant the

opportunity to cure its discovery deficiencies. (*Id.* at ¶ 12.) Registrant subsequently made small document productions in December 2013 and January 2014, but produced almost no email correspondence. (*Id.* at ¶ 15.)

On February 11, 2014, counsel for Google wrote to Registrant's attorneys regarding the continued deficiencies in Registrant's discovery responses and requested to promptly meet and confer. (Krajeck Dec. ¶ 16, Ex. K.) Google noted that Registrant's production was "obviously incomplete relative to e-mails" and asked that Registrant "confirm whether [it] has engaged in the required systematic search of e-mail" and whether "it has preserved emails and other documents relating to this dispute." (*Id.*) Google also addressed Registrant's incomplete interrogatory responses, and queried whether it would be filing supplemental responses. (*Id.*)

Counsel for Google conferred telephonically with Registrant's attorneys on February 12, 2014. (Krajeck Dec. ¶ 17.) During this conversation, Registrant's attorneys explained that Registrant was relying in large part on a self-directed document search process, but failed to confirm whether Registrant had performed the required systematic search of its email servers and electronic databases, to detail any collection efforts that Registrant had undertaken, or to indicate what, if any, search terms Registrant had run across its electronically-stored information. (*Id.*) Registrant's counsel, however, provided oral assurances and separate email confirmation indicating that supplemental discovery responses and documents were forthcoming. (*Id.* at ¶¶ 17-18, Ex. L.) Accordingly, counsel for Google agreed to a consent motion to extend the discovery period, which it filed on February 12, 2014. (*Id.* at ¶ 12.)

Registrant produced a small number of additional documents on March 19, 2014. (Krajeck Dec. ¶ 19.) However, as counsel for Google documented in a letter dated March 25, 2014, this production once again consisted almost solely of third-party website screenshots and

included no internal emails or communications. (Krajeck Dec. ¶ 20, Ex. M, at p.1.) On March 26, 2014, Registrant’s attorneys wrote to counsel for Google, promising that Registrant would “amend [its] earlier response as soon as [the relevant] information [was] compiled.” (*Id.* at ¶ 21, Ex. N, at p.1.) Registrant’s attorneys also promised that Registrant “will discover and produce additional responsive documents.” (*Id.*) Given these promises, Google once again agreed to extend the discovery period, and filed a consent motion on March 28, 2014. (*Id.* at ¶ 12.)

After receiving no supplemental discovery from Registrant, Google’s counsel wrote an additional letter to Registrant’s attorneys on April 11, 2014, requesting confirmation that Registrant would rectify its discovery deficiencies no later than April 18, 2014. (Krajeck Dec. ¶ 22, Ex. O, at p.1.) Registrant failed to respond until April 18, 2014, at which point Registrant’s attorneys advised that Registrant intended to supplement its interrogatory responses and produce additional documents by the end of the following week. (*Id.* at ¶ 23, Ex. P, at p.1.)

At Google’s request, the parties met and conferred via telephone on April 25, 2014. (Krajeck Dec. ¶ 24; Hughes Dec ¶ 2.) Google’s counsel expressed serious concern over Registrant’s self-collection and review, which had obviously resulted in an inadequate production to date. (*Id.*) In response, Registrant’s attorneys expressed their own frustration with their client’s discovery efforts, stated that Registrant needed additional time to complete its document collection, review and production and informed Google’s counsel that Registrant would not be able to supplement its discovery within the previously promised timeframe. (*Id.*) On April 30, 2014, counsel for Google wrote to Registrant’s attorneys, and indicated that Google would allow Registrant additional time to investigate and supplement its interrogatory responses and search for and produce additional documents, provided that Registrant commit to a “date

certain” for full satisfaction of Registrant’s obligations. (Krajeck Dec. ¶ 25, Ex. Q, at p.1.) Having received no response, on May 2, 2014, Google’s counsel once again requested a “date certain in May for satisfying [Registrant’s] discovery obligations.” (*Id.* at ¶ 26, Ex. R, at p.1.) Registrant eventually promised that it would “produce outstanding documents and supplement interrogatory responses by May 30.” (*Id.* at ¶ 27, Ex. S, at p.1.) On the basis of this promise, Google filed a consent motion on May 16, 2014, citing “Registrant VIA Technologies, Inc.[’s] . . . agree[ment] to complete its document production and satisfy its written discovery obligations no later than May 30, 2014” as grounds for the motion. (*Id.* at ¶ 12; Motion for Extension of Discovery Period with Consent, Cancellation No. 92056816, at p.1 (May 16, 2014).)

Registrant’s May 30, 2014 production of some additional documents and service of its Second Amended Interrogatory Responses failed to address the discovery deficiencies made clear to Registrant since at least February 2014. In particular, Registrant did not provide a complete list of products and services in connection with which it has used or is using the CHROME mark, and produced only a few (mainly irrelevant) email chains. (Krajeck Dec. ¶ 29, Ex. T.) Accordingly, in a letter dated June 5, 2014, Google provided notice of its intent to move to compel unless Registrant rectified its discovery deficiencies by Monday, June 9. (*Id.* at Ex. T, at p.2.) Registrant failed to do so. Instead, in a telephone call on June 9, 2014, Registrant’s counsel sought an additional extension. (*Id.* at ¶ 30.) In a final good faith attempt to avoid motion practice, Google granted Registrant an additional two days, until June 11, 2014, to comply with its earlier promises. (Krajeck Dec. ¶ 31, Ex. U.)

On June 11, 2014, Registrant produced nearly 1,000 pages of documents, but once again failed to produce any substantial email correspondence. (Krajeck Dec. ¶¶ 32, 39.) On June 13, 2014, counsel for Google wrote to Registrant’s attorneys, noting Google’s ongoing concern that

Registrant had not conducted a reasonable search of its electronic files and emails. In response, Registrant's counsel flatly asserted that Registrant had "already produced all non-privileged, relevant email communications authored or received by" certain custodians. (*Id.* at ¶ 34, Ex. W.) Registrant subsequently declined Google's request to make a corporate witness available to testify as to the specifics of its document preservation, collection, review, and production efforts. (*Id.* at ¶ 36, Ex. Y.)

In the weeks after the May 30, 2014 deadline, Registrant twice amended its interrogatory responses, but in both instances failed to give a complete answer to Interrogatory No. 4. (*Id.* at ¶¶ 8-9, Exs. G at pp. 4-6 & H at pp. 4-6.) In addition, after Google pointed out that certain new documents revealed the existence of at least one other witness with highly relevant information (who Registrant had not previously identified in its initial disclosures or interrogatory responses), Registrant also amended its initial disclosures to identify this individual and three other additional witnesses. (*Id.* at ¶¶ 11 & 33, Ex. J, at pp. 2-3 & Ex. V at p. 2.)

Given the need for time to thoroughly review this new information and to notice and take the depositions of Registrant's newly disclosed witnesses, Google requested on June 19, 2014 that Registrant consent to a 60-day extension of the discovery period. (*Id.* at ¶ 35, Ex. X.) In addition, Google asked Registrant to make a 30(b)(6) witness available to testify regarding Registrant's discovery efforts well in advance of any of the other depositions Google intended to conduct. (*Id.*) Registrant characterized both requests as "unreasonable" and refused to consent to the 60-day extension. (*Id.* at ¶ 36, Ex. Y.) While Registrant subsequently indicated it might consent to a 60-day extension, Registrant indicated it would only do so if Google agreed to onerous terms limiting its discovery going forward – including Google's agreement

not to propound any additional discovery requests. (*Id.* at ¶ 36, Ex. Z.) Accordingly, Google filed this motion to compel.

III. ARGUMENT

A. Google's Motion to Compel is Timely and Properly Supported.

Federal Rule of Civil Procedure 37 and 37 CFR § 2.120(e) permit a party seeking discovery to move for an order compelling disclosures and responses from a party who has not fulfilled its discovery obligations. A motion to compel is timely if it is filed prior to the commencement of the first testimony period. *Societa per Azioni Chianti Ruffino Esportazione Vinicola Toscana S.p.A. v. Colli Spolenti Spoletoducale SCRL*, 59 USPQ2d 1383, 1383 (TTAB 2001) (citing TBMP § 523.03); 37 C.F.R. § 2.120(e). A properly-supported motion to compel must be accompanied by a written statement explaining the good faith effort the movant made, by conference or correspondence, to resolve the discovery issues. *See Envirotech Corp. v. Compagnie des Lampes*, 219 U.S.P.Q. 448, 450 (TTAB 1979) (citing 37 C.F.R. § 2.120); TBMP § 523.02.

Google's motion to compel is filed before the discovery period closes on June 26, 2014, and well prior to the first testimony period. Therefore, this motion is timely. *See Societa*, 59 USPQ2d at 1383.

After receipt of Registrant's incomplete interrogatory responses and document productions, Google has made numerous unsuccessful attempts to discuss and resolve these discovery deficiencies with Registrant. (*See* Section II, *supra*.) Google likewise agreed to four extensions of the discovery period to allow Registrant the opportunity to investigate facts and search for, collect, and produce documents. (Krajeck Dec. ¶ 12.) Although Registrant's counsel repeatedly promised that Registrant would address the discovery deficiencies identified

above and discussed in detail below, Registrant has failed to do so. Instead, Registrant now claims that its document production is complete and that its response to Interrogatory No. 4 is adequate. (*See* Section II, *supra*.)

Google has thus met the good faith requirement by trying to resolve this dispute without the Board's intervention. Its motion to compel is properly supported and should be granted. *See Envirotech Corp. v. Compagnie des Lampes*, 219 U.S.P.Q. 448 at 450; *compare Hot Tamale Mama...and More, LLC v. SF Investments, Inc.*, Opposition No. 91209030, at *7 (March 20, 2014) (finding party failed to satisfy requirement to confer in good faith where it moved to compel after a single round of email correspondence in which the opposing party alluded to forthcoming responses).

B. The Board Should Compel Registrant to Produce a 30(b)(6) Witness to Testify Regarding Its Discovery Efforts, to Produce All Responsive, Non-Privileged Documents, and to Provide a Complete Response to Google's Interrogatory No. 4.

Registrant has a duty to cooperate in the discovery process and make a good faith effort to satisfy Google's discovery requests. TBMP § 408.01; *see Panda Travel Inc., v Resort Option Enterprises, Inc.*, 94 USPQ2d 1789, 1791 (TTAB 2009) ("Each party has a duty to make a good faith effort to satisfy the reasonable and appropriate discovery needs of its adversary."). Federal Rules of Civil Procedure 33 and 34 and TBMP §§ 405.04, 406.04 require Registrant to fully respond to all properly served discovery requests. Further, Rule 37(a)(4) states that "an evasive or incomplete disclosure, answer, or response must be treated as a failure to disclose, answer, or respond."

Registrant's production of only a handful of email communications, coupled with its refusal to produce a 30(b)(6) witness to testify as to Registrant's preservation, collection, review, and production of documents, and its failure to provide a complete response to Interrogatory No.

4 violates both the spirit and letter of these rules.

1. **The Paucity of Documents Produced by Registrant and the Statements of Registrant’s Own Counsel Signal the Inadequacy of Registrant’s Search for and Production of Documents Responsive to Google’s Document Requests Nos. 3, 7-8, 12-14, 16-18 and 26-27.**

In its responses to Google’s First Set of Requests for Production of Documents (the “Requests”), Registrant agreed to produce non-privileged hardcopy and electronic documents and communications¹ in its “possession, custody or control subject to a reasonable search” in response to requests seeking basic information regarding Registrant’s use of the CHROME mark in connection with each of the goods and/or services identified in its trademark filings. Specifically, Registrant agreed to collect, review and produce documents responsive to the following requests:

- **Request No. 3.** All DOCUMENTS referring to the adoption of the CHROME MARKS by YOU or other authorized users, including without limitation, all DOCUMENTS and things referring to or evidencing the origination, selection, and development of the CHROME MARKS.
- **Request No. 7.** All DOCUMENTS referring to or reflecting YOUR use of the CHROME MARK I in commerce on each of the goods and services listed in YOUR Statement of Use, dated October 12, 2007.
- **Request No. 8.** All DOCUMENTS referring to or reflecting YOUR use of the CHROME MARK II in commerce on each of the goods and services listed in YOUR Statement of Use, dated March 1, 2011.
- **Request No. 12.** All DOCUMENTS that refer to or reflect YOUR past, current, or planned future use of the CHROME MARKS.
- **Request No. 13.** All DOCUMENTS referring to or constituting

¹ Google defined the term “document” to include, among other things, communications and correspondence in electronic format. (Krajec Dec. ¶ 2, Ex. A, at pp. 1-2.) Google likewise defined the term “communication” to mean “any transmission of information from one person to another by any means, including without limitation written communications . . ., email and other electronic communications.” (*Id.* at p.2.) Registrant neither objected to these definitions at the time it served its responses nor has it done so to date; thus, the Board should find that Registrant waived any objections to the scope of either term. *See Crane Co. v. Shimano Indus. Co.*, 184 USPQ 691, 691 (TTAB 1975) (finding that a party “waived its right to object” to discovery requests where it filed no timely objections).

COMMUNICATIONS regarding the use, or planned future use, of the CHROME MARKS by YOU.

- **Request No. 14.** All DOCUMENTS that refer to or reflect YOUR non-use or intent not to use YOUR CHROME MARKS on or in connection with any of the goods or services identified in YOUR CHROME MARK I or CHROME MARK II Registrations.
- **Request No. 16.** All DOCUMENTS that refer to or reflect YOUR current or planned future use or sale of the CHROME MARKS in commerce in connection with any personal computer, desktop computer, portable computer, notebook computer, laptop computer, or any other computer device.
- **Request No. 17.** All DOCUMENTS that refer to or reflect YOUR use or sale of the CHROME MARKS in commerce in the last 4 years in connection with any personal computer, desktop computer, portable computer, notebook computer, laptop computer, or any other computer device.
- **Request No. 18.** All DOCUMENTS that refer to or reflect YOUR past, current, or planned future use or sale of the CHROME MARKS in commerce in connection with operating system software.
- **Request No. 26.** All DOCUMENTS that refer to or reflect the use or planned use of the CHROME MARKS in connection with any product packaging, including all DOCUMENTS referring or relating to the design of such packaging.
- **Request No. 27.** All DOCUMENTS that refer to or reflect the use or planned use of the CHROME MARKS in connection with the sale or advertising of a product and/or service.

(Krajeck Dec. ¶ 4, Ex. C.) By agreeing to produce these indisputably relevant documents, Registrant was obligated to “take care to ensure that it . . . searche[d] for documents maintained by[] the appropriate employees and/or custodians.” *See Frito-Lay N.A., Inc. v. Princeton Vanguard, LLC*, 100 USPQ2d (BNA) 1904, at *12, *24 (TTAB 2011) (noting that “ESI must be produced in Board proceedings where appropriate”).

Despite having almost a year to search for and produce documents responsive to these Requests, Registrant has failed to produce documents and communications that reflect Registrant’s alleged continuous use of the CHROME mark from July 1, 2001 to present in

connection with each of the goods and services identified in the Subject Registrations. Such documents are highly relevant to the claims and defenses in this cancellation action, and Google will be prejudiced if it is forced to prosecute this action without the benefit of Respondent's production of these documents.

In particular, Registrant has produced fewer than 20 email chains – five of which contain no mention of the CHROME mark and appear to be irrelevant. (Krajeck Dec. ¶ 40.) Furthermore, Registrant's entire production contains no emails dated earlier than April 2005, no emails from the years 2006, 2007 or 2010, and no relevant emails from 2013 that mention Registrant's use of the CHROME mark, or otherwise reflect the goods or services on which the CHROME mark has been or is being used. (*Id.*)

Of the nineteen produced email chains, only four identify Mr. Ken Weng as a sender or recipient – which is quite surprising given that Registrant previously stated that Mr. Weng would be its sole 30(b)(6) witness and identified him in its original initial disclosures as the only witness having information relating to the following key topics: “VIA's adoption, ownership, application for service mark registrations, actual use and planned use of its CHROME trademarks;” [and] “VIA's advertising, promotional, and marketing activities and publications featuring its CHROME trademarks and CHROME branded products.” (Krajeck Dec. ¶ 10, Ex. I, at p.2.) Registrant's production also contains only two emails authored or received by Mr. Richard Brown and no emails authored or received by Ms. Pat Meier, both of whom are additional witnesses listed for the first time in Registrant's June 17, 2014 amended interrogatory responses. (*Id.* at ¶ 11, Ex. J, at p. 3.)

Given Registrant's claim that it has continuously used the CHROME mark since July 1, 2001 in connection with the numerous goods and services identified in the Subject Registrations

and in response to Interrogatory No. 4 (Krajeck Dec. ¶ 9, Ex. H at pp. 4-6, 8), it is simply not possible that Registrant's production of fewer than twenty email chains represents all of the non-privileged, responsive communications in Registrant's possession, custody, or control.

When Google's counsel previously questioned the adequacy of Registrant's discovery efforts, Registrant's counsel revealed that Registrant had conducted a self-directed search for documents with little to no involvement from in-house or outside counsel. (Krajeck Dec. ¶ 17.) Registrant's attorneys further indicated that language barriers were an issue preventing Registrant's prompt production of all responsive documents. (*Id.* at ¶ 21, Ex. N, at p.1.) Registrant has not otherwise explained its failure to produce internal documents and communications responsive to Requests Nos. 3, 7-8, 12-14, 16-18 and 26-27. Indeed, Registrant has provided extremely limited information concerning its document preservation efforts, the nature of its search for responsive documents, or the steps taken to retrieve electronically stored information. As a result, Google has no insight into the extent of Registrant's search, the number of responsive documents that Registrant is improperly withholding, or the witnesses with relevant information whose identities are contained in these documents.

Registrant's most recent document production on June 11, 2014, while almost devoid of responsive communications, contains a handful of documents that indicate the existence of additional individuals with discoverable and highly relevant information, including Ms. Amy Wu, an Assistant Director of Product Marketing, who appears to be involved in the naming and marketing of goods and services under the CHROME mark since at least 2011. (Krajeck Dec. ¶ 33, Ex. V, at p.2.) Registrant failed to identify Ms. Wu in its original initial disclosures and interrogatory responses, and only added Ms. Wu as a witness with discoverable information after Google pointed out this discrepancy. (*Compare id.* at ¶ 10, Ex. I, at p. 2, *with id.* at ¶ 11, Ex. J, at

p. 2.) Registrant's failure to promptly identify Ms. Wu as a witness gives Google great concern that there are other witnesses with relevant information that Google will not be able to identify until Registrant fully complies with its discovery obligations.

Accordingly, on June 19, 2014, Google requested that Registrant produce a witness to testify regarding Registrant's document preservation, collection, review, and production efforts well in advance of any fact witness depositions. (Krajeck Dec. ¶ 35, Ex. X.) In light of Registrant's self-directed document collection and production, along with the gaping holes in Registrant's document production to date, Google requires this testimony in order to assess whether it is appropriate to take fact witness depositions, or whether there are additional relevant documents that Registrant has not produced or other relevant witnesses that Registrant has not disclosed. Registrant declined to produce a witness on these topics – leaving Google with no assurance that it has the information necessary to prosecute its case. (*Id.* at ¶ 36, Ex. Y.)

Because Registrant has not rectified its deficient document production or otherwise demonstrated that it has performed an adequate search for internal communications, Google seeks an order compelling Registrant to: (1) produce a witness to testify regarding Registrant's document preservation, collection, review, and production efforts to date including, without limitation, the steps taken to preserve relevant, responsive documents, the identity of all custodians whose electronic and hardcopy files have been searched, a description of the files that have been searched and a list of the search terms and date parameters employed; and (2) engage in a reasonable search of its hardcopy and electronic files and produce all non-privileged documents and communications responsive to Document Requests Nos. 3, 7-8, 12-14, 16-18 and 26-27.

2. **Registrant Repeatedly Has Failed to Respond Adequately to Google's Interrogatory No. 4.**

In its Interrogatory No. 4, Google requests that that Registrant “[d]escribe in detail all goods and/or services with which the CHROME MARKS have been or are currently being used by any PERSON.” (Krajeck Dec. ¶ 3, Ex. B, at p.5.) Registrant objected to Interrogatory No. 4 and then responded to the interrogatory on five separate occasions – on July 2, 2013, August 6, 2013, May 30, 2014, June 11, 2014 and June 17, 2014. (*Id.* at ¶¶ 5-9, Exs. D-H.) In each version of Registrant’s response, Registrant improperly refuses to simply identify each of the particular goods and services on which the CHROME mark is used. (*Id.*)

There is no basis for Registrant’s objections. Interrogatory No. 4 is straightforward and seeks basic information regarding the goods and services on which the CHROME mark has been or is being used. The minimal burden involved in compiling a simple list of goods and services is significantly outweighed by the relevance of the requested information to this Cancellation action, where Google alleges that Registrant has not and does not currently use the CHROME mark in connection with some or all of the goods and services identified in the Subject Registrations. Moreover, information regarding the products offered under Registrant’s own marks should be well known and readily available to Registrant. Indeed, in its First Amended Interrogatory Responses, Registrant referred to particular products by name and model number in response to Interrogatory No. 4, but then deleted this information in its three subsequent sets of responses. (Krajeck Dec. ¶¶ 5-9, Ex. E at p. 7, Ex. F at p. 4, Ex. G at pp. 4-6 & Ex. H at pp. 4-6.)

Rather than compile the requested information in list format, Registrant refers in its Fourth Amended Responses to the generic goods and services identified in the Subject Registrations, and cites over 1,500 pages of documents that it claims relate to the particular goods and services with which its CHROME mark has been or is currently being used. (Krajeck Dec. ¶ 9, Ex. H, at pp. 4-6.) Registrant also asserts that “the burden and expense of summarizing

the contents of these documents . . . would be substantially the same for [Registrant] as for Google.” (*Id.*)

In reality, Google’s initial review of each of the documents cited by Registrant makes clear that an answer to Interrogatory No. 4 may not “be determined by examining, auditing, compiling, abstracting or summarizing” these materials. *See* Fed. R. Civ. P. 33(d). Registrant likewise fails to satisfy the basic conditions a party must satisfy in order to invoke Rule 33. *See, e.g., No Fear, Inc. v. Rule*, 54 USPQ2d 1551, 1555 (TTAB 2000) (explaining that the party “must identify documents which the responding party knows to contain the responsive information”; (2) “may not rely on the option to produce business records unless it can establish that providing written responses would impose a significant burden on the party”; and (3) even if these conditions are met, may not leave “the inquiring party . . . with any greater burden than the responding party when searching through and inspecting the records”) (citation omitted).

First, Registrant admits that it has not identified a complete list of documents necessary to answer Google’s interrogatory. Registrant states that its response is “without limitation” to other unidentified documents that presumably contain information about additional goods and services on which the CHROME mark has been or is being used. (Krajeck Dec. ¶ 9 Ex. H, at p.5.)

Moreover, “[when] a responding party makes the decision to produce documents in lieu of responding directly to an interrogatory, a duty is imposed on the party to provide documents from which the response to the interrogatory is clearly ascertainable.” *Johnson & Johnson and RoC Int’l S.A.R.L. v. Obschestvo s ogranitchennoy; ot-vetstvennostiu “WDS”*, 95 USPQ2D 1567, at *8 (TTAB 2010). A review of the documents cited by Registrant reveals numerous photographs of individuals and convention center scenes, among other blurry and indistinct

images. (Krajeck Dec. ¶ 38, Ex. AA.) The relevant portions of these documents (if any) are not clearly ascertainable.

In addition, it is well settled that “the documentary materials to which a responding party refers the interrogating party must be, in fact, ‘business records’ of the responding party.” *See, e.g., D.K. Jain d/b/a Luxor Pen Company v. Ramparts, Inc.*, 49 U.S.P.Q.2d (BNA) 1429, at *14 n.5 (TTAB 1998). Many of the documents cited by Registrant consist of third-party product reviews and screenshots from sites such as Amazon.com, Flickr, YouTube, ExtremeTech.com, Newegg.com, HillbillyHardware.com, ReStockIt.com, eBay, Wayback Machine and CNET, among many others. (Krajeck Dec. ¶¶ 38-39, Ex. AA.) These third-party materials “do not qualify as ‘business records of the party upon whom the interrogatory has been served.’” *E. & J. Gallo Winery v. Rallo*, No. 1:04cv5153 OWW DLB, 2006 U.S. Dist. LEXIS 84048, at *7-*8 (E.D. Cal. Nov. 8, 2006) (ordering that “clear and straightforward answers” be provided to interrogatories seeking “information . . . regarding . . . products which bear [certain] Trademark[s]”); *see also Hoffman v. United Telecomms., Inc.*, 117 F.R.D. 436, 438 (D. Kans. 1987) (finding that party’s “reliance on [Rule 33] is not appropriate” where it responded to interrogatories with third-party records).

Registrant has also failed to establish that providing a complete written answer to Interrogatory No. 4 would impose a significant burden on Registrant. As the Board previously noted, “Rule 33(d) contemplates situations in which the responding party shows that it would have to undertake ‘burdensome and expensive research’ into its own business records in order to provide a written answer to the interrogatory.” *Jain*, 49 U.S.P.Q.2D 1429 at *11-*12. This is certainly not the case here, where Interrogatory No. 4 seeks a discrete list of products on which

Registrant's own CHROME mark has been or is being used. This basic information should be well known and readily available to Registrant without extensive research or investigation.

Finally, it is significantly more burdensome for Google to review and decipher the relevant products and services contained in the cited documents than it is for Registrant to simply list these goods and services in response to Interrogatory No. 4. Indeed, in order to have identified the cited documents, Registrant must have reviewed all of its produced documents and purposefully selected those documents that reflect a good or service offered under the CHROME mark. It is much easier for Registrant to simply list the good or service at issue, rather than require Google to interpret the relevance of each of the documents cited by Registrant.

In sum, Registrant's response to Interrogatory No. 4 is incomplete and evasive. The Board should compel Registrant to provide a complete response, in the form of a list of the particular goods and/or services with which the CHROME mark has been used and the name(s) and model number(s) of all such goods and services.

C. The Board Should Suspend the Proceeding and Reset Deadlines After the Disposition of Google's Motion.

Pursuant to 37 CFR § 2.120(e)(2) and TBMP § 523.01, the filing of Google's motion to compel should suspend this proceeding. Google thus requests that the Board enter an order suspending the proceeding until the disposition of this motion.

Google also requests that the Board extend the discovery period by 60 days upon disposition of this motion, and reset all other deadlines accordingly. *See* 37 CFR §§ 2.120(a)(2), 2.121(a); *Jain v. Ramparts Inc.*, 49 USPQ2d 1429, 1430 (TTAB 1998) (proceedings deemed suspended as of the filing of the motion and relevant deadlines reset). Because Registrant has failed to respond fully to Google's interrogatories and to produce a complete universe of responsive documents, the parties cannot complete discovery before the current expiration of the

discovery period on June 26, 2014. In particular, Google has been unable to prepare for and conduct the depositions of relevant witnesses to date and will need additional time to conduct the 30(b)(6) deposition regarding Registrant's discovery efforts, if granted.

IV. CONCLUSION

For the foregoing reasons, Google respectfully requests that the Board grant this Motion to Compel Discovery and for an Extension of Deadlines.

Respectfully submitted,

Date: June 24, 2014

By: Brendan J. Hughes/
Janet L. Cullum
Brendan J. Hughes
Katie Krajeck
COOLEY LLP
1299 Pennsylvania Ave., N.W., Suite 700
Washington, D.C. 20004
Tel: (202) 842-7800
Fax: (202) 842-7899
Emails: jcullum@cooley.com
bhughes@cooley.com
kkrajeck@cooley.com

Counsel for Petitioner Google Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the date indicated below, a true and correct copy of the foregoing **MOTION TO COMPEL DISCOVERY AND FOR AN EXTENSION OF DEADLINES**, along with true and correct copies of the supporting declarations of Brendan J. Hughes and Katie Krajeck and the accompanying exhibits were emailed pursuant to the agreement of the parties to counsel for Registrant at the following e-mail addresses:

trademark@raklaw.com
ilee@raklaw.com
rgookin@raklaw.com
jrhee@raklaw.com
azivkovic@raklaw.com

Date: June 24, 2014

/Katie Krajeck/
Katie Krajeck
COOLEY LLP
3175 Hanover Street
Palo Alto, California 94304-1130

Counsel for Petitioner Google Inc.

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

Google Inc.,)	Cancellation No.: 92056816
)	
Petitioner,)	Registration No.: 3,360,331
)	Mark: CHROME
v.)	Issued: December 25, 2007
)	
VIA Technologies, Inc.,)	Registration No.: 3,951,287
)	Mark: CHROME
Registrant.)	Issued: April 26, 2011
)	

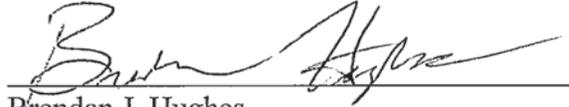
**DECLARATION OF BRENDAN J. HUGHES IN SUPPORT OF
PETITIONER'S MOTION TO COMPEL DISCOVERY AND
FOR AN EXTENSION OF DEADLINES**

I, Brendan J. Hughes, hereby declare as follows.

1. I am a partner at the law firm Cooley LLP and represent Petitioner Google Inc. ("Google") in this cancellation action against Registrant VIA Technologies, Inc. ("Registrant"). I make this statement based on my personal knowledge of the facts set forth herein. I submit this declaration in support of Google's Motion to Compel Discovery and for an Extension of Deadlines.
2. On April 25, 2014, I met and conferred via telephone with Mr. Robert Gookin and Ms. Irene Lee, attorneys for Registrant. During the conversation, I expressed serious concern over Registrant's self-collection and review, given the obviously inadequate production to date. In response, Ms. Lee expressed her own frustration with Registrant's discovery efforts and stated that Registrant needed additional time to complete its document collection, review, and production and that Registrant would not be able to supplement its discovery within the previously promised timeframe.

I declare under penalty of perjury that the foregoing statements are true and correct.

Executed this 24th day of June, 2014 in Washington, DC.

A handwritten signature in black ink, appearing to read "Brendan Hughes", is written over a horizontal line.

Brendan J. Hughes

COOLEY LLP

1299 Pennsylvania Avenue, NW, Suite 700

Washington, DC 20004

Tel: 202-842-7826

Email: bhughes@cooley.com

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

Google Inc.,)	Cancellation No.: 92056816
)	
Petitioner,)	Registration No.: 3,360,331
)	Mark: CHROME
v.)	Issued: December 25, 2007
)	
VIA Technologies, Inc.,)	Registration No.: 3,951,287
)	Mark: CHROME
Registrant.)	Issued: April 26, 2011

**DECLARATION OF KATIE KRAJECK IN SUPPORT OF PETITIONER
GOOGLE INC.'S MOTION TO COMPEL DISCOVERY AND FOR AN
EXTENSION OF DEADLINES**

I, Katie Krajeck, hereby declare as follows.

1. I am an associate at the law firm Cooley LLP and represent Petitioner Google Inc. (“Google”) in this cancellation action against Registrant VIA Technologies, Inc. (“Registrant”). I make this statement based on my personal knowledge of the facts set forth herein, my review of client files maintained by Cooley LLP for Google and my conversations with my colleagues regarding this proceeding. I submit this declaration in support of Google’s Motion to Compel Discovery and for an Extension of Deadlines.
2. Attached hereto as Exhibit A is a true and correct copy of Google’s First Set of Requests for Production of Documents to Registrant re: CHROME Cancellation Petition dated July 2, 2013.
3. Attached hereto as Exhibit B is a true and correct copy of Google’s First Set of Special Interrogatories to Registrant re: CHROME Cancellation Petition dated July 2, 2013.
4. Attached hereto as Exhibit C is a true and correct copy of Registrant’s Response to Google’s First Set of Requests for Production of Documents dated August 6, 2013.

5. Attached hereto as Exhibit D is a true and correct copy of Registrant's Responses to Google's First Set of Special Interrogatories dated August 6, 2013.

6. Attached hereto as Exhibit E is a true and correct copy of Registrant's Amended Responses to Google's First Set of Special Interrogatories dated September 9, 2013.

7. Attached hereto as Exhibit F is a true and correct copy of Registrant's Second Amended Responses to Google's First Set of Special Interrogatories dated May 30, 2014.

8. Attached hereto as Exhibit G is a true and correct copy of Registrant's Third Amended Responses to Google's First Set of Special Interrogatories dated June 11, 2014.

9. Attached hereto as Exhibit H is a true and correct copy of Registrant's Fourth Amended Responses to Google's First Set of Special Interrogatories dated June 17, 2014.

10. Attached hereto as Exhibit I is a true and correct copy of Registrant's Initial Disclosures dated July 31, 2013.

11. Attached hereto as Exhibit J is a true and correct copy of Registrant's Amended Initial Disclosures dated June 17, 2014.

12. Following Registrant's Answer on June 3, 2013, Google filed four consent motions for extensions of the discovery period: (1) a consent motion filed November 22, 2013 to extend the discovery period by 60 days; (2) a consent motion filed February 12, 2014 to extend the discovery period by 60 days; (3); a consent motion filed March 28, 2014 to extend the discovery period by 30 days; and (4) a consent motion filed May 16, 2014 to extend the discovery period by 30 days.

13. Based on client files maintained by Cooley LLP for Google, I am aware that Mr. Jeffrey Norberg, a former Cooley LLP associate, met and conferred via telephone with Mr. Robert Gookin, an attorney for Registrant, on August 26, 2013. I also understand that during

this meeting, Registrant promised to provide supplemental interrogatory responses, and to use its best efforts to answer each interrogatory as fully and as accurately as possible.

14. Based on client files maintained by Cooley LLP for Google, I am aware that Mr. Norberg met and conferred via telephone with Mr. Gookin on November 6, 2013.

15. Based on client files maintained by Cooley LLP for Google, I am aware that Registrant produced documents bearing Bates Numbers VIA00001-00735 in December 2013 and January 2014. There are three email chains included in the entirety of VIA00001-735, bearing Bates Numbers VIA00626-31, VIA00632-33 and VIA00634-59.

16. Attached hereto as Exhibit K is a true and correct copy of a letter from Mr. Norberg to Mr. Gookin dated February 11, 2014.

17. Mr. Norberg and I met and conferred via telephone with Mr. Gookin on February 12, 2014. During this conversation, Mr. Gookin explained that Registrant was relying in large part on a self-directed document search process, but did not confirm whether Registrant had performed the required systematic search of its email servers and electronic databases, to detail any collection efforts that Registrant had undertaken, or to indicate what, if any, search terms Registrant had run across its electronically-stored information. Mr. Gookin also stated that Registrant would produce supplemental documents and interrogatory responses.

18. Attached hereto as Exhibit L is a true and correct copy of an email from Mr. Gookin to Mr. Norberg dated February 15, 2014.

19. On March 19, 2014, Registrant produced documents bearing Bates Stamps VIA00736-1098.

20. Attached hereto as Exhibit M is a true and correct copy of letter from me to Mr. Gookin dated March 25, 2014.

21. Attached hereto as Exhibit N is a true and correct copy of letter from Mr. Gookin to me dated March 26, 2014.

22. Attached hereto as Exhibit O is a true and correct copy of letter from me to Mr. Gookin dated April 11, 2014.

23. Attached hereto as Exhibit P is a true and correct copy of an email from Mr. Gookin to me dated April 18, 2014.

24. Based on client files maintained by Cooley LLP for Google and my conversations with Mr. Brendan Hughes, a partner with Cooley LLP, I am aware that Mr. Hughes met and conferred via telephone with Mr. Gookin and Ms. Irene Lee, an attorney for Registrant, on April 25, 2014. During this conversation, Mr. Hughes expressed serious concern over Registrant's self-collection and review, given the obviously inadequate production to date. In response, Ms. Lee expressed her frustration with Registrant's discovery efforts and stated that Registrant needed additional time to complete its document collection, review, and production and that Registrant would not be able to supplement its discovery within the previously promised timeframe. Mr. Hughes can and will testify to the same if this Board requires such testimony.

25. Attached hereto as Exhibit Q is a true and correct copy of an email from Mr. Hughes to Ms. Lee and Mr. Gookin dated April 30, 2014.

26. Attached hereto as Exhibit R is a true and correct copy of an email from Mr. Hughes to Ms. Lee and Mr. Gookin dated May 2, 2014.

27. Attached hereto as Exhibit S is a true and correct copy of an email from Ms. Lee to Mr. Hughes dated May 2, 2014.

28. On May 30, 2014, Registrant produced documents bearing Bates Stamps VIA01099-2094.

29. Attached hereto as Exhibit T is a true and correct copy of letter from me to Ms. Lee and Mr. Gookin dated June 5, 2014.

30. Based on client files maintained by Cooley LLP for Google and my conversations with Ms. Janet Cullum, a partner with Cooley LLP, I am aware that Ms. Cullum spoke via telephone with Ms. Lee on June 9, 2014. I understand that during this conversation, Ms. Lee sought an additional extension of time in which to complete Registrant's document production and supplement Registrant's interrogatory responses. I further understand that Ms. Cullum granted Ms. Lee's request. Ms. Cullum can and will testify to the same if this Board requires such testimony.

31. Attached hereto as Exhibit U is a true and correct copy of an email from me to Ms. Lee dated June 10, 2014.

32. On June 11, 2014, Registrant produced documents bearing Bates Stamps VIA02095-3018.

33. Attached hereto as Exhibit V is a true and correct copy of letter from me to Ms. Jean Rhee, an attorney for Registrant, dated June 13, 2014.

34. Attached hereto as Exhibit W is a true and correct copy of letter from Ms. Rhee to me, dated June 17, 2014.

35. Attached hereto as Exhibit X is a true and correct copy of an email from Mr. Hughes to Ms. Lee dated June 19, 2014.

36. Attached hereto as Exhibit Y is a true and correct copy of an email from Ms. Lee to Mr. Hughes dated June 20, 2014.

37. Attached hereto as Exhibit Z is a true and correct copy of a letter from Ms. Rhee to me dated June 23, 2014.

38. Attached hereto as Exhibit AA are examples of documents cited by Registrant in response to Google's Interrogatory No. 4.

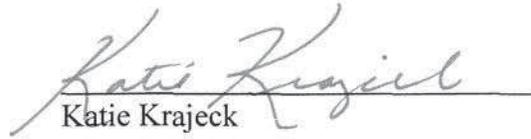
39. The documents cited by Registrant in response to Google's Interrogatory No. 4 include numerous third-party product reviews and screenshots from sites such as Amazon.com, Flickr, YouTube, ExtremeTech.com, Newegg.com, HillbillyHardware.com, ReStockIt.com, eBay, Wayback Machine and CNET.

40. The following chart details the individual email chains produced by Registrant, in order of date sent.

Emails Produced by Registrant

No.	Bates Number	Date	Author	Recipients	Notes
1	VIA01839-42	[REDACTED]	[REDACTED]	[REDACTED]	
2	VIA01843-45	[REDACTED]	[REDACTED]	[REDACTED]	
3	VIA00632-33	[REDACTED]	[REDACTED]	[REDACTED]	
4	VIA00955	[REDACTED]	[REDACTED]	[REDACTED]	
5	VIA00958	[REDACTED]	[REDACTED]	[REDACTED]	
6	VIA00956-57	[REDACTED]	[REDACTED]	[REDACTED]	
7	VIA02297	[REDACTED]	[REDACTED]	[REDACTED]	No mention of CHROME.
8	VIA02393-99	[REDACTED]	[REDACTED]	[REDACTED]	

Executed this 24th day of June, 2014 in Palo Alto, California

A handwritten signature in cursive script, appearing to read "Katie Krajeck", is written over a horizontal line.

Katie Krajeck

COOLEY LLP

3175 Hanover Street

Palo Alto, California 94304-1130

Tel: (650) 849-7048

Email: kkrajeck@cooley.com

Exhibit A

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

Google, Inc.,

Petitioner,

v.

VIA Technologies, Inc.,

Registrant.

Cancellation No.: 92056816

Registration No.: 3,360,331

Mark: CHROME

Issued: December 25, 2007

Registration No.: 3,951,287

Mark: CHROME

Issues: April 26, 2011

**PETITIONER GOOGLE, INC.'S FIRST SET OF REQUESTS FOR PRODUCTION OF
DOCUMENTS TO VIA TECHNOLOGIES re CHROME CANCELLATION PETITION**

PROPOUNDING PARTY: PETITIONER GOOGLE, INC.

RESPONDING PARTY: REGISTRANT VIA TECHNOLOGIES, INC.

SET NUMBER: ONE

Pursuant to Section 2.120 of the Rules of Practice in Trademark Cases and the Federal Rule of Civil Procedure 34, Petitioner Google, Inc. ("Google") hereby requests that Registrant VIA Technologies, Inc. ("Registrant") produce all documents and tangible things described below within 30 days of service hereof and in accordance with the following Definitions and Instructions:

I. DEFINITIONS

1. YOU and YOUR refer to Registrant and each of its officers, directors, employees, consultants, members, managers, representatives, partners, corporate parent, subsidiaries, divisions, successors in interest, associates, affiliates, attorneys, accountants and agents.

2. DOCUMENT is used in its broadest sense, and is defined to be synonymous in meaning and equal in scope to the definition in Federal Rule of Civil Procedure 34. A draft or non-identical copy is a separate DOCUMENT within the meaning of this term. Without limiting the generality of

the foregoing, the term “DOCUMENT” means, without limitation, the following items, whether printed, or written, produced or reproduced by any other mechanical process, or written or produced by hand, or in electronic format: agreements, communications, reports, correspondence, telegrams, memoranda, summaries or records of telephone conversations, summaries or records of personal conversations or interviews, diaries, graphs, reports, notebooks, plans, drawings, sketches, maps, summaries or records of any meetings or conferences, summaries or reports of investigations or negotiations, opinions or reports of consultants, photographs, motion picture film, tape recordings, videotapes, computer disks, tapes or hard drives, electronic mail, brochures, pamphlets, advertisements, circulars, newspaper or magazine articles, newsletters, publications, press releases, surveys, judicial records, customer lists, governmental certificates, applications, licenses, registrations, letters, accounts, objects, minutes of meetings, interoffice communications, studies, written forecasts, projections, analyses, contracts, guarantee agreements, ledgers, books of accounts, vouchers, checks, purchase orders, invoices, charge slips, expense account reports, receipts, working papers, drafts, statistical records, costs sheets, calendars, appointment books, time sheets or logs, job or transaction files, computer printouts or papers similar to any of the foregoing, and any marginal comments appearing on any DOCUMENT and any other writings.

3. COMMUNICATION is used in its broadest sense, and means any transmission of information from one PERSON or entity to another by any means, including without limitation written communications, telephone communications, in-person communications, email and other electronic communications.

4. PERSON means any natural person, business or other legal entity.

5. PETITION FOR CANCELLATION refers to the Consolidated Petition for Cancellation No. 92056816, filed by Google on February 19, 2013.

6. YOUR ANSWER refers to the Answer you filed to the PETITION FOR CANCELLATION on June 3, 2013.

7. Registrant’s CHROME MARKS refer to Registrant’s Registration Nos. 3,360,331 for CHROME in international class 9 (“CHROME MARK I”) and 3,951,287 for CHROME in

international class 42 (“CHROME MARK II”).

8. A Request to provide DOCUMENTS that SUPPORT something means relating to, referring to, describing, referencing, evidencing, concerning or constituting.

9. Wherever used herein, the singular shall include the plural and the plural shall include the singular.

II. INSTRUCTIONS

1. The original and each non-identical copy of each DOCUMENT or other tangible thing requested herein which is in YOUR possession, custody or control is to be produced. If the original or original carbon copy is not in YOUR possession, custody or control, a full, clear, legible copy thereof is to be produced.

2. Each Request shall be answered fully unless it is in good faith objected to, in which event the reasons for YOUR objection shall be stated in detail. If an objection pertains to only a portion of a Request, or a word, phrase, or clause contained within it, YOU are required to state YOUR objection to that portion only and to respond to the remainder of the Request, using YOUR best efforts to do so.

3. Pursuant to Federal Rule of Civil Procedure 34(b), each DOCUMENT and/or thing produced in response is to be produced as it is kept in the usual course of business, including all file folders, binders, notebooks and other devices by which such papers, data, information or things may be organized, separated or stored.

4. Electronic records and computerized information must be produced in native format. If Google so requests, YOU shall provide a description of the system from which the records or information were derived sufficient to permit rendering the records and information intelligible. This description shall include, but not be limited to, the manufacturer’s name and model number for electronic hardware used to create the electronic records, as well as the manufacturer’s name, version number, any special parameters, and written documentation and instructions for any software used to create the electronic records and sufficient to permit those records to be read from the media produced. YOU shall provide all decryption or access passwords necessary to unlock any

computerized information produced, including without limitation electronic mail passwords and file decryption passwords.

5. If a record, DOCUMENT or data item was created on a computer or computer system, including but not limited to electronic mail, data files, databases, electronic documents, spreadsheets, source code, object code, machine code, or other programming code, it must be produced in an unaltered state and in its native format. For all such media produced, external labels on the media shall identify the computer(s) from which the copies of computer files were made and the full names of the individuals who used the computer so identified. If any such media has been altered from its original state, you must clearly identify it in your production by placing a label on it, titled "ALTERED FROM ORIGINAL STATE," and in a separate DOCUMENT describe the manner in which the record, DOCUMENT or data item has been altered.

6. For any electronic records, DOCUMENTS or data items produced in native format, YOU shall verify that YOU have modified YOUR DOCUMENT retention policies in a manner that will insure retention of the original records, DOCUMENTS and data items. These DOCUMENT retention policies shall include, without limitation, policies that automatically delete electronic mail, policies that permit overwriting of computer media for system backup functions, and similar policies.

7. If YOU assert that any DOCUMENT and/or thing required to be produced is privileged or otherwise protected from discovery, please set forth in YOUR written response hereto regarding each DOCUMENT or thing for which a claim of privilege is made:

(a) The approximate date, and manner of recording, creating or otherwise preparing the DOCUMENT or thing;

(b) The name and organizational position, if any, of each sender of the DOCUMENT or thing;

(c) The name and organizational position, if any, of each recipient and/or custodian of the DOCUMENT or thing;

(d) The name and organizational position, if any, of each PERSON (other than stenographic or clerical assistants) participating in the preparation or creation of the DOCUMENT;

(e) The name and organizational position, if any, of each PERSON to whom the contents of the DOCUMENT or any portion thereof have heretofore been communicated by copy, exhibition, reading or summarization; and

(f) A statement of the basis on which privilege is claimed with respect to each DOCUMENT or thing and whether or not its contents are limited solely to legal advice or information provided for the purpose of securing legal advice.

8. If any responsive DOCUMENT is no longer in existence, cannot be located or is not in YOUR possession, custody or control, identify it, describe its subject matter and describe its disposition, including, without limitation, identifying the PERSON having knowledge of the disposition.

9. These Requests shall be deemed to seek the productions of DOCUMENTS as of the date of the required response, but shall be deemed to be continuing so that any additional information relating in any way to these Requests, which Registrant acquires or which become known to Registrant, shall be furnished to Google immediately after such information or DOCUMENTS are acquired or become known, to the full extent provided for by Federal Rule of Civil Procedure 26(e).

III. DOCUMENTS TO BE PRODUCED

REQUEST FOR PRODUCTION No. 1:

All DOCUMENTS that refer to or SUPPORT allegations made by YOU in YOUR ANSWER.

REQUEST FOR PRODUCTION No. 2:

All DOCUMENTS used, identified, relied upon or referred to by YOU when answering Google's First Set of Interrogatories or any other discovery requests propounded by Google.

REQUEST FOR PRODUCTION No. 3:

All DOCUMENTS referring to the adoption of the CHROME MARKS by YOU or other authorized users, including without limitation, all DOCUMENTS and things referring to or evidencing the origination, selection, and development of the CHROME MARKS.

REQUEST FOR PRODUCTION No. 4:

DOCUMENTS sufficient to show the date of first use for each of the CHROME MARKS.

REQUEST FOR PRODUCTION No. 5:

A specimen sufficient to show any use of the CHROME MARKS with each good or service identified in response to Interrogatory No. 4 of Google's First Set of Interrogatories.

REQUEST FOR PRODUCTION No. 6:

All DOCUMENTS referring to or constituting COMMUNICATIONS regarding YOUR use of the CHROME MARKS.

REQUEST FOR PRODUCTION No. 7:

All DOCUMENTS referring to or reflecting YOUR use of the CHROME MARK I in commerce on each of the goods and services listed in YOUR Statement of Use, dated October 12, 2007.

REQUEST FOR PRODUCTION No. 8:

All DOCUMENTS referring to or reflecting YOUR use of the CHROME MARK II in commerce on each of the goods and services listed in YOUR Statement of Use, dated March 1, 2011.

REQUEST FOR PRODUCTION No. 9:

DOCUMENTS sufficient to show YOUR current and continuous use of CHROME MARK I on or in connection with the goods or services identified in YOUR Combined Declaration of Use and Incontestability under Sections 8 and 15 that YOU filed on February 14, 2013.

REQUEST FOR PRODUCTION No. 10:

A specimen sufficient to show YOUR current and continuous use of the CHROME MARK I with each good or service identified in YOUR Combined Declaration of Use and Incontestability under Sections 8 and 15 on February 14, 2013.

REQUEST FOR PRODUCTION No. 11:

All DOCUMENTS referring to or constituting COMMUNICATIONS regarding YOUR decision to delete the goods YOU identified in paragraph 6 of YOUR ANSWER from YOUR Combined Declaration of Use and Incontestability for YOUR CHROME MARK I.

REQUEST FOR PRODUCTION No. 12:

All DOCUMENTS that refer to or reflect YOUR past, current, or planned future use of the CHROME MARKS.

REQUEST FOR PRODUCTION No. 13:

All DOCUMENTS referring to or constituting COMMUNICATIONS regarding the use, or planned future use, of the CHROME MARKS by YOU.

REQUEST FOR PRODUCTION No. 14:

All DOCUMENTS that refer to or reflect YOUR non-use or intent not to use YOUR CHROME MARKS on or in connection with any of the goods or services identified in YOUR CHROME MARK I or CHROME MARK II Registrations.

REQUEST FOR PRODUCTION No. 15:

All DOCUMENTS referring to or constituting COMMUNICATIONS regarding YOUR non-use or intent not to use YOUR CHROME MARKS on or in connection with any of the goods or services identified in YOUR CHROME MARK I or CHROME MARK II Registrations.

REQUEST FOR PRODUCTION No. 16:

All DOCUMENTS that refer to or reflect YOUR current or planned future use or sale of the CHROME MARKS in commerce in connection with any personal computer, desktop computer, portable computer, notebook computer, laptop computer, or any other computer device.

REQUEST FOR PRODUCTION No. 17:

All DOCUMENTS that refer to or reflect YOUR use or sale of the CHROME MARKS in commerce in the last 4 years in connection with any personal computer, desktop computer, portable computer, notebook computer, laptop computer, or any other computer device.

REQUEST FOR PRODUCTION No. 18:

All DOCUMENTS that refer to or reflect YOUR past, current, or planned future use or sale of the CHROME MARKS in commerce in connection with operating system software.

REQUEST FOR PRODUCTION No. 19:

All DOCUMENTS that refer to or reflect the use, or planned future use, of the CHROME MARKS by any third party.

REQUEST FOR PRODUCTION No. 20:

All COMMUNICATIONS regarding the use, or planned future use, of the CHROME MARKS by

any third party.

REQUEST FOR PRODUCTION No. 21:

All DOCUMENTS referring to or reflecting YOUR use of any mark including a “chrome” component, including without limitation, all COMMUNICATIONS regarding YOUR use of any mark including a “chrome” component.

REQUEST FOR PRODUCTION No. 22:

All DOCUMENTS referring to or reflecting YOUR planned or considered use of any mark including a “chrome” component, including without limitation, all COMMUNICATIONS regarding YOUR planned or considered use of any mark including a “chrome” component.

REQUEST FOR PRODUCTION No. 23:

All DOCUMENTS that refer to or reflect the use or planned use of the CHROME MARKS in connection with the plans or preparation to develop a product and/or service.

REQUEST FOR PRODUCTION No. 24:

All DOCUMENTS that refer to or reflect business plans regarding any products bearing the CHROME MARKS.

REQUEST FOR PRODUCTION No. 25:

All DOCUMENTS that refer to or reflect the cessation or phasing out of any product or product line that has at any time been advertised, offered or sold in connection with a “chrome” designation.

REQUEST FOR PRODUCTION No. 26:

All DOCUMENTS that refer to or reflect the use or planned use of the CHROME MARKS in connection with any product packaging, including all DOCUMENTS referring or relating to the design of such packaging.

REQUEST FOR PRODUCTION No. 27:

All DOCUMENTS that refer to or reflect the use or planned use of the CHROME MARKS in connection with the sale or advertising of a product and/or service.

REQUEST FOR PRODUCTION No. 28:

DOCUMENTS sufficient to show the target market of products and/or services offered, sold or

offered for sale in connection with the CHROME MARKS.

REQUEST FOR PRODUCTION No. 29:

DOCUMENTS sufficient to show the target market of products and/or services offered, planned to be sold or offered for sale in the future in connection with the CHROME MARKS.

REQUEST FOR PRODUCTION No. 30:

DOCUMENTS sufficient to identify, to date, the purchasers and/or users of any products and/or services offered, sold, or offered for sale in connection with the CHROME MARKS.

REQUEST FOR PRODUCTION No. 31:

All advertising and promotional DOCUMENTS referring, reflecting and/or relating to the products and/or services offered, sold, or planned to be sold in the future, in connection with the CHROME MARKS.

REQUEST FOR PRODUCTION No. 32:

All marketing plans, forecasts, projections and DOCUMENTS referring, reflecting and/or relating to YOUR marketing and sales plans for products and/or services sold, to be sold, advertised, or to be advertised, bearing or associated with the CHROME MARKS.

REQUEST FOR PRODUCTION No. 33:

DOCUMENTS sufficient sales in the United States, by volume and dollar amount, of all products or services bearing the CHROME MARKS.

REQUEST FOR PRODUCTION No. 34:

DOCUMENTS sufficient to identify the channels of trade through which YOU offer or plan to offer each product and/or service sold, to be sold, advertised, or to be advertised, bearing the CHROME MARKS.

REQUEST FOR PRODUCTION No. 35:

DOCUMENTS sufficient to show the identities of individuals who have ever been associated with the development and/or marketing of any products and/or services offered under the CHROME MARKS.

REQUEST FOR PRODUCTION No. 36:

DOCUMENTS sufficient to show YOUR organizational structure, including but not limited to an organizational chart.

REQUEST FOR PRODUCTION No. 37:

All DOCUMENTS that refer to or reflect YOUR acquisition of any ownership interest in S3 Graphics Co., Ltd. to the extent any such DOCUMENTS refer or relate to any CHROME trademark or product bearing a CHROME MARK.

REQUEST FOR PRODUCTION No. 38:

All COMMUNICATIONS with S3 Graphics Co., Ltd. that refer or reflect to any CHROME trademark or product bearing a CHROME MARK.

REQUEST FOR PRODUCTION No. 39:

All DOCUMENTS referring to or reflecting COMMUNICATIONS between YOU and S3 Graphics Co., Ltd. regarding the past, current, or future use, or the intent not to use, the CHROME MARKS.

REQUEST FOR PRODUCTION No. 40:

All DOCUMENTS referring to or reflecting COMMUNICATIONS between YOU and HTC Corporation regarding the past, current, or future use, or the intent not to use, the CHROME MARKS.

REQUEST FOR PRODUCTION No. 41:

All DOCUMENTS constituting or reflecting market surveys of any kind regarding the CHROME MARKS or any products or services offered under the CHROME MARKS.

REQUEST FOR PRODUCTION No. 42:

All DOCUMENTS upon which YOU intend to rely in this matter.

COOLEY LLP
JANET L. CULLUM
ANNE H. PECK
JEFFREY NORBERG

Date: July 2, 2013

By: /s/ Jeffrey Norberg
Jeffrey Norberg
Attorneys for Petitioner Google, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the date indicated below, a true and correct copy of the foregoing **PETITIONER GOOGLE, INC.'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO REGISTRANT VIA TECHNOLOGIES, INC** was, pursuant to the parties' stipulation, served electronically upon Registrant and correspondent (being the same as the Registrant) for the subject application, via email to the following addresses:

trademark@raklaw.com
ilee@raklaw.com
rgookin@raklaw.com
azivkovic@raklaw.com

Date: July 2, 2013

/s/ Jeffrey Norberg

Exhibit B

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

Google, Inc.,

Petitioner,

v.

VIA Technologies, Inc.,

Registrant.

Cancellation No.: 92056816

Registration No.: 3,360,331

Mark: CHROME

Issued: December 25, 2007

Registration No.: 3,951,287

Mark: CHROME

Issues: April 26, 2011

**PETITIONER GOOGLE, INC.'S FIRST SET OF SPECIAL INTERROGATORIES TO
REGISTRANT VIA TECHNOLOGIES re CHROME CANCELLATION PETITION**

PROPOUNDING PARTY: PETITIONER GOOGLE, INC.

RESPONDING PARTY: REGISTRANT VIA TECHNOLOGIES, INC.

SET NUMBER: ONE

Pursuant to Section 2.120 of the Rules of Practice in Trademark Cases and Rule 33 of the Federal Rules of Civil Procedure, Petitioner Google, Inc. ("Google") requests that Registrant VIA Technologies, Inc. ("Registrant") answer separately and completely in writing under oath within 30 days of service hereof each of the Interrogatories set forth below in accordance with the following Definitions and Instructions:

I. DEFINITIONS

1. YOU and YOUR refer to Registrant and each of its officers, directors, employees, consultants, members, managers, representatives, partners, corporate parent, subsidiaries, divisions, successors in interest, associates, affiliates, attorneys, accountants and agents.

2. DOCUMENT is used in its broadest sense, and is defined to be synonymous in meaning and equal in scope to the definition in Federal Rule of Civil Procedure 34. A draft or non-identical copy is a separate DOCUMENT within the meaning of this term. Without limiting the generality of

the foregoing, the term “DOCUMENT” means, without limitation, the following items, whether printed, or written, produced or reproduced by any other mechanical process, or written or produced by hand, or in electronic format: agreements, COMMUNICATIONS, reports, correspondence, telegrams, memoranda, summaries or records of telephone conversations, summaries or records of personal conversations or interviews, diaries, graphs, reports, notebooks, plans, drawings, sketches, maps, summaries or records of any meetings or conferences, summaries or reports of investigations or negotiations, opinions or reports of consultants, photographs, motion picture film, tape recordings, videotapes, computer disks, tapes or hard drives, electronic mail, brochures, pamphlets, advertisements, circulars, newspaper or magazine articles, newsletters, publications, press releases, surveys, judicial records, customer lists, governmental certificates, applications, licenses, registrations, letters, accounts, objects, minutes of meetings, interoffice communications, studies, written forecasts, projections, analyses, contracts, guarantee agreements, ledgers, books of accounts, vouchers, checks, purchase orders, invoices, charge slips, expense account reports, receipts, working papers, drafts, statistical records, costs sheets, calendars, appointment books, time sheets or logs, job or transaction files, computer printouts or papers similar to any of the foregoing, and any marginal comments appearing on any DOCUMENT and any other writings.

3. COMMUNICATION is used in its broadest sense, and means any transmission of information from one PERSON or entity to another by any means, including without limitation written communications, telephone communications, in-person communications, email and other electronic communications.

4. PERSON means any natural person, business or other legal entity.

5. PETITION FOR CANCELLATION refers to the Consolidated Petition for Cancellation No. 92056816, filed by Google on February 19, 2013.

6. YOUR ANSWER refers to the Answer you filed to the PETITION FOR CANCELLATION on June 3, 2013.

7. Registrant’s CHROME MARKS refer to Registrant’s Registration Nos. 3,360,331 for CHROME in international class 9 (“CHROME MARK I”) and 3,951,287 for CHROME in

international class 42 (“CHROME MARK II”).

8. A request to provide information CONCERNING something means relating to, referencing, evidencing or constituting.

9. The use of the singular form of any word includes the plural, and use of the plural form includes the singular form.

II. INSTRUCTIONS

1. YOU are requested to answer each Interrogatory set forth below separately and completely in writing under oath. YOUR response hereto is to be signed and verified by the PERSON making it, and the objections signed by YOU, as required by Federal Rule of Civil Procedure 33(b) and section 405.04(c) of the Trademark Trial and Appeal Board Manual of Procedure (“T.B.M.P.”).

2. Each Interrogatory shall be answered fully unless it is objected to in good faith, in which event the reasons for YOUR objection shall be stated in detail. If an objection pertains to only a portion of an Interrogatory, or a word, phrase or clause contained within it, YOU are required to state YOUR objection to that portion only and to respond to the remainder of the Interrogatory, using YOUR best efforts to do so.

3. If YOU or YOUR counsel assert that any information responsive to any Interrogatory is privileged or otherwise protected from discovery, YOU are required to comply with the requirements of Federal Rule of Civil Procedure 26(b)(5) as to each DOCUMENT, thing, oral COMMUNICATION or piece of information for which a claim of privilege or protection from discovery is made. For any DOCUMENT or information withheld on the grounds that it is privileged or otherwise claimed to be excludable from discovery, identify the information or DOCUMENT, describe its subject matter and date, identify all authors and all recipients (including copied and blind copied recipients), and specify the basis for the claimed privilege or other grounds of exclusion.

4. If YOU answer any of the Interrogatories by reference to records from which the answer may be derived or ascertained, YOU are required to comply with the requirements of Federal Rule of Civil Procedure 33 and section 405.04(b) of the T.B.M.P.

5. If any responsive DOCUMENT is no longer in existence, cannot be located or is not in

YOUR possession, custody or control, identify it, describe its subject matter and describe its disposition, including, without limitation, identifying the PERSON having knowledge of the disposition.

6. These Interrogatories are continuing in nature and YOUR responses to them are to be promptly supplemented or amended if, after the time of YOUR initial responses, YOU learn that any response is or has become in some material respect incomplete or incorrect, to the full extent provided for by Federal Rule of Civil Procedure 26(e).

III. INTERROGATORIES

INTERROGATORY NO. 1:

Identify each PERSON that has used or it is contemplated will in the future use the CHROME MARKS in the U.S. in connection with providing or offering for sale goods or services.

INTERROGATORY NO. 2:

Identify each PERSON with knowledge of the selection, adoption, and development of the CHROME MARKS.

INTERROGATORY NO. 3:

Describe fully the facts and circumstances surrounding the selection, adoption, and development of the CHROME MARKS.

INTERROGATORY NO. 4:

Describe in detail all goods and/or services with which the CHROME MARKS have been or are currently being used by any PERSON.

INTERROGATORY NO. 5:

Describe in detail all goods and/or services in connection with which YOU intend to use the CHROME MARKS in the future.

INTERROGATORY NO. 6:

Describe in detail all goods and/or services in connection with which YOU no longer use or intend to use the CHROME MARKS.

INTERROGATORY NO. 7:

With respect to any of the goods and services identified in response to Interrogatory No. 5, identify the intended customer markets.

INTERROGATORY NO. 8:

With respect to any of the goods and services identified in response to Interrogatory No. 4, provide the date(s) that the CHROME MARK I and CHROME MARK II were first used within the U.S.

INTERROGATORY NO. 9:

With respect to any of the goods and services identified in response to Interrogatory No. 4, identify the dates during which each PERSON has continuously used the CHROME MARKS, or if such use(s) has (have) not been continuous, state with particularity the dates and reasons for any period that the CHROME MARK I and CHROME MARK II has not been used by any PERSON.

INTERROGATORY NO. 10:

Describe in detail any personal computer, desktop computer, portable computer, notebook computer, laptop computer, or any other computer device on which YOUR CHROME MARKS are currently being used in commerce in the United States.

INTERROGATORY NO. 11:

Describe in detail any personal computer, desktop computer, portable computer, notebook computer, laptop computer, or any other computer device on which YOUR CHROME MARKS have been used in commerce in the United States in the last 4 years.

INTERROGATORY NO. 12:

With respect to any of the goods and services identified in response to Interrogatory No. 4, provide the geographical scope of such former or current use of the CHROME MARKS.

INTERROGATORY NO. 13:

With respect to any of the goods and services identified in response to Interrogatory No. 4, describe in detail the manner in which the CHROME MARKS are or have been promoted in the United States.

INTERROGATORY NO. 14:

Identify and fully describe the channels of trade and/or the potential channels of trade, for YOUR products or services that are or were distributed, sold and/or marketed under the CHROME MARKS.

INTERROGATORY NO. 15:

Describe fully any advertising conducted by any PERSON of the CHROME MARKS including, but without limitation: the nature of such advertising, the identity of each PERSON who has conducted such advertising, the geographic scope of such advertising, and the amount of money spent for such advertising on a yearly basis by each PERSON.

INTERROGATORY NO. 16:

Describe in detail all goods and/or services with which YOU used CHROME MARK I when YOU filed YOUR Combined Declaration of Use and Incontestability under Sections 8 and 15 (“Declaration of Use”) on February 14, 2013.

INTERROGATORY NO. 17:

Describe in detail YOUR decision to delete the goods and services YOU identified in paragraph 6 of YOUR ANSWER from YOUR Declaration of Use for the CHROME MARK I.

INTERROGATORY NO. 18:

Please provide a specimen that shows YOUR use in commerce of the goods and services listed in YOUR Declaration of Use for the CHROME MARK I.

INTERROGATORY NO. 19:

Describe in detail the basis for YOUR assertion in YOUR Declaration of Use that YOU currently and continuously use the CHROME MARK I in connection with any computer devices, including personal computers, portable computers, notebook computers, microcomputers, and desktop computers.

INTERROGATORY NO. 20:

Describe in detail the basis for YOUR assertion in YOUR Declaration of Use that YOU currently and continuously use the CHROME MARK I in connection with operating system software.

INTERROGATORY NO. 21:

Identify each witness Registrant intends to present or rely upon in this proceeding.

INTERROGATORY NO. 22:

Identify each person who supplied information included in any of the answers to this set of interrogatories or who was consulted or whose documents or files were consulted in connection with the preparation of the answers.

INTERROGATORY NO. 23:

Describe in detail all efforts done to-date to use or in preparation to use the CHROME MARKS in commerce in connection with the goods and services identified in their respective registrations.

INTERROGATORY NO. 24:

Provide all known current and past contact information for all individuals identified in response to Interrogatory No. 15, including but not limited to physical address(es), phone number(s), and e-mail address(es).

INTERROGATORY NO. 25:

Provide all known current and past contact information for Ken Weng, including but not limited to physical address(es), phone number(s), and e-mail address(es).

INTERROGATORY NO. 26:

Provide all known current and past contact information for Jonathan Chang, including but not limited to physical address(es), phone number(s), and e-mail address(es).

INTERROGATORY NO. 27:

Provide all known current and past contact information for Miller Chen, including but not limited to physical address(es), phone number(s), and e-mail address(es).

COOLEY LLP
JANET L. CULLUM
ANNE H. PECK
JEFFREY NORBERG

Date: July 2, 2013

By: /s/ Jeffrey Norberg
Jeffrey Norberg
Attorneys for Petitioner Google, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on the date indicated below, a true and correct copy of the foregoing **PETITIONER GOOGLE, INC.'S FIRST SET OF SPECIAL INTERROGATORIES TO REGISTRANT VIA TECHNOLOGIES RE CHROME CANCELLATION PETITION** was, pursuant to the parties' stipulation, served electronically upon Registrant and correspondent (being the same as the Registrant) for the subject application, via email to the following addresses:

trademark@raklaw.com
ilee@raklaw.com
rgookin@raklaw.com
azivkovic@raklaw.com

Date: July 2, 2013

/s/ Jeffrey Norberg

Exhibit C

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

Google, Inc., Petitioner, v. VIA Technologies, Inc., Registrant.	Cancellation No.: 92056816 Registration No.: 3,360,331 Mark: CHROME Issued: December 25, 2007 Registration No.: 3,951,287 Mark: CHROME Issued: April 26, 2011
--	---

**REGISTRANT VIA TECHNOLOGIES, INC.’S RESPONSE TO PETITIONER
GOOGLE, INC.’S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS**

PROPOUNDING PARTY: PETITIONER GOOGLE, INC.

RESPONDING PARTY: REGISTRANT VIA TECHNOLOGIES, INC.

SET NUMBER: ONE

Registrant VIA Technologies, LLC (“Registrant”) submits the following responses to Petitioner Google, Inc.’s (“Petitioner”) First Set of Requests for Production of Documents.

PRELIMINARY STATEMENT

These responses are made pursuant to Federal Code of Civil Procedure, Rule 34, solely for the purposes of this action. Each response is subject to all objections as to competence, relevance, materiality, propriety and admissibility, and any and all other objections and grounds which would require the exclusion of any statement herein if the questions were asked of, or any statements contained herein were made by, a witness present and testifying in court, all of which objections and grounds are reserved and may be interposed at the time of trial. Registrant has not completed its investigation of the facts relating to this case, and has not completed its preparation for trial. The following responses are based upon information presently available to and known

by Registrant and are made without prejudice to its rights to utilize subsequently discovered facts or documents.

Registrant has not fully completed its investigation of the facts relating to this case, has not fully completed discovery in this action, and has not completed preparation for trial. All of the responses contained herein are based only upon such information and documents that presently are available to and specifically known to Registrant. It is anticipated that further discovery, independent investigation, legal research and analysis will supply additional facts and add meaning to known facts, as well as establish entirely new factual conclusions and legal contentions, all of which may lead to substantial additions, changes and variations to the responses herein set forth.

The following responses are given without prejudice to Registrant's right to produce evidence and any subsequently discovered fact or facts that Registrant may later discover or recall. Registrant accordingly reserves the right to change any and all responses herein as additional facts are ascertained, analyses are made, legal research is completed and contentions are made. The responses contained herein are made in a good-faith effort to supply as much factual information and as many specific legal contentions as are presently known, but are without prejudice to the rights of this Registrant in relation to further discovery, research or further analyses.

GENERAL OBJECTIONS TO REQUESTS FOR PRODUCTION

1. Registrant objects to each request for production to the extent it seeks information protected by the attorney-client privilege and/or work product doctrine, or any other applicable privilege. Registrant and its counsel do not intend to waive either the attorney-client privilege and/or any other privilege and/or the work product privilege, and these responses shall not be deemed to be any such waiver. In response to the Requests, Registrant will produce those documents believed to be non-privileged, responsive and otherwise discoverable. By producing

any such documents, Registrant does not intend to waive and shall not be construed as having waived any privilege.

2. Registrant objects generally to the Requests as overly broad and unduly burdensome and oppressive insofar as any Request or instruction purports to require Registrant to produce documents in the possession, custody or control of third parties.

3. Registrant objects to the Requests to the extent they seek information about matters not relevant to the subject matter of this action and not reasonably calculated to lead to the discovery of admissible evidence.

4. Registrant further objects to each Request on the grounds that they are vague, ambiguous, and propounded solely for the purpose of harassment.

5. Registrant reserves the right to produce only those documents which contain information that is relevant and not to produce those documents that contain information not relevant to the subject matter of this action.

6. Registrant further objects to each Request on the grounds that they are overbroad as to scope and time.

7. Registrant further objects to the definition of “You” set forth in the Requests for Production on the grounds such definition is overbroad and purports to require Registrant to respond to, or on behalf of, persons or entities other than this answering Registrant. As such, it includes the attorneys for Registrant, and hence renders each inquiry subject to objection on the grounds of the attorney-client privilege or work product doctrine. Further, as such, it calls for information in the possession, custody or control of parties other than this answering Registrant. This answering Registrant will respond solely based upon information and documents in its possession, custody or control.

8. Registrant incorporates by reference each of the foregoing general objections set forth herein above into each response to Requests for Production set forth below.

Without waiving the foregoing objections, Defendant responds as follows:

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

All DOCUMENTS that refer to or SUPPORT allegations made by YOU in YOUR ANSWER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Subject to the foregoing general and specific objections, Registrant will produce relevant and non-privileged documents responsive to this request to the extent such documents are within its possession, custody, or control and subject to a reasonable search.

REQUEST FOR PRODUCTION NO. 2:

All DOCUMENTS used, identified, relied upon or referred to by YOU when answering Google's First Set of Interrogatories or any other discovery requests propounded by Google.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by

the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents.

REQUEST FOR PRODUCTION NO. 3:

All DOCUMENTS referring to the adoption of the CHROME MARKS by YOU or other authorized users, including without limitation, all DOCUMENTS and things referring to or evidencing the origination, selection, and development of the CHROME MARKS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Subject to the foregoing general and specific objections, Registrant will produce relevant and non-privileged documents responsive to this request to the extent such documents are within its possession, custody, or control and subject to a reasonable search.

REQUEST FOR PRODUCTION NO. 4:

DOCUMENTS sufficient to show the date of first use for each of the CHROME MARKS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by

the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Registrant further objects to this request to the extent it seeks a legal conclusion. Subject to the foregoing general and specific objections, Registrant will produce relevant and non-privileged documents responsive to this request to the extent such documents are within its possession, custody, or control and subject to a reasonable search.

REQUEST FOR PRODUCTION NO. 5:

A specimen sufficient to show any use of the CHROME MARKS with each good or service identified in response to Interrogatory No. 4 of Google's First Set of Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5

In addition to the General Objections set forth above, Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Subject to the foregoing general and specific objections, Registrant responds that it did not identify any good or service in response to Interrogatory No. 4 of Google's First Set of Interrogatories.

REQUEST FOR PRODUCTION NO. 6:

All DOCUMENTS referring to or constituting COMMUNICATIONS regarding YOUR use of the CHROME MARKS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by

the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents.

REQUEST FOR PRODUCTION NO. 7:

All DOCUMENTS referring to or reflecting YOUR use of the CHROME MARK I in commerce on each of the goods and services listed in YOUR Statement of Use, dated October 12, 2007.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Subject to the foregoing general and specific objections, Registrant will produce relevant and non-privileged documents responsive to this request to the extent such documents are within its possession, custody, or control and subject to a reasonable search.

REQUEST FOR PRODUCTION NO. 8:

All DOCUMENTS referring to or reflecting YOUR use of the CHROME MARK II in commerce on each of the goods and services listed in YOUR Statement of Use, dated March 1, 2011.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Subject to the foregoing general and specific objections, Registrant will produce relevant and non-privileged documents responsive to this request to the extent such documents are within its possession, custody, or control and subject to a reasonable search.

REQUEST FOR PRODUCTION NO. 9:

DOCUMENTS sufficient to show YOUR current and continuous use of CHROME MARK I on or in connection with the goods or services identified in YOUR Combined Declaration of Use and Incontestability under Sections 8 and 15 that YOU filed on February 14, 2013.

RESPONSE TO REQUEST FOR PRODUCTION NO. 9

In addition to the General Objections set forth above, Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Registrant further objects to this Request to the extent it seeks a legal conclusion. Subject to the foregoing general and specific objections, Registrant will produce relevant and non-privileged documents responsive to this request to the extent such documents are within its possession, custody, or control and subject to a reasonable search.

REQUEST FOR PRODUCTION NO. 10:

A specimen sufficient to show YOUR current and continuous use of the CHROME MARK I with each good or service identified in YOUR Combined Declaration of Use and Incontestability under Sections 8 and 15 on February 14, 2013.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10

In addition to the General Objections set forth above, Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Registrant further objects to this Request to the extent it seeks a legal conclusion. Subject to the foregoing general and specific objections, Registrant will produce relevant and non-privileged documents responsive to this request to the extent such documents are within its possession, custody, or control and subject to a reasonable search.

REQUEST FOR PRODUCTION NO. 11:

All DOCUMENTS referring to or constituting COMMUNICATIONS regarding YOUR decision to delete the goods YOU identified in paragraph 6 of YOUR ANSWER from YOUR Combined Declaration of Use and Incontestability for YOUR CHROME MARK I.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents.

REQUEST FOR PRODUCTION NO. 12:

All DOCUMENTS that refer to or reflect YOUR past, current, or planned future use of the CHROME MARKS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 12

In addition to the General Objections set forth above, Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Subject to the foregoing general and specific objections, Registrant will produce relevant and non-privileged documents responsive to this request to the extent such documents are within its possession, custody, or control and subject to a reasonable search.

REQUEST FOR PRODUCTION NO. 13:

All DOCUMENTS referring to or constituting COMMUNICATIONS regarding the use, or planned future use, of the CHROME MARKS by YOU.

RESPONSE TO REQUEST FOR PRODUCTION NO. 13

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Subject to the foregoing general and specific objections, Registrant will produce relevant and non-privileged documents responsive to this request to the extent such documents are within its possession, custody, or control and subject to a reasonable search.

REQUEST FOR PRODUCTION NO. 14:

All DOCUMENTS that refer to or reflect YOUR non-use or intent not to use YOUR CHROME MARKS on or in connection with any of the goods or services identified in YOUR CHROME MARK I or CHROME MARK II Registrations.

RESPONSE TO REQUEST FOR PRODUCTION NO. 14

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Subject to the foregoing general and specific objections, Registrant will produce relevant and non-privileged documents responsive to this request to the extent such documents are within its possession, custody, or control and subject to a reasonable search.

REQUEST FOR PRODUCTION NO. 15:

All DOCUMENTS referring to or constituting COMMUNICATIONS regarding YOUR non-use or intent not to use YOUR CHROME MARKS on or in connection with any of the goods or services identified in YOUR CHROME MARK I or CHROME MARK II Registrations.

RESPONSE TO REQUEST FOR PRODUCTION NO. 15

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive

documents.

REQUEST FOR PRODUCTION NO. 16:

All DOCUMENTS that refer to or reflect YOUR current or planned future use or sale of the CHROME MARKS in commerce in connection with any personal computer, desktop computer, portable computer, notebook computer, laptop computer, or any other computer device.

RESPONSE TO REQUEST FOR PRODUCTION NO. 16

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Subject to the foregoing general and specific objections, Registrant will produce relevant and non-privileged documents responsive to this request to the extent such documents are within its possession, custody, or control and subject to a reasonable search.

REQUEST FOR PRODUCTION NO. 17:

All DOCUMENTS that refer to or reflect YOUR use or sale of the CHROME MARKS in commerce in the last 4 years in connection with any personal computer, desktop computer, portable computer, notebook computer, laptop computer, or any other computer device.

RESPONSE TO REQUEST FOR PRODUCTION NO. 17

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this

Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Subject to the foregoing general and specific objections, Registrant will produce relevant and non-privileged documents responsive to this request to the extent such documents are within its possession, custody, or control and subject to a reasonable search.

REQUEST FOR PRODUCTION NO. 18:

All DOCUMENTS that refer to or reflect YOUR past, current, or planned future use or sale of the CHROME MARKS in commerce in connection with operating system software.

RESPONSE TO REQUEST FOR PRODUCTION NO. 18

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Subject to the foregoing general and specific objections, Registrant will produce relevant and non-privileged documents responsive to this request to the extent such documents are within its possession, custody, or control and subject to a reasonable search.

REQUEST FOR PRODUCTION NO. 19:

All DOCUMENTS that refer to or reflect the use, or planned future use, of the CHROME MARKS by any third party.

RESPONSE TO REQUEST FOR PRODUCTION NO. 19

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by

the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

REQUEST FOR PRODUCTION NO. 20:

All COMMUNICATIONS regarding the use, or planned future use, of the CHROME MARKS by any third party.

RESPONSE TO REQUEST FOR PRODUCTION NO. 20

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

REQUEST FOR PRODUCTION NO. 21:

All DOCUMENTS referring to or reflecting YOUR use of any mark including a “chrome” component, including without limitation, all COMMUNICATIONS regarding YOUR use of any mark including a “chrome” component.

RESPONSE TO REQUEST FOR PRODUCTION NO. 21

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by

the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

REQUEST FOR PRODUCTION NO. 22:

All DOCUMENTS referring to or reflecting YOUR planned or considered use of any mark including a “chrome” component, including without limitation, all COMMUNICATIONS regarding YOUR planned or considered use of any mark including a “chrome” component.

RESPONSE TO REQUEST FOR PRODUCTION NO. 22

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

REQUEST FOR PRODUCTION NO. 23:

All DOCUMENTS that refer to or reflect the use or planned use of the CHROME MARKS in connection with the plans or preparation to develop a product and/or service.

RESPONSE TO REQUEST FOR PRODUCTION NO. 23

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by

the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents.

REQUEST FOR PRODUCTION NO. 24:

All DOCUMENTS that refer to or reflect business plans regarding any products bearing the CHROME MARKS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 24

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents.

REQUEST FOR PRODUCTION NO. 25:

All DOCUMENTS that refer to or reflect the cessation or phasing out of any product or product line that has at any time been advertised, offered or sold in connection with a “chrome” designation.

RESPONSE TO REQUEST FOR PRODUCTION NO. 25

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent

that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

REQUEST FOR PRODUCTION NO. 26:

All DOCUMENTS that refer to or reflect the use or planned use of the CHROME MARKS in connection with any product packaging, including all DOCUMENTS referring or relating to the design of such packaging.

RESPONSE TO REQUEST FOR PRODUCTION NO. 26

In addition to the General Objections set forth above, Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Registrant further objects to this Request to the extent it seeks a legal conclusion. Subject to the foregoing general and specific objections, Registrant will produce relevant and non-privileged documents responsive to this request to the extent such documents are within its possession, custody, or control and subject to a reasonable search.

REQUEST FOR PRODUCTION NO. 27:

All DOCUMENTS that refer to or reflect the use or planned use of the CHROME MARKS in connection with the sale or advertising of a product and/or service.

RESPONSE TO REQUEST FOR PRODUCTION NO. 27

In addition to the General Objections set forth above, Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Registrant further objects to this Request to the extent it seeks a legal conclusion.

Subject to the foregoing general and specific objections, Registrant will produce relevant and non-privileged documents responsive to this request to the extent such documents are within its possession, custody, or control and subject to a reasonable search.

REQUEST FOR PRODUCTION NO. 28:

DOCUMENTS sufficient to show the target market of products and/or services offered, sold or offered for sale in connection with the CHROME MARKS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 28

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Registrant further objects to this Request to the extent it seeks a legal conclusion. Subject to the foregoing general and specific objections, Registrant will produce relevant and non-privileged documents responsive to this request to the extent such documents are within its possession, custody, or control and subject to a reasonable search.

REQUEST FOR PRODUCTION NO. 29:

DOCUMENTS sufficient to show the target market of products and/or services offered, planned to be sold or offered for sale in the future in connection with the CHROME MARKS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 29

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this

Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Registrant further objects to this Request to the extent it seeks a legal conclusion. Subject to the foregoing general and specific objections, Registrant will produce relevant and non-privileged documents responsive to this request to the extent such documents are within its possession, custody, or control and subject to a reasonable search.

REQUEST FOR PRODUCTION NO. 30:

DOCUMENTS sufficient to identify, to date, the purchasers and/or users of any products and/or services offered, sold, or offered for sale in connection with the CHROME MARKS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 30

In addition to the General Objections set forth above, Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

REQUEST FOR PRODUCTION NO. 31:

All advertising and promotional DOCUMENTS referring, reflecting and/or relating to the products and/or services offered, sold, or planned to be sold in the future, in connection with the CHROME MARKS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 31

In addition to the General Objections set forth above, Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive

documents. Registrant further objects to this Request to the extent it seeks a legal conclusion.

REQUEST FOR PRODUCTION NO. 32:

All marketing plans, forecasts, projections and DOCUMENTS referring, reflecting and/or relating to YOUR marketing and sales plans for products and/or services sold, to be sold, advertised, or to be advertised, bearing or associated with the CHROME MARKS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 32

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents.

REQUEST FOR PRODUCTION NO. 33:

DOCUMENTS sufficient [sic] sales in the United States, by volume and dollar amount, of all products or services bearing the CHROME MARKS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 33

In addition to the General Objections set forth above, Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Registrant further objects to this Request to the extent it seeks a legal conclusion. Subject to the foregoing general and specific objections, Registrant will produce relevant and non-privileged documents responsive to this request to the extent such documents are within its possession, custody, or control and subject to a reasonable search.

REQUEST FOR PRODUCTION NO. 34:

DOCUMENTS sufficient to identify the channels of trade through which YOU offer or plan to offer each product and/or service sold, to be sold, advertised, or to be advertised, bearing the CHROME MARKS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 34

In addition to the General Objections set forth above, Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Registrant further objects to this Request to the extent it seeks a legal conclusion. Subject to the foregoing general and specific objections, Registrant will produce relevant and non-privileged documents responsive to this request to the extent such documents are within its possession, custody, or control and subject to a reasonable search.

REQUEST FOR PRODUCTION NO. 35:

DOCUMENTS sufficient to show the identities of individuals who have ever been associated with the development and/or marketing of any products and/or services offered under the CHROME MARKS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 35

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Registrant further objects to this Interrogatory to the extent that it is overbroad and

not relevant or reasonably calculated to lead to admissible evidence.

REQUEST FOR PRODUCTION NO. 36:

DOCUMENTS sufficient to show YOUR organizational structure, including but not limited to an organizational chart.

RESPONSE TO REQUEST FOR PRODUCTION NO. 36

In addition to the General Objections set forth above, Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

REQUEST FOR PRODUCTION NO. 37:

All DOCUMENTS that refer to or reflect YOUR acquisition of any ownership interest in S3 Graphics Co., Ltd. to the extent any such DOCUMENTS refer or relate to any CHROME trademark or product bearing a CHROME MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 37

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

REQUEST FOR PRODUCTION NO. 38:

All COMMUNICATIONS with S3 Graphics Co., Ltd. that refer or reflect to any CHROME trademark or product bearing a CHROME MARK.

RESPONSE TO REQUEST FOR PRODUCTION NO. 38

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

REQUEST FOR PRODUCTION NO. 39:

All DOCUMENTS referring to or reflecting COMMUNICATIONS between YOU and S3 Graphics Co., Ltd. regarding the past, current, or future use, or the intent not to use, the CHROME MARKS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 39

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive

documents. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

REQUEST FOR PRODUCTION NO. 40:

All DOCUMENTS referring to or reflecting COMMUNICATIONS between YOU and HTC Corporation regarding the past, current, or future use, or the intent not to use, the CHROME MARKS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 40

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive documents. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

REQUEST FOR PRODUCTION NO. 41:

All DOCUMENTS constituting or reflecting market surveys of any kind regarding the CHROME MARKS or any products or services offered under the CHROME MARKS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 41

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome. Registrant further objects to this Request to the extent that it seeks proprietary, trade secret, and commercially confidential or competitively sensitive

documents. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

REQUEST FOR PRODUCTION NO. 42:

All DOCUMENTS upon which YOU intend to rely in this matter.

RESPONSE TO REQUEST FOR PRODUCTION NO. 42

In addition to the General Objections set forth above, Registrant further objects to this request to the extent it seeks the production of documents that are protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Request is vague and unduly burdensome.

Dated: August 6, 2013

Respectfully submitted,

/s/ Robert F. Gookin

Robert F. Gookin
RUSS, AUGUST & KABAT
Twelfth Floor
12424 Wilshire Boulevard
Los Angeles, California 90025
Telephone: (310) 826-7474
Facsimile: (310) 826-6991

*Attorneys for Registrant
VIA Technologies, Inc.*

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing **REGISTRANT VIA TECHNOLOGIES, INC.'S RESPONSE TO PETITIONER GOOGLE, INC.'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS** was served by electronic mail on August 6, 2013, upon counsel of Petitioner:

COOLEY LLP
JANET L. CULLUM
ANNE H. PECK
JEFFREY NORBERG
jcullum@cooley.com
apec@cooley.com
jnorberg@cooley.com
thance@cooley.com
smartinez@cooley.com
trademarks@cooley.com

/s/ Josie Mercado

Josie Mercado

Exhibit D

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

Google, Inc., Petitioner, v. VIA Technologies, Inc., Registrant.	Cancellation No.: 92056816 Registration No.: 3,360,331 Mark: CHROME Issued: December 25, 2007 Registration No.: 3,951,287 Mark: CHROME Issued: April 26, 2011
--	---

**REGISTRANT VIA TECHNOLOGIES, INC.’S RESPONSES TO PETITIONER
GOOGLE, INC.’S FIRST SET OF SPECIAL INTERROGATORIES**

PROPOUNDING PARTY: PETITIONER GOOGLE, INC.

RESPONDING PARTY: REGISTRANT VIA TECHNOLOGIES, INC.

SET NUMBER: ONE

PRELIMINARY STATEMENT

These responses are made pursuant to Rule 33 of the Federal Rules of Civil Procedure, solely for the purposes of this action. Each response is subject to all objections as to competence, relevance, materiality, propriety and admissibility, and any and all other objections and grounds which would require the exclusion of any statement herein if the questions were asked of, or any statements contained herein were made by, a witness present and testifying in court, all of which objections and grounds are reserved and may be interposed at the time of trial.

Registrant VIA Technologies, Inc. (“Registrant”) has not completed its investigation of the facts relating to this case, and has not completed discovery in this action, and has not completed preparation for trial. The following responses are based upon information presently

available to and known by Registrant and are made without prejudice to its rights to utilize subsequently discovered facts or documents.

Registrant discloses only those contentions which presently occur to it. It is anticipated that further discovery, independent investigation, legal research and analysis will supply additional facts and add meaning to known facts, as well as establish entirely new factual conclusions and legal contentions, all of which may lead to substantial additions, changes and variations to the responses herein set forth.

The following responses are given without prejudice to Registrant's right to produce evidence and any subsequently discovered fact or facts that Registrant may later discover or recall. Registrant accordingly reserves the right to change any and all responses herein as additional facts are ascertained, analyses are made, legal research is completed and contentions are made. The responses contained herein are made in a good-faith effort to supply as much factual information and as many specific legal contentions as are presently known, but are without prejudice to the rights of this Registrant in relation to further discovery, research or further analyses.

Objections to each interrogatory are made on an individual basis below. From time to time, for special emphasis, Registrant will repeat in the specific objections certain objections also set forth in the General Objections. The specific objections are submitted without prejudice to, and without in any way waiving, the General Objections listed below, but not expressly set forth in the response. The assertion of any objection to any interrogatory below is neither intended as, nor shall in any way be deemed, a waiver of Registrant's right to assert that or any other objection at a later date.

No incidental or implied admissions are intended by the responses below. The fact that Registrant answered or objected to any interrogatory should not be taken as an admission that Registrant accepts or admits the existence of any “facts” set forth or assumed by such interrogatory. The fact that Registrant has answered part or all of interrogatory is not intended to be, and shall not be construed to be, a waiver by Registrant of any part of any objection to the interrogatory.

GENERAL OBJECTIONS TO INTERROGATORIES

1. Registrant objects to each Interrogatory to the extent it seeks information protected by the attorney-client privilege and/or work product doctrine, or any other applicable privilege.

2. Registrant further objects to each Interrogatory on the grounds that they are overbroad in time and/or scope, oppressive, vague, ambiguous, harassing and unduly burdensome.

3. Registrant objects to each Interrogatory to the extent that they seek information in the possession, custody or control of non-parties. This answering Registrant will respond solely based upon information and documents in its possession, custody or control.

4. Registrant further objects to each Interrogatory to the extent that it seeks information that is not relevant to the subject matter of this litigation and not likely to lead to the discovery of admissible evidence.

5. Registrant further objects to each Interrogatory to the extent it calls upon Registrant to compile or relate information that is available to the Petitioner through public documents.

6. Registrant objects to the definition of “You” set forth in the interrogatories on the grounds such definition is overbroad and purports to require Registrant to respond to, or on behalf of, persons or entities other than this answering Registrant. As such, it includes the attorneys for Registrant, and hence renders each inquiry subject to objection on the grounds of the attorney-client privilege or work product doctrine. Further, as such, it calls for information in the possession, custody or control of parties other than this answering Registrant. This answering Registrant will respond solely based upon information and documents in its possession, custody or control.

7. Registrant incorporates by reference each of the foregoing general objections set forth herein above into each Interrogatory response set forth below.

Without waiving the foregoing objections, Registrant responds as follows:

INTERROGATORIES

INTERROGATORY NO. 1:

Identify each PERSON that has used or it is contemplated will in the future use the CHROME MARKS in the U.S. in connection with providing or offering for sale goods or services.

RESPONSE TO INTERROGATORY NO. 1

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

INTERROGATORY NO. 2:

Identify each PERSON with knowledge of the selection, adoption, and development of the CHROME MARKS.

RESPONSE TO INTERROGATORY NO. 2

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory to the extent it seeks the information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

INTERROGATORY NO. 3:

Describe fully the facts and circumstances surrounding the selection, adoption, and development of the CHROME MARKS.

RESPONSE TO INTERROGATORY NO. 3

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory to the extent it seeks the information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

INTERROGATORY NO. 4:

Describe in detail all goods and/or services with which the CHROME MARKS have been or are currently being used by any PERSON.

RESPONSE TO INTERROGATORY NO. 4

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory to the extent it seeks the information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

INTERROGATORY NO. 5:

Describe in detail all goods and/or services in connection with which YOU intend to use the CHROME MARKS in the future.

RESPONSE TO INTERROGATORY NO. 5

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory to the extent it seeks the information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

INTERROGATORY NO. 6:

Describe in detail all goods and/or services in connection with which YOU no longer use or intend to use the CHROME MARKS.

RESPONSE TO INTERROGATORY NO. 6

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this

Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

INTERROGATORY NO. 7:

With respect to any of the goods and services identified in response to Interrogatory No. 5, identify the intended customer markets.

RESPONSE TO INTERROGATORY NO. 7

In addition to the General Objections set forth above, In addition to the General Objections set forth above, Registrant further objects to this Interrogatory to the extent it seeks the information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

INTERROGATORY NO. 8:

With respect to any of the goods and services identified in response to Interrogatory No. 4, provide the date(s) that the CHROME MARK I and CHROME MARK II were first used within the U.S.

RESPONSE TO INTERROGATORY NO. 8

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to

admissible evidence. Subject to the foregoing general and specific objections Registrant responds that CHROME MARK I was first used within the United States on July 1, 2000, and CHROME MARK II was first used within the United States on July 19, 2007.

INTERROGATORY NO. 9:

With respect to any of the goods and services identified in response to Interrogatory No. 4, identify the dates during which each PERSON has continuously used the CHROME MARKS, or if such use(s) has (have) not been continuous, state with particularity the dates and reasons for any period that the CHROME MARK I and CHROME MARK II has not been used by any PERSON.

RESPONSE TO INTERROGATORY NO. 9:

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory to the extent it seeks the information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory as requiring a legal conclusion. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

INTERROGATORY NO. 10:

Describe in detail any personal computer, desktop computer, portable computer, notebook computer, laptop computer, or any other computer device on which YOUR CHROME MARKS are currently being used in commerce in the United States.

RESPONSE TO INTERROGATORY NO. 10

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

INTERROGATORY NO. 11:

Describe in detail any personal computer, desktop computer, portable computer, notebook computer, laptop computer, or any other computer device on which YOUR CHROME MARKS have been used in commerce in the United States in the last 4 years.

RESPONSE TO INTERROGATORY NO. 11

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

INTERROGATORY NO. 12:

With respect to any of the goods and services identified in response to Interrogatory No. 4, provide the geographical scope of such former or current use of the CHROME MARKS.

RESPONSE TO INTERROGATORY NO. 12

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

INTERROGATORY NO. 13:

With respect to any of the goods and services identified in response to Interrogatory No. 4, describe in detail the manner in which the CHROME MARKS are or have been promoted in the United States.

RESPONSE TO INTERROGATORY NO. 13

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

INTERROGATORY NO. 14:

Identify and fully describe the channels of trade and/or the potential channels of trade, for YOUR products or services that are or were distributed, sold and/or marketed under the CHROME MARKS.

RESPONSE TO INTERROGATORY NO. 14

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

INTERROGATORY NO. 15:

Describe fully any advertising conducted by any PERSON of the CHROME MARKS including, but without limitation: the nature of such advertising, the identity of each PERSON who has conducted such advertising, the geographic scope of such advertising, and the amount of money spent for such advertising on a yearly basis by each PERSON.

RESPONSE TO INTERROGATORY NO. 15

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad.

INTERROGATORY NO. 16:

Describe in detail all goods and/or services with which YOU used CHROME MARK I when YOU filed YOUR Combined Declaration of Use and Incontestability under Sections 8 and 15 (“Declaration of Use”) on February 14, 2013.

RESPONSE TO INTERROGATORY NO. 16:

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

INTERROGATORY NO. 17:

Describe in detail YOUR decision to delete the goods and services YOU identified in paragraph 6 of YOUR ANSWER from YOUR Declaration of Use for the CHROME MARK I.

RESPONSE TO INTERROGATORY NO. 17:

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory as seeking information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

INTERROGATORY NO. 18:

Please provide a specimen that shows YOUR use in commerce of the goods and services listed in YOUR Declaration of Use for the CHROME MARK I.

RESPONSE TO INTERROGATORY NO. 18:

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, unduly burdensome and/or duplicative of other discovery requests. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

INTERROGATORY NO. 19:

Describe in detail the basis for YOUR assertion in YOUR Declaration of Use that YOU currently and continuously use the CHROME MARK I in connection with any computer devices, including personal computers, portable computers, notebook computers, microcomputers, and desktop computers.

RESPONSE TO INTERROGATORY NO. 19

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory as seeking information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent it seeks a legal conclusion. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

INTERROGATORY NO. 20:

Describe in detail the basis for YOUR assertion in YOUR Declaration of Use that YOU currently and continuously use the CHROME MARK I in connection with operating system

software.

RESPONSE TO INTERROGATORY NO. 20

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory as seeking information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent it seeks a legal conclusion. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

INTERROGATORY NO. 21:

Identify each witness Registrant intends to present or rely upon in this proceeding.

RESPONSE TO INTERROGATORY NO. 21:

In addition to the General Objections set forth above, Registrant objects that this Interrogatory is premature and it seeks information protected by the attorney-client privilege and attorney work product. Discovery in this action is ongoing. Accordingly, Registrant reserves the right to further supplement and/or amend its response to this interrogatory based on further discovery in compliance with the TTAB's Scheduling Order and Federal Rules of Civil Procedure.

INTERROGATORY NO. 22:

Identify each person who supplied information included in any of the answers to this set of interrogatories or who was consulted or whose documents or files were consulted in connection with the preparation of the answers.

RESPONSE TO INTERROGATORY NO. 22

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory as seeking information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome.

INTERROGATORY NO. 23:

Describe in detail all efforts done to-date to use or in preparation to use the CHROME MARKS in commerce in connection with the goods and services identified in their respective registrations.

RESPONSE TO INTERROGATORY NO. 23

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

INTERROGATORY NO. 24:

Provide all known current and past contact information for all individuals identified in response to Interrogatory No. 15, including but not limited to physical address(es), phone number(s), and e-mail address(es).

RESPONSE TO INTERROGATORY NO. 24

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

INTERROGATORY NO. 25:

Provide all known current and past contact information for Ken Weng, including but not limited to physical address(es), phone number(s), and e-mail address(es).

RESPONSE TO INTERROGATORY NO. 25

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence. Registrant further objects further objects to this Interrogatory to the extent it invades any constitutionally protected right of privacy.

INTERROGATORY NO. 26:

Provide all known current and past contact information for Jonathan Chang, including but not limited to physical address(es), phone number(s), and e-mail address(es).

RESPONSE TO INTERROGATORY NO. 26

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence. Registrant further objects further objects to this Interrogatory to the extent it invades any constitutionally protected right of privacy.

INTERROGATORY NO. 27:

Provide all known current and past contact information for Miller Chen, including but not limited to physical address(es), phone number(s), and e-mail address(es).

RESPONSE TO INTERROGATORY NO. 27

In addition to the General Objections set forth above, Registrant further objects that this

Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence. Registrant further objects further objects to this Interrogatory to the extent it invades any constitutionally protected right of privacy.

Dated: August 6, 2013

Respectfully submitted,

/s/ Robert F. Gookin

Robert F. Gookin
RUSS, AUGUST & KABAT
Twelfth Floor
12424 Wilshire Boulevard
Los Angeles, California 90025
Telephone: (310) 826-7474
Facsimile: (310) 826-6991

*Attorneys for Registrant
VIA Technologies, Inc.*

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing **REGISTRANT VIA TECHNOLOGIES, INC.'S RESPONSES TO PETITIONER GOOGLE, INC.'S FIRST SET OF SPECIAL INTERROGATORIES** was served by electronic mail on August 6, 2013, upon counsel of
Petitioner:

COOLEY LLP
JANET L. CULLUM
ANNE H. PECK
JEFFREY NORBERG
jcullum@cooley.com
apec@cooley.com
jnorberg@cooley.com
thance@cooley.com
smartinez@cooley.com
trademarks@cooley.com

/s/ Josie Mercado
Josie Mercado

Exhibit E

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

Google, Inc., Petitioner, v. VIA Technologies, Inc., Registrant.	Cancellation No.: 92056816 Registration No.: 3,360,331 Mark: CHROME Issued: December 25, 2007 Registration No.: 3,951,287 Mark: CHROME Issued: April 26, 2011
--	---

**REGISTRANT VIA TECHNOLOGIES, INC.'S AMENDED RESPONSES TO
PETITIONER GOOGLE, INC.'S FIRST SET OF SPECIAL INTERROGATORIES**

PROPOUNDING PARTY: PETITIONER GOOGLE, INC.

RESPONDING PARTY: REGISTRANT VIA TECHNOLOGIES, INC.

SET NUMBER: ONE

PRELIMINARY STATEMENT

These responses are made pursuant to Rule 33 of the Federal Rules of Civil Procedure, solely for the purposes of this action. Each response is subject to all objections as to competence, relevance, materiality, propriety and admissibility, and any and all other objections and grounds which would require the exclusion of any statement herein if the questions were asked of, or any statements contained herein were made by, a witness present and testifying in court, all of which objections and grounds are reserved and may be interposed at the time of trial.

Registrant VIA Technologies, Inc. ("Registrant") has not completed its investigation of the facts relating to this case, and has not completed discovery in this action, and has not completed preparation for trial. The following responses are based upon information presently

available to and known by Registrant and are made without prejudice to its rights to utilize subsequently discovered facts or documents.

Registrant discloses only those contentions which presently occur to it. It is anticipated that further discovery, independent investigation, legal research and analysis will supply additional facts and add meaning to known facts, as well as establish entirely new factual conclusions and legal contentions, all of which may lead to substantial additions, changes and variations to the responses herein set forth.

The following responses are given without prejudice to Registrant's right to produce evidence and any subsequently discovered fact or facts that Registrant may later discover or recall. Registrant accordingly reserves the right to change any and all responses herein as additional facts are ascertained, analyses are made, legal research is completed and contentions are made. The responses contained herein are made in a good-faith effort to supply as much factual information and as many specific legal contentions as are presently known, but are without prejudice to the rights of this Registrant in relation to further discovery, research or further analyses.

Objections to each interrogatory are made on an individual basis below. From time to time, for special emphasis, Registrant will repeat in the specific objections certain objections also set forth in the General Objections. The specific objections are submitted without prejudice to, and without in any way waiving, the General Objections listed below, but not expressly set forth in the response. The assertion of any objection to any interrogatory below is neither intended as, nor shall in any way be deemed, a waiver of Registrant's right to assert that or any other objection at a later date.

No incidental or implied admissions are intended by the responses below. The fact that Registrant answered or objected to any interrogatory should not be taken as an admission that Registrant accepts or admits the existence of any "facts" set forth or assumed by such interrogatory. The fact that Registrant has answered part or all of interrogatory is not intended to be, and shall not be construed to be, a waiver by Registrant of any part of any objection to the interrogatory.

GENERAL OBJECTIONS TO INTERROGATORIES

1. Registrant objects to each Interrogatory to the extent it seeks information protected by the attorney-client privilege and/or work product doctrine, or any other applicable privilege.

2. Registrant further objects to each Interrogatory on the grounds that they are overbroad in time and/or scope, oppressive, vague, ambiguous, harassing and unduly burdensome.

3. Registrant objects to each Interrogatory to the extent that they seek information in the possession, custody or control of non-parties. This answering Registrant will respond solely based upon information and documents in its possession, custody or control.

4. Registrant further objects to each Interrogatory to the extent that it seeks information that is not relevant to the subject matter of this litigation and not likely to lead to the discovery of admissible evidence.

5. Registrant further objects to each Interrogatory to the extent it calls upon Registrant to compile or relate information that is available to the Petitioner through public documents.

6. Registrant objects to the definition of “You” set forth in the interrogatories on the grounds such definition is overbroad and purports to require Registrant to respond to, or on behalf of, persons or entities other than this answering Registrant. As such, it includes the attorneys for Registrant, and hence renders each inquiry subject to objection on the grounds of the attorney-client privilege or work product doctrine. Further, as such, it calls for information in the possession, custody or control of parties other than this answering Registrant. This answering Registrant will respond solely based upon information and documents in its possession, custody or control.

7. Registrant incorporates by reference each of the foregoing general objections set forth herein above into each Interrogatory response set forth below.

Without waiving the foregoing objections, Registrant responds as follows:

INTERROGATORIES

INTERROGATORY NO. 1:

Identify each PERSON that has used or it is contemplated will in the future use the CHROME MARKS in the U.S. in connection with providing or offering for sale goods or services.

RESPONSE TO INTERROGATORY NO. 1

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

VIA Technologies, Inc. has used the CHROME MARKS in the U.S. in connection with providing or offering for sale goods or services and contemplates continuing that use in the future.

INTERROGATORY NO. 2:

Identify each PERSON with knowledge of the selection, adoption, and development of the CHROME MARKS.

RESPONSE TO INTERROGATORY NO. 2

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory to the extent it seeks the information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

Young Kwon is an individual with knowledge of the selection, adoption, and development of the CHROME MARKS. He can be contacted through VIA's counsel of record in this proceeding.

INTERROGATORY NO. 3:

Describe fully the facts and circumstances surrounding the selection, adoption, and development of the CHROME MARKS.

RESPONSE TO INTERROGATORY NO. 3

In addition to the General Objections set forth above, Registrant further objects to this

Interrogatory to the extent it seeks the information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

At the time that the CHROME MARKS were conceived, Young Kwon was the Sr. Product Marketing Manager for S3 Graphics, a wholly owned subsidiary of Registrant. In that capacity, Mr. Kwon was responsible for coming up with branding ideas. At the time that the CHROME MARKS were conceived, S3 Graphics was working on a graphics processor that had 8 pipelines, which are parallel processing units contained within the chip. S3 Graphics considered this graphics processor to be a high performance product and was searching for a brand that would capture its high performance aspects.

The initial idea of using the CHROME MARKS came to Mr. Kwon one day when he was driving to work. At that time, Mr. Kwon saw a motorcycle that was fully accessorized with chrome-plated parts. At that moment, Mr. Kwon realized that chrome is not a color, but rather a reflection of all colors. Because the graphics processor that they were looking to brand essentially manipulated color data to form images, CHROME seemed to be a perfect fit. Additionally, Chrome conjured up images of the golden age of American automobiles – a lot of which featured 8 cylinder engines and chrome accessories. This evocative tie-in with high-powered automobiles embodied the performance aspect of the graphics processor. In fact, Registrant even chose the 'raceway' font – a classic American font -- to write the product names

containing Chrome in the style of drive-through dining and performance auto products.

INTERROGATORY NO. 4:

Describe in detail all goods and/or services with which the CHROME MARKS have been or are currently being used by any PERSON.

RESPONSE TO INTERROGATORY NO. 4

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory to the extent it seeks the information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

The CHROME MARKS have been and/or are currently being used on a wide variety of multi-media and computer related products, including but not limited to graphics/video related products. Additionally, as Registrant is a graphics chip provider, it is important to understand that many of its customers utilize its products in a variety of applications, including, for example, the Fujitsu S6520 Notebook and the ARTIGO system.

VIA is informed and believes and based thereon alleges that the CHROME MARKS have been or are currently being used in connection with the following goods and services:

Computers, namely, personal computers, portable computers, notebook computers, microcomputers, desktop computers; computer system components, parts and fittings, namely, motherboards, central processing units (CPUs), base PC modules, computer hardware, namely,

semiconductors, microprocessors, graphics processors, integrated circuits, computer chips, computer motherboards, computer graphics boards, computer interface boards, computer accelerator board, circuit boards, computer memory cards, memory chips, computer firmware, namely, computer utility software and other computer software used to maintain and operate computer system all stored in a computer's read only memory or elsewhere in the computer's circuitry, operating system software; printed and electronic instructional manuals, specification sheets, data sheets, computer reference manuals, user guides and documents providing instruction in the use and operation of various electronic digital devices, sold as a unit therewith the aforesaid good; computer services, namely, providing on-line information available on computer networks, global information networks and wireless communication networks in the fields of the design, development and customization of computer hardware, computer software, computer graphics software, information technology, wireless communication devices, multimedia technology, robotics, namely, the design and development of new technology in the field of robotics, business computing and environmentally-friendly computing, and specifically excluding computer games and video games, using both an interactive and non-interactive format; technical support services, namely, troubleshooting of computer hardware and software problems in person, by telephone, by electronic, computer and communications networks; provision of computer systems analysis and computer diagnostic services; design of computer hardware, integrated circuits, computer networks and communications hardware and software for others; consultancy in the field of design, development, configuration, installation, updating, upgrading or maintenance of computer software - excluding computer game and video game software; computer programming for others; research and development of 3d content, 3d technology and

processes, 3d animation technology, 3d processing power, 3d techniques, and flexible forward projection; creating, designing and maintaining web sites.

INTERROGATORY NO. 5:

Describe in detail all goods and/or services in connection with which YOU intend to use the CHROME MARKS in the future.

RESPONSE TO INTERROGATORY NO. 5

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory to the extent it seeks the information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

In addition to continuing the use of the CHROME MARKS on the goods and services identified in response to Interrogatory No. 4, VIA intends to expand the use of the CHROME MARKS in several areas, including but not limited to television related applications, tablets, and smart phones.

INTERROGATORY NO. 6:

Describe in detail all goods and/or services in connection with which YOU no longer use or intend to use the CHROME MARKS.

RESPONSE TO INTERROGATORY NO. 6

In addition to the General Objections set forth above, Registrant further objects that this

Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

“Handheld computers, computer housing, computer casing, computer chassis, computer frames, hard drives, disc drives, computer keyboards, computer printers, computer monitors, computer cables, disc and tape controller cards, scanners, computer mice, joysticks, microphones; computer network adapters, networking switches, routers, modems, power adapters for computers; hand-held devices, namely, Personal Digital Assistants (PDAs), electronic personal organizers, MP3 players; BIOS software, pre-recorded computer discs featuring documentary programs, drama, musical entertainment, blank magnetic data carriers, electronic computer locks, computer speakers, computer peripherals, multimedia and digital displays, namely, CRT monitors, DVI displays, LCD panels, HDTV displays, GPS navigational displays and automotive visual displays, input devices, namely, software and hardware for management, storage, communications and network management of digital media and enhancement of graphical and video display; portable computer carry bags; cases to carry CDs and DVDs.”

INTERROGATORY NO. 7:

With respect to any of the goods and services identified in response to Interrogatory No. 5, identify the intended customer markets.

RESPONSE TO INTERROGATORY NO. 7

In addition to the General Objections set forth above, In addition to the General Objections set forth above, Registrant further objects to this Interrogatory to the extent it seeks

the information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

VIA intends to market the products it identified in Interrogatory No. 5 to manufacturers as well as directly to consumers.

INTERROGATORY NO. 8:

With respect to any of the goods and services identified in response to Interrogatory No. 4, provide the date(s) that the CHROME MARK I and CHROME MARK II were first used within the U.S.

RESPONSE TO INTERROGATORY NO. 8

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

CHROME MARK I was first used within the United States on July 1, 2000, and CHROME MARK II was first used within the United States on July 19, 2007.

INTERROGATORY NO. 9:

With respect to any of the goods and services identified in response to Interrogatory No. 4, identify the dates during which each PERSON has continuously used the CHROME MARKS,

or if such use(s) has (have) not been continuous, state with particularity the dates and reasons for any period that the CHROME MARK I and CHROME MARK II has not been used by any PERSON.

RESPONSE TO INTERROGATORY NO. 9:

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory to the extent it seeks the information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence. Registrant further objects to this Interrogatory as requiring a legal conclusion.

Subject to the foregoing general and specific objections Registrant responds as follows:

VIA has continuously used the CHROME MARKS on the goods and services identified in response to Interrogatory No. 4.

INTERROGATORY NO. 10:

Describe in detail any personal computer, desktop computer, portable computer, notebook computer, laptop computer, or any other computer device on which YOUR CHROME MARKS are currently being used in commerce in the United States.

RESPONSE TO INTERROGATORY NO. 10

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to

admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

The CHROME MARKS are currently being used in connection with various computer devices that are currently being used in the United States, including but not limited with respect to the ARTIGO A1150, the ARTIGO A1200, and the ARTIGO A1250.

INTERROGATORY NO. 11:

Describe in detail any personal computer, desktop computer, portable computer, notebook computer, laptop computer, or any other computer device on which YOUR CHROME MARKS have been used in commerce in the United States in the last 4 years.

RESPONSE TO INTERROGATORY NO. 11

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

In the past four years, the CHROME MARKS have been used in connection with various computer devices in the United States, including but not limited with respect to the ARTIGO A1150, the ARTIGO A1200, and the ARTIGO A1250.

INTERROGATORY NO. 12:

With respect to any of the goods and services identified in response to Interrogatory No. 4, provide the geographical scope of such former or current use of the CHROME MARKS.

RESPONSE TO INTERROGATORY NO. 12

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

As clarified during the Parties' meet and confer, VIA understands this question to be seeking information relating to the geographic scope of former or current use of the CHROME MARKS in the United States. VIA states that the CHROME MARKS have been used all over the United States.

INTERROGATORY NO. 13:

With respect to any of the goods and services identified in response to Interrogatory No. 4, describe in detail the manner in which the CHROME MARKS are or have been promoted in the United States.

RESPONSE TO INTERROGATORY NO. 13

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

The goods and services identified in response to Interrogatory No. 4 have been extensively promoted in the United States, including but not limited to in print media, over the

Internet – including in specially commissioned YouTube videos -- and at trade shows in the United States, including but not limited to the 2007 and 2008 Consumer Electronics Show in Las Vegas, Nevada, the 2007, 2009, 2010 and 2011 Embedded Systems Conference in San Jose, California, and the 2008 Game Developers Conference in San Francisco, California. Additionally, VIA has promoted the CHROME MARKS at international trade shows that are attended by large numbers of American consumers and manufacturers such as CeBIT in Germany and Computex in Taipei.

INTERROGATORY NO. 14:

Identify and fully describe the channels of trade and/or the potential channels of trade, for YOUR products or services that are or were distributed, sold and/or marketed under the CHROME MARKS.

RESPONSE TO INTERROGATORY NO. 14

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

The primary channel of trade for the products or services that are or were distributed, sold and/or marketed under the CHROME MARKS is over the Internet. However, VIA has also taken direct orders from consumers at the various trade shows that it has attended to promote the CHROME MARKS.

INTERROGATORY NO. 15:

Describe fully any advertising conducted by any PERSON of the CHROME MARKS including, but without limitation: the nature of such advertising, the identity of each PERSON who has conducted such advertising, the geographic scope of such advertising, and the amount of money spent for such advertising on a yearly basis by each PERSON.

RESPONSE TO INTERROGATORY NO. 15

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad.

Subject to the foregoing general and specific objections Registrant responds as follows:

VIA has advertised the CHROME MARKS in the United States over the Internet, in print media, through a series of specially commissioned YouTube videos and at Trade Shows. While much of VIA's advertising and marketing efforts are handled in-house, VIA has also retained Pat Meier Associates to assist it in its advertising and marketing efforts. Pat Meier Associates owns a website that is available at www.patmeier.com.

INTERROGATORY NO. 16:

Describe in detail all goods and/or services with which YOU used CHROME MARK I when YOU filed YOUR Combined Declaration of Use and Incontestability under Sections 8 and 15 ("Declaration of Use") on February 14, 2013.

RESPONSE TO INTERROGATORY NO. 16:

In addition to the General Objections set forth above, Registrant further objects that this

Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

Computers, namely, personal computers, portable computers, notebook computers, microcomputers, desktop computers; computer system components, parts and fittings, namely, motherboards, central processing units (CPUs), base PC modules, computer hardware, namely, semiconductors, microprocessors, graphics processors, integrated circuits, computer chips, computer motherboards, computer graphics boards, computer interface boards, computer accelerator board, circuit boards, computer memory cards, memory chips, computer firmware, namely, computer utility software and other computer software used to maintain and operate computer system all stored in a computer's read only memory or elsewhere in the computer's circuitry, operating system software; printed and electronic instructional manuals, specification sheets, data sheets, computer reference manuals, user guides and documents providing instruction in the use and operation of various electronic digital devices, sold as a unit therewith the aforesaid good.

INTERROGATORY NO. 17:

Describe in detail YOUR decision to delete the goods and services YOU identified in paragraph 6 of YOUR ANSWER from YOUR Declaration of Use for the CHROME MARK I.

RESPONSE TO INTERROGATORY NO. 17:

In addition to the General Objections set forth above, Registrant further objects to this

Interrogatory as seeking information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

INTERROGATORY NO. 18:

Please provide a specimen that shows YOUR use in commerce of the goods and services listed in YOUR Declaration of Use for the CHROME MARK I.

RESPONSE TO INTERROGATORY NO. 18:

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, unduly burdensome and/or duplicative of other discovery requests. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

Please see the documents produced in response to Opposer's Requests for Production.

INTERROGATORY NO. 19:

Describe in detail the basis for YOUR assertion in YOUR Declaration of Use that YOU currently and continuously use the CHROME MARK I in connection with any computer devices, including personal computers, portable computers, notebook computers, microcomputers, and desktop computers.

RESPONSE TO INTERROGATORY NO. 19

In addition to the General Objections set forth above, Registrant further objects to this

Interrogatory as seeking information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent it seeks a legal conclusion. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

VIA has used CHROME MARK I in connection with computer devices, including personal computers, portable computers, notebook computers, microcomputers, and desktop computers continuously in the United States since July 1, 2000, primarily by marketing and selling CHROME branded graphics chipsets to manufacturers of those devices, as well as by using CHROME branded components in products such as the ARTIGO system.

INTERROGATORY NO. 20:

Describe in detail the basis for YOUR assertion in YOUR Declaration of Use that YOU currently and continuously use the CHROME MARK I in connection with operating system software.

RESPONSE TO INTERROGATORY NO. 20

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory as seeking information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent it seeks a legal conclusion. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

Software drivers enable the CHROME-branded chipset in various operating systems, including but not limited to the Windows operating system.

INTERROGATORY NO. 21:

Identify each witness Registrant intends to present or rely upon in this proceeding.

RESPONSE TO INTERROGATORY NO. 21:

In addition to the General Objections set forth above, Registrant objects that this Interrogatory is premature and it seeks information protected by the attorney-client privilege and attorney work product. Discovery in this action is ongoing. Accordingly, Registrant reserves the right to further supplement and/or amend its response to this interrogatory based on further discovery in compliance with the TTAB's Scheduling Order and Federal Rules of Civil Procedure.

INTERROGATORY NO. 22:

Identify each person who supplied information included in any of the answers to this set of interrogatories or who was consulted or whose documents or files were consulted in connection with the preparation of the answers.

RESPONSE TO INTERROGATORY NO. 22

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory as seeking information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome.

Subject to the foregoing general and specific objections Registrant responds as follows:

Ken Weng

Young Kwon

INTERROGATORY NO. 23:

Describe in detail all efforts done to-date to use or in preparation to use the CHROME MARKS in commerce in connection with the goods and services identified in their respective registrations.

RESPONSE TO INTERROGATORY NO. 23

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence. Registrant still further objects to this Interrogatory as being duplicative of other Interrogatories.

INTERROGATORY NO. 24:

Provide all known current and past contact information for all individuals identified in response to Interrogatory No. 15, including but not limited to physical address(es), phone number(s), and e-mail address(es).

RESPONSE TO INTERROGATORY NO. 24

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

Pat Meier Associates owns a website that is available at www.patmeier.com. According to the information on that website, the phone numbers for Pat Meier Associates are 415.389.1700 and 415.717.9677.

INTERROGATORY NO. 25:

Provide all known current and past contact information for Ken Weng, including but not limited to physical address(es), phone number(s), and e-mail address(es).

RESPONSE TO INTERROGATORY NO. 25

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence. Registrant further objects to this Interrogatory to the extent it invades any constitutionally protected right of privacy.

Subject to the foregoing general and specific objections Registrant responds as follows:

Mr. Weng can be contacted through Registrant's counsel of record.

INTERROGATORY NO. 26:

Provide all known current and past contact information for Jonathan Chang, including but not limited to physical address(es), phone number(s), and e-mail address(es).

RESPONSE TO INTERROGATORY NO. 26

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence. Registrant further objects further objects to this Interrogatory to the extent

it invades any constitutionally protected right of privacy.

Subject to the foregoing general and specific objections Registrant responds as follows:

Registrant has no contact information for Jonathon Chang.

INTERROGATORY NO. 27:

Provide all known current and past contact information for Miller Chen, including but not limited to physical address(es), phone number(s), and e-mail address(es).

RESPONSE TO INTERROGATORY NO. 27

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence. Registrant further objects further objects to this Interrogatory to the extent it invades any constitutionally protected right of privacy.

Subject to the foregoing general and specific objections Registrant responds as follows:

Registrant has no contact information for Miller Chen.

Dated: September 9, 2013

/s/ Robert F. Gookin

Robert F. Gookin
RUSS, AUGUST & KABAT
Twelfth Floor
12424 Wilshire Boulevard
Los Angeles, California 90025
Telephone: (310) 826-7474
Facsimile: (310) 826-6991

*Attorneys for Registrant
VIA Technologies, Inc.*

VERIFICATION

I, Ken Weng, am an officer of Registrant VIA Technologies, Inc. ("VIA"). On behalf of VIA, I have read the foregoing REGISTRANT VIA TECHNOLOGIES, INC.'S AMENDED RESPONSES TO PETITIONER GOOGLE, INC.'S FIRST SET OF SPECIAL INTERROGATORIES and know the contents thereof. As to those responses, but not the legal objections, I certify that the answers set forth in those responses are true and correct to the best of my knowledge.

Dated: September 5, 2013


Ken Weng

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing **REGISTRANT VIA TECHNOLOGIES, INC.'S AMENDED RESPONSES TO PETITIONER GOOGLE, INC.'S FIRST SET OF SPECIAL INTERROGATORIES** was served by electronic mail on September 9, 2013, upon counsel of Petitioner:

COOLEY LLP
JANET L. CULLUM
ANNE H. PECK
JEFFREY NORBERG
jcullum@cooley.com
[apeck@cooley.com](mailto:apeek@cooley.com)
jnorberg@cooley.com
thance@cooley.com
smartinez@cooley.com
trademarks@cooley.com

/s/ Josie Mercado

Josie Mercado

Exhibit F

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

Google, Inc.,

Petitioner,

v.

VIA Technologies, Inc.,

Registrant.

Cancellation No.: 92056816

Registration No.: 3,360,331

Mark: CHROME

Issued: December 25, 2007

Registration No.: 3,951,287

Mark: CHROME

Issued: April 26, 2011

**REGISTRANT VIA TECHNOLOGIES, INC.'S SECOND AMENDED RESPONSES TO
PETITIONER GOOGLE, INC.'S FIRST SET OF SPECIAL INTERROGATORIES**

PROPOUNDING PARTY: PETITIONER GOOGLE, INC.

RESPONDING PARTY: REGISTRANT VIA TECHNOLOGIES, INC.

SET NUMBER: ONE

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Registrant VIA Technologies, Inc. ("VIA") hereby supplements its response to Petitioner Google, Inc.'s Interrogatory Nos. 4 as follows:

GENERAL OBJECTIONS

VIA incorporates by reference Preliminary Statement and General Objections set forth in Registrant VIA Technologies, Inc.'s Amended Responses to Petitioner Google, Inc.'s First Set of Special Interrogatories dated September 5, 2013.

INTERROGATORIES

INTERROGATORY NO. 1:

Identify each PERSON that has used or it is contemplated will in the future use the CHROME MARKS in the U.S. in connection with providing or offering for sale goods or services.

RESPONSE TO INTERROGATORY NO. 1

In addition to the General Objections set forth above, Registrant further objects that this

Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:
VIA Technologies, S3 Graphics, Fujitsu, and Zotac.

INTERROGATORY NO. 2:

Identify each PERSON with knowledge of the selection, adoption, and development of the CHROME MARKS.

RESPONSE TO INTERROGATORY NO. 2

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory to the extent it seeks the information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

Young Kwon is an individual with knowledge of the selection, adoption, and development of the CHROME MARKS.

INTERROGATORY NO. 3:

Describe fully the facts and circumstances surrounding the selection, adoption, and development of the CHROME MARKS.

RESPONSE TO INTERROGATORY NO. 3

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory to the extent it seeks the information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to

admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

At the time that the CHROME MARKS were conceived, Young Kwon was the Sr. Product Marketing Manager for S3 Graphics, a wholly owned subsidiary of Registrant. In that capacity, Mr. Kwon was responsible for coming up with branding ideas. At the time that the CHROME MARKS were conceived, S3 Graphics was working on a graphics processor that had 8 pipelines, which are parallel processing units contained within the chip. S3 Graphics considered this graphics processor to be a high performance product and was searching for a brand that would capture its high performance aspects.

The initial idea of using the CHROME MARKS came to Mr. Kwon one day when he was driving to work. At that time, Mr. Kwon saw a motorcycle that was fully accessorized with chrome-plated parts. At that moment, Mr. Kwon realized that chrome is not a color, but rather a reflection of all colors. Because the graphics processor that they were looking to brand essentially manipulated color data to form images, CHROME seemed to be a perfect fit. Additionally, Chrome conjured up images of the golden age of American automobiles – a lot of which featured 8 cylinder engines and chrome accessories. This evocative tie-in with high-powered automobiles embodied the performance aspect of the graphics processor. In fact, Registrant even chose the 'raceway' font – a classic American font – to write the product names containing Chrome in the style of drive-through dining and performance auto products.

INTERROGATORY NO. 4:

Describe in detail all goods and/or services with which the CHROME MARKS have been or are currently being used by any PERSON.

RESPONSE TO INTERROGATORY NO. 4

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory to the extent it seeks the information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this

Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

personal computers, portable computers, notebook computers, microcomputers, desktop computers, motherboards, central processing units (CPUs), semiconductors, microprocessors, graphics processors, integrated circuits, computer chips, computer motherboards, computer graphics boards, computer interface boards, computer accelerator board, circuit boards, computer memory cards, memory chips, computer firmware, namely, computer utility software and other computer software used to maintain and operate computer system all stored in a computer's read only memory or elsewhere in the computer's circuitry, operating system software, printed and electronic instructional manuals, specification sheets, data sheets, computer reference manuals, user guides and documents providing instruction in the use and operation of various electronic digital devices, sold as a unit therewith the aforesaid good, technical support services, namely, troubleshooting of computer hardware and software problems in person, by telephone, by electronic, computer and communications networks, provision of computer systems analysis and computer diagnostic services, design of computer hardware, integrated circuits, computer networks and communications hardware and software for others, consultancy in the field of design, development, configuration, installation, updating, upgrading or maintenance of computer software - excluding computer game and video game software, and research and development of 3d content, 3d technology and processes, 3d animation technology, 3d processing power, 3d techniques, and flexible forward projection.

INTERROGATORY NO. 5:

Describe in detail all goods and/or services in connection with which YOU intend to use the CHROME MARKS in the future.

RESPONSE TO INTERROGATORY NO. 5

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory to the extent it seeks the information that is protected from discovery by the

attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

In addition to continuing the use of the CHROME MARKS on the goods and services identified in response to Interrogatory No. 4, VIA intends to expand the use of the CHROME MARKS in communication devices and media players.

INTERROGATORY NO. 6:

Describe in detail all goods and/or services in connection with which YOU no longer use or intend to use the CHROME MARKS.

RESPONSE TO INTERROGATORY NO. 6

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague and unintelligible and assumes false facts. Subject to the foregoing general and specific objections Registrant responds as follows: None.

INTERROGATORY NO. 7:

With respect to any of the goods and services identified in response to Interrogatory No. 5, identify the intended customer markets.

RESPONSE TO INTERROGATORY NO. 7

In addition to the General Objections set forth above, In addition to the General Objections set forth above, Registrant further objects to this Interrogatory to the extent it seeks the information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows: OEM manufacturers and end users.

INTERROGATORY NO. 8:

With respect to any of the goods and services identified in response to Interrogatory No. 4, provide the date(s) that the CHROME MARK I and CHROME MARK II were first used within the U.S.

RESPONSE TO INTERROGATORY NO. 8

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

CHROME MARK I was first used within the United States on July 1, 2001, and CHROME MARK II was first used within the United States on July 19, 2007.

INTERROGATORY NO. 9:

With respect to any of the goods and services identified in response to Interrogatory No. 4, identify the dates during which each PERSON has continuously used the CHROME MARKS, or if such use(s) has (have) not been continuous, state with particularity the dates and reasons for any period that the CHROME MARK I and CHROME MARK II has not been used by any PERSON.

RESPONSE TO INTERROGATORY NO. 9:

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory to the extent it seeks the information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence. Registrant further objects to this Interrogatory as requiring a legal conclusion.

Subject to the foregoing general and specific objections Registrant responds as follows:

VIA has continuously used the CHROME MARKS on the goods and services identified in response to Interrogatory No. 4.

INTERROGATORY NO. 10:

Describe in detail any personal computer, desktop computer, portable computer, notebook computer, laptop computer, or any other computer device on which YOUR CHROME MARKS are currently being used in commerce in the United States.

RESPONSE TO INTERROGATORY NO. 10

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:
ARTIGO series, AMOS series, and ZOTAC.

INTERROGATORY NO. 11:

Describe in detail any personal computer, desktop computer, portable computer, notebook computer, laptop computer, or any other computer device on which YOUR CHROME MARKS have been used in commerce in the United States in the last 4 years.

RESPONSE TO INTERROGATORY NO. 11

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:
ARTIGO series, AMOS series, ZOTAC and Fujitsu.

INTERROGATORY NO. 12:

With respect to any of the goods and services identified in response to Interrogatory No. 4, provide the geographical scope of such former or current use of the CHROME MARKS.

RESPONSE TO INTERROGATORY NO. 12

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

As clarified during the Parties' meet and confer, VIA understands this question to be seeking information relating to the geographic scope of former or current use of the CHROME MARKS in the United States. VIA states that the CHROME MARKS have been used all over the United States.

INTERROGATORY NO. 13:

With respect to any of the goods and services identified in response to Interrogatory No. 4, describe in detail the manner in which the CHROME MARKS are or have been promoted in the United States.

RESPONSE TO INTERROGATORY NO. 13

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

The goods and services identified in response to Interrogatory No. 4 have been extensively promoted in the United States, including but not limited to in print media, over the Internet – including in specially commissioned YouTube videos – and at trade shows in the United States, including but not limited to the 2007 and 2008 Consumer Electronics Show in Las Vegas, Nevada, the 2007, 2009, 2010 and 2011 Embedded Systems Conference in San Jose, California, and the 2008 Game Developers Conference in San Francisco, California. Additionally, VIA has promoted the CHROME MARKS at international trade shows that are

attended by large numbers of American consumers and manufacturers such as CeBIT in Germany and Computex in Taipei.

INTERROGATORY NO. 14:

Identify and fully describe the channels of trade and/or the potential channels of trade, for YOUR products or services that are or were distributed, sold and/or marketed under the CHROME MARKS.

RESPONSE TO INTERROGATORY NO. 14

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

The primary channel of trade for the products or services that are or were distributed, sold and/or marketed under the CHROME MARKS is over the Internet and retail stores. However, VIA has also taken direct orders from consumers at the various trade shows that it has attended to promote the CHROME MARKS.

INTERROGATORY NO. 15:

Describe fully any advertising conducted by any PERSON of the CHROME MARKS including, but without limitation: the nature of such advertising, the identity of each PERSON who has conducted such advertising, the geographic scope of such advertising, and the amount of money spent for such advertising on a yearly basis by each PERSON.

RESPONSE TO INTERROGATORY NO. 15

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad.

Subject to the foregoing general and specific objections Registrant responds as follows:

VIA has advertised the CHROME MARKS in the United States over the Internet, in print

media, through a series of specially commissioned YouTube videos and at Trade Shows. While much of VIA's advertising and marketing efforts are handled in-house, VIA has also retained Pat Meier Associates to assist it in its advertising and marketing efforts. Pat Meier Associates owns a website that is available at www.patmeier.com.

INTERROGATORY NO. 16:

Describe in detail all goods and/or services with which YOU used CHROME MARK I when YOU filed YOUR Combined Declaration of Use and Incontestability under Sections 8 and 15 ("Declaration of Use") on February 14, 2013.

RESPONSE TO INTERROGATORY NO. 16:

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

Computers, namely, personal computers, portable computers, notebook computers, microcomputers, desktop computers; computer system components, parts and fittings, namely, motherboards, central processing units (CPUs), computer hardware, namely, semiconductors, microprocessors, graphics processors, integrated circuits, computer chips, computer motherboards, computer graphics boards, computer interface boards, computer accelerator board, circuit boards, computer memory cards, memory chips, computer firmware, namely, computer utility software and other computer software used to maintain and operate computer system all stored in a computer's read only memory or elsewhere in the computer's circuitry, operating system software; printed and electronic instructional manuals, specification sheets, data sheets, computer reference manuals, user guides and documents providing instruction in the use and operation of various electronic digital devices, sold as a unit therewith the aforesaid good.

INTERROGATORY NO. 17:

Describe in detail YOUR decision to delete the goods and services YOU identified in

paragraph 6 of YOUR ANSWER from YOUR Declaration of Use for the CHROME MARK I.

RESPONSE TO INTERROGATORY NO. 17:

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory as seeking information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

INTERROGATORY NO. 18:

Please provide a specimen that shows YOUR use in commerce of the goods and services listed in YOUR Declaration of Use for the CHROME MARK I.

RESPONSE TO INTERROGATORY NO. 18:

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, unduly burdensome and/or duplicative of other discovery requests. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

Please see the documents produced in response to Petitioner's Requests for Production.

INTERROGATORY NO. 19:

Describe in detail the basis for YOUR assertion in YOUR Declaration of Use that YOU currently and continuously use the CHROME MARK I in connection with any computer devices, including personal computers, portable computers, notebook computers, microcomputers, and desktop computers.

RESPONSE TO INTERROGATORY NO. 19

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory as seeking information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is

vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent it seeks a legal conclusion. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

VIA has used CHROME MARK I in connection with computer devices, including personal computers, portable computers, notebook computers, microcomputers, and desktop computers continuously in the United States since July 1, 2001, primarily by marketing and selling CHROME branded graphics chipsets to manufacturers of those devices, as well as by using CHROME branded components in products such as the ARTIGO system.

INTERROGATORY NO. 20:

Describe in detail the basis for YOUR assertion in YOUR Declaration of Use that YOU currently and continuously use the CHROME MARK I in connection with operating system software.

RESPONSE TO INTERROGATORY NO. 20

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory as seeking information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent it seeks a legal conclusion. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

Software drivers enable the CHROME-branded chipset in various operating systems, including but not limited to the Windows operating system.

INTERROGATORY NO. 21:

Identify each witness Registrant intends to present or rely upon in this proceeding.

RESPONSE TO INTERROGATORY NO. 21:

In addition to the General Objections set forth above, Registrant objects that this

Interrogatory is premature and it seeks information protected by the attorney-client privilege and attorney work product. Discovery in this action is ongoing. Accordingly, Registrant reserves the right to further supplement and/or amend its response to this interrogatory based on further discovery in compliance with the TTAB's Scheduling Order and Federal Rules of Civil Procedure.

INTERROGATORY NO. 22:

Identify each person who supplied information included in any of the answers to this set of interrogatories or who was consulted or whose documents or files were consulted in connection with the preparation of the answers.

RESPONSE TO INTERROGATORY NO. 22

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory as seeking information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome.

Subject to the foregoing general and specific objections Registrant responds as follows:

Ken Weng

Young Kwon

Epan Wu

INTERROGATORY NO. 23:

Describe in detail all efforts done to-date to use or in preparation to use the CHROME MARKS in commerce in connection with the goods and services identified in their respective registrations.

RESPONSE TO INTERROGATORY NO. 23

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence. Registrant still further objects to this Interrogatory as being duplicative of

other Interrogatories.

INTERROGATORY NO. 24:

Provide all known current and past contact information for all individuals identified in response to Interrogatory No. 15, including but not limited to physical address(es), phone number(s), and e-mail address(es).

RESPONSE TO INTERROGATORY NO. 24

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

Pat Meier Associates owns a website that is available at www.patmeier.com. According to the information on that website, the phone numbers for Pat Meier Associates are 415.389.1700 and 415.717.9677.

INTERROGATORY NO. 25:

Provide all known current and past contact information for Ken Weng, including but not limited to physical address(es), phone number(s), and e-mail address(es).

RESPONSE TO INTERROGATORY NO. 25

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence. Registrant further objects to this Interrogatory to the extent it invades any constitutionally protected right of privacy.

Subject to the foregoing general and specific objections Registrant responds as follows:

Mr. Weng can be contacted through Registrant's counsel of record.

INTERROGATORY NO. 26:

Provide all known current and past contact information for Jonathan Chang, including but

not limited to physical address(es), phone number(s), and e-mail address(es).

RESPONSE TO INTERROGATORY NO. 26

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence. Registrant further objects further objects to this Interrogatory to the extent it invades any constitutionally protected right of privacy.

Subject to the foregoing general and specific objections Registrant responds as follows:
22215 Rae Lane, Cupertino, CA 95014.

INTERROGATORY NO. 27:

Provide all known current and past contact information for Miller Chen, including but not limited to physical address(es), phone number(s), and e-mail address(es).

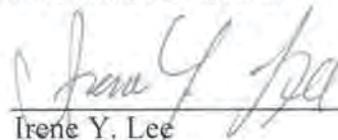
RESPONSE TO INTERROGATORY NO. 27

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence. Registrant further objects further objects to this Interrogatory to the extent it invades any constitutionally protected right of privacy.

Subject to the foregoing general and specific objections Registrant responds as follows:

Miller Chen can be contacted through Registrant's counsel of record.

Dated: May 30, 2014



Irene Y. Lee
Jean Y. Rhee
Robert F. Gookin
RUSS, AUGUST & KABAT
Twelfth Floor
12424 Wilshire Boulevard
Los Angeles, California 90025
Telephone: (310) 826-7474
Facsimile: (310) 826-6991
*Attorneys for Registrant VIA
Technologies, Inc.*

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing **REGISTRANT VIA TECHNOLOGIES, INC.'S SECOND AMENDED RESPONSES TO PETITIONER GOOGLE, INC.'S FIRST SET OF SPECIAL INTERROGATORIES** was served by Federal Express on May 30, 2014, upon counsel of Petitioner:

COOLEY LLP

Janet L. Cullum - jcullum@cooley.com

Brendan Joseph Hughes- bhughes@cooley.com

Katie Krajeck- kkrajeck@cooley.com
trademarks@cooley.com

Cooley LLP

Palo Alto—Hanover Campus

3175 Hanover Street

Palo Alto, California 94304-1130

/s/ Josie Mercado

Josie Mercado

Exhibit G

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

Google, Inc., Petitioner, v. VIA Technologies, Inc., Registrant.	Cancellation No.: 92056816 Registration No.: 3,360,331 Mark: CHROME Issued: December 25, 2007 Registration No.: 3,951,287 Mark: CHROME Issued: April 26, 2011
--	---

**REGISTRANT VIA TECHNOLOGIES, INC.'S THIRD AMENDED RESPONSES TO
PETITIONER GOOGLE, INC.'S FIRST SET OF SPECIAL INTERROGATORIES**

PROPOUNDING PARTY: PETITIONER GOOGLE, INC.

RESPONDING PARTY: REGISTRANT VIA TECHNOLOGIES, INC.

SET NUMBER: ONE

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Registrant VIA Technologies, Inc. ("VIA") hereby supplements its responses to Petitioner Google, Inc.'s Interrogatory Nos. 4, 10 & 11 as follows:

GENERAL OBJECTIONS

VIA incorporates by reference the Preliminary Statement and General Objections set forth in Registrant VIA Technologies, Inc.'s Amended Responses to Petitioner Google, Inc.'s First Set of Special Interrogatories dated September 5, 2013.

INTERROGATORIES

INTERROGATORY NO. 1:

Identify each PERSON that has used or it is contemplated will in the future use the CHROME MARKS in the U.S. in connection with providing or offering for sale goods or services.

RESPONSE TO INTERROGATORY NO. 1

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:
VIA Technologies, S3 Graphics, Fujitsu, and Zotac.

INTERROGATORY NO. 2:

Identify each PERSON with knowledge of the selection, adoption, and development of the CHROME MARKS.

RESPONSE TO INTERROGATORY NO. 2

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory to the extent it seeks the information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

Young Kwon is an individual with knowledge of the selection, adoption, and development of the CHROME MARKS.

INTERROGATORY NO. 3:

Describe fully the facts and circumstances surrounding the selection, adoption, and development of the CHROME MARKS.

RESPONSE TO INTERROGATORY NO. 3

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory to the extent it seeks the information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this

Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

At the time that the CHROME MARKS were conceived, Young Kwon was the Sr. Product Marketing Manager for S3 Graphics, a wholly owned subsidiary of Registrant. In that capacity, Mr. Kwon was responsible for coming up with branding ideas. At the time that the CHROME MARKS were conceived, S3 Graphics was working on a graphics processor that had 8 pipelines, which are parallel processing units contained within the chip. S3 Graphics considered this graphics processor to be a high performance product and was searching for a brand that would capture its high performance aspects.

The initial idea of using the CHROME MARKS came to Mr. Kwon one day when he was driving to work. At that time, Mr. Kwon saw a motorcycle that was fully accessorized with chrome-plated parts. At that moment, Mr. Kwon realized that chrome is not a color, but rather a reflection of all colors. Because the graphics processor that they were looking to brand essentially manipulated color data to form images, CHROME seemed to be a perfect fit. Additionally, Chrome conjured up images of the golden age of American automobiles – a lot of which featured 8 cylinder engines and chrome accessories. This evocative tie-in with high-powered automobiles embodied the performance aspect of the graphics processor. In fact, Registrant even chose the 'raceway' font – a classic American font – to write the product names containing Chrome in the style of drive-through dining and performance auto products.

INTERROGATORY NO. 4:

Describe in detail all goods and/or services with which the CHROME MARKS have been or are currently being used by any PERSON.

RESPONSE TO INTERROGATORY NO. 4

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome.

Subject to the foregoing general and specific objections Registrant responds as follows:

personal computers, portable computers, notebook computers, microcomputers, desktop computers, motherboards, central processing units (CPUs), semiconductors, microprocessors, graphics processors, integrated circuits, computer chips, computer motherboards, computer graphics boards, computer interface boards, computer accelerator board, circuit boards, computer memory cards, memory chips, computer firmware, namely, computer utility software and other computer software used to maintain and operate computer system all stored in a computer's read only memory or elsewhere in the computer's circuitry, operating system software, printed and electronic instructional manuals, specification sheets, data sheets, computer reference manuals, user guides and documents providing instruction in the use and operation of various electronic digital devices, sold as a unit therewith the aforesaid good, technical support services, namely, troubleshooting of computer hardware and software problems in person, by telephone, by electronic, computer and communications networks, provision of computer systems analysis and computer diagnostic services, design of computer hardware, integrated circuits, computer networks and communications hardware and software for others, consultancy in the field of design, development, configuration, installation, updating, upgrading or maintenance of computer software - excluding computer game and video game software, and research and development of 3d content, 3d technology and processes, 3d animation technology, 3d processing power, 3d techniques, and flexible forward projection.

VIA has produced documents relating to the aforementioned goods and/or services with which the CHROME MARKS have been or are currently being used that are non-privileged and non-attorney work product, within its possession, custody, or control, and could be located upon a reasonably diligent search. These documents include, without limitation, the documents bearing the following Bates numbers, VIA00001-3, 5, 7-10, 14, 16-17, 19-20, 22, 27-29, 31-38, 40, 42-46, 48-49, 51, 53, 76, 94-102, 288-295, 324, 331-332, 334, 437-440, 454, 488-494, 508-510, 514-516, 523, 525, 528-529, 533, 539, 544-545, 550-554, 562-564, 568-570, 581-582, 584, 696, 736-738, 742-762, 766-775, 788-790, 800-802, 812-817, 839-845, 851-860, 899-907, 941-951, 959, 962-969, 973-1034, 1036-1098, 1101-1101, 1104-1105, 1108-1201, 1204-1267, 1317-

1338, 1341-1347, 1353-1364, 1419-1436, 1443-1459, 1462-1490, 1496-1502, 1508, 1512, 1518, 1521-1522, 1528, 1530, 1533, 1543, 1545-1547, 1551, 1560-1564, 1568, 1573-1577, 1591, 1658-1666, 1682-1686, 1766-1808, 1829-1838, 1846-1911, 1930-1935, 1941-1942, 1988-2094, 2297-2399, 2410-2532, 2542-2544, and 2577-3018, and pursuant to Federal Rule of Civil Procedure 33(d) the burden and expense of summarizing the contents of these documents to respond to this Interrogatory would be substantially the same for VIA as for Google.

INTERROGATORY NO. 5:

Describe in detail all goods and/or services in connection with which YOU intend to use the CHROME MARKS in the future.

RESPONSE TO INTERROGATORY NO. 5

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory to the extent it seeks the information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

In addition to continuing the use of the CHROME MARKS on the goods and services identified in response to Interrogatory No. 4, VIA intends to expand the use of the CHROME MARKS in communication devices and media players.

INTERROGATORY NO. 6:

Describe in detail all goods and/or services in connection with which YOU no longer use or intend to use the CHROME MARKS.

RESPONSE TO INTERROGATORY NO. 6

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague and unintelligible and assumes false facts. Subject to the foregoing general and specific objections Registrant responds as follows: None.

INTERROGATORY NO. 7:

With respect to any of the goods and services identified in response to Interrogatory No. 5, identify the intended customer markets.

RESPONSE TO INTERROGATORY NO. 7

In addition to the General Objections set forth above, In addition to the General Objections set forth above, Registrant further objects to this Interrogatory to the extent it seeks the information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows: OEM manufacturers and end users.

INTERROGATORY NO. 8:

With respect to any of the goods and services identified in response to Interrogatory No. 4, provide the date(s) that the CHROME MARK I and CHROME MARK II were first used within the U.S.

RESPONSE TO INTERROGATORY NO. 8

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

CHROME MARK I was first used within the United States on July 1, 2001, and CHROME MARK II was first used within the United States on July 19, 2007.

INTERROGATORY NO. 9:

With respect to any of the goods and services identified in response to Interrogatory No. 4, identify the dates during which each PERSON has continuously used the CHROME MARKS,

or if such use(s) has (have) not been continuous, state with particularity the dates and reasons for any period that the CHROME MARK I and CHROME MARK II has not been used by any PERSON.

RESPONSE TO INTERROGATORY NO. 9:

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory to the extent it seeks the information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence. Registrant further objects to this Interrogatory as requiring a legal conclusion.

Subject to the foregoing general and specific objections Registrant responds as follows:

VIA has continuously used the CHROME MARKS on the goods and services identified in response to Interrogatory No. 4.

INTERROGATORY NO. 10:

Describe in detail any personal computer, desktop computer, portable computer, notebook computer, laptop computer, or any other computer device on which YOUR CHROME MARKS are currently being used in commerce in the United States.

RESPONSE TO INTERROGATORY NO. 10

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome.

Subject to the foregoing general and specific objections Registrant responds as follows:

ARTIGO series, AMOS series, ZOTAC, Wyse, Lenovo, and HP. VIA has produced documents relating to the aforementioned computer devices with which the CHROME MARKS are currently being used that are non-privileged and non-attorney work product, within its possession, custody, or control, and could be located upon a reasonably diligent search. These documents include, without limitation, the documents bearing the following Bates numbers, 5,

696, 736-738, 742-762, 766-771, 800-802, 812-817, 839-842, 858-860, 899-907, 945-951, 1151-1170, 2410-2497, and 2542-2544, and pursuant to Federal Rule of Civil Procedure 33(d) the burden and expense of summarizing the contents of these documents to respond to this Interrogatory would be substantially the same for VIA as for Google.

INTERROGATORY NO. 11:

Describe in detail any personal computer, desktop computer, portable computer, notebook computer, laptop computer, or any other computer device on which YOUR CHROME MARKS have been used in commerce in the United States in the last 4 years.

RESPONSE TO INTERROGATORY NO. 11

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome.

Subject to the foregoing general and specific objections Registrant responds as follows:
ARTIGO series, AMOS series, ZOTAC, Fujitsu, Wyse, Lenovo, HP, Samsung, and ASRock. VIA has produced documents relating to the aforementioned computer devices with which the CHROME MARKS have been used in the last 4 years that are non-privileged and non-attorney work product, within its possession, custody, or control, and could be located upon a reasonably diligent search. These documents include, without limitation, the documents bearing the following Bates numbers, 5, 488-494, 533, 696, 736-738, 742-762, 766-771, 800-802, 812-817, 839-842, 858-860, 899-907, 945-951, 962-969, 1151-1170, 1575-1577, 2338-2340, 2410-2497, and 2542-2544, and pursuant to Federal Rule of Civil Procedure 33(d) the burden and expense of summarizing the contents of these documents to respond to this Interrogatory would be substantially the same for VIA as for Google.

INTERROGATORY NO. 12:

With respect to any of the goods and services identified in response to Interrogatory No. 4, provide the geographical scope of such former or current use of the CHROME MARKS.

RESPONSE TO INTERROGATORY NO. 12

In addition to the General Objections set forth above, Registrant further objects that this

Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

As clarified during the Parties' meet and confer, VIA understands this question to be seeking information relating to the geographic scope of former or current use of the CHROME MARKS in the United States. VIA states that the CHROME MARKS have been used all over the United States.

INTERROGATORY NO. 13:

With respect to any of the goods and services identified in response to Interrogatory No. 4, describe in detail the manner in which the CHROME MARKS are or have been promoted in the United States.

RESPONSE TO INTERROGATORY NO. 13

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

The goods and services identified in response to Interrogatory No. 4 have been extensively promoted in the United States, including but not limited to in print media, over the Internet – including in specially commissioned YouTube videos – and at trade shows in the United States, including but not limited to the 2007 and 2008 Consumer Electronics Show in Las Vegas, Nevada, the 2007, 2009, 2010 and 2011 Embedded Systems Conference in San Jose, California, and the 2008 Game Developers Conference in San Francisco, California. Additionally, VIA has promoted the CHROME MARKS at international trade shows that are attended by large numbers of American consumers and manufacturers such as CeBIT in Germany and Computex in Taipei.

INTERROGATORY NO. 14:

Identify and fully describe the channels of trade and/or the potential channels of trade, for YOUR products or services that are or were distributed, sold and/or marketed under the CHROME MARKS.

RESPONSE TO INTERROGATORY NO. 14

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

The primary channel of trade for the products or services that are or were distributed, sold and/or marketed under the CHROME MARKS is over the Internet and retail stores. However, VIA has also taken direct orders from consumers at the various trade shows that it has attended to promote the CHROME MARKS.

INTERROGATORY NO. 15:

Describe fully any advertising conducted by any PERSON of the CHROME MARKS including, but without limitation: the nature of such advertising, the identity of each PERSON who has conducted such advertising, the geographic scope of such advertising, and the amount of money spent for such advertising on a yearly basis by each PERSON.

RESPONSE TO INTERROGATORY NO. 15

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad.

Subject to the foregoing general and specific objections Registrant responds as follows:

VIA has advertised the CHROME MARKS in the United States over the Internet, in print media, through a series of specially commissioned YouTube videos and at Trade Shows. While much of VIA's advertising and marketing efforts are handled in-house, VIA has also retained Pat

Meier Associates to assist it in its advertising and marketing efforts. Pat Meier Associates owns a website that is available at www.patmeier.com.

INTERROGATORY NO. 16:

Describe in detail all goods and/or services with which YOU used CHROME MARK I when YOU filed YOUR Combined Declaration of Use and Incontestability under Sections 8 and 15 (“Declaration of Use”) on February 14, 2013.

RESPONSE TO INTERROGATORY NO. 16:

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

Computers, namely, personal computers, portable computers, notebook computers, microcomputers, desktop computers; computer system components, parts and fittings, namely, motherboards, central processing units (CPUs), computer hardware, namely, semiconductors, microprocessors, graphics processors, integrated circuits, computer chips, computer motherboards, computer graphics boards, computer interface boards, computer accelerator board, circuit boards, computer memory cards, memory chips, computer firmware, namely, computer utility software and other computer software used to maintain and operate computer system all stored in a computer's read only memory or elsewhere in the computer's circuitry, operating system software; printed and electronic instructional manuals, specification sheets, data sheets, computer reference manuals, user guides and documents providing instruction in the use and operation of various electronic digital devices, sold as a unit therewith the aforesaid good.

INTERROGATORY NO. 17:

Describe in detail YOUR decision to delete the goods and services YOU identified in paragraph 6 of YOUR ANSWER from YOUR Declaration of Use for the CHROME MARK I.

RESPONSE TO INTERROGATORY NO. 17:

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory as seeking information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

INTERROGATORY NO. 18:

Please provide a specimen that shows YOUR use in commerce of the goods and services listed in YOUR Declaration of Use for the CHROME MARK I.

RESPONSE TO INTERROGATORY NO. 18:

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, unduly burdensome and/or duplicative of other discovery requests. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

Please see the documents produced in response to Petitioner's Requests for Production.

INTERROGATORY NO. 19:

Describe in detail the basis for YOUR assertion in YOUR Declaration of Use that YOU currently and continuously use the CHROME MARK I in connection with any computer devices, including personal computers, portable computers, notebook computers, microcomputers, and desktop computers.

RESPONSE TO INTERROGATORY NO. 19

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory as seeking information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent it seeks a legal conclusion. Registrant further objects to this Interrogatory to the extent

that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

VIA has used CHROME MARK I in connection with computer devices, including personal computers, portable computers, notebook computers, microcomputers, and desktop computers continuously in the United States since July 1, 2001, primarily by marketing and selling CHROME branded graphics chipsets to manufacturers of those devices, as well as by using CHROME branded components in products such as the ARTIGO system.

INTERROGATORY NO. 20:

Describe in detail the basis for YOUR assertion in YOUR Declaration of Use that YOU currently and continuously use the CHROME MARK I in connection with operating system software.

RESPONSE TO INTERROGATORY NO. 20

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory as seeking information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent it seeks a legal conclusion. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

Software drivers enable the CHROME-branded chipset in various operating systems, including but not limited to the Windows operating system.

INTERROGATORY NO. 21:

Identify each witness Registrant intends to present or rely upon in this proceeding.

RESPONSE TO INTERROGATORY NO. 21:

In addition to the General Objections set forth above, Registrant objects that this Interrogatory is premature and it seeks information protected by the attorney-client privilege and attorney work product. Discovery in this action is ongoing. Accordingly, Registrant reserves the

right to further supplement and/or amend its response to this interrogatory based on further discovery in compliance with the TTAB's Scheduling Order and Federal Rules of Civil Procedure.

INTERROGATORY NO. 22:

Identify each person who supplied information included in any of the answers to this set of interrogatories or who was consulted or whose documents or files were consulted in connection with the preparation of the answers.

RESPONSE TO INTERROGATORY NO. 22

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory as seeking information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome.

Subject to the foregoing general and specific objections Registrant responds as follows:

Ken Weng

Young Kwon

Epan Wu

INTERROGATORY NO. 23:

Describe in detail all efforts done to-date to use or in preparation to use the CHROME MARKS in commerce in connection with the goods and services identified in their respective registrations.

RESPONSE TO INTERROGATORY NO. 23

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence. Registrant still further objects to this Interrogatory as being duplicative of other Interrogatories.

INTERROGATORY NO. 24:

Provide all known current and past contact information for all individuals identified in response to Interrogatory No. 15, including but not limited to physical address(es), phone number(s), and e-mail address(es).

RESPONSE TO INTERROGATORY NO. 24

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

Pat Meier Associates owns a website that is available at www.patmeier.com. According to the information on that website, the phone numbers for Pat Meier Associates are 415.389.1700 and 415.717.9677.

INTERROGATORY NO. 25:

Provide all known current and past contact information for Ken Weng, including but not limited to physical address(es), phone number(s), and e-mail address(es).

RESPONSE TO INTERROGATORY NO. 25

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence. Registrant further objects to this Interrogatory to the extent it invades any constitutionally protected right of privacy.

Subject to the foregoing general and specific objections Registrant responds as follows:

Mr. Weng can be contacted through Registrant's counsel of record.

INTERROGATORY NO. 26:

Provide all known current and past contact information for Jonathan Chang, including but not limited to physical address(es), phone number(s), and e-mail address(es).

RESPONSE TO INTERROGATORY NO. 26

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence. Registrant further objects further objects to this Interrogatory to the extent it invades any constitutionally protected right of privacy.

Subject to the foregoing general and specific objections Registrant responds as follows:
22215 Rae Lane, Cupertino, CA 95014.

INTERROGATORY NO. 27:

Provide all known current and past contact information for Miller Chen, including but not limited to physical address(es), phone number(s), and e-mail address(es).

RESPONSE TO INTERROGATORY NO. 27

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence. Registrant further objects further objects to this Interrogatory to the extent it invades any constitutionally protected right of privacy.

Subject to the foregoing general and specific objections Registrant responds as follows:

Miller Chen can be contacted through Registrant's counsel of record.

Dated: June 11, 2014

Irene Y. Lee
Jean Y. Rhee
Robert F. Gookin
RUSS, AUGUST & KABAT
12424 Wilshire Boulevard
Twelfth Floor
Los Angeles, California 90025
Telephone: (310) 826-7474
Facsimile: (310) 826-6991
*Attorneys for Registrant VIA
Technologies, Inc.*

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing **REGISTRANT VIA TECHNOLOGIES, INC.'S THIRD AMENDED RESPONSES TO PETITIONER GOOGLE, INC.'S FIRST SET OF SPECIAL INTERROGATORIES** was served by Federal Express on June 11, 2014, upon counsel of Petitioner:

COOLEY LLP

Janet L. Cullum

jcullum@cooley.com

Brendan Joseph Hughes

bhughes@cooley.com

Katie Krajeck

kkrajeck@cooley.com

trademarks@cooley.com

Cooley LLP

1299 Pennsylvania Avenue, NW • Suite 700

Washington, DC 20004-2400

Direct: (202) 842-7826 • Fax: (202) 842-7899

/s/ Josie Mercado
Josie Mercado

Exhibit H

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

Google, Inc., Petitioner, v. VIA Technologies, Inc., Registrant.	Cancellation No.: 92056816 Registration No.: 3,360,331 Mark: CHROME Issued: December 25, 2007 Registration No.: 3,951,287 Mark: CHROME Issued: April 26, 2011
--	---

**REGISTRANT VIA TECHNOLOGIES, INC.'S FOURTH AMENDED RESPONSES TO
PETITIONER GOOGLE, INC.'S FIRST SET OF SPECIAL INTERROGATORIES**

PROPOUNDING PARTY: PETITIONER GOOGLE, INC.

RESPONDING PARTY: REGISTRANT VIA TECHNOLOGIES, INC.

SET NUMBER: ONE

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Registrant VIA Technologies, Inc. ("VIA") hereby supplements its responses to Petitioner Google, Inc.'s Interrogatory Nos. 10 & 11 as follows:

GENERAL OBJECTIONS

VIA incorporates by reference the Preliminary Statement and General Objections set forth in Registrant VIA Technologies, Inc.'s Amended Responses to Petitioner Google, Inc.'s First Set of Special Interrogatories dated September 5, 2013.

INTERROGATORIES

INTERROGATORY NO. 1:

Identify each PERSON that has used or it is contemplated will in the future use the CHROME MARKS in the U.S. in connection with providing or offering for sale goods or services.

RESPONSE TO INTERROGATORY NO. 1

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:
VIA Technologies, S3 Graphics, Fujitsu, and Zotac.

INTERROGATORY NO. 2:

Identify each PERSON with knowledge of the selection, adoption, and development of the CHROME MARKS.

RESPONSE TO INTERROGATORY NO. 2

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory to the extent it seeks the information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

Young Kwon is an individual with knowledge of the selection, adoption, and development of the CHROME MARKS.

INTERROGATORY NO. 3:

Describe fully the facts and circumstances surrounding the selection, adoption, and development of the CHROME MARKS.

RESPONSE TO INTERROGATORY NO. 3

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory to the extent it seeks the information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this

Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

At the time that the CHROME MARKS were conceived, Young Kwon was the Sr. Product Marketing Manager for S3 Graphics, a wholly owned subsidiary of Registrant. In that capacity, Mr. Kwon was responsible for coming up with branding ideas. At the time that the CHROME MARKS were conceived, S3 Graphics was working on a graphics processor that had 8 pipelines, which are parallel processing units contained within the chip. S3 Graphics considered this graphics processor to be a high performance product and was searching for a brand that would capture its high performance aspects.

The initial idea of using the CHROME MARKS came to Mr. Kwon one day when he was driving to work. At that time, Mr. Kwon saw a motorcycle that was fully accessorized with chrome-plated parts. At that moment, Mr. Kwon realized that chrome is not a color, but rather a reflection of all colors. Because the graphics processor that they were looking to brand essentially manipulated color data to form images, CHROME seemed to be a perfect fit. Additionally, Chrome conjured up images of the golden age of American automobiles – a lot of which featured 8 cylinder engines and chrome accessories. This evocative tie-in with high-powered automobiles embodied the performance aspect of the graphics processor. In fact, Registrant even chose the 'raceway' font – a classic American font – to write the product names containing Chrome in the style of drive-through dining and performance auto products.

INTERROGATORY NO. 4:

Describe in detail all goods and/or services with which the CHROME MARKS have been or are currently being used by any PERSON.

RESPONSE TO INTERROGATORY NO. 4

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome.

Subject to the foregoing general and specific objections Registrant responds as follows:

personal computers, portable computers, notebook computers, microcomputers, desktop computers, motherboards, central processing units (CPUs), semiconductors, microprocessors, graphics processors, integrated circuits, computer chips, computer motherboards, computer graphics boards, computer interface boards, computer accelerator board, circuit boards, computer memory cards, memory chips, computer firmware, namely, computer utility software and other computer software used to maintain and operate computer system all stored in a computer's read only memory or elsewhere in the computer's circuitry, operating system software, printed and electronic instructional manuals, specification sheets, data sheets, computer reference manuals, user guides and documents providing instruction in the use and operation of various electronic digital devices, sold as a unit therewith the aforesaid good, technical support services, namely, troubleshooting of computer hardware and software problems in person, by telephone, by electronic, computer and communications networks, provision of computer systems analysis and computer diagnostic services, design of computer hardware, integrated circuits, computer networks and communications hardware and software for others, consultancy in the field of design, development, configuration, installation, updating, upgrading or maintenance of computer software - excluding computer game and video game software, and research and development of 3d content, 3d technology and processes, 3d animation technology, 3d processing power, 3d techniques, and flexible forward projection.

VIA has produced documents relating to the aforementioned goods and/or services with which the CHROME MARKS have been or are currently being used that are non-privileged and non-attorney work product, within its possession, custody, or control, and could be located upon a reasonably diligent search. These documents include, without limitation, the documents bearing the following Bates numbers, VIA00001-3, 5, 7-10, 14, 16-17, 19-20, 22, 27-29, 31-38, 40, 42-46, 48-49, 51, 53, 76, 94-102, 288-295, 324, 331-332, 334, 437-440, 454, 488-494, 508-510, 514-516, 523, 525, 528-529, 533, 539, 544-545, 550-554, 562-564, 568-570, 581-582, 584, 696, 736-738, 742-762, 766-775, 788-790, 800-802, 812-817, 839-845, 851-860, 899-907, 941-

951, 959, 962-969, 973-1034, 1036-1098, 1101-1101, 1104-1105, 1108-1201, 1204-1267, 1317-1338, 1341-1347, 1353-1364, 1419-1436, 1443-1459, 1462-1490, 1496-1502, 1508, 1512, 1518, 1521-1522, 1528, 1530, 1533, 1543, 1545-1547, 1551, 1560-1564, 1568, 1573-1577, 1591, 1658-1666, 1682-1686, 1766-1808, 1829-1838, 1846-1911, 1930-1935, 1941-1942, 1988-2094, 2297-2399, 2410-2532, 2542-2544, and 2577-3018, and pursuant to Federal Rule of Civil Procedure 33(d) the burden and expense of summarizing the contents of these documents to respond to this Interrogatory would be substantially the same for VIA as for Google.

INTERROGATORY NO. 5:

Describe in detail all goods and/or services in connection with which YOU intend to use the CHROME MARKS in the future.

RESPONSE TO INTERROGATORY NO. 5

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory to the extent it seeks the information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

In addition to continuing the use of the CHROME MARKS on the goods and services identified in response to Interrogatory No. 4, VIA intends to expand the use of the CHROME MARKS in communication devices and media players.

INTERROGATORY NO. 6:

Describe in detail all goods and/or services in connection with which YOU no longer use or intend to use the CHROME MARKS.

RESPONSE TO INTERROGATORY NO. 6

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague and unintelligible and assumes false facts. Subject to the foregoing general

and specific objections Registrant responds as follows: None.

INTERROGATORY NO. 7:

With respect to any of the goods and services identified in response to Interrogatory No. 5, identify the intended customer markets.

RESPONSE TO INTERROGATORY NO. 7

In addition to the General Objections set forth above, In addition to the General Objections set forth above, Registrant further objects to this Interrogatory to the extent it seeks the information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows: OEM manufacturers and end users.

INTERROGATORY NO. 8:

With respect to any of the goods and services identified in response to Interrogatory No. 4, provide the date(s) that the CHROME MARK I and CHROME MARK II were first used within the U.S.

RESPONSE TO INTERROGATORY NO. 8

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

CHROME MARK I was first used within the United States on July 1, 2001, and CHROME MARK II was first used within the United States on July 19, 2007.

INTERROGATORY NO. 9:

With respect to any of the goods and services identified in response to Interrogatory No.

4, identify the dates during which each PERSON has continuously used the CHROME MARKS, or if such use(s) has (have) not been continuous, state with particularity the dates and reasons for any period that the CHROME MARK I and CHROME MARK II has not been used by any PERSON.

RESPONSE TO INTERROGATORY NO. 9:

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory to the extent it seeks the information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence. Registrant further objects to this Interrogatory as requiring a legal conclusion.

Subject to the foregoing general and specific objections Registrant responds as follows:

VIA has continuously used the CHROME MARKS on the goods and services identified in response to Interrogatory No. 4.

INTERROGATORY NO. 10:

Describe in detail any personal computer, desktop computer, portable computer, notebook computer, laptop computer, or any other computer device on which YOUR CHROME MARKS are currently being used in commerce in the United States.

RESPONSE TO INTERROGATORY NO. 10

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome.

Subject to the foregoing general and specific objections Registrant responds as follows:

ARTIGO series, AMOS series, ZOTAC, Wyse, Lenovo, and HP. More specifically, ARTIGO A1100, ARTIGO A1150, ARTIGO A1200, ARTIGO A1250, ARTIGO A2000, AMOS-3001, ZOTAC ZBOX Nano (ZBOXNANO-VDO1-U), ZOTAC ZBOX Nano Plus (ZBOXNANO-VD01-PLUS), Wyse C10LE Thin Client, Wyse C30LE Thin Client, Wyse C50LE Thin Client,

Wyse C90LE Thin Client, Wyse C90LE7 Thin Client, Lenovo Itona MD27-F9R7-US-L Thin Client, HP 2533t Mobile Thin Client, and HP t5565 Thin Client.

VIA has produced documents relating to the aforementioned computer devices with which the CHROME MARKS are currently being used that are non-privileged and non-attorney work product, within its possession, custody, or control, and could be located upon a reasonably diligent search. These documents include, without limitation, the documents bearing the following Bates numbers, 5, 696, 736-738, 742-762, 766-771, 800-802, 812-817, 839-842, 858-860, 899-907, 945-951, 1151-1170, 2410-2497, and 2542-2544, and pursuant to Federal Rule of Civil Procedure 33(d) the burden and expense of summarizing the contents of these documents to respond to this Interrogatory would be substantially the same for VIA as for Google.

INTERROGATORY NO. 11:

Describe in detail any personal computer, desktop computer, portable computer, notebook computer, laptop computer, or any other computer device on which YOUR CHROME MARKS have been used in commerce in the United States in the last 4 years.

RESPONSE TO INTERROGATORY NO. 11

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome.

Subject to the foregoing general and specific objections Registrant responds as follows: ARTIGO series, AMOS series, ZOTAC, Fujitsu, Wyse, Lenovo, HP, and Samsung. More specifically, ARTIGO A1100, ARTIGO A1150, ARTIGO A1200, ARTIGO A1250, ARTIGO A2000, AMOS-3001, ZOTAC ZBOX Nano (ZBOXNANO-VDO1-U), ZOTAC ZBOX Nano Plus (ZBOXNANO-VD01-PLUS), Fujitsu LifeBook S6520, Wyse C10LE Thin Client, Wyse C30LE Thin Client, Wyse C50LE Thin Client, Wyse C90LE Thin Client, Wyse C90LE7 Thin Client, Lenovo Itona MD27-F9R7-US-L Thin Client, HP 2533t Mobile Thin Client, HP t5565 Thin Client, Samsung NP-NC20, and Samsung NC20-21 GBK.

VIA has produced documents relating to the aforementioned computer devices with which the CHROME MARKS have been used in the last 4 years that are non-privileged and non-

attorney work product, within its possession, custody, or control, and could be located upon a reasonably diligent search. These documents include, without limitation, the documents bearing the following Bates numbers, 5, 488-494, 533, 696, 736-738, 742-762, 766-771, 800-802, 812-817, 839-842, 858-860, 899-907, 945-951, 962-969, 1151-1170, 1575-1577, 2338-2340, 2410-2497, and 2542-2544, and pursuant to Federal Rule of Civil Procedure 33(d) the burden and expense of summarizing the contents of these documents to respond to this Interrogatory would be substantially the same for VIA as for Google.

INTERROGATORY NO. 12:

With respect to any of the goods and services identified in response to Interrogatory No. 4, provide the geographical scope of such former or current use of the CHROME MARKS.

RESPONSE TO INTERROGATORY NO. 12

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

As clarified during the Parties' meet and confer, VIA understands this question to be seeking information relating to the geographic scope of former or current use of the CHROME MARKS in the United States. VIA states that the CHROME MARKS have been used all over the United States.

INTERROGATORY NO. 13:

With respect to any of the goods and services identified in response to Interrogatory No. 4, describe in detail the manner in which the CHROME MARKS are or have been promoted in the United States.

RESPONSE TO INTERROGATORY NO. 13

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this

Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

The goods and services identified in response to Interrogatory No. 4 have been extensively promoted in the United States, including but not limited to in print media, over the Internet – including in specially commissioned YouTube videos – and at trade shows in the United States, including but not limited to the 2007 and 2008 Consumer Electronics Show in Las Vegas, Nevada, the 2007, 2009, 2010 and 2011 Embedded Systems Conference in San Jose, California, and the 2008 Game Developers Conference in San Francisco, California. Additionally, VIA has promoted the CHROME MARKS at international trade shows that are attended by large numbers of American consumers and manufacturers such as CeBIT in Germany and Computex in Taipei.

INTERROGATORY NO. 14:

Identify and fully describe the channels of trade and/or the potential channels of trade, for YOUR products or services that are or were distributed, sold and/or marketed under the CHROME MARKS.

RESPONSE TO INTERROGATORY NO. 14

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

The primary channel of trade for the products or services that are or were distributed, sold and/or marketed under the CHROME MARKS is over the Internet and retail stores. However, VIA has also taken direct orders from consumers at the various trade shows that it has attended to promote the CHROME MARKS.

INTERROGATORY NO. 15:

Describe fully any advertising conducted by any PERSON of the CHROME MARKS including, but without limitation: the nature of such advertising, the identity of each PERSON who has conducted such advertising, the geographic scope of such advertising, and the amount of money spent for such advertising on a yearly basis by each PERSON.

RESPONSE TO INTERROGATORY NO. 15

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad.

Subject to the foregoing general and specific objections Registrant responds as follows:

VIA has advertised the CHROME MARKS in the United States over the Internet, in print media, through a series of specially commissioned YouTube videos and at Trade Shows. While much of VIA's advertising and marketing efforts are handled in-house, VIA has also retained Pat Meier Associates to assist it in its advertising and marketing efforts. Pat Meier Associates owns a website that is available at www.patmeier.com.

INTERROGATORY NO. 16:

Describe in detail all goods and/or services with which YOU used CHROME MARK I when YOU filed YOUR Combined Declaration of Use and Incontestability under Sections 8 and 15 ("Declaration of Use") on February 14, 2013.

RESPONSE TO INTERROGATORY NO. 16:

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

Computers, namely, personal computers, portable computers, notebook computers, microcomputers, desktop computers; computer system components, parts and fittings, namely, motherboards, central processing units (CPUs), computer hardware, namely, semiconductors,

microprocessors, graphics processors, integrated circuits, computer chips, computer motherboards, computer graphics boards, computer interface boards, computer accelerator board, circuit boards, computer memory cards, memory chips, computer firmware, namely, computer utility software and other computer software used to maintain and operate computer system all stored in a computer's read only memory or elsewhere in the computer's circuitry, operating system software; printed and electronic instructional manuals, specification sheets, data sheets, computer reference manuals, user guides and documents providing instruction in the use and operation of various electronic digital devices, sold as a unit therewith the aforesaid good.

INTERROGATORY NO. 17:

Describe in detail YOUR decision to delete the goods and services YOU identified in paragraph 6 of YOUR ANSWER from YOUR Declaration of Use for the CHROME MARK I.

RESPONSE TO INTERROGATORY NO. 17:

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory as seeking information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

INTERROGATORY NO. 18:

Please provide a specimen that shows YOUR use in commerce of the goods and services listed in YOUR Declaration of Use for the CHROME MARK I.

RESPONSE TO INTERROGATORY NO. 18:

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, unduly burdensome and/or duplicative of other discovery requests. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

Please see the documents produced in response to Petitioner's Requests for Production.

INTERROGATORY NO. 19:

Describe in detail the basis for YOUR assertion in YOUR Declaration of Use that YOU currently and continuously use the CHROME MARK I in connection with any computer devices, including personal computers, portable computers, notebook computers, microcomputers, and desktop computers.

RESPONSE TO INTERROGATORY NO. 19

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory as seeking information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent it seeks a legal conclusion. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

VIA has used CHROME MARK I in connection with computer devices, including personal computers, portable computers, notebook computers, microcomputers, and desktop computers continuously in the United States since July 1, 2001, primarily by marketing and selling CHROME branded graphics chipsets to manufacturers of those devices, as well as by using CHROME branded components in products such as the ARTIGO system.

INTERROGATORY NO. 20:

Describe in detail the basis for YOUR assertion in YOUR Declaration of Use that YOU currently and continuously use the CHROME MARK I in connection with operating system software.

RESPONSE TO INTERROGATORY NO. 20

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory as seeking information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is

vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent it seeks a legal conclusion. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

Software drivers enable the CHROME-branded chipset in various operating systems, including but not limited to the Windows operating system.

INTERROGATORY NO. 21:

Identify each witness Registrant intends to present or rely upon in this proceeding.

RESPONSE TO INTERROGATORY NO. 21:

In addition to the General Objections set forth above, Registrant objects that this Interrogatory is premature and it seeks information protected by the attorney-client privilege and attorney work product. Discovery in this action is ongoing. Accordingly, Registrant reserves the right to further supplement and/or amend its response to this interrogatory based on further discovery in compliance with the TTAB's Scheduling Order and Federal Rules of Civil Procedure.

INTERROGATORY NO. 22:

Identify each person who supplied information included in any of the answers to this set of interrogatories or who was consulted or whose documents or files were consulted in connection with the preparation of the answers.

RESPONSE TO INTERROGATORY NO. 22

In addition to the General Objections set forth above, Registrant further objects to this Interrogatory as seeking information that is protected from discovery by the attorney-client privilege and/or the work product doctrine. Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome.

Subject to the foregoing general and specific objections Registrant responds as follows:

Ken Weng

Young Kwon

Epan Wu

INTERROGATORY NO. 23:

Describe in detail all efforts done to-date to use or in preparation to use the CHROME MARKS in commerce in connection with the goods and services identified in their respective registrations.

RESPONSE TO INTERROGATORY NO. 23

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence. Registrant still further objects to this Interrogatory as being duplicative of other Interrogatories.

INTERROGATORY NO. 24:

Provide all known current and past contact information for all individuals identified in response to Interrogatory No. 15, including but not limited to physical address(es), phone number(s), and e-mail address(es).

RESPONSE TO INTERROGATORY NO. 24

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence.

Subject to the foregoing general and specific objections Registrant responds as follows:

Pat Meier Associates owns a website that is available at www.patmeier.com. According to the information on that website, the phone numbers for Pat Meier Associates are 415.389.1700 and 415.717.9677.

INTERROGATORY NO. 25:

Provide all known current and past contact information for Ken Weng, including but not limited to physical address(es), phone number(s), and e-mail address(es).

RESPONSE TO INTERROGATORY NO. 25

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence. Registrant further objects to this Interrogatory to the extent it invades any constitutionally protected right of privacy.

Subject to the foregoing general and specific objections Registrant responds as follows:

Mr. Weng can be contacted through Registrant's counsel of record.

INTERROGATORY NO. 26:

Provide all known current and past contact information for Jonathan Chang, including but not limited to physical address(es), phone number(s), and e-mail address(es).

RESPONSE TO INTERROGATORY NO. 26

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence. Registrant further objects further objects to this Interrogatory to the extent it invades any constitutionally protected right of privacy.

Subject to the foregoing general and specific objections Registrant responds as follows:

22215 Rae Lane, Cupertino, CA 95014.

INTERROGATORY NO. 27:

Provide all known current and past contact information for Miller Chen, including but not limited to physical address(es), phone number(s), and e-mail address(es).

RESPONSE TO INTERROGATORY NO. 27

In addition to the General Objections set forth above, Registrant further objects that this Interrogatory is vague, compound, and unduly burdensome. Registrant further objects to this Interrogatory to the extent that it is overbroad and not relevant or reasonably calculated to lead to admissible evidence. Registrant further objects further objects to this Interrogatory to the extent

it invades any constitutionally protected right of privacy.

Subject to the foregoing general and specific objections Registrant responds as follows:

Miller Chen can be contacted through Registrant's counsel of record.

Dated: June 17, 2014

/s/ Jean Y. Rhee

Irene Y. Lee

Jean Y. Rhee

Robert F. Gookin

RUSS, AUGUST & KABAT

12424 Wilshire Boulevard

Twelfth Floor

Los Angeles, California 90025

Telephone: (310) 826-7474

Facsimile: (310) 826-6991

Attorneys for Registrant

VIA Technologies, Inc.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing **REGISTRANT VIA TECHNOLOGIES, INC.'S FOURTH AMENDED RESPONSES TO PETITIONER GOOGLE, INC.'S FIRST SET OF SPECIAL INTERROGATORIES** was served by electronic mail and First Class Mail on June 17, 2014, upon counsel of Petitioner:

COOLEY LLP

Janet L. Cullum

jcullum@cooley.com

Brendan Joseph Hughes

bhughes@cooley.com

Katie Krajeck

kkrajeck@cooley.com

trademarks@cooley.com

Cooley LLP

1299 Pennsylvania Avenue, NW • Suite 700

Washington, DC 20004-2400

Direct: (202) 842-7826 • Fax: (202) 842-7899

/s/ Anne Zivkovic

Anne Zivkovic

Exhibit I

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

Google, Inc., Petitioner, v. VIA Technologies, Inc., Registrant.	Cancellation No.: 92056816 Registration No.: 3,360,331 Mark: CHROME Issued: December 25, 2007 Registration No.: 3,951,287 Mark: CHROME Issued: April 26, 2011
--	---

REGISTRANT VIA TECHNOLOGIES, INC.'S INITIAL DISCLOSURES

Pursuant to Rule 26(a)(1)(A) of the Federal Rules of Civil Procedure, Registrant VIA Technologies, Inc. ("VIA") hereby makes the following initial disclosures. These disclosures are based on VIA's reasonable inquiries to date, and VIA reserves the right to amend, supplement, or otherwise modify these disclosures. VIA's initial disclosures represent a good faith effort to identify information and documents it may use to support claims and defenses.

By making these disclosures, VIA does not represent that it is identifying every document, tangible thing or witness possibly relevant to this proceeding. VIA's initial disclosures are made without in any way waiving: (1) the right to object to the use of any of the disclosed information, for any purpose, in whole or in part, in any subsequent proceeding in this action or any other action; and (2) the right to object on any and all grounds, at any time, to any discovery request or proceeding involving or relating to the subject matter of these disclosures.

Fed. R. Civ. Proc. 26(a)(1)(A)(i) Witnesses:

The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(i), VIA identifies the following individuals. VIA expressly reserves the right to identify and/or call as witnesses additional and/or different individuals if, during the course of discovery and investigation relating to this case, VIA learns that such additional and/or different individuals have relevant knowledge.

1. Ken Weng

Mr. Weng can be contacted through VIA's counsel:

Russ, August & Kabat
12424 Wilshire Boulevard, 12th Floor
Los Angeles, California 90025
Tel.: 310-826-7474

Subjects: VIA's adoption, ownership, application for service mark registrations, actual use and planned use of its CHROME trademarks; VIA's advertising, promotional, and marketing activities and publications featuring its CHROME trademarks and CHROME branded products.

Fed. R. Civ. Proc. 26(a)(1)(A)(ii) Documents:

A copy — or a description by category and location — of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

Pursuant to Fed. R. Civ. P. 26(a)(1)(A)(ii), and based upon presently available information, VIA may use relevant documents from the following categories to support its claims. VIA expressly reserves the right to identify and use documents from additional categories if, during the course of discovery and investigation relating to this case, VIA learns that such additional categories contain relevant documents. VIA also reserves the right to respond to and/or rebut the contentions and allegations Petitioner may make.

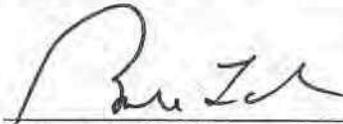
1. Copies of VIA's United States trademark filing and submissions to the United States Patent and Trademark Office;

2. Documents showing VIA Technologies' valid, enforceable rights in the CHROME marks;
3. Documents showing VIA's use and intended use of the CHROME marks in the United States, including but not limited to VIA's sales and/or marketing and/or advertising activities in connection with the CHROME marks; and
4. Documents showing VIA's intended expansion of its use of the CHROME marks.

Further discovery and investigation may reveal additional tangible items or documents, which may be relevant and discoverable. VIA may produce other relevant and non-privileged documents in its own possession, custody or control, to the extent reasonably available, in response to the appropriate document requests, subject to its objections.

Dated: July 31, 2013

Respectfully submitted,



Robert F. Gookin
RUSS, AUGUST & KABAT
Twelfth Floor
12424 Wilshire Boulevard
Los Angeles, California 90025
Telephone: (310) 826-7474
Facsimile: (310) 826-6991

*Attorneys for Registrant
VIA Technologies Industries, Inc.*

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing **REGISTRANT VIA TECHNOLOGIES, INC.'S INITIAL DISCLOSURES** was served by electronic mail on July 31, 2013, upon counsel of Petitioner:

COOLEY LLP
JANET L. CULLUM
ANNE H. PECK
JEFFREY NORBERG
jcullum@cooley.com
apecck@cooley.com
jnorberg@cooley.com
thance@cooley.com
smartinez@cooley.com
trademarks@cooley.com

/s/ Anne Zivkovic

Anne Zivkovic

Exhibit J

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

Google, Inc., Petitioner, v. VIA Technologies, Inc., Registrant.	Cancellation No.: 92056816 Registration No.: 3,360,331 Mark: CHROME Issued: December 25, 2007 Registration No.: 3,951,287 Mark: CHROME Issued: April 26, 2011
--	---

REGISTRANT VIA TECHNOLOGIES, INC.'S AMENDED INITIAL DISCLOSURES

Pursuant to Rules 26(a)(1)(A) and 26(e) of the Federal Rules of Civil Procedure, Registrant VIA Technologies, Inc. ("VIA") hereby provides the following amended initial disclosures. These amended initial disclosures are based on VIA's reasonable inquiries to date, and VIA reserves the right to further amend, supplement, or otherwise modify these disclosures. VIA's amended initial disclosures represent a good faith effort to identify information and documents it may use to support claims and defenses.

By making these amended initial disclosures, VIA does not represent that it is identifying every document, tangible thing or witness possibly relevant to this proceeding. VIA's amended initial disclosures are made without in any way waiving: (1) the right to object to the use of any of the disclosed information, for any purpose, in whole or in part, in any subsequent proceeding in this action or any other action; and (2) the right to object on any and all grounds, at any time, to any discovery request or proceeding involving or relating to the subject matter of these disclosures.

Fed. R. Civ. Proc. 26(a)(1)(A)(i) Witnesses:

The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(i), VIA identifies the following individuals. VIA expressly reserves the right to identify and/or call as witnesses additional and/or different individuals if, during the course of discovery and investigation relating to this case, VIA learns that such additional and/or different individuals have relevant knowledge.

1. Dr. Ken Weng

Dr. Weng can be contacted through VIA's counsel:

Russ, August & Kabat
12424 Wilshire Boulevard, 12th Floor
Los Angeles, California 90025
Tel.: 310-826-7474

Subjects: VIA's adoption, ownership, application for service mark registrations, actual use, and planned use of its CHROME trademarks; VIA's advertising, promotional, and marketing activities and publications featuring its CHROME trademarks and CHROME branded products and services.

2. Amy Wu

Ms. Wu can be contacted through VIA's counsel:

Russ, August & Kabat
12424 Wilshire Boulevard, 12th Floor
Los Angeles, California 90025
Tel.: 310-826-7474

Subjects: VIA's actual use and planned use of its CHROME trademarks; VIA's advertising, promotional, and marketing activities and publications featuring its CHROME trademarks and CHROME branded products and services.

3. Young Kwon

Mr. Kwon's last known contact information is:
ykwonusa@yahoo.com.

Subjects: VIA's selection, adoption, and development of its CHROME trademarks.

4. Richard Brown

Mr. Brown can be contacted through VIA's counsel:
Russ, August & Kabat
12424 Wilshire Boulevard, 12th Floor
Los Angeles, California 90025
Tel.: 310-826-7474

Subjects: VIA's actual use of its CHROME trademarks; VIA's advertising, promotional, and marketing activities and publications featuring its CHROME trademarks and CHROME branded products and services.

5. Pat Meier

Ms. Meier's contact information is:
Pat Meier Associates Public Relations
Tel.: 415-389-1700

Subjects: VIA's advertising, promotional, and marketing activities and publications featuring its CHROME trademarks and CHROME branded products and services.

Fed. R. Civ. Proc. 26(a)(1)(A)(ii) Documents:

A copy — or a description by category and location — of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(ii), and based upon presently available information, VIA may use relevant documents from the following categories to support its claims. VIA expressly reserves the right to identify and use documents from additional categories if, during the course of discovery and investigation relating to this case, VIA learns that such additional categories contain relevant documents. VIA also reserves the right to respond to and/or rebut the contentions and allegations Petitioner may make.

1. Copies of VIA's United States trademark filing and submissions to the United States Patent and Trademark Office;

2. Documents showing VIA Technologies' valid, enforceable rights in the CHROME marks;
3. Documents showing VIA's use and intended use of the CHROME marks in the United States, including but not limited to VIA's sales and/or marketing and/or advertising activities in connection with the CHROME marks; and
4. Documents showing VIA's intended expansion of its use of the CHROME marks.

Further discovery and investigation may reveal additional tangible items or documents, which may be relevant and discoverable. VIA may produce other relevant and non-privileged documents in its own possession, custody or control, to the extent reasonably available, in response to the appropriate document requests, subject to its objections.

Dated: June 17, 2014

Respectfully submitted,



Jean Y. Rhee
RUSS, AUGUST & KABAT
Twelfth Floor
12424 Wilshire Boulevard
Los Angeles, California 90025
Telephone: (310) 826-7474
Facsimile: (310) 826-6991

*Attorneys for Registrant
VIA Technologies Industries, Inc.*

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing **REGISTRANT VIA TECHNOLOGIES, INC.'S AMENDED INITIAL DISCLOSURES** was served by electronic mail and First Class Mail on June 17, 2014, upon counsel of Petitioner:

COOLEY LLP

Janet L. Cullum

jcullum@cooley.com

Brendan Joseph Hughes

bhughes@cooley.com

Katie Krajeck

kkrajeck@cooley.com

trademarks@cooley.com

Cooley LLP

1299 Pennsylvania Avenue, NW • Suite 700

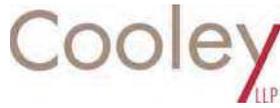
Washington, DC 20004-2400

Direct: (202) 842-7826 • Fax: (202) 842-7899

/s/ Anne Zivkovic

Anne Zivkovic

Exhibit K



Jeffrey T. Norberg
T +1 415 693 2089
jnorberg@cooley.com

VIA EMAIL

February 11, 2014

Robert Gookin
Russ August & Kabat
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025

RE: Via's Discovery Response Deficiencies
Google Inc. v. VIA Technologies, Inc., Cancellation No. 92056816

Dear Robert:

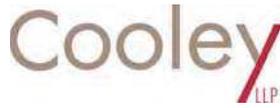
I write regarding continued deficiencies in the responses by Via Technologies, Inc. ("Via") to Google's discovery requests.

Document Requests

Via's document production remains incomplete despite months of efforts by Google to obtain a complete production. During our meet and confer calls in August and November last year, Via represented that it would be gathering and producing additional documents to remedy the deficiencies Google raised in correspondence and during those calls. Via later made small productions in December and February, neither of which resolved the issues raised by Google.

To date, Via has produced a mere 735 pages consisting primarily of photographs and web screenshots, most of which appear to have been generated solely for use in this litigation. Since Via has claimed that it used the CHROME mark since 2001, it strains credulity that Via has only been able to produce this small volume of documents.

In particular, the document productions are obviously incomplete relative to e-mails. Via has either failed to conduct an adequate search for e-mail or failed to institute an appropriate litigation hold to preserve records. Via's document production contains only a small number of internal communications regarding this dispute, even though the dispute has been outstanding between the parties for many years, and no communications regarding the use of the CHROME mark in connection with any specific products despite Via's position that it has used the mark for many years (Requests for Production 6, 12-15 and 20-22). We would expect that Via's documents would include, for example, communications relating to Via's decision to add the "Chrome" label that appears on some (but not all) of the Artigo products depicted on Via's website and in its document production. Via's production contained no such documents. Rather, Via's most recent production contains only a few internal communications, most of which appear to be the communications from the Taiwanese dispute, which were apparently kept in hard copy.



Robert Gookin
February 11, 2014
Page Two

Moreover, none of the documents produced by Via appear to have come from any systematic collection and review of e-mail or other documents. Please confirm whether Via has engaged in the required systematic search of e-mail and back up repositories of emails and other documents (i.e. using keyword searches). Please also confirm that Via has preserved emails and other documents relating to this dispute and, if you cannot make that representation, then please provide a detailed account of why such materials were not preserved.

Via has also failed to produce any documents relating to the selection and development of the CHROME mark (Request No. 3), and Via's production also lacks any documents relating to the target markets of any products bearing a CHROME mark (Request Nos. 28 and 29). Given Via's claim to use of the mark, and given the time that Via has allegedly been offering products under the CHROME mark, Via cannot legitimately claim that no such documents were generated at any time.

Privilege Log

Via has also failed to provide a privilege log. During our prior meet and confer calls, you mentioned that you believed that many of the documents sought by Google are likely privileged. To the extent Via is withholding any documents based on a claim of privilege, it must immediately provide a privilege log to support such claim.

Interrogatories

Via has also failed to provide complete information in response to Interrogatories 10 and 11 (relating to the products on which Via has allegedly used the CHROME mark), and 25-27 (which seek the *last known* contact information for certain former Via employees). During our call in November, you told me that you would confer with your client and get back to me on this obviously relevant information. Please let me know if Via will be providing supplemental responses, or if we will need to seek an order compelling these responses.

After months of meet and confer efforts, we are now just 15 days from the close of discovery in this case, and Via has yet to comply with its discovery obligations. Via's failure to provide complete responses is creating needless expense for both sides, and will likely necessitate a further extension of the schedule. Please let me know your availability for a meet and confer call to discuss these issues no later than tomorrow (Wednesday).

Sincerely,

Cooley LLP

/s/ Jeffrey T. Norberg

cc: Irene Lee

Exhibit L

From: Robert Gookin [mailto:rgookin@raklaw.com]
Sent: Saturday, February 15, 2014 9:23 AM
To: Norberg, Jeffrey
Cc: Irene Lee; Martinez, Suenmy; Krajeck, Katie
Subject: Re: Google v. Via, Meet and Confer Letter

Jeff,

I apologize for not getting back to you yesterday. We have been in communication with our client and they are continuing their search for responsive documents. I will update Katie further when I have more information.

Thanks for your professionalism throughout this litigation and all best wishes for the future.

Bob

Robert Gookin
Russ August & Kabat
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025
310 826-7474
rgookin@raklaw.com

IRS Circular 230 Notice: This communication is not intended to be used and cannot be used, for the purpose of avoiding U.S. federal tax-related penalties or promoting, marketing or recommending to another party any tax-related matter addressed herein.

This communication shall not create, waive or modify any right, obligation or liability, or be construed to contain or be an electronic signature. This communication may contain information that is legally privileged, confidential or exempt from disclosure, and is intended only for the named addressee(s). If you are not the intended recipient, please note that any dissemination, distribution, or copying of this communication is prohibited.

On Feb 12, 2014, at 2:26 PM, Norberg, Jeffrey wrote:

Robert,

Thanks for speaking with me today. Attached please find the confirmation copy of the 60 day extension request, which has just been filed. I look forward to receiving an update on your client's collection of documents, the privilege log, and the supplemental interrogatory responses, by Friday of this week.

As I mentioned during the call, I will be leaving Cooley at the end of next week. Please direct future correspondence on this matter to Katie Krajeck.

Thanks,

Jeff

From: Robert Gookin [<mailto:rgookin@raklaw.com>]
Sent: Tuesday, February 11, 2014 5:02 PM
To: Norberg, Jeffrey
Cc: Irene Lee; Martinez, Suenmy
Subject: Re: Google v. Via, Meet and Confer Letter

Jeff,

That's fine.

Talk to you tomorrow at 2:00.

Best,

Bob

Robert Gookin
Russ August & Kabat
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025
310 826-7474
rgookin@raklaw.com

IRS Circular 230 Notice: This communication is not intended to be used and cannot be used, for the purpose of avoiding U.S. federal tax-related penalties or promoting, marketing or recommending to another party any tax-related matter addressed herein.

This communication shall not create, waive or modify any right, obligation or liability, or be construed to contain or be an electronic signature. This communication may contain information that is legally privileged, confidential or exempt from disclosure, and is intended only for the named addressee(s). If you are not the intended recipient, please note

that any dissemination, distribution, or copying of this communication is prohibited.

On Feb 11, 2014, at 2:57 PM, Norberg, Jeffrey wrote:

Hi Robert,

Let's plan to talk at 2:00. Shall I call your office?

Thanks,

Jeff

From: Robert Gookin [<mailto:rgookin@raklaw.com>]
Sent: Tuesday, February 11, 2014 4:31 PM
To: Norberg, Jeffrey
Cc: Irene Lee; Martinez, Suenmy
Subject: Re: Google v. Via, Meet and Confer Letter

Jeff,

I am available to meet and confer tomorrow any time between 2:00 and 5:00 p.m.

Please advise as to what time works best for you.

Best,

Bob

Robert Gookin
Russ August & Kabat
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025
310 826-7474
rgookin@raklaw.com

IRS Circular 230 Notice: This communication is not intended to be used and cannot be used, for the purpose of avoiding U.S. federal tax-related penalties or promoting, marketing or recommending to another party any tax-related matter addressed herein.

This communication shall not create, waive or modify any right, obligation or

liability, or be construed to contain or be an electronic signature. This communication may contain information that is legally privileged, confidential or exempt from disclosure, and is intended only for the named addressee(s). If you are not the intended recipient, please note that any dissemination, distribution, or copying of this communication is prohibited.

On Feb 11, 2014, at 9:11 AM, Norberg, Jeffrey wrote:

Robert and Irene,

Please see attached letter and let me know your availability for a meet and confer call today or tomorrow.

Sincerely,

Jeffrey T. Norberg

Cooley LLP
101 California Street • 5th Floor
San Francisco, CA 94111-5800
Direct: (415) 693-2089 • Fax: (415) 693-2222 • Cell: (415) 359-5656
Bio: www.cooley.com/jnorberg • Practice: www.cooley.com/iplitigation

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. If you are the intended recipient, please be advised that the content of this message is subject to access, review and disclosure by the sender's Email System Administrator.

IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachment) is not intended or written by us to be used, and cannot be used, (i) by any taxpayer for the purpose of avoiding tax penalties under the Internal Revenue Code or (ii) for promoting, marketing or recommending to another party any transaction or matter addressed herein.

<Feb 11 Meet and Confer Letter.pdf>

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. If you are the intended recipient, please be advised that the content of this message is subject to access, review and disclosure by the sender's Email System Administrator.

IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachment) is not intended or written by us to be used, and cannot be used, (i) by any taxpayer for the purpose of avoiding tax penalties under the Internal Revenue Code or (ii) for promoting, marketing or recommending to another party any transaction or matter addressed herein.

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. If you are the intended recipient, please be advised that the content of this message is subject to access, review and disclosure by the sender's Email System Administrator.

IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachment) is not intended or written by us to be used, and cannot be used, (i) by any taxpayer for the purpose of avoiding tax penalties under the Internal Revenue Code or (ii) for promoting, marketing or recommending to another party any transaction or matter addressed herein.

Exhibit M



Katie Krajeck
T +1 858 550 6123
kkrajeck@cooley.com

BY EMAIL

March 25, 2014

Robert Gookin
Russ August & Kabat
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025

**RE: VIA's Continued Discovery Deficiencies
Google Inc. v. VIA Technologies, Inc., Cancellation No. 92056816**

Dear Robert:

On behalf of Petitioner Google Inc. ("Google"), we have reviewed the additional materials produced by VIA Technologies, Inc. ("VIA") on March 19, 2014.

VIA has failed to cure the deficiencies outlined in Google's February 11, 2014 and March 14, 2014 letters. Indeed, VIA's supplemental production consists almost wholly of third-party website screenshots and includes no internal emails or communications.

Moreover, despite repeated requests, VIA has also failed to produce a log of documents withheld on the basis of applicable privileges and failed to provide complete responses to interrogatories seeking basic information regarding the products on which VIA has used the CHROME mark and contact information for former employees with highly relevant information.

Given VIA's ongoing failure to provide the requested discovery – and in the absence of assurance from VIA that these materials will be produced by Friday, March 28, 2014 – Google intends to promptly move to compel production of: (1) all responsive, nonprivileged documents and communications; (2) a privilege log reflecting all responsive documents and communications withheld on the basis of applicable privileges; and (3) complete responses to Google's interrogatories to VIA.

Sincerely,

A handwritten signature in black ink that reads "Katie Krajeck".

Katie Krajeck

cc: Irene Lee
Counsel for VIA Technologies, Inc.

Janet L. Cullum
Brendan J. Hughes
Counsel for Google Inc.

Exhibit N



12424
Wilshire Boulevard
12th Floor
Los Angeles
California
90025

Tel 310.826.7474
Fax 310.826.6991
www.raklaw.com

March 26, 2014

Via Email

Katie Krajeck
Cooley LLP
4401 Eastgate Mall
San Diego, CA 92121

Re: Google/VIA: TTAB Proceeding No. 92056816

Dear Ms. Krajeck:

I am writing in response to your March 25, 2014 letter.

As a threshold matter, and as I discussed on a number of occasions with Jeff Norberg, the fact that VIA is based in Taipei, with an American base of operations in San Jose, has made the discovery process in this proceeding unusually difficult and cumbersome. VIA's investigations and productions need to be coordinated on two continents and are further complicated by language barriers. In spite of that, and in direct contrast to the assertions in your letter, VIA has diligently complied with its discovery obligations and will continue to do so.

With respect to the specific assertions in your letter, your assertion that VIA's most recent production "consists almost wholly of third-party website screenshots" is simply incorrect. Contrary to that assertion, the bulk of those documents are confidential internal VIA documents that clearly establish VIA's strategic partnerships with some of the largest computer manufacturers in the world, including but not limited to Fujitsu, HP, IBM, Sony, Toshiba, Dell, Sharp, Samsung and Lenovo. In fact, based on those documents, which we only just received, we have instructed our client to undertake additional investigation with respect to those corporate partners and are confident that VIA will discover and produce additional responsive documents prior to the discovery cut off.

Please be advised that I have attached VIA's privilege log to this email.

With respect to VIA's responses to Google's Interrogatories, pursuant to your March 14, 2014 letter, there appear to be four interrogatories at issue: Numbers 10, 11, 26 and 27. Interrogatories 10 and 11 seek information regarding "any personal computer, desktop computer, portable computer, notebook computer, laptop computer, or any other computer device; on which the CHROME Marks are currently being used, or on which they have been used within the past four years. As set forth above, we continue to investigate the broad scope of VIA's strategic partnerships and are working to create a comprehensive list of computers and "computing devices," including model numbers, in response to those interrogatories. Be advised that we will amend our earlier response as soon as that information has been compiled. With

respect to Interrogatory No. 26, I can confirm that Jonathon Chang is a VIA employee who is currently on a leave of absence. Accordingly, Mr. Chang can be contacted through RAK. And finally with respect to Interrogatory No. 27, I can confirm that Miller Chen is a VIA employee and can be contacted through RAK.

Accordingly, and consistent with VIA's good faith efforts to comply with its discovery obligations and resolve any purported differences with Google, we do not believe that Google has any good faith basis to proceed with the threatened motion to compel at this time and we will so advise the Board if you decide to move to compel. *See, e.g., Hot Tamale Mama...and More, LLC v. SF Investments, Inc., Opposition No. 91209030 (March 20, 2014).*

While your March 25, 2014 letter does not address schedule of the upcoming depositions, we have spoken with our client and are attempting to clear dates for those depositions, as well as to determine the identity and location of VIA's 30(b)(6) deponent(s). That said, please be advised that Ken Weng has substantial duties with respect to VIA's tax reporting and, as such, will not be available on April 16, 2014, as noticed. Mr. Weng has indicated that the earliest he can be available is the last week in April or the first week in May. I will advise further as soon as we obtain additional information.

In light of all the above, and in order to avoid burdening the Board with an unnecessary Motion to Compel, VIA would suggest that the Parties request a continuance of all deadlines by 30 days, which extension will hopefully obviate the issues raised in your letters and allow the process to proceed smoothly and efficiently. Please advise if Google agrees to request that extension and VIA will prepare and file a consented motion with the Board.

As always, please feel free to contact me if you have any questions.

Sincerely,

Russ, August & Kabat



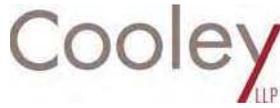
Robert F. Gookin

RFG/jm

Enclosure.

cc: Irene Lee, Esq.

Exhibit O



Katie M. Krajeck
T +1 858 550 6123
kkrajeck@cooley.com

BY EMAIL

April 11, 2014

Robert Gookin
Russ August & Kabat
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025

**RE: Ongoing Discovery Deficiencies / Deposition Scheduling
*Google Inc. v. VIA Technologies, Inc., Cancellation No. 92056816***

Dear Robert:

I write in response to your letter dated March 26, 2014. While you state that "VIA has diligently complied with its discovery obligations and will continue to do so," VIA has failed to produce any additional documents in the intervening two weeks, or to fully answer key Interrogatories regarding VIA's use of the CHROME marks.

In your letter, you suggest that only certain Interrogatory responses are at issue. This is not the case. In addition to Interrogatories Nos. 10 and 11, VIA is obligated to provide complete responses to Interrogatory No. 4 (seeking a detailed description of all goods and/or services in connection with which VIA has used or is using the CHROME marks) and Interrogatory No. 5 (seeking a detailed description of all goods and services in connection with which VIA intends to use the CHROME marks in the future). VIA's current responses, which reference a "variety of applications" and "several areas" of use but fail to describe each such good or service with particularity, are not sufficient.

Please confirm as soon as possible that VIA will rectify its discovery deficiencies, produce all responsive documents and provide complete Interrogatory responses no later than Friday, April 18, 2014.

Finally, in light of VIA's failure to produce documents and the lack of availability of Mr. Ken Weng, the depositions noticed for April 15-17 will not proceed. Please provide the availability of Messrs. Weng and Kwon in May 2014, as well as that of VIA's 30(b)(6) deponent(s).

Sincerely,

A handwritten signature in black ink, appearing to read "Katie Krajeck".

Katie Krajeck

cc: Irene Lee - *Counsel for VIA Technologies, Inc.*
Janet L. Cullum, Brendan J. Hughes - *Counsel for Google Inc.*

Exhibit P

From: Robert Gookin [<mailto:rgookin@raklaw.com>]
Sent: Friday, April 18, 2014 3:52 PM
To: Krajeck, Katie
Cc: Irene Lee; Cullum, Janet; Hughes, Brendan; Josie Mercado
Subject: Re: Google v. VIA

Katie,

Thank you for your letter. According to our records, it is my understanding that this is the first time Google has raised any objection to VIA's responses to Interrogatories Nos. 4 & 5. Given the scope of your requested supplementation, Google's arbitrary one week deadline is simply not reasonable. That said, and as has been the case throughout this litigation, VIA will work diligently to address Google's stated concerns and objections. Accordingly, be advised that VIA intends, by the end of next week, to (1) supplement its interrogatory responses, (2) produce additional documents, and (3) provide Google with dates as to the availability of VIA's deponents.

If you believe that a telephone call is warranted to discuss your letter, or any of the above, please suggest some dates and times next week and Ms. Lee and/or I will work to accommodate your schedule.

All best,

Bob

Robert Gookin
Russ August & Kabat
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025
310 826-7474
rgookin@raklaw.com

IRS Circular 230 Notice: This communication is not intended to be used and cannot be used, for the purpose of avoiding U.S. federal tax-related penalties or promoting, marketing or recommending to another party any tax-related matter addressed herein.

This communication shall not create, waive or modify any right, obligation or liability, or be construed to contain or be an electronic signature. This communication may contain information that is legally privileged, confidential or exempt from disclosure, and is intended only for the named addressee(s). If you are not the intended recipient, please note that any dissemination, distribution, or copying of this communication is prohibited.

On Apr 11, 2014, at 5:44 PM, Krajeck, Katie wrote:

Dear Robert,

Please see the attached correspondence.

Thank you,
-Katie

Katie Krajeck

Cooley LLP

4401 Eastgate Mall

San Diego, CA 92121-1909

Direct: (858) 550-6123 • Fax: (858) 550-6420

Email: kkrajeck@cooley.com • www.cooley.com

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. If you are the intended recipient, please be advised that the content of this message is subject to access, review and disclosure by the sender's Email System Administrator.

IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachment) is not intended or written by us to be used, and cannot be used, (i) by any taxpayer for the purpose of avoiding tax penalties under the Internal Revenue Code or (ii) for promoting, marketing or recommending to another party any transaction or matter addressed herein.

<2014-04-11 Letter from K. Krajeck to R. Gookin.pdf>

Exhibit Q

From: Hughes, Brendan
Sent: Wednesday, April 30, 2014 10:16 AM
To: ilee@raklaw.com; rgookin@raklaw.com; jmercado@raklaw.com
Cc: Krajeck, Katie
Subject: Google v. VIA/ Discovery Issues

Irene and Bob --

Following up on our call last week, please let me know if you are available any time this afternoon to discuss the proposed 30 day extension. Are you able to provide us with a date certain in May for VIA to commit to fully satisfying its discovery obligations?

I note that you previously stated that VIA intended to "(1) supplement its interrogatory responses, (2) produce additional documents, and (3) provide Google with dates as to the availability of VIA's deponents" by last Friday, April 25. Please let me know the status of those discovery efforts. While we discussed the availability of Mr. Weng for a deposition and VIA's efforts overall during our call, I do not believe that you supplemented your interrogatories or produced any additional documents.

Best regards,

Brendan

Brendan Joseph Hughes

Cooley LLP
1299 Pennsylvania Avenue, NW • Suite 700
Washington, DC 20004-2400
Direct: (202) 842-7826 • Fax: (202) 842-7899
Bio: www.cooley.com/bhughes • Practice: www.cooley.com/litigation

Exhibit R

From: Hughes, Brendan
Sent: Friday, May 02, 2014 7:52 AM
To: Irene Lee
Cc: Robert Gookin; jmercado@raklaw.com; Krajeck, Katie; Cullum, Janet
Subject: Google v. VIA/ Discovery Issues

Irene –

Following up on our call on Wednesday, please let me know if your client will commit to a date certain in May for satisfying its discovery obligations and will agree to make its deponents available for deposition in mid-June. We need to resolve this issue today.

Best regards,

Brendan

Brendan Joseph Hughes

Cooley LLP
1299 Pennsylvania Avenue, NW • Suite 700
Washington, DC 20004-2400
Direct: (202) 842-7826 • Fax: (202) 842-7899
Bio: www.cooley.com/bhughes • Practice: www.cooley.com/litigation

On Apr 30, 2014, at 10:15 AM, Hughes, Brendan <bhughes@cooley.com> wrote:

Irene and Bob --

Following up on our call last week, please let me know if you are available any time this afternoon to discuss the proposed 30 day extension. Are you able to provide us with a date certain in May for VIA to commit to fully satisfying its discovery obligations?

I note that you previously stated that VIA intended to "(1) supplement its interrogatory responses, (2) produce additional documents, and (3) provide Google with dates as to the availability of VIA's deponents" by last Friday, April 25. Please let me know the status of those discovery efforts. While we discussed the availability of Mr. Weng for a deposition and VIA's efforts overall during our call, I do not believe that you supplemented your interrogatories or produced any additional documents.

Best regards,

Brendan

Brendan Joseph Hughes

Cooley LLP
1299 Pennsylvania Avenue, NW • Suite 700
Washington, DC 20004-2400
Direct: (202) 842-7826 • Fax: (202) 842-7899
Bio: www.cooley.com/bhughes • Practice: www.cooley.com/litigation

Exhibit S

From: llee@raklaw.com [mailto:llee@raklaw.com]
Sent: Friday, May 02, 2014 5:42 PM
To: Hughes, Brendan
Cc: Robert Gookin; jmercado@raklaw.com; Krajeck, Katie; Cullum, Janet
Subject: Re: Google v. VIA/ Discovery Issues

Brendan,

VIA will produce outstanding documents and supplement interrogatory responses by May 30. Mr. Ken Weng is available for deposition on June 19 or 20. Would you let me know either date works for Google?

--

Irene Y. Lee
RUSS AUGUST & KABAT
12th Floor
12424 Wilshire Boulevard
Los Angeles, California 90025
Tel: 001.310.826.7474
Fax: 001.310.826.6991

On May 2, 2014, at 7:52 AM, "Hughes, Brendan" <bhughes@cooley.com> wrote:

Irene –

Following up on our call on Wednesday, please let me know if your client will commit to a date certain in May for satisfying its discovery obligations and will agree to make its deponents available for deposition in mid-June. We need to resolve this issue today.

Best regards,

Brendan

Brendan Joseph Hughes

Cooley LLP
1299 Pennsylvania Avenue, NW • Suite 700
Washington, DC 20004-2400
Direct: (202) 842-7826 • Fax: (202) 842-7899
Bio: www.cooley.com/bhughes • Practice: www.cooley.com/litigation

On Apr 30, 2014, at 10:15 AM, Hughes, Brendan <bhughes@cooley.com> wrote:

Irene and Bob --

Following up on our call last week, please let me know if you are available any time this afternoon to

discuss the proposed 30 day extension. Are you able to provide us with a date certain in May for VIA to commit to fully satisfying its discovery obligations?

I note that you previously stated that VIA intended to "(1) supplement its interrogatory responses, (2) produce additional documents, and (3) provide Google with dates as to the availability of VIA's deponents" by last Friday, April 25. Please let me know the status of those discovery efforts. While we discussed the availability of Mr. Weng for a deposition and VIA's efforts overall during our call, I do not believe that you supplemented your interrogatories or produced any additional documents.

Best regards,

Brendan

Brendan Joseph Hughes

Cooley LLP
1299 Pennsylvania Avenue, NW • Suite 700
Washington, DC 20004-2400
Direct: (202) 842-7826 • Fax: (202) 842-7899
Bio: www.cooley.com/bhughes • Practice: www.cooley.com/litigation

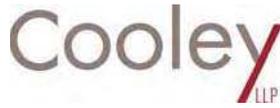
This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. If you are the intended recipient, please be advised that the content of this message is subject to access, review and disclosure by the sender's Email System Administrator.

IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachment) is not intended or written by us to be used, and cannot be used, (i) by any taxpayer for the purpose of avoiding tax penalties under the Internal Revenue Code or (ii) for promoting, marketing or recommending to another party any transaction or matter addressed herein.

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. If you are the intended recipient, please be advised that the content of this message is subject to access, review and disclosure by the sender's Email System Administrator.

IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachment) is not intended or written by us to be used, and cannot be used, (i) by any taxpayer for the purpose of avoiding tax penalties under the Internal Revenue Code or (ii) for promoting, marketing or recommending to another party any transaction or matter addressed herein.

Exhibit T



Katie Krajeck
T: +1 650 849 7048
F: +1 650 849 7400
kkrajeck@cooley.com

BY EMAIL

June 5, 2014

Irene Lee, Esq.
Robert Gookin, Esq.
Russ August & Kabat
12424 Wilshire Boulevard, 12th Floor
Los Angeles, CA 90025

**RE: VIA's Incomplete Interrogatory Responses and Document Production
Google Inc. v. VIA Technologies, Inc., Cancellation No. 92056816**

Dear Irene and Robert:

We have reviewed VIA's Second Amended Responses to Google's First Set of Special Interrogatories and the additional documents produced by VIA on May 30, 2014. Despite repeated assurances that VIA would provide complete interrogatory responses and produce all responsive, non-privileged documents no later than May 30, 2014, VIA has failed to resolve the discovery deficiencies identified in Google's numerous prior letters and discussed during the parties' previous meet & confer telephone conferences.

Failure to Identify Goods on which the CHROME Mark Has Been or Is Being Used

As VIA is aware, Google seeks cancellation of VIA's registrations for the CHROME mark on the grounds that VIA either does not use the mark in connection with the goods identified in the registrations or in fact never used the mark in connection with those goods. Accordingly, Google's requests for detailed descriptions of "all goods and/or services with which the CHROME Marks have been or are currently being used," and for the identification of "any personal computer, desktop computer, portable computer, notebook computer, laptop computer, or any other computer device on which [VIA's] CHROME Marks are currently being used" or have been used "in commerce in the United States in the last 4 years" are highly relevant to key issues in this Cancellation proceeding, and seek basic information that should be readily available to VIA and easily compiled. (See Google's Interrogatories to VIA Nos. 4, 10 & 11.)

Both sets of VIA's amended interrogatory responses are deficient. In its First Amended Interrogatory Responses, VIA made only oblique references to a "variety of applications" and "several areas" of use of the CHROME mark, but failed to describe each such good or service with particularity. Despite Google's repeated requests for complete responses, VIA's Second Amended Interrogatory Responses are similarly vague and incomplete. Rather than describe or list the individual products on which the CHROME mark have been or are being used, VIA instead refers broadly to the basic goods and services set forth in its trademark registrations and to the "ARTIGO series," the "AMOS series," "ZOTAC" and "Fujitsu." These evasive, incomplete responses, which include reference to "Fujitsu" – a third party provider of IT services



Irene Lee, Robert Gookin
June 5, 2014
Page Two

and products (and not a computer product) – do not satisfy VIA's obligation to respond "fully" to Google's Interrogatories pursuant to Fed. R. Civ. P. 33(b)(3).

Failure to Produce Internal Communications

VIA's document production is also clearly incomplete, as it contains only two internal email strings – one of which makes no mention of the CHROME mark and appears to be irrelevant to this Cancellation proceeding. (See VIA001839-1845, VIA001846-1902.) As Google noted in its February 11, 2014 letter addressing VIA's discovery response deficiencies, VIA's failure to produce any substantial internal correspondence relating to VIA's use of the CHROME mark is at odds with its claim that VIA has been offering products under the CHROME mark since July 2001. (See Letter from J. Norberg to R. Gookin, Feb. 11, 2014; VIA's Second Am. Interrogatory Resp. No. 8.) Under these circumstances, Google would expect a significant number of non-privileged emails, memos and other internal communications relating to and evincing the goods and services offered under the CHROME mark.

VIA's failure to produce no more than two internal email strings demonstrates that VIA's "self-directed document search process" (described during the parties' February 12, 2014 meet-and-confer telephone conference) is deficient and that VIA's production does not satisfy its disclosure obligations. (See Letter from K. Krajeck to R. Gookin, Mar. 14, 2014.)

In sum, Google has made multiple good faith attempts to resolve these discovery issues, and has granted multiple extensions of time in which to do so. In light of VIA's failure to abide by its promise to cure its discovery deficiencies by May 30, 2014, Google will be left with no choice but to move to compel unless VIA produces all responsive documents, including internal communications, and supplements its interrogatory responses no later than Monday, June 9, 2014. Moreover, given the discovery deficiencies outlined above and VIA's failure to proffer complete evidence of its use of the CHROME mark, Google will need to postpone the 30(b)(6) deposition of Mr. Ken Weng currently scheduled for June 19, 2014 until after these discovery issues are resolved.

Privilege Log

Finally, while VIA claims attorney-client privilege with respect to sixteen emails dated between October 2004 and February 2008, VIA has failed to indicate which of the recipients and/or authors of these emails is an attorney. Please provide this information no later than the close of business on Friday, June 6, 2014.

Sincerely,

A handwritten signature in cursive script, appearing to read "Katie Krajeck".

Katie Krajeck

cc: Janet L. Cullum, Esq.
Brendan J. Hughes, Esq.

Exhibit U

From: Krajeck, Katie [mailto:kkrajeck@cooley.com]
Sent: Tuesday, June 10, 2014 12:00 PM
To: Irene Lee
Cc: Robert Gookin; Hughes, Brendan; Jean Rhee; Cullum, Janet
Subject: RE: Google Inc. v. VIA Technologies, Inc.

Dear Irene,

I write to follow-up on your June 9, 2014 call with Janet Cullum, in which Janet granted VIA's request for a few more days to respond to Google's most recent letter regarding VIA's discovery deficiencies.

Please be advised that in the absence of VIA's production of all responsive documents, including internal communications, and supplementation of its interrogatory responses by no later than Wednesday, June 11, 2014, Google will be left with no choice but to move to compel.

In addition, please promptly provide the names of all attorneys listed in VIA's May 30 privilege log, as requested in my June 5, 2014 letter.

Thank you,
-Katie

From: Irene Lee [mailto:ilee@raklaw.com]
Sent: Monday, June 09, 2014 1:56 PM
To: Cullum, Janet
Cc: Robert Gookin; Hughes, Brendan; Jean Rhee; Krajeck, Katie
Subject: Re: Google Inc. v. VIA Technologies, Inc.

Dear Janet,

I appreciate our conversation today.
As discussed, we will provide a substantive response to the June 5 letter and any additional documents in the next couple days.

Best regards,

Irene
--
Irene Y. Lee
RUSS AUGUST & KABAT
12th Floor
12424 Wilshire Boulevard
Los Angeles, California 90025
Main: 001.310.826.7474
Direct: 001.310.979.8224

IRS Circular 230 Notice: This communication is not intended to be used and cannot be used, for

the purpose of avoiding U.S. federal tax-related penalties or promoting, marketing or recommending to another party any tax-related matter addressed herein.

This communication shall not create, waive or modify any right, obligation or liability, or be construed to contain or be an electronic signature. This communication may contain information that is legally privileged, confidential or exempt from disclosure, and is intended only for the named addressee(s). If you are not the intended recipient, please note that any dissemination, distribution, or copying of this communication is prohibited.

On Jun 6, 2014, at 3:24 PM, ilee@raklaw.com <ilee@raklaw.com> wrote:

Janet,

No worries. 4 works on 6/9. I will call you then. Have a great weekend!

--

Irene Y. Lee
RUSS AUGUST & KABAT
12th Floor
12424 Wilshire Boulevard
Los Angeles, California 90025
Tel: 001.310.826.7474
Fax: 001.310.826.6991

On Jun 6, 2014, at 12:48 PM, "Cullum, Janet" <jcullum@cooley.com> wrote:

Hi Irene.

Sorry to be so long responding due to some travel. Yes, I'm in the office and Monday and could do a call in the afternoon, say 4 p.m. EST? Let me know if that works and in the meantime I hope your weekend is enjoyable.

Best regards, Janet

Janet L. Cullum

Cooley LLP
1114 Avenue of the Americas
New York, NY 10036-7798
Direct: (212) 479-6500 • Fax: (212) 479-6275
Email: jcullum@cooley.com • www.cooley.com

From: Irene Lee [<mailto:ilee@raklaw.com>]
Sent: Thursday, June 05, 2014 8:34 PM
To: Cullum, Janet
Cc: Robert Gookin; Hughes, Brendan; Jean Rhee; Krajeck, Katie
Subject: Re: Google Inc. v. VIA Technologies, Inc.

Hi Janet,

Hops all is well.

Can we set up a time for a call?

I'm traveling tomorrow, but available on 6/9 (except 8:30 am - 10 am).

Let me know if you are available on 6/9.

—

Irene Y. Lee
RUSS AUGUST & KABAT
12th Floor
12424 Wilshire Boulevard
Los Angeles, California 90025
Main: 001.310.826.7474
Direct: 001.310.979.8224

IRS Circular 230 Notice: This communication is not intended to be used and cannot be used, for the purpose of avoiding U.S. federal tax-related penalties or promoting, marketing or recommending to another party any tax-related matter addressed herein.

This communication shall not create, waive or modify any right, obligation or liability, or be construed to contain or be an electronic signature. This communication may contain information that is legally privileged, confidential or exempt from disclosure, and is intended only for the named addressee(s). If you are not the intended recipient, please note that any dissemination, distribution, or copying of this communication is prohibited.

On Jun 5, 2014, at 2:00 PM, Krajeck, Katie <kkrajeck@cooley.com> wrote:

Dear Irene and Robert,

Please see the attached correspondence.

Thank you,
-Katie

Katie Krajeck
Cooley LLP
3175 Hanover Street
Palo Alto, CA 94304-1130
Direct: +1 650 849 7048 • Fax: +1 650 849 7400

Email: kkrajeck@cooley.com • www.cooley.com

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. If you are the intended recipient, please be advised that the content of this message is subject to access, review and disclosure by the sender's Email System Administrator.

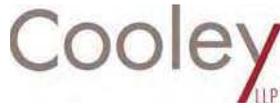
IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachment) is not intended or written by us to be used, and cannot be used, (i) by any taxpayer for the purpose of avoiding tax penalties under the Internal Revenue Code or (ii) for promoting, marketing or recommending to another party any transaction or matter addressed herein.

<2014-06-05 Letter from K. Krajeck to I. Lee and R. Gookin.pdf>

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. If you are the intended recipient, please be advised that the content of this message is subject to access, review and disclosure by the sender's Email System Administrator.

IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachment) is not intended or written by us to be used, and cannot be used, (i) by any taxpayer for the purpose of avoiding tax penalties under the Internal Revenue Code or (ii) for promoting, marketing or recommending to another party any transaction or matter addressed herein.

Exhibit V



Katie Krajec k
T +1 650 849 7048
kkrajec k@cooley.com

BY EMAIL

June 13, 2014

Jean Rhee, Esq.
Russ, August & Kabat
12424 Wilshire Boulevard, 12th Floor
Los Angeles, California 90025
jrhee@raklaw.com

RE: *Google Inc. v. VIA Technologies, Inc. - Discovery Deficiencies*

Dear Jean:

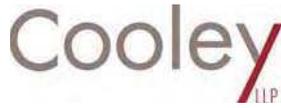
I write in response to your letter dated June 11, 2014. VIA's belated production of additional documents and Third Amended Interrogatory Responses fails to cure the deficiencies addressed in my prior letters dated February 11, 2014, March 25, 2014, April 11, 2014, and June 5, 2014.

Interrogatory Responses

VIA's amended interrogatory responses are still evasive.

Google requested that VIA provide a detailed description all goods and services, including computers, with which the CHROME mark has been or is currently being used. (See Interrogatories No. 4, 10 and 11.) VIA's recitation of the generic goods and services set forth in its trademark registrations and reference to various series of products and third-party computer providers fail to fully answer Google's interrogatories and fall far short of the comprehensive list, including model numbers, promised by VIA in Mr. Gookin's March 26, 2014 letter.

In addition, while VIA claims that "the burden and expense of summarizing the contents" of the documents identified by VIA in response to Interrogatories Nos. 4, 10 and 11 is "substantially the same for VIA as for Google," this is not the case. Google has requested a discrete list of all goods and services on which the CHROME mark has been used. The documents cited in VIA's response consist of photographs, invoices, screenshots, product manuals and various other documents. The burden to Google to identify the relevant goods or service in each such document is manifestly greater than the burden to VIA to simply list the goods and services on which its own CHROME trademark has been used.



Jean Rhee, Esq.
June 13, 2014
Page Two

Moreover, even if Google were able to discern the goods and services at issue from the documents identified by VIA, VIA makes clear that this is not a complete list, but rather is “without limitation” to other unidentified products.

Finally, VIA purports to satisfy its obligation under Federal Rule of Civil Procedure 33(d) by reference to numerous third-party website screenshots and product manuals. However, it is well settled that third-party records “do not qualify as ‘business records of the party upon whom the interrogatory has been served.’” *E. & J. Gallo Winery v. Rallo*, No. 1:04cv5153 OWW DLB, 2006 U.S. Dist. LEXIS 84048, at *7-*8 (E.D. Cal. Nov. 8, 2006) (ordering that “clear and straightforward answers” be provided to interrogatories seeking “information . . . regarding . . . products which bear [certain] Trademark[s]”).

Document Production

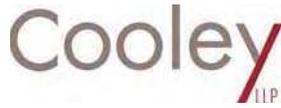
We have reviewed the additional documents included in VIA’s most recent production. Despite the production of a handful of responsive communications, it remains evident that VIA has not undertaken a reasonable search of its hardcopy and electronic files and, in particular, its email files. For example, VIA’s document production to date contains almost no relevant communications authored or received by Mr. Ken Weng, the sole witness identified in VIA’s initial disclosures.

Moreover, Google notes that VIA’s most recent document production contains responsive documents authored by, among other individuals, Ms. Amy Wu, an Assistant Director of Product Marketing, who appears to be involved in the marketing of goods and services under the CHROME mark since at least 2011. VIA’s failure to identify Ms. Wu in its initial disclosures and interrogatory responses gives Google great concern that there are other witnesses with relevant information that Google will not be able to identify until VIA fully complies with its discovery obligations.

VIA has also failed to identify the document custodians whose files were searched, the nature of the files searched, the search terms run across VIA’s electronically stored data, or the number of documents retrieved in connection with its searches.

Depositions of VIA’s Witnesses

In the absence of the relevant universe of responsive documents and communications, as well as complete information regarding the goods and services in connection with which VIA has used its CHROME mark, Google is not in a position to proceed with the deposition of any VIA witnesses, or to determine which witness(es) it will depose.



Jean Rhee, Esq.
June 13, 2014
Page Three

Google's Document Production

Despite your assertion otherwise, VIA did not request and Google has not agreed to produce "documents to support its position that VIA consented to Google's use of the CHROME mark or [that] VIA has abandoned the CHROME mark." As set forth in its responses to VIA's document requests, Google will produce all documents it intends to rely upon in its case, as well as any documents that are relevant to the abandonment and non-use issues in this proceeding.

Google has repeatedly consented to extending deadlines in an effort to reach resolution of these discovery matters. However, each effort to compromise has been met with further delay, evasiveness and obfuscation. In light of the discovery deficiencies identified above and the upcoming deadline for the close of discovery, Google is left with no choice but to move to compel.

Sincerely,

A handwritten signature in black ink, appearing to read "Katie M. Krajeck".

Katie M. Krajeck

cc: Janet L. Cullum, Brendan J. Hughes – *Counsel for Google Inc.*
Irene Lee, Robert Gookin – *Counsel for VIA Technologies, Inc.*

Exhibit W



June 17, 2014

12TH FLOOR
12424
WILSHIRE
BOULEVARD
LOS ANGELES
CALIFORNIA
90025
TELEPHONE
310.826.7474
FACSIMILE
310.826.6991
WWW.RAKLAW.COM

VIA ELECTRONIC MAIL

Katie Krajeck
Cooley LLP
Five Palo Alto Square
3000 El Camino Real
Palo Alto, CA 94306
kkrajeck@cooley.com

**Re: Google Inc. v. VIA Technologies, Inc.
Cancellation No. 92056816**

Dear Katie:

This letter responds to your correspondence of June 13, 2014. As set forth below, Google's attempts to raise new issues that were never previously brought to VIA's attention on the eve of the discovery cutoff and distort the facts to create a false record to support its threatened motion to compel are not well taken. Indeed, Google's blustering response to VIA's repeated, good faith attempts to address Google's concerns regarding discovery is particularly inappropriate (and ironic) given ***Google's own abject failure to provide VIA with even one substantive discovery response or a single page of documents throughout the entire course of these proceedings***, notwithstanding its prior promises to do so. To date, VIA has supplemented its interrogatory responses three times and produced over 3000 pages of documents, whereas Google has supplemented its interrogatory responses zero times and produced zero pages of documents.

VIA's Interrogatory Responses

Google's interrogatories are utterly silent with respect to the information that you now claim Google was seeking; although, as is customary practice, Google could have specified the various details it was looking to receive from VIA, neither the interrogatories at issue nor the accompanying instructions and definitions ask VIA to provide more than the comprehensive lists that it has already provided of the various goods and services on which the CHROME mark has been or is currently being used. In the spirit of cooperation and avoiding unnecessary motion practice, my colleague, Mr. Gookin, nevertheless agreed by letter on March 26, 2014 to provide you with model numbers for computing devices responsive to Interrogatories Nos. 10 and 11 once such information was compiled. Because I did not join this matter until April of this year, I was unaware that Mr. Gookin had made this agreement with you until you



Katie Krajeck
June 17, 2014
Page 2

mentioned it in your letter of June 13, 2014. Thus, now that I have been made aware, I have compiled this information from the documents that we identified to you by Bates number in our Third Amended Interrogatory Responses for you. I reiterate, however, that the burden for Google to perform this reading comprehension exercise would have been substantially the same as for VIA given that VIA does not maintain comprehensive lists of all of the goods and services on which its CHROME marks are or were used in the ordinary course of its business.

I further note that you have falsely stated that, "VIA makes clear that this is not a complete list, but rather is 'without limitation' to other identified products." In fact, VIA's responses to Interrogatories Nos. 4, 10, and 11 provided complete, unqualified lists of the goods, services, and computers on which the CHROME marks are or were used. The only place in which VIA used the "without limitation" language was in reference to the documents that VIA identified as additional support for its substantive written responses.

Similarly, your statement that "VIA purports to satisfy its obligation under Federal Rule of Civil Procedure 33(d) by reference to numerous third-party website screenshots and product manuals" is false and your reliance on *E&J Gallo Winery & Rallo*, No. 1:04-cv-5153-OWW-DLB, 2006 U.S. Dist. LEXIS 84048 (E.D. Cal. Nov. 8, 2006) misplaced for two reasons. First, many of the documents cited by VIA in its response are clearly, on their face, VIA documents. Second, unlike in *E&J* where the responding party simply cited to a voluminous set of documents in lieu of providing any substantive written responses to the interrogatories at issue, here, as noted above, VIA had already provided substantive written responses to Interrogatories Nos. 4, 10, and 11, and was providing citations to specific documents as additional support for those written responses.

VIA's Document Production

In your letter, you again speculate without basis that VIA's production is incomplete because it does not contain many email communications authored or received by Dr. Ken Weng. But VIA has already produced all non-privileged, relevant email communications authored or received by Dr. Weng, Amy Wu, Donna Lee, Jonathan Chang, Young Kwon, and Jack Tsai in its custody or control that could be located upon a reasonably diligent search performed utilizing "CHROME," "Google," "laptop," "computer," "Artigo," and "Fujitsu," as key words, and the mere fact that Google's counsel insists that there should be more emails does not actually mean that any such emails exist.



Katie Krajeck
June 17, 2014
Page 3

Your letter also raises for the very first time that VIA's initial disclosures served on July 13, 2013 when VIA's factual investigation had only just begun are somehow deficient because VIA failed to disclose Amy Wu therein. It is unclear to us why Google waited until ten business days before the close of discovery to raise this issue despite that it has had documents authored by Ms. Wu since at least mid-March (*i.e.*, for three months). *See, e.g.*, VIA00968-969. We also note that, "there is no need, as a matter of course, [for VIA] to submit a supplemental disclosure to include information **already revealed** by a witness in a deposition or **otherwise through formal discovery**, including the identity of the witness." *Galaxy Metal Gear, Inc. v. Direct Access Tech., Inc.*, 2009 TTAB LEXIS 529, at *9 (TTAB 2009); *see also* Fed. R. Civ. P. 26(e) Adv. Comm. Notes (same). Nonetheless, as a further sign of our efforts to resolve, or at least narrow, the parties' discovery disputes and thereby avoid unnecessarily burdening the Board, we now enclose a supplement to VIA's initial disclosures.

Previously-noticed Depositions of VIA Witnesses

Google's statement that it "is not in a position to proceed with the deposition of **any** VIA witnesses, **or to determine which witness(es) it will depose**" because of the claimed "absence of the relevant universe of responsive documents and communications, as well as complete information regarding the goods and services in connection with which VIA has used its CHROME mark" is disingenuous. In March 2014, Google served deposition notices for at least some witnesses that it had already clearly determined that it wanted to depose based on the information available to it as of that time, including, Dr. Weng and VIA's 30(b)(6) witness. VIA has for weeks been holding June 19 and 20 open for Dr. Weng's deposition in his personal capacity and as VIA's 30(b)(6) because Google represented that either of those dates would work for Google. Although VIA has since attempted to confirm the exact date for Dr. Weng's deposition (and deposition dates for other witnesses) with Google on several occasions, Google has failed to extend VIA and Dr. Weng the basic professional courtesy of doing so. Now, with less than a week to go, Google claims that it is not in a position to proceed with any depositions at all, in part, because it does not know which witnesses to depose, even though such an excuse obviously has no bearing as to a 30(b)(6) witness that the company, and not the deposing party, is entitled to identify, and also rings hollow to the extent that Dr. Weng is a witness that Google already noticed. Additionally, as noted above, Google's other stated reason for refusing to proceed with any depositions because it believes that it does not have the relevant universe of responsive documents, communications, and information is purely speculative.



Katie Krajeck
June 17, 2014
Page 4

Accordingly, please confirm by no later than **5 p.m. on Friday, June 20, 2014** whether you intend to proceed with Dr. Weng's deposition and the dates that you are proposing for proceeding, or whether you will be withdrawing your deposition notices for Dr. Weng and VIA's 30(b)(6).

Google's Failure to Produce Any Documents In These Proceedings

Your statement that, "[d]espite [my] assertion otherwise, VIA did not request and Google has not agreed to produce 'documents to support its position that VIA consented to Google's use of the CHROME mark or [that] VIA has abandoned the CHROME mark'" grossly misstates my letter of June 11, 2014 and the facts. As to whether VIA requested such documents, it is indisputable that VIA served Google with document requests on September 23, 2013. Among VIA's document requests were the following, any of which would cover documents that Google intends to rely on to support its positions that VIA consented to Google's use of the CHROME mark and abandoned the CHROME mark:

REQUEST FOR PRODUCTION NO. 27:

All DOCUMENTS in YOUR possession, custody or control that refer or relate to REGISTRANT.

REQUEST FOR PRODUCTION NO. 28:

All DOCUMENTS in YOUR possession, custody or control that refer or relate to any of REGISTRANT'S MARKS.

REQUEST FOR PRODUCTION NO. 34:

All DOCUMENTS, other than those produced to any of the foregoing requests, upon which YOU intend to rely in connection with this opposition proceeding.

As to whether Google ever agreed to produce such documents, it is likewise indisputable that on October 31, 2013, Google responded to each of these requests by stating that, subject to certain objections "and upon the entry of and subject to an appropriate protective order, Google will conduct a reasonable search for and produce on a rolling basis non-privileged documents in its possession, custody, or control to the extent any such documents exist and are relevant to the abandonment and non-use issues in this proceeding." *More than 7 months have since elapsed, and Google still has not produced any documents to VIA.*

When my colleague, Irene Lee, conferred with Janet Cullum by telephone on June 9, 2014, Ms. Lee asked whether Google intended to produce any documents in



Katie Krajeck
June 17, 2014
Page 5

these proceedings, including, specifically, documents to support its positions that VIA consented to Google's use of the CHROME mark and abandoned the CHROME mark. At that time, Ms. Cullum indicated orally that Google would **not** be producing any documents, which prompted my request of June 11, 2014 that Google confirm this in writing. Your response to my request, however, was the epitome of evasiveness and obfuscation; you denied that Google had ever agreed to produce documents to support its positions before turning around and admitting in the very next sentence that Google had "set forth in its responses to VIA's document requests" that it "will produce all documents it intends to rely on in its case, as well as any documents that are relevant to the abandonment and non-use issues in this proceeding" and indicating that Google still intended to honor this promise made more than seven months prior at some as-yet unspecified time. In view of the fact that discovery closes on June 26, 2014 and that Google has had since at least last October to search for and produce the documents in question, VIA asks that Google complete its long overdue productions in response to Requests for Production Nos. 27, 28, and 34 by no later than **5 p.m. on Friday, June 20, 2014.**

VIA further asks that Google produce by **5 p.m. on Friday, June 20, 2014,** documents responsive to Requests for Production Nos. 21 through 24 insofar as they seek documents relating to Google's awareness of VIA's trademark applications and registrations and use of the CHROME marks or designations including the term CHROME. Although Google raised a number of boilerplate objections to these requests, VIA is clearly entitled to documents in Google's custody or control that relate to VIA's ownership and use of the subject marks.

Moreover, to the extent that Google is asserting privilege as grounds for withholding documents responsive to any of the aforementioned requests, VIA is entitled to a privilege log with information sufficient to enable VIA to assess the validity of such assertions. Fed. R. Civ. P. 26(b)(5).

If Google is unwilling or unable to comply with VIA's requests that it fulfill its document production obligations by the close of business on June 20, 2014, please provide your availability on or before Monday, June 23, 2014 to meet and confer regarding the same so that VIA can determine whether it is necessary to seek the Board's intervention in resolving Google's total failure to participate in document discovery in good faith.

Google's Failure to Produce Any Responses to VIA's Interrogatories

VIA served interrogatories on Google on September 23, 2013. On October 31, 2013 – after having sought and received an extension of time to respond – Google



Katie Krajeck
June 17, 2014
Page 6

objected to VIA's interrogatories as exceeding the 75 permitted by the Board and refused to furnish any substantive responses. On November 6, 2013, my colleague, Robert Gookin, had a meet-and-confer with Jeffrey Norberg, during which Mr. Norberg agreed that Google would provide substantive responses to the relevant interrogatories. ***It has now been more than six months, however, and Google has yet to serve any substantive responses whatsoever to VIA's interrogatories.*** Such delay is plainly inexcusable. Please provide Google's responses by **5 p.m. on Friday, June 20, 2014.**

At a bare minimum, Google should respond to Interrogatories 30 through 39, which relate to the factual bases for the allegations in its cancellation petition. Again, if Google is unwilling or unable to comply with VIA's requests that it fulfill its written discovery obligations by the close of business on June 20, 2014, please provide your availability on or before Monday, June 23, 2014 to meet and confer regarding the same so that VIA can determine whether it is necessary to seek the Board's intervention with regard to Google's total failure to participate in written discovery in good faith.

Sincerely,

Russ, August & Kabat

Jean Rhee

Exhibit X

From: Hughes, Brendan
Sent: Thursday, June 19, 2014 5:27 PM
To: llee@raklaw.com; Robert Gookin; jrhee@raklaw.com
Cc: Cullum, Janet; Krajeck, Katie
Subject: Google v. VIA - CHROME Cancellation Action

Irene –

Given VIA's failure to abide by its promise to produce all documents and supplement its interrogatory responses by May 30, and the fact that VIA has in the past three weeks alone: (1) produced nearly 2,000 pages of additional documents; (2) amended its interrogatory responses three times; and (3) amended its Initial Disclosures so as to identify an additional four witnesses with discoverable information, Google requests a 60-day extension of the discovery period to allow Google to fully review these new materials. Please confirm VIA's consent to this extension no later than 2:00 p.m. PDT on Friday, June 20, 2014.

In addition, we understand that it is VIA's position that it has now "produced all non-privileged relevant email communications authored or received by Dr. Weng, Amy Wu, Donna Lee, Jonathan Chang, Young Kwon, and Jack Tsai in its custody or control that could be located upon a reasonably diligent search." To date, however, VIA has produced only 20 separate email strings. Given VIA's claimed use of the CHROME mark since July 1, 2001, and its agreement to produce, inter alia, all electronic and hardcopy documents and communications relating to VIA's current or past use of the CHROME mark in commerce on each of the goods and services identified in its registrations, Google is understandably concerned that VIA has either not undertaken a reasonable search for electronic documents, or has not preserved all relevant documents and communications. This is particularly the case given your and Mr. Gookin's earlier representations that VIA was conducting a self-directed review in Taiwan with little to no involvement by its outside counsel.

Accordingly, so that Google may evaluate VIA's most recent claim regarding the thoroughness and reasonableness of its discovery efforts, Google requests that VIA make a witness available for a 30(b)(6) deposition relating to VIA's document preservation, collection, review, and production efforts well in advance of any other individual depositions or the 30(b)(6) deposition of VIA relating to other substantive topics. Please confirm that VIA will produce a witness to cover these limited topics well in advance of the other depositions no later than 2:00 pm PDT on Friday, June 20, 2014.

Best regards,

Brendan

Brendan Joseph Hughes

Cooley LLP
1299 Pennsylvania Avenue, NW • Suite 700
Washington, DC 20004-2400
Direct: (202) 842-7826 • Fax: (202) 842-7899
Bio: www.cooley.com/bhughes • Practice: www.cooley.com/litigation

Exhibit Y

From: Irene Lee [mailto:ilee@raklaw.com]
Sent: Friday, June 20, 2014 8:05 AM
To: Hughes, Brendan; Cullum, Janet; Krajeck, Katie
Cc: Robert Gookin; jrhee@raklaw.com; Anne Zivkovic
Subject: Re: Google v. VIA - CHROME Cancellation Action

Brendan,

I am puzzled by the mischaracterizations and unreasonable demand made in your email below, which we received after the end of business last night.

With respect to your request for another 60-day extension of the discovery period, we disagree that you would need 60 more days to review the documents and supplemental interrogatory responses. Further, the fact that we amended VIA's initialed disclosures to identify witnesses does not warrant a lengthy extension. All of the witnesses had previously been identified in our interrogatory responses and documents. Indeed, Google had already noticed Young Kwon for deposition and contacted Pat Meier. As we previously indicated in our July 17, 2014, correspondence, "there is no need, as a matter of course, [for VIA] to submit a supplemental disclosure to include information *already revealed* by a witness in a deposition or *otherwise through formal discovery*, including the identity of the witness." *Galaxy Metal Gear, Inc. v. Direct Access Tech., Inc.*, 2009 TTAB LEXIS 529, at *9 (TTAB 2009); *see also* Fed. R. Civ. P. 26(e) Adv. Comm. Notes (same). Nonetheless, as further sign of our efforts to resolve Google's purported discovery issues, and to avoid burdening the Board with discovery disputes, we served amended initial disclosures on June 17, 2014. Thus, your assertion now that there is new information in the disclosures requiring more time for you to complete the discovery is disingenuous to say the least.

If you need more time to serve outstanding responses to VIA's interrogatories and produce documents, we can recommend VIA to consider consenting to an extension of a couple more weeks. Otherwise, we refuse to take part in your attempts to avoid and further delay litigating this matter on the merits.

With respect to your other demands, I am out of the office today in meetings and unable to provide a substantive response until after we have an opportunity to discuss them with our client.

In any event, we look forward to receiving your responses to our inquiries of June 17, 2014, regarding Dr. Weng's deposition, Google's outstanding responses to VIA's interrogatories and Google's document production, by 5 p.m. today.

Sincerely,

--

Irene Y. Lee
RUSS AUGUST & KABAT

12th Floor
12424 Wilshire Boulevard
Los Angeles, California 90025
Main: 001.310.826.7474
Direct: 001.310.979.8224

IRS Circular 230 Notice: This communication is not intended to be used and cannot be used, for the purpose of avoiding U.S. federal tax-related penalties or promoting, marketing or recommending to another party any tax-related matter addressed herein.

This communication shall not create, waive or modify any right, obligation or liability, or be construed to contain or be an electronic signature. This communication may contain information that is legally privileged, confidential or exempt from disclosure, and is intended only for the named addressee(s). If you are not the intended recipient, please note that any dissemination, distribution, or copying of this communication is prohibited.

On Jun 19, 2014, at 5:26 PM, Hughes, Brendan <bhughes@cooley.com> wrote:

Irene –

Given VIA's failure to abide by its promise to produce all documents and supplement its interrogatory responses by May 30, and the fact that VIA has in the past three weeks alone: (1) produced nearly 2,000 pages of additional documents; (2) amended its interrogatory responses three times; and (3) amended its Initial Disclosures so as to identify an additional four witnesses with discoverable information, Google requests a 60-day extension of the discovery period to allow Google to fully review these new materials. Please confirm VIA's consent to this extension no later than 2:00 p.m. PDT on Friday, June 20, 2014.

In addition, we understand that it is VIA's position that it has now "produced all non-privileged relevant email communications authored or received by Dr. Weng, Amy Wu, Donna Lee, Jonathan Chang, Young Kwon, and Jack Tsai in its custody or control that could be located upon a reasonably diligent search." To date, however, VIA has produced only 20 separate email strings. Given VIA's claimed use of the CHROME mark since July 1, 2001, and its agreement to produce, inter alia, all electronic and hardcopy documents and communications relating to VIA's current or past use of the CHROME mark in commerce on each of the goods and services identified in its registrations, Google is understandably concerned that VIA has either not undertaken a reasonable search for electronic documents, or has not preserved all relevant documents and communications. This is particularly the case given your and Mr. Gookin's earlier representations that VIA was conducting a self-directed review in Taiwan with little to no involvement by its outside counsel.

Accordingly, so that Google may evaluate VIA's most recent claim regarding the thoroughness and reasonableness of its discovery efforts, Google requests that VIA make a witness available for a 30(b)(6) deposition relating to VIA's document preservation, collection, review, and production efforts well in

advance of any other individual depositions or the 30(b)(6) deposition of VIA relating to other substantive topics. Please confirm that VIA will produce a witness to cover these limited topics well in advance of the other depositions no later than 2:00 pm PDT on Friday, June 20, 2014.

Best regards,

Brendan

Brendan Joseph Hughes

Cooley LLP

1299 Pennsylvania Avenue, NW • Suite 700

Washington, DC 20004-2400

Direct: (202) 842-7826 • Fax: (202) 842-7899

Bio: www.cooley.com/bhughes • Practice: www.cooley.com/litigation

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message. If you are the intended recipient, please be advised that the content of this message is subject to access, review and disclosure by the sender's Email System Administrator.

IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachment) is not intended or written by us to be used, and cannot be used, (i) by any taxpayer for the purpose of avoiding tax penalties under the Internal Revenue Code or (ii) for promoting, marketing or recommending to another party any transaction or matter addressed herein.

Exhibit Z



June 23, 2014

12TH FLOOR
12424
WILSHIRE
BOULEVARD
LOS ANGELES
CALIFORNIA
90025
TELEPHONE
310.826.7474
FACSIMILE
310.826.6991
WWW.RAKLAW.COM

VIA ELECTRONIC MAIL

Katie Krajeck
Cooley LLP
Five Palo Alto Square
3000 El Camino Real
Palo Alto, CA 94306
kkrajeck@cooley.com

**Re: *Google Inc. v. VIA Technologies, Inc.*
*Cancellation No. 92056816***

Dear Katie:

I am responding to your correspondence of June 20, 2014.

Discovery Extensions Requested By Google

Your attempts to accuse VIA of “bad faith discovery gamesmanship” and shift the blame for every discovery delay to VIA are wholly unfounded. In fact, in November of 2013, your colleague, Jeffrey Norberg, requested that the discovery cutoff be extended by 60 days so that Google could have sufficient time to supplement its interrogatory responses with substantive answers, which responses Google still has not provided. Google also utterly failed to provide any documents in these proceedings that it initiated (indeed, to even extend VIA the basic professional courtesy of confirming whether any documents would or would not be forthcoming) until June 20, 2014, when it finally produced by Federal Express approximately 800 pages of documents. VIA, on the other hand, produced documents and discovery responses and then timely supplemented them to address concerns raised by Google, whether such concerns had merit or not, all in a good faith effort to avoid disturbing the Board with unnecessary motion practice. Under these circumstances, it is clear that it is Google, and not VIA, that has engaged in bad faith discovery gamesmanship.

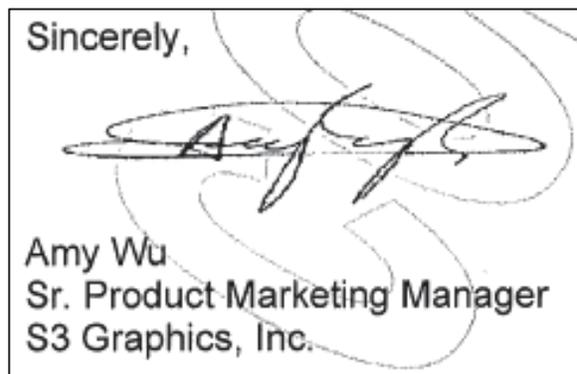
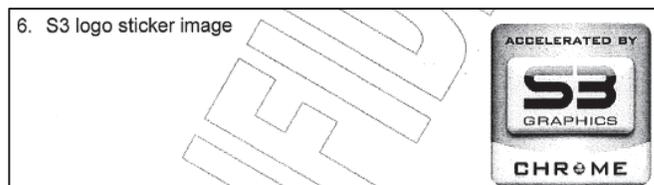
Your letter also blatantly misstates what Ms. Lee and Mr. Gookin previously explained to you, which is simply that they were having logistical difficulties in working with foreign legal personnel to coordinate document collection and review. Similarly, your letter misstates the contents of VIA’s amended interrogatory responses dated June 17, 2014. Nowhere do these responses provide that Google must review and summarize hundreds of pages of documents to determine the full list of goods and services on which VIA has used the CHROME mark. Instead, the



Katie Krajeck
June 23, 2014
Page 2

responses list all of the pertinent goods and services by name, and in certain cases, even by model number, and cite to supporting documents.

As for Google's request for an additional extension of discovery, it is hard to imagine that Google would actually need 60 more days just to review 1,000 pages of documents and assess the relevance of witnesses identified in VIA's amended initial disclosures. This is particularly true given that Google has long had information about all of the witnesses through VIA's interrogatory responses and document productions and, in fact had already approached and/or noticed most of them for deposition. Although Google tries to make much over Ms. Wu's addition to VIA's initial disclosures and pretends that "[n]othing in VIA's prior document productions hints at the nature of Ms. Wu's role," the fact remains that Google has had documents since at least mid-March that, *on their face, expressly identify Ms. Wu as "Sr. Product Marketing Manager, S3 Graphics, Inc.,"* and make clear that she was involved in VIA's use of the CHROME mark. By way of example, the very document numbered VIA00969 cited in your June 20, 2014 letter, which you discount as a "letter to Fujitsu regarding product stickers," is specifically a letter regarding use of the CHROME mark, and which identifies Ms. Wu's role as "Sr. Product Marketing Manager, S3 Graphics, Inc.," as reflected in the clips below:



VIA00969. Accordingly, Google's failure to appreciate Ms. Wu's role until recently is clearly due to its own failure to review documents in its possession. Furthermore, since Google has now drawn the conclusion that Ms. Wu "plays a key role in naming VIA's products, and in particular, in the decision to use the CHROME mark in



Katie Krajeck
June 23, 2014
Page 3

connection with VIA's products," it makes no sense that an additional 60 days would be required for it to assess her relevance as a witness.

Thus, we reiterate that a 2-week extension of the discovery cutoff would give Google adequate time both to supplement its own grossly deficient discovery responses and to review the additional 1,000 pages of documents VIA produced on June 11, 2014 (since that would then give Google 4 weeks to review 1,000 pages of documents). If, however, Google really needs 60 days to review 1,000 pages of documents, we would be willing to agree to such an extension on condition that Google agree (1) not to propound additional discovery requests, and only use the time to complete outstanding discovery; (2) confirm dates for Dr. Ken Weng's deposition and for any other witnesses it intends to depose by **July 17, 2014**; and (3) produce all of its documents and serve substantive responses to VIA's interrogatory responses as it previously agreed to do by **July 17, 2014**.

Google's Failure to Provide Any Responses to VIA's Interrogatories

Given Google's continuing failure to substantively respond to VIA's interrogatories notwithstanding that Mr. Norberg previously agreed that Google would do so without VIA having to seek Board intervention and that VIA consented to a discovery extension of 60-days based on that agreement, VIA requests a telephonic meet and confer as soon as possible. We are available today, June 23, 2014 after 2 pm PST, at any time on June 24, 2014, and on June 25, 2014 except from 11 am to noon. We will be prepared to discuss both Google's outstanding interrogatory responses and its request for a discovery extension on this call, and ask that you be prepared to do the same.

Sincerely,

Russ, August & Kabat

/s/

Jean Rhee

Exhibit AA









VIA00038



16.04.2008



10" netbook (NC series) NP-NC20

NP-NC20

[Print-friendly](#)



WHERE TO BUY

Sorry! This product is no longer available

OVERVIEW

FEATURES

TECH SPECS

GALLERY

SUPPORT

Samsung recommends Windows 8.



Table view

Operating System

Operating System Genuine Windows XP Home

Processor

Processor VIA Nano™ ULV Processor U2250 (1.3+GHz, 800MHz, 1MB)

Main Chipset

Main Chipset VIA VX800

Memory

System Memory 1GB (DDR2 / 1GB x 1)

Memory Slot 1 x SODIMM

Display

LCD 12.1" LED WXGA (1280 x 800) Gloss

Graphic

Graphic Memory Shared Memory (Int. Graphic)

Graphic Processor VIA Chrome9 HC3 (Int. Graphic)

Multimedia

Sound HD (High Definition) Audio

Sound Effect Mic Noise Suppression
EDS (Enhanced Digital Sound) Effect

Multimedia Player No

VIA00736

Speaker	3 watts Stereo Speaker (1.5 watts x 2)
TV	No
Integrated Camera	1.3MP Web Camera

Storage

HDD	160GB (5,400rpm S-ATA)
ODD	No

Network

Modem	No
Wired Ethernet LAN	10 / 100 LAN
Wireless LAN	Atheros 802.11b/g
Wireless WAN	No
Bluetooth	Bluetooth 2.0 + EDR

I/O Port

VGA	Yes
S-Video (TV-out)	No
HDMI	No
Headphone Out	Headphone-out
Mic-in	Yes
Internal MIC	Yes
USB	3 x USB 2.0
Multi Card Slot	3-in-1 (SD, SDHC, MMC)
Dock Port	No
SIO	No
IEEE 1394	No
RJ11 (Modem)	No
RJ45 (LAN)	Yes
TV Antenna	No
DC-In (Power Port)	Yes
PC CardBus Slot	No

Input Device

Keyboard	82 Key (Anti-Bacteria Keyboard) 83 Key (Anti-Bacteria Keyboard)
EZ BLU Keys	Fn + F7 (SAMSUNG Magic Doctor) Fn + F8 (Easy SpeedUp Manager)
Touch Pad, Touch Screen	Touch Pad (Scroll Scope, Flat Type)

Security

TPM	No
AMT	No
Virus	McAfee Virus Scan
Lock	Kensington Lock Port
Recovery Solution	SAMSUNG Recovery Solution III

Recovery Solution SAMSUNG Recovery Solution III

FingerPrint Reader No

Security BIOS Boot Up Password

Power

AC Adapter 40 watts

Battery 6 Cell

Physical Specification

Dimension (WxDxH) 292.4 x 217.0 x 30.7

weight 1.52 (6 Cell)

Software

Installed S/W
Adobe Acrobat Reader
Easy Battery Manager
Easy Display Manger
Easy Network Manager
Easy SpeedUp Manager
Samsung Magic Doctor
Samsung Update Plus

Standard DVD
OS CD
System S / W Media

[Email a Friend](#) [Print-friendly](#)

Features and specifications are subject to change without prior notification.

Who We Are

[About Samsung](#)
[News](#)
[Affiliated Companies](#)
[Investor Relations](#)

What We Make

Mobile Devices

[GALAXY Note](#)
[Tablet](#)
[Smart Phones](#)
[Duos](#)
[Galaxy Camera](#)
[Mobile Phones](#)
[MP3 players](#)

Printers & Multifunction

[Colour multi-function](#)
[Colour laser](#)
[Mono multi-function](#)
[Mono laser](#)

TV / Audio / Video

[Television](#)
[Home Entertainment](#)
[Blu-ray & DVD](#)

Home Appliances

[Refrigerator](#)
[Washing machine](#)
[Cooking](#)
[Air conditioner](#)
[Vacuum Cleaner](#)

Cameras & Camcorders

[SMART Cameras](#)
[Cameras](#)
[SMART Camcorders](#)
[Camcorders](#)

Accessories

[Mobile Phone Accessories](#)
[TV Accessories](#)
[NX Lenses](#)
[Printer Consumables](#)

Computers & Peripherals

[Notebook](#)
[Monitors](#)
[Optic disc drives](#)
[PC Accessories](#)

How can we help you?

[Find product support](#)
[Get downloads](#)
[How-to Guides](#)
[Articles](#)
[Contact us](#)
[Accessibility Help](#)



[UAE / English](#)

[View low bandwidth version](#)

[FEEDBACK](#)

[Business](#) [Privacy](#) [Legal](#) [Contact Us](#) [Career](#) [Sitemap](#)

Copyright © 1995-2014 SAMSUNG All rights reserved.

VIA00738

Shop by Department

Search

Electronics

VIA chrome9 thin-client

Go

Hello, Milos Your Account

Your Prime

0

Cart

Wish List

All Electronics Best Sellers Electronics Accessories Audio & Home Theater Camera & Photo Car Electronics & GPS Cell Phones & Accessories

Electronics > Computers & Accessories > Computer Components



Click to open expanded view

ell Wyse C90LE7 Wireless Thin Client - WiFi Win7 EM 1GHz C7 GB RAM 4GB Flash

Wyse

Be the first to review this item

Share

33 new

See All Buying Options

Add to Wish List

Note: This item is only available from third-party sellers (see all offers.)

Available from these sellers.

Features a separate graphic accelerator for unparalleled performance in its class

The ultra low power media system processor delivers rich multimedia and video playback up to 1080p HD resolution

- It draws just under 7 watts of power; as a result it reduces carbon footprints
- This device also supports Windows Aero functionality within Windows Embedded Standard 7
- C7 1 GHz, RAM 2 GB - 4GB Flash - Chrome9 HCM - Gigabit LAN - WLAN : 802.11b/g/n - Windows Embedded Standard 7

33 new



Spring Outlet Deals in Electronics

Find big savings on laptops, cameras, wireless, headphones, home audio, mp3 players, office products, home entertainment and more.

Customers Who Viewed This Item Also Viewed



Plugable DC-125 USB 2.0 Multiseat Zero Client for Windows Multipoint Server and ...

(29)

\$64.95



Wyse C90LE7 Desktop Slimline Thin Client - VIA 1 GHz

(2)

\$476.09



HP H2P23AT#ABA t510 Flexible Thin Client

\$292.00



WYSE TECHNOLOGY (WINTERM) Wyse Xenith 2 Zero Client - Marvell ARMADA PXA510 1 GHz XENITH 2 ...

\$331.09

Customers viewing this page may be interested in these sponsored links (What's this?)

- [Wyse C90LE7](#)

Purchase all your **Wyse** products and **Wyse C90LE7 Thin Clients** from Arcy! www.arcy.com/

- [Wireless Thin Client](#)

Durable WES7, Wireles **Thin Client** Tablets for VDI. Free demo units! www.10zig.com/WirelessThinClient

- [Thin Client VDI Solutions](#)

Virtualize Desktop with Zero **Client** - Watch a how-it-works Video www.teradici.com/zeroclients

See a problem with these advertisements? [Let us know](#)

Product Details

Product Dimensions: 4.8 x 7 x 1.3 inches ; 6 pounds
Shipping Weight: 6.6 pounds
Shipping: Currently, item can be shipped only within the U.S.
ASIN: B0044UCJI8
Item model number: 902199-01L
Average Customer Review: [Be the first to review this item](#)
Date first available at Amazon.com: September 27, 2010

Would you like to [update product info](#), [give feedback on images](#), or [tell us about a lower price?](#)

Product Description

C90LE7 -4G FLASH/2G RAM WITH IW 2 GB RAM - 4 GB Flash - Genuine Windows 7 Embedded - Wi-Fi - DVI

Product Ads from External Websites [\(What's this?\)](#)

Sponsored Content

Page 1 of 6

					
	<p>16-port inkskey Prima IP USB/PS2 IPKVM Switch 19" Rt 1U w/ O... \$999.95 No Shipping Info SF CABLE</p>	<p>DT-Research 166LX-CE- 0203 DT166 \$270.20 No Shipping Info Barcode Discount</p>	<p>8-port Linkskey Prima IP USB/PS2 IP KVM Switch 19" Rt 1U w/ O... \$814.95 No Shipping Info SF CABLE</p>	<p>Retail Point of Sale System with Corner Store POS- \$799.00 + \$57.10 Est. shipping The Perfect POS, Inc.</p>	

See a problem with these advertisements? [Let us know](#)

[Advertise here](#)

Customer Questions & Answers

[See questions and answers](#)

Customer Reviews

There are no customer reviews yet.

5 star Share your thoughts with other customers

4 star

3 star

2 star

1 star

- ▶ If you have a question or problem, visit our [Help pages](#).
- ▶ Would you like to [update product info](#), [give feedback on images](#), or [tell us about a lower price](#)?
- ▶ If you are a seller for this product and want to change product data, click [here](#) (you may have to sign in with your seller id).

Your Recently Viewed Items and Featured Recommendations



Get to Know Us

[Careers](#)
[Investor Relations](#)
[Press Releases](#)
[Amazon and Our Planet](#)
[Amazon in the Community](#)

Make Money with Us

[Sell on Amazon](#)
[Become an Affiliate](#)
[Advertise Your Products](#)
[Independently Publish with Us](#)
▶ [See all](#)

Amazon Payment Products

[Amazon.com Rewards Visa Card](#)
[Amazon.com Store Card](#)
[Shop with Points](#)
[Credit Card Marketplace](#)
[Amazon Currency Converter](#)

Let Us Help You

[Your Account](#)
[Shipping Rates & Policies](#)
[Amazon Prime](#)
[Returns & Replacements](#)
[Manage Your Kindle](#)
[Help](#)



[Australia](#)
[Brazil](#)
[Canada](#)
[China](#)
[France](#)
[Germany](#)
[India](#)
[Italy](#)
[Japan](#)
[Mexico](#)
[Spain](#)
[United Kingdom](#)

6pm
Score deals on fashion brands

AbeBooks
Rare Books & Textbooks

AfterSchool.com
Kids' Sports, Outdoor & Dance Gear

Alexa
Actionable Analytics for the Web

AmazonFresh
Groceries & More Right To Your Door

Amazon Local
Great Local Deals in Your City

AmazonSupply
Business, Industrial & Scientific Supplies

Amazon Web Services
Scalable Cloud Computing Services

Audible
Download Audio Books

BeautyBar.com
Prestige Beauty Delivered

Book Depository
Books With Free Delivery Worldwide

Bookworm.com
Books For Children Of All Ages

Casa.com
Kitchen, Storage & Everything Home

CreateSpace
Indie Print Publishing Made Easy

Diapers.com
Everything But The Baby

DPRReview
Digital Photography

East Dane
Designer Men's Fashion

Fabric
Sewing, Quilting & Knitting

IMDb
Movies, TV & Celebrities

Junglee.com
Shop Online in India

Kindle Direct Publishing
Indie Digital Publishing Made Easy

Look.com
Kids' Clothing & Shoes

MYHABIT
Private Fashion Designer Sales

Shopbop
Designer Fashion Brands

Soap.com
Health, Beauty & Home Essentials

TenMarks.com
Math Activities for Kids & Schools

Vine.com
Everything to Live Life Green

Wag.com
Everything For Your Pet

Warehouse Deals
Open-Box Discounts

Woot!
Discounts and Shenanigans

Yoyo.com
A Happy Place To Shop For Toys

Zappos
Shoes & Clothing

[Conditions of Use](#)
[Privacy Notice](#)
[Interest-Based Ads](#)
© 1996-2014, Amazon.com, Inc. or its affiliates

Shop by Department

Search

Electronics

VIA chrome9 thin-client

Go

Hello, Milos Your Account

Your Prime

0

Cart

Wish List

All Electronics Best Sellers Electronics Accessories Audio & Home Theater Camera & Photo Car Electronics & GPS Cell Phones & Accessories

Electronics > Computers & Accessories > Monitors



Click to open expanded view

ENOVO 0C63949 / Itona MD27-9R7-US-L Desktop Thin Client - IA Eden U4200 1 GHz /2 GB RAM 8 GB Flash - Windows Embedded tandard 7 - DisplayPort - DVI

Lenovo
Be the first to review this item

Price: ~~\$479.15~~

Save \$5.99 shipping when purchased from IP Camera Store. Not eligible for Amazon Prime.

Only 2 left in stock.

Ships from and sold by IP Camera Store.

MPN: 0C63949

2 new from \$479.15

Share

Qty: 1

\$479.15 + \$5.99 shipping
In Stock. Sold by IP Camera Store

Add to Cart

or

Sign in to turn on 1-Click ordering.

Add to Wish List

More buying choices

Moon Tech Add to Cart
\$1,614.66 + Free Shipping

2 new from \$479.15

Have one to sell? Sell on Amazon

Technical Details

Model: 0C63949

Product Details

Shipping Weight: 3 pounds (View shipping rates and policies)

ASIN: B00HPSFA3M

Item model number: 0C63949

Average Customer Review: Be the first to review this item

Date first available at Amazon.com: January 6, 2014

Would you like to update product info, give feedback on images, or tell us about a lower price?

Product Description

Brand Name: Lenovo
Product Line: Itona
Product Series: Md27
Product Model: MD27-F9R7-US-L
Product Name: Itona MD27-F9R7-US-L Thin Client
Marketing Information: Featuring Windows Embedded Standard, WES 7 operating system, the multi-media capable Md27 incorporates a powerful 1GHz VIA Eden Dual Core processor and boasts excellent connectivity including six USBs, one Parallel, Display and DVI ports plus a further two Serial ports.
Product Type: Thin Client
Processor Manufacturer: VIA
Processor Type: Eden
Processor Model: U4200
Processor Core: Dual-core (2 Core)
Processor Speed: 1 GHz
Standard Memory: 2 GB
Memory Technology: DDR3 SDRAM
Flash Memory: 8 GB
Number of Hard Drives: No
Graphics Controller Manufacturer: VIA
Graphics Controller Model: Chrome9 HD
Graphics Memory Accessibility: Shared

Ethernet Technology: Gigabit Ethernet
DVI: Yes
Total Number of USB Ports: 8
DisplayPort: Yes
Operating System: Windows Embedded Standard 7
Form Factor: Desktop

Customers viewing this page may be interested in these sponsored links [\(What's this?\)](#)

- [Get New Acer Thin Clients](#)  Smart, **Thin**, Affordable **Thin Client** Get the PC Experience at a Low Cost
www.devonit.com/Acer-Thin-Clients
- [Best Lenovo Thin Client](#)  **Lenovo Thin Client** Browse Top Deals. Get Huge Savings!
www.localbuzz.us/Thin-Client
- [Lenovo Thin Client Desktop](#)  Get your results now! Search **Lenovo Thin Client Desktop**
www.aolsearch.com/Cheap-Desktops

See a problem with these advertisements? [Let us know](#)

Product Ads from External Websites [\(What's this?\)](#)

Sponsored Content

Page 1 of 6

				
Dell 23 Dual Monitor Bundle P2314H with MDS14 \$629.99 + Free Shipping Dell Home	Dell 19 Dual Monitor Bundle - P1913 with MDS14 \$459.99 + Free Shipping Dell Home	Dell 24 Monitor - E2414H (34) \$199.99 + Free Shipping Dell Consumer SO SP	Dell MDS14 Dual Monitor Stand \$169.99 + Free Shipping Dell Consumer SO SP	

See a problem with these advertisements? [Let us know](#)

[Advertise here](#)

Customer Questions & Answers

[See questions and answers](#)

Customer Reviews

There are no customer reviews yet.

5 star Share your thoughts with other customers

4 star

3 star

2 star

1 star

Advertisement

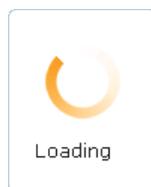
See the Top Rated Monitors in our [Monitor Reviews](#).

VIA00746

Feedback

- ▶ If you have a question or problem, visit our [Help pages](#).
- ▶ Would you like to [update product info](#), [give feedback on images](#), or [tell us about a lower price](#)?
- ▶ If you are a seller for this product and want to change product data, click [here](#) (you may have to sign in with your seller id).

Your Recently Viewed Items and Featured Recommendations



Get to Know Us

[Careers](#)
[Investor Relations](#)
[Press Releases](#)
[Amazon and Our Planet](#)
[Amazon in the Community](#)

Make Money with Us

[Sell on Amazon](#)
[Become an Affiliate](#)
[Advertise Your Products](#)
[Independently Publish with Us](#)
[▶ See all](#)

Amazon Payment Products

[Amazon.com Rewards Visa Card](#)
[Amazon.com Store Card](#)
[Shop with Points](#)
[Credit Card Marketplace](#)
[Amazon Currency Converter](#)

Let Us Help You

[Your Account](#)
[Shipping Rates & Policies](#)
[Amazon Prime](#)
[Returns & Replacements](#)
[Manage Your Kindle](#)
[Help](#)

amazon.com

[Australia](#) [Brazil](#) [Canada](#) [China](#) [France](#) [Germany](#) [India](#) [Italy](#) [Japan](#) [Mexico](#) [Spain](#) [United Kingdom](#)

[6pm](#)
Score deals
on fashion brands

[AbeBooks](#)
Rare Books
& Textbooks

[AfterSchool.com](#)
Kids' Sports, Outdoor
& Dance Gear

[Alexa](#)
Actionable Analytics
for the Web

[AmazonFresh](#)
Groceries & More
Right To Your Door

[Amazon Local](#)
Great Local Deals
in Your City

[AmazonSupply](#)
Business, Industrial
& Scientific Supplies

[Amazon Web Services](#)
Scalable Cloud
Computing Services

[Audible](#)
Download
Audio Books

[BeautyBar.com](#)
Prestige Beauty
Delivered

[Book Depository](#)
Books With Free
Delivery Worldwide

[Bookworm.com](#)
Books For Children
Of All Ages

[Casa.com](#)
Kitchen, Storage
& Everything Home

[CreateSpace](#)
Indie Print Publishing
Made Easy

[Diapers.com](#)
Everything
But The Baby

[DPRReview](#)
Digital
Photography

[East Dane](#)
Designer Men's
Fashion

[Fabric](#)
Sewing, Quilting
& Knitting

[IMDb](#)
Movies, TV
& Celebrities

[Junglee.com](#)
Shop Online
in India

[Kindle Direct Publishing](#)
Indie Digital Publishing
Made Easy

[Look.com](#)
Kids' Clothing
& Shoes

[MYHABIT](#)
Private Fashion
Designer Sales

[Shopbop](#)
Designer
Fashion Brands

[Soap.com](#)
Health, Beauty &
Home Essentials

[TenMarks.com](#)
Math Activities
for Kids & Schools

[Vine.com](#)
Everything
to Live Life Green

[Wag.com](#)
Everything
For Your Pet

[Warehouse Deals](#)
Open-Box
Discounts

[Woot!](#)
Discounts and
Shenanigans

[Yoyo.com](#)
A Happy Place
To Shop For Toys

[Zappos](#)
Shoes &
Clothing

[Conditions of Use](#) [Privacy Notice](#) [Interest-Based Ads](#) © 1996-2014, Amazon.com, Inc. or its affiliates

VIA00747

Shop by Department

Search

Electronics

VIA chrome9 thin-client

Go

Hello, Milos Your Account

Your Prime

0

Cart

Wish List

All Electronics Best Sellers Electronics Accessories Audio & Home Theater Camera & Photo Car Electronics & GPS Cell Phones & Accessories

Electronics > Computers & Accessories > Monitors



Click to open expanded view

ENOVO Itona MD27-F9R7-US-L Desktop Thin Client - VIA Eden 4200 1 GHz / 2 GB RAM - 8 GB Flash - Windows Embedded Standard 7 - DisplayPort - DVI /

Lenovo Be the first to review this item

Price: \$479.04

Shipping: \$5.99 shipping when purchased from IP Camera Store. Not eligible for Amazon Prime.

Only 2 left in stock.

Ships from and sold by IP Camera Store.

MPN: 0C63949

3 new from \$476.94

Share

Qty: 1

\$479.04 + \$5.99 shipping In Stock. Sold by IP Camera Store

Add to Cart

or

Sign in to turn on 1-Click ordering.

Add to Wish List

More buying choices

Moon Tech Add to Cart

\$1,614.66 + Free Shipping

3 new from \$476.94

Have one to sell? Sell on Amazon

Technical Details

Model: 0C63949

Product Details

Shipping Weight: 3 pounds (View shipping rates and policies)

ASIN: B00HFU3CVC

Item model number: 0C63949

Average Customer Review: Be the first to review this item

Date first available at Amazon.com: December 20, 2013

Would you like to update product info, give feedback on images, or tell us about a lower price?

Product Description

Brand Name: Lenovo
Product Line: Itona
Product Series: Md27
Product Model: MD27-F9R7-US-L
Product Name: Itona MD27-F9R7-US-L Thin Client
Marketing Information: Featuring Windows Embedded Standard, WES 7 operating system, the multi-media capable Md27 incorporates a powerful 1GHz VIA Eden Dual Core processor and boasts excellent connectivity including six USBs, one Parallel, Display and DVI ports plus a further two Serial ports.
Product Type: Thin Client
Processor Manufacturer: VIA
Processor Type: Eden
Processor Model: U4200
Processor Core: Dual-core (2 Core)
Processor Speed: 1 GHz
Standard Memory: 2 GB
Memory Technology: DDR3 SDRAM
Flash Memory: 8 GB
Number of Hard Drives: No
Graphics Controller Manufacturer: VIA
Graphics Controller Model: Chrome9 HD
Graphics Memory Accessibility: Shared

Ethernet Technology: Gigabit Ethernet
DVI: Yes
Total Number of USB Ports: 8
DisplayPort: Yes
Operating System: Windows Embedded Standard 7
Form Factor: Desktop

Customers viewing this page may be interested in these sponsored links [\(What's this?\)](#)

- [Get New Acer Thin Clients](#)  Smart, **Thin**, Affordable **Thin Client** Find Your Solution Today with Acer www.devonit.com/Acer-Thin-Clients
- [Looking for Thin Clients?](#)  Why not virtualize with PCoIP Zero **Clients** for best performance? www.teradici.com/zeroclients
- [Cisco Solutions for VDI](#)  Highly Secure & Scalable VDI From Cisco UCS w/Intel® Xeon®!
www.cisco.com/go/buildprice

See a problem with these advertisements? [Let us know](#)

Product Ads from External Websites [\(What's this?\)](#)

Sponsored Content

Page 1 of 6

				
<p>ThinkPad 320GB 7200rpm 7mm SATA3 OPAL Hard Drive \$99.99 + Free Shipping LENOVO <small>accepts</small> </p>	<p>Dell 23 Dual Monitor Bundle P2314H with MDS14 \$629.99 + Free Shipping Dell Home</p>	<p>Dell 19 Dual Monitor Bundle - P1913 with MDS14 \$459.99 + Free Shipping Dell Home</p>	<p>Dell 24 Monitor - E2414H (34) \$199.99 + Free Shipping Dell Consumer SO SP</p>	

See a problem with these advertisements? [Let us know](#)

[Advertise here](#)

Customer Questions & Answers

[See questions and answers](#)

Customer Reviews

There are no customer reviews yet.

5 star Share your thoughts with other customers

4 star

3 star

2 star

1 star

See the Top Rated Monitors in our [Monitor Reviews](#).

Feedback

- ▶ If you have a question or problem, visit our [Help pages](#).
- ▶ Would you like to [update product info](#), [give feedback on images](#), or [tell us about a lower price](#)?
- ▶ If you are a seller for this product and want to change product data, click [here](#) (you may have to sign in with your seller id).

Your Recently Viewed Items and Featured Recommendations



Get to Know Us

[Careers](#)
[Investor Relations](#)
[Press Releases](#)
[Amazon and Our Planet](#)
[Amazon in the Community](#)

Make Money with Us

[Sell on Amazon](#)
[Become an Affiliate](#)
[Advertise Your Products](#)
[Independently Publish with Us](#)
[▶ See all](#)

Amazon Payment Products

[Amazon.com Rewards Visa Card](#)
[Amazon.com Store Card](#)
[Shop with Points](#)
[Credit Card Marketplace](#)
[Amazon Currency Converter](#)

Let Us Help You

[Your Account](#)
[Shipping Rates & Policies](#)
[Amazon Prime](#)
[Returns & Replacements](#)
[Manage Your Kindle](#)
[Help](#)

amazon.com

[Australia](#) [Brazil](#) [Canada](#) [China](#) [France](#) [Germany](#) [India](#) [Italy](#) [Japan](#) [Mexico](#) [Spain](#) [United Kingdom](#)

[6pm](#)
Score deals
on fashion brands

[AbeBooks](#)
Rare Books
& Textbooks

[AfterSchool.com](#)
Kids' Sports, Outdoor
& Dance Gear

[Alexa](#)
Actionable Analytics
for the Web

[AmazonFresh](#)
Groceries & More
Right To Your Door

[Amazon Local](#)
Great Local Deals
in Your City

[AmazonSupply](#)
Business, Industrial
& Scientific Supplies

[Amazon Web Services](#)
Scalable Cloud
Computing Services

[Audible](#)
Download
Audio Books

[BeautyBar.com](#)
Prestige Beauty
Delivered

[Book Depository](#)
Books With Free
Delivery Worldwide

[Bookworm.com](#)
Books For Children
Of All Ages

[Casa.com](#)
Kitchen, Storage
& Everything Home

[CreateSpace](#)
Indie Print Publishing
Made Easy

[Diapers.com](#)
Everything
But The Baby

[DPRReview](#)
Digital
Photography

[East Dane](#)
Designer Men's
Fashion

[Fabric](#)
Sewing, Quilting
& Knitting

[IMDb](#)
Movies, TV
& Celebrities

[Junglee.com](#)
Shop Online
in India

[Kindle Direct Publishing](#)
Indie Digital Publishing
Made Easy

[Look.com](#)
Kids' Clothing
& Shoes

[MYHABIT](#)
Private Fashion
Designer Sales

[Shopbop](#)
Designer
Fashion Brands

[Soap.com](#)
Health, Beauty &
Home Essentials

[TenMarks.com](#)
Math Activities
for Kids & Schools

[Vine.com](#)
Everything
to Live Life Green

[Wag.com](#)
Everything
For Your Pet

[Warehouse Deals](#)
Open-Box
Discounts

[Woot!](#)
Discounts and
Shenanigans

[Yoyo.com](#)
A Happy Place
To Shop For Toys

[Zappos](#)
Shoes &
Clothing

[Conditions of Use](#) [Privacy Notice](#) [Interest-Based Ads](#) © 1996-2014, Amazon.com, Inc. or its affiliates

VIA00750

Shop by Department ▾

Search

Electronics ▾

VIA chrome9 thin-client

Go

Hello, Milos
Your Account ▾

Your Prime ▾

0 Cart ▾

Wish List ▾

All Electronics Best Sellers Electronics Accessories Audio & Home Theater Camera & Photo Car Electronics & GPS Cell Phones & Accessories

Electronics > Computers & Accessories > Desktops



Click to open expanded view

Wyse 902167-04L Dell Wyse C90LE Thin Client - DTS - 1 x C7 1 GHz ULV - RAM 1 GB - Flash 1 GB - no HDD - Chrome9 HCM - Gigabit LAN - Win XP Embedded - Monitor : none.

Be the first to review this item

Price: \$504.67

Note: \$6.49 shipping when purchased from Good Luck Bargains. Not eligible for Amazon Prime.

Only 3 left in stock.

Ships from and sold by Good Luck Bargains.

2 new from \$494.96



Spring Outlet Deals in Electronics

Find big savings on laptops, cameras, wireless, headphones, home audio, mp3 players, office products, home entertainment and more.

Share

Qty: 1 ▾

\$504.67 + \$6.49 shipping
In Stock. Sold by Good Luck Bargains

Add to Cart

or

Sign in to turn on 1-Click ordering.

Add to Wish List

More buying choices

2 new from \$494.96

Have one to sell? Sell on Amazon

Product Details

Shipping Weight: 7 pounds (View shipping rates and policies)

ASIN: B005Y004LW

Average Customer Review: Be the first to review this item

Would you like to [update product info](#), [give feedback on images](#), or [tell us about a lower price?](#)

Product Description

The Wyse C90LE Thin Client features a separate graphic accelerator for unparalleled performance in its class. The ultra low power media system processor delivers rich multimedia and video playback up to 1080p HD resolution. Package Contents: C90LE Thin Client DVI to VGA (DB-15) Adapter Mouse Product Type: Thin Client Standard Memory: 1 GB Product Type: Thin Client Flash Memory: 1 GB Manufacturer Part Number: 902167-04L Maximum Memory: 2 GB Limited Warranty: 3 Year Standard Memory: 1 GB Operating System: Windows XP Embedded Form Factor: Small Form Factor Processor Speed: 1 GHz Processor Type: C7 Operating System: Windows XP Embedded Form Factor: Small Form Factor Manufacturer: Dell, Inc Product Name: C90LE Thin Client Processor Speed: 1 GHz Processor Type: C7 Brand Name: Wyse Brand Name: Wyse Memory Technology: DDR2 SDRAM Height: 1.4 Width: 6.9 Depth: 4.8 Green Compliant: Yes Processor Manufacturer: VIA Green Compliant: Yes Green Compliance Certificate/Authority: RoHS Green Compliance Certificate/Authority: WEEE Green Compliance Certificate/Authority: ENERGY STAR Processor Manufacturer: VIA Ethernet Technology: Gigabit Ethernet Total Number of USB Ports: 4

Customers viewing this page may be interested in these sponsored links (What's this?)

- [Wyse Thin Clients - Cheap](#) - S30, V30, V90 **Thin Clients** In Stock Authorized **Wyse** Service Center wyse.vecmar.com/
- [Arcy Solutions](#) - Purchase all your **Wyse** products and C Class **Thin Clients** from Arcy! www.arcy.com/
- [Customized Thin Clients](#) - In-House Tech Support, Free Central Management SW, Free Evaluation Unit www.10zig.com/ThinClient

See a problem with these advertisements? [Let us know](#)

<p>Retail Point of Sale System with Corner Store POS-</p> <p>\$799.00</p> <p>+ \$57.10 Est. shipping</p> <p>The Perfect POS, Inc.</p>	<p>HP Envy 700 Desktop Series with A10-6700- 3.7 GHz; 3TB HD; 8G...</p> <p>(1)</p> <p>\$749.99</p> <p>+ Free Shipping</p> <p>HP Direct</p>	<p>HP Envy 700 Desktop Series with A10-5800K- 3.8 GHz; 1TB HD; 1...</p> <p>(1)</p> <p>\$609.99</p> <p>+ Free Shipping</p> <p>HP Direct</p>	<p>HP Envy 700 Desktop Series with A10-6700- 3.7 GHz; 2TB HD; 12...</p> <p>(1)</p> <p>\$699.99</p> <p>+ Free Shipping</p> <p>HP Direct</p>

See a problem with these advertisements? [Let us know](#)

[Advertise here](#)

Customer Questions & Answers

Have a question? Ask the owners here.

Ask owners

Typical questions asked about products:

- Is the item durable?
- Is this item easy to use?
- What are the dimensions of this item?

Customer Reviews

There are no customer reviews yet.

5 star Share your thoughts with other customers

4 star

3 star

2 star

1 star

Feedback

- ▶ If you have a question or problem, visit our [Help pages](#).
- ▶ Would you like to [update product info](#), [give feedback on images](#), or [tell us about a lower price](#)?
- ▶ If you are a seller for this product and want to change product data, click [here](#) (you may have to sign in with your seller id).

Your Recently Viewed Items and Featured Recommendations



Get to Know Us

[Careers](#)
[Investor Relations](#)
[Press Releases](#)
[Amazon and Our Planet](#)
[Amazon in the Community](#)

Make Money with Us

[Sell on Amazon](#)
[Become an Affiliate](#)
[Advertise Your Products](#)
[Independently Publish with Us](#)
[› See all](#)

Amazon Payment Products

[Amazon.com Rewards Visa Card](#)
[Amazon.com Store Card](#)
[Shop with Points](#)
[Credit Card Marketplace](#)
[Amazon Currency Converter](#)

Let Us Help You

[Your Account](#)
[Shipping Rates & Policies](#)
[Amazon Prime](#)
[Returns & Replacements](#)
[Manage Your Kindle](#)
[Help](#)



[Australia](#) [Brazil](#) [Canada](#) [China](#) [France](#) [Germany](#) [India](#) [Italy](#) [Japan](#) [Mexico](#) [Spain](#) [United Kingdom](#)

[6pm](#)
Score deals on fashion brands

[AbeBooks](#)
Rare Books & Textbooks

[AfterSchool.com](#)
Kids' Sports, Outdoor & Dance Gear

[Alexa](#)
Actionable Analytics for the Web

[AmazonFresh](#)
Groceries & More Right To Your Door

[Amazon Local](#)
Great Local Deals in Your City

[AmazonSupply](#)
Business, Industrial & Scientific Supplies

[Amazon Web Services](#)
Scalable Cloud Computing Services

[Audible](#)
Download Audio Books

[BeautyBar.com](#)
Prestige Beauty Delivered

[Book Depository](#)
Books With Free Delivery Worldwide

[Bookworm.com](#)
Books For Children Of All Ages

[Casa.com](#)
Kitchen, Storage & Everything Home

[CreateSpace](#)
Indie Print Publishing Made Easy

[Diapers.com](#)
Everything But The Baby

[DPReview](#)
Digital Photography

[East Dane](#)
Designer Men's Fashion

[Fabric](#)
Sewing, Quilting & Knitting

[IMDb](#)
Movies, TV & Celebrities

[Junglee.com](#)
Shop Online in India

[Kindle Direct Publishing](#)
Indie Digital Publishing Made Easy

[Look.com](#)
Kids' Clothing & Shoes

[MYHABIT](#)
Private Fashion Designer Sales

[Shopbop](#)
Designer Fashion Brands

[Soap.com](#)
Health, Beauty & Home Essentials

[TenMarks.com](#)
Math Activities for Kids & Schools

[Vine.com](#)
Everything to Live Life Green

[Wag.com](#)
Everything For Your Pet

[Warehouse Deals](#)
Open-Box Discounts

[Woot!](#)
Discounts and Shenanigans

[Yoyo.com](#)
A Happy Place To Shop For Toys

[Zappos](#)
Shoes & Clothing

[Conditions of Use](#) [Privacy Notice](#) [Interest-Based Ads](#) © 1996-2014, Amazon.com, Inc. or its affiliates

Shop by Department ▾

Search

Electronics ▾

VIA chrome9 thin-client

Go

Hello, Milos
Your Account ▾

Your Prime ▾

0 Cart ▾

Wish List ▾

All Electronics Best Sellers Electronics Accessories Audio & Home Theater Camera & Photo Car Electronics & GPS Cell Phones & Accessories

Electronics > Computers & Accessories > Desktops



Click to open expanded view

Dell Wyse 902169-54L
C90LEW Thin Client - DTS - 1 x C7
1 GHz ULV - RAM 2 GB - Flash 4
GB - no HDD - Chrome9 HCM -
Gigabit LAN - Windows Embedded
Standard 2009 - Monitor : none.

by Wyse
Be the first to review this item

Price: **\$549.09**

Note: \$6.99 shipping when purchased from Good Luck Bargains. Not eligible for Amazon Prime.

Only 3 left in stock.

Ships from and sold by **Good Luck Bargains**.

• New

3 new from **\$521.64**



Spring Outlet Deals in Electronics
Find big savings on [laptops](#), [cameras](#),
[wireless](#), [headphones](#), [home audio](#), [mp3](#)
[players](#), [office products](#), [home entertainment](#)
and more.

Share

Qty: 1 ▾

\$549.09 + \$6.99 shipping
In Stock. Sold by **Good Luck Bargains**

Add to Cart

or

[Sign in](#) to turn on 1-Click ordering.

Add to Wish List

More buying choices

3 new from **\$521.64**

Have one to sell?

Sell on Amazon

Technical Details

Model: 902169-54L

Product Details

Shipping Weight: 8 pounds (View shipping rates and policies)

ASIN: B0093GBCQS

Item model number: 902169-54L

Average Customer Review: [Be the first to review this item](#)

Date first available at Amazon.com: April 29, 2013

Would you like to [update product info](#), [give feedback on images](#), or [tell us about a lower price](#)?

Product Description

The Wyse C90LE thin client features a separate graphic accelerator for unparalleled performance in its class. The ultra low power media system processor delivers rich multimedia and video playback up to 1080p HD resolution. Powered by VIA ULV 1GHz processors, the Wyse C90LE diskless devices boot-up in seconds, provide secure user login to corporate networks and, with no moving parts, are capable of delivering a long service life-span of between 5-7 years. Package Contents: C90LE Thin Client PS/2 Keyboard PS/2 Optical mouse DVI to VGA Adapter Horizontal Feet Product Type: Thin Client Standard Memory: 2 GB Product Type: Thin Client Flash Memory: 4 GB Manufacturer Part Number: 902169-54L Maximum Memory: 2 GB Limited Warranty: 3 Year Standard Memory: 2 GB Operating System: Wyse Thin OS Form Factor: Small Form Factor Processor Speed: 1 GHz Operating System: Wyse Thin OS Form Factor: Small Form Factor Manufacturer: Dell, Inc Product Model: C90LEW Product Name: C90LEW Thin Client Processor Speed: 1 GHz Brand Name: Wyse Product Series: C Brand Name: Wyse Memory Technology: DDR2 SDRAM Height: 1.3 Width: 7 Depth: 4.8 Green Compliant: Yes Processor Manufacturer: VIA Product Family: C Green Compliant: Yes Green Compliance Certificate/Authority: ENERGY STAR Green Compliance Certificate/Authority: WEEE Green Compliance Certificate/Authority: RoHS Processor Manufacturer: VIA Ethernet Technology: Gigabit Ethernet DVI: Yes Total Number of USB Ports: 4

Customers viewing this page may be interested in these sponsored links (What's this?)

VIA00754

- [Wyse Thin Client Terminal](#)
 - Great price, Service, 3yr warranty! Free Expert Tech Service at Vecmar wyse.vecmar.com/
- [Best Wyse Thin Client](#)
 - **Wyse Thin Client** Browse Top Deals. Get Huge Savings! www.localbuzz.us/Thin-Client
- [Wyse C90lew Thin](#)
 - Get **Wyse C90lew Thin?** Compare Prices Now www.priceheros.com/Wyse+C90lew+Thin

See a problem with these advertisements? [Let us know](#)

Customer Questions & Answers

See questions and answers

Customer Reviews

There are no customer reviews yet.

5 star Share your thoughts with other customers

4 star

3 star

2 star

1 star

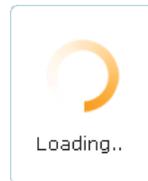


Advertisement

Feedback

- ▶ If you have a question or problem, visit our [Help pages](#).
- ▶ Would you like to [update product info](#), [give feedback on images](#), or [tell us about a lower price](#)?
- ▶ If you are a seller for this product and want to change product data, click [here](#) (you may have to sign in with your seller id).

Your Recently Viewed Items and Featured Recommendations



[Get to Know Us](#)
Careers

[Make Money with Us](#)
Sell on Amazon

[Amazon Payment Products](#)
Amazon.com Rewards Visa Card

[Let Us Help You](#)
Your Account

VIA00755

[Investor Relations](#)
[Press Releases](#)
[Amazon and Our Planet](#)
[Amazon in the Community](#)

[Become an Affiliate](#)
[Advertise Your Products](#)
[Independently Publish with Us](#)
[› See all](#)

[Amazon.com Store Card](#)
[Shop with Points](#)
[Credit Card Marketplace](#)
[Amazon Currency Converter](#)

[Shipping Rates & Policies](#)
[Amazon Prime](#)
[Returns & Replacements](#)
[Manage Your Kindle](#)
[Help](#)



[Australia](#) [Brazil](#) [Canada](#) [China](#) [France](#) [Germany](#) [India](#) [Italy](#) [Japan](#) [Mexico](#) [Spain](#) [United Kingdom](#)

[6pm](#)
Score deals
on fashion brands

[AbeBooks](#)
Rare Books
& Textbooks

[AfterSchool.com](#)
Kids' Sports, Outdoor
& Dance Gear

[Alexa](#)
Actionable Analytics
for the Web

[AmazonFresh](#)
Groceries & More
Right To Your Door

[Amazon Local](#)
Great Local Deals
in Your City

[AmazonSupply](#)
Business, Industrial
& Scientific Supplies

[Amazon Web Services](#)
Scalable Cloud
Computing Services

[Audible](#)
Download
Audio Books

[BeautyBar.com](#)
Prestige Beauty
Delivered

[Book Depository](#)
Books With Free
Delivery Worldwide

[Bookworm.com](#)
Books For Children
Of All Ages

[Casa.com](#)
Kitchen, Storage
& Everything Home

[CreateSpace](#)
Indie Print Publishing
Made Easy

[Diapers.com](#)
Everything
But The Baby

[DPReview](#)
Digital
Photography

[East Dane](#)
Designer Men's
Fashion

[Fabric](#)
Sewing, Quilting
& Knitting

[IMDb](#)
Movies, TV
& Celebrities

[Junglee.com](#)
Shop Online
in India

[Kindle Direct Publishing](#)
Indie Digital Publishing
Made Easy

[Look.com](#)
Kids' Clothing
& Shoes

[MYHABIT](#)
Private Fashion
Designer Sales

[Shopbop](#)
Designer
Fashion Brands

[Soap.com](#)
Health, Beauty &
Home Essentials

[TenMarks.com](#)
Math Activities
for Kids & Schools

[Vine.com](#)
Everything
to Live Life Green

[Wag.com](#)
Everything
For Your Pet

[Warehouse Deals](#)
Open-Box
Discounts

[Woot!](#)
Discounts and
Shenanigans

[Yoyo.com](#)
A Happy Place
To Shop For Toys

[Zappos](#)
Shoes &
Clothing

[Conditions of Use](#) [Privacy Notice](#) [Interest-Based Ads](#) © 1996-2014, Amazon.com, Inc. or its affiliates

Shop by Department

Search

Electronics

VIA chrome9 thin-client

Go

Hello, Milos Your Account

Your Prime

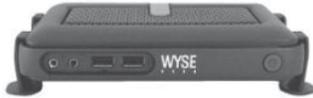
0

Cart

Wish List

All Electronics Best Sellers Electronics Accessories Audio & Home Theater Camera & Photo Car Electronics & GPS Cell Phones & Accessories

Electronics > Computers & Accessories > Desktops



Click to open expanded view

Wyse 902171-04L Dell Wyse C50LE Thin Client - DTS - 1 x C7 1 GHz ULV - RAM 1 GB - Flash 1 GB - no HDD - Chrome9 HCM - Gigabit LAN - Wyse Enhanced SUSE Linux Enterprise - Monitor : none.

by Wyse

Be the first to review this item

Price: \$396.20

Note: \$6.99 shipping when purchased from Good Luck Bargains. Not eligible for Amazon Prime.

Only 3 left in stock.

Ships from and sold by Good Luck Bargains.

- Dell Wyse C50LE Thin Client
- WYSE

2 new from \$385.14



Spring Outlet Deals in Electronics

Find big savings on laptops, cameras, wireless, headphones, home audio, mp3 players, office products, home entertainment and more.

Share

Qty: 1

\$396.20 + \$6.99 shipping In Stock. Sold by Good Luck Bargains

- Include 4-Year Warranty for \$25.99
- Include 3-Year Warranty for \$19.99

Add to Cart

or

Sign in to turn on 1-Click ordering.

Add to Wish List

More buying choices

2 new from \$385.14

Have one to sell?

Sell on Amazon

Product Details

Item Weight: 8 pounds

Shipping Weight: 8 pounds (View shipping rates and policies)

ASIN: B0046U0AUA

Average Customer Review: Be the first to review this item

Amazon Best Sellers Rank: #448,536 in Electronics (See Top 100 in Electronics)

Would you like to update product info, give feedback on images, or tell us about a lower price?

Product Description

The Wyse C50LE thin client features a separate graphic accelerator for unparalleled performance in its class. The ultra low power media system processor delivers rich multimedia and video playback up to 1080p HD resolution. Package Contents: C50LE Thin Client Keyboard DVI to VGA Adapter Mouse Product Type: Thin Client Standard Memory: 1 GB Product Type: Thin Client Flash Memory: 1 GB Manufacturer Part Number: 902171-04L Limited Warranty: 3 Year Standard Memory: 1 GB Operating System: Enhanced SUSE Linux Enterprise Form Factor: Desktop Slimline Processor Speed: 1 GHz Processor Type: C7 Operating System: Enhanced SUSE Linux Enterprise Form Factor: Desktop Slimline Manufacturer: Dell, Inc Product Model: C50LE Product Name: C50LE Thin Client Processor Speed: 1 GHz Processor Type: C7 Brand Name: Wyse Brand Name: Wyse Memory Technology: DDR2 SDRAM Height: 1.4 Width: 6.9 Depth: 4.8 Green Compliant: Yes Processor Manufacturer: VIA Green Compliant: Yes Green Compliance Certificate/Authority: ENERGY STAR Green Compliance Certificate/Authority: RoHS Green Compliance Certificate/Authority: WEEE Processor Manufacturer: VIA Ethernet Technology: Gigabit Ethernet DVI: Yes Total Number of USB Ports: 4

Customers viewing this page may be interested in these sponsored links (What's this?)

- [Wyse C50LE Thin Client](#) - Cheap Price, Great Service In Stock and ready to ship. wyse.vecmar.com/
- [Arcy Solutions](#) - Purchase all your **Wyse** products and **C50LE Thin Clients** from Arcy today! www.arcy.com/

VIA00757

See a problem with these advertisements? [Let us know](#)

Product Ads from External Websites (What's this?)

Sponsored Content

Page 1 of 6

<p>Retail Point of Sale System with Corner Store POS- \$799.00 + \$57.10 Est. shipping The Perfect POS, Inc.</p>	<p>HP Envy 700 Desktop Series with A10-6700- 3.7 GHz; 3TB HD; 8G... \$749.99 (1) + Free Shipping HP Direct</p>	<p>HP Envy 700 Desktop Series with A10-5800K- 3.8 GHz; 1TB HD; 1... \$609.99 (1) + Free Shipping HP Direct</p>	<p>HP Envy 700 Desktop Series with A10-6700- 3.7 GHz; 2TB HD; 12... \$699.99 (1) + Free Shipping HP Direct</p>

See a problem with these advertisements? [Let us know](#)

[Advertise here](#)

Customer Questions & Answers

Have a question? Ask the owners here.

Ask owners

Typical questions asked about products:

- Is the item durable?
- Is this item easy to use?
- What are the dimensions of this item?

Customer Reviews

There are no customer reviews yet.

5 star Share your thoughts with other customers

4 star

3 star

2 star

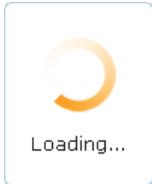
1 star

[Write a customer review](#)

Feedback

- ▶ If you have a question or problem, visit our [Help pages](#).
- ▶ Would you like to [update product info](#), [give feedback on images](#), or [tell us about a lower price](#)?
- ▶ If you are a seller for this product and want to change product data, click [here](#) (you may have to sign in with your seller id).

Your Recently Viewed Items and Featured Recommendations



Get to Know Us

- [Careers](#)
- [Investor Relations](#)
- [Press Releases](#)
- [Amazon and Our Planet](#)
- [Amazon in the Community](#)

Make Money with Us

- [Sell on Amazon](#)
- [Become an Affiliate](#)
- [Advertise Your Products](#)
- [Independently Publish with Us](#)
- [› See all](#)

Amazon Payment Products

- [Amazon.com Rewards Visa Card](#)
- [Amazon.com Store Card](#)
- [Shop with Points](#)
- [Credit Card Marketplace](#)
- [Amazon Currency Converter](#)

Let Us Help You

- [Your Account](#)
- [Shipping Rates & Policies](#)
- [Amazon Prime](#)
- [Returns & Replacements](#)
- [Manage Your Kindle](#)
- [Help](#)

amazon.com

[Australia](#) [Brazil](#) [Canada](#) [China](#) [France](#) [Germany](#) [India](#) [Italy](#) [Japan](#) [Mexico](#) [Spain](#) [United Kingdom](#)

[6pm](#)
Score deals
on fashion brands

[AbeBooks](#)
Rare Books
& Textbooks

[AfterSchool.com](#)
Kids' Sports, Outdoor
& Dance Gear

[Alexa](#)
Actionable Analytics
for the Web

[AmazonFresh](#)
Groceries & More
Right To Your Door

[Amazon Local](#)
Great Local Deals
in Your City

[AmazonSupply](#)
Business, Industrial
& Scientific Supplies

[Amazon Web Services](#)
Scalable Cloud
Computing Services

[Audible](#)
Download
Audio Books

[BeautyBar.com](#)
Prestige Beauty
Delivered

[Book Depository](#)
Books With Free
Delivery Worldwide

[Bookworm.com](#)
Books For Children
Of All Ages

[Casa.com](#)
Kitchen, Storage
& Everything Home

[CreateSpace](#)
Indie Print Publishing
Made Easy

[Diapers.com](#)
Everything
But The Baby

[DPReview](#)
Digital
Photography

[East Dane](#)
Designer Men's
Fashion

[Fabric](#)
Sewing, Quilting
& Knitting

[IMDb](#)
Movies, TV
& Celebrities

[Junglee.com](#)
Shop Online
in India

[Kindle Direct Publishing](#)
Indie Digital Publishing
Made Easy

[Look.com](#)
Kids' Clothing
& Shoes

[MYHABIT](#)
Private Fashion
Designer Sales

[Shopbop](#)
Designer
Fashion Brands

[Soap.com](#)
Health, Beauty &
Home Essentials

[TenMarks.com](#)
Math Activities
for Kids & Schools

[Vine.com](#)
Everything
to Live Life Green

[Wag.com](#)
Everything
For Your Pet

[Warehouse Deals](#)
Open-Box
Discounts

[Woot!](#)
Discounts and
Shenanigans

[Yoyo.com](#)
A Happy Place
To Shop For Toys

[Zappos](#)
Shoes &
Clothing

[Conditions of Use](#) [Privacy Notice](#) [Interest-Based Ads](#) © 1996-2014, Amazon.com, Inc. or its affiliates

VIA00759

Shop by Department

Search

Electronics

VIA chrome9 thin-client

Go

Hello, Milos Your Account

Your Prime

0

Cart

Wish List

All Electronics Best Sellers Electronics Accessories Audio & Home Theater Camera & Photo Car Electronics & GPS Cell Phones & Accessories

Electronics > Computers & Accessories > Desktops



Click to open expanded view

Wyse 902174-04L Dell Wyse C10LE Thin Client - DTS - 1 x C7 1 GHz ULV - RAM 512 MB - Flash 128 MB - no HDD - Chrome9 HCM - Gigabit LAN - WLAN : 802.11b/g - Wyse Thin OS - Monitor : none.

by Wyse

Be the first to review this item

Price: \$396.20

Note: \$9.49 shipping when purchased from Good Luck Bargains. Not eligible for Amazon Prime.

Only 3 left in stock.

Ships from and sold by Good Luck Bargains.

- New

2 new from \$369.91



Spring Outlet Deals in Electronics

Find big savings on laptops, cameras, wireless, headphones, home audio, mp3 players, office products, home entertainment and more.

Share

Qty: 1

\$396.20 + \$9.49 shipping In Stock. Sold by Good Luck Bargains

Add to Cart

or

Sign in to turn on 1-Click ordering.

Add to Wish List

More buying choices

2 new from \$369.91

Have one to sell?

Sell on Amazon

Technical Details

Model: 902174-04L

Product Details

Item Weight: 13.2 pounds

Shipping Weight: 13 pounds (View shipping rates and policies)

ASIN: B0083UDLCS

Item model number: 902174-04L

Average Customer Review: Be the first to review this item

Date first available at Amazon.com: April 29, 2013

Would you like to update product info, give feedback on images, or tell us about a lower price?

Product Description

The Wyse C10LE Thin Client features a separate graphic accelerator for unparalleled performance in its class. The ultra low power media system processor delivers rich multimedia and video playback up to 1080p HD resolution. Package Contents: C10LE Thin Client PS/2 Keyboard PS/2 Optical Mouse DVI to VGA Adapter Horizontal Standing Feet Product Type: Thin Client Standard Memory: 512 MB Product Type: Thin Client Flash Memory: 128 MB Manufacturer Part Number: 902174-04L Limited Warranty: 3 Year Standard Memory: 512 MB Operating System: Wyse Thin OS Processor Speed: 1 GHz Operating System: Wyse Thin OS Manufacturer: Dell, Inc Product Model: C10LE Product Name: C10LE Thin Client Processor Speed: 1 GHz Brand Name: Wyse Product Series: C Brand Name: Wyse Memory Technology: DDR2 SDRAM Height: 1.4 Width: 6.9 Depth: 4.8 Green Compliant: Yes Processor Manufacturer: VIA Wireless LAN: Yes Product Family: C Green Compliant: Yes Green Compliance Certificate/Authority: ENERGY STAR Green Compliance Certificate/Authority: RoHS Green Compliance Certificate/Authority: WEEE Processor Manufacturer: VIA Wireless LAN: Yes Wireless LAN Standard: IEEE 802.11n Ethernet Technology: Gigabit Ethernet DVI: Yes Total Number of USB Ports: 4

Customers viewing this page may be interested in these sponsored links (What's this?)

- Wyse Thin Client Terminal

wyse.vecmar.com/

VIA00760



Great price, Service, 3yr warranty! Free Expert Tech Service at Vecmar

- **Thin Client VDI Solutions** - Virtualize Desktop with Zero **Client** - Watch a how-it-works Video www.teradici.com/zeroclients
- **Netvoyager Thin Client** - Lower your TCO. Windows, Citrix, LX Green IT. Request a free evaluation www.netvoyager.co.uk/

See a problem with these advertisements? [Let us know](#)

Product Ads from External Websites (What's this?)

Sponsored Content

Page 1 of 6



HP ENVY Recline 27 All-in-One with 4th Gen. Intel i5-4570T - 2...
\$1,269.99
 No Shipping Info
 HP Direct



Dell GX 620 Tower
 Pentium 4 3.2GHz 512MB
 Ram 40GB
\$109.99
 No Shipping Info
 PCLiquidations



HP ENVY Rove 20-k120us All-in-One Desktop PC - ENERGY STAR
 (7)
\$829.99
 + \$9.99 Est. shipping
 HP Direct



Retail Point of Sale System with Corner Store POS-
\$799.00
 + \$57.10 Est. shipping
 The Perfect POS, Inc.



See a problem with these advertisements? [Let us know](#)

[Advertise here](#)

Customer Questions & Answers

Have a question? Ask the owners here.

Ask owners

Typical questions asked about products:

- Is the item durable?
- Is this item easy to use?
- What are the dimensions of this item?

Customer Reviews

There are no customer reviews yet.

5 star Share your thoughts with other customers

4 star

3 star

2 star

1 star

Feedback

- ▶ If you have a question or problem, visit our [Help pages](#).
- ▶ Would you like to **update product info**, **give feedback on images**, or **tell us about a lower price**?
- ▶ If you are a seller for this product and want to change product data, click [here](#) (you may have to sign in with your seller id).

Shop All Stores

Keywords, Model # or Item #



Search all

SEARCH

Marketplace

Home > Computer Hardware > Motherboards > Embedded Solutions > ASRock > Item#: N82E16813157321



**ASROCK PV530A
VIA PV530
Processor (1.8
GHz) VIA VX900 A3
Micro ATX
Motherboard/CPU
Combo**

3 / 5 (7) | [Write a Review](#)

OUT OF STOCK.

- VIA VX900 A3
- VIA PV530
- DDR3 800
- DDR2 800/667/533

[Ask Or Answer A Question](#)

OUT OF STOCK

This item is currently out of stock and it may or may not be restocked.

Sold and Shipped by:
Newegg

OUT OF STOCK

IMAGE
COMING SOON

Learn more about the ASRock PV530A

Model

Brand ASRock

Model PV530A

Combo Type Motherboard/CPU Combo

Bundle

CPU VIA PV530 Processor (1.8 GHz)

With Cooler Yes

Supported CPU

CPU Type VIA PV530

FSB 800MHz

Chipsets

North Bridge VIA VX900 A3

Memory

Number of Memory Slots 1 x DDR3 DIMM slot
2 x DDR2 DIMM slots

Memory Standard DDR3 800
DDR2 800/667/533

Maximum Memory Supported 4GB(DDR2) / 4GB(DDR3)

Expansion Slots

PCI Express x16 1 x PCI Express 2.0 x16 slot (blue @ x8 mode)

PCI Slots 1

Storage Devices



ARE YOU AN E-BLAST INSIDER?

Enter Email Address

SUBSCRIBE

Top Favorable Review

Rating: 3/5

- posted on 8/26/2012

VS

Top Critical Review

Rating: 3/5

- posted on 4/17/2013



Shop without retyping payment details.
Secure shopping made faster.
Check out with PayPal.



Newegg Preferred Account

No Payments + No Interest if paid in full in up to 12 Months. Minimum purchase required. Subject to credit approval. [See Terms](#)



Bill Me Later

No Payments + No Interest if paid in full in 6 Months on order over \$250. Subject to credit approval. [See Terms](#)

SATA	2 x SATA 3.0Gb/s
------	------------------

Onboard Video

Onboard Video Chipset	VIA Chrome9 HD DX9 Graphics
-----------------------	-----------------------------

Onboard Audio

Audio Chipset	VIA VT1705
---------------	------------

Audio Channels	6 Channels
----------------	------------

Onboard LAN

LAN Chipset	Atheros PCIEx1 LAN AR8132L
-------------	----------------------------

Max LAN Speed	10/100Mbps
---------------	------------

Rear Panel Ports

PS/2	2
------	---

COM	1
-----	---

LPT	1
-----	---

Video Ports	D-Sub
-------------	-------

USB 1.1/2.0	4 x USB 2.0
-------------	-------------

Audio Ports	3 Ports
-------------	---------

Internal I/O Connectors

Onboard USB	4 x USB 2.0
-------------	-------------

Other Connectors	CPU/Chassis/Power FAN connector 24 pin ATX power connector Front panel audio connector
------------------	--

Physical Spec

Form Factor	Micro ATX
-------------	-----------

Dimensions	8.5" x 6.7"
------------	-------------

Features

Features	VIA PV530 Processor
----------	---------------------

Solid Capacitor for CPU Power

Supports DDR3 / DDR2 memory (1 x DDR3 800, 2 x DDR2 8

Built-in VIA Chrome9 HD DX9 Graphics, DirectX 9.0, Max. sl

5.1 CH HD Audio (VIA VT1705 Audio Codec)

Supports ASRock XFast RAM, XFast LAN, XFast USB Tec

Supports APP Charger, SmartView

Free Bundle : CyberLink MediaEspresso 6.5 Trial, ASRock M

Quick Info

Limited Warranty period (parts): 1 year

Limited Warranty period (labor): 1 year

Manufacturer Contact Info

[Manufacturer Product Page](#)

Website: <http://www.asrock.com/>

Support Phone: 1-909-590-8308

Support Email: support@asrockamerica.com

[Support Website](#)

[View other products from ASRock](#)

VIA00770

Return Policies

This item is covered by Newegg.com's .

Return for refund within: 30 days

Return for replacement within: 30 days

Restocking Fee: Yes

[Home](#) > [Computer Hardware](#) > [Motherboards](#) > [Embedded Solutions](#) > [ASRock](#) > Item#: **N82E16813157321**

[Policy & Agreement](#) | [Privacy Policy](#) © 2000-2014 Newegg Inc. All rights reserved.

VIA00771

KENTIA HALL EXHIBITS
LOS ANGELES CONVENTION CENTER
MAY 10-12, 2006



CHROME

@ E3 2006



See the girls of destruction getting their Chrome on at E3

Booth #7209

May 10 - 12, 2006

Los Angeles Convention Center

