Nike, Inc. et al v. QiLoo InternationaDlo & im

EXHIBIT GG

TO DECLARATION AND LOCAL RULE 7-5 CERTIFICATION OF ERIK S. MAURER IN SUPPORT OF PLAINTIFFS' EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER, SEIZURE ORDER, AND PRELIMINARY INJUNCTION



February 3, 2010 - Date Typo -- This letter was hand served on August 11, 2010.

QiLoo International Limited 2-2303, No. 2 Bldg. Fuxin Garden Castle, Fengze Street QuanZhou, 362000, Fujian, China

Re: Notice of Patent Infringement Under 35 U.S.C. §287 Regarding U.S. Patent Nos. D555,332 and D586,548; and

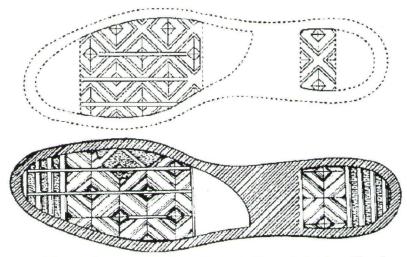
Notice of Trademark Infringement – Chuck Taylor Outsole Designs, U.S. Trademark Registration Nos. 1,588,960 and 3,258,103; Dunk "high" and "low" designs, U.S. Trademark Registration Nos. 3,711,303 and 3,711,305; and Air Force 1 "low" design, U.S. Trademark Registration No. 3,451,905

Dear Mr. Kevin Lin:

This letter is on behalf of NIKE, Inc. and its wholly owned subsidiary, Converse, Inc.

First, this letter provides QiLoo notice under 35 U.S.C. §287 that shoes it is offering to sell and selling at the WSA trade show, including shoes identified by model number QL-24715, infringe Converse's U.S. Patent No. D555,332. In addition, shoes that QiLoo is offering to sell and selling through its current catalog available at the current WSA trade show, including shoes identified as model number QL-26294, infringe NIKE's U.S. Patent No. D586,548. Copies of these patents are enclosed for your reference. We request that you immediately stop offering to sell and selling shoes covered by these design patents.

Second, as you undoubtedly know, Converse has used the outsole tread designs shown below in connection with Converse Chuck Taylor All Star athletic and fashion related footwear products around the world for many years. As a result of Converse's long and substantial use of its outsole tread designs, those designs are associated with Converse and Converse owns trademark rights in its outsole tread designs.



Converse Chuck Taylor All Star Outsole Tread Design Trademarks
NIKE, INC. ONE BOWERMAN DRIVE DF 4, BEAVERTON, OR 97005 T: 503.671.6453 F: 503.671.5777 NIKE.COM

Converse also owns United States Trademark Registration Nos. 1,588,960 and 3,258,103, relating to its Chuck Taylor All Star outsole tread designs. Copies of the Certificates of Registration for these trademarks are enclosed for your reference. Converse's outsole tread design trademarks are valuable assets of Converse.

Based on an investigation at the current WSA trade show in Las Vegas, we learned that your company is infringing Converse's outsole tread design trademark rights by promoting and selling shoes, including shoes identified by model number QL-27141, QL-27188, QL-23860, and QL-25472, bearing confusingly similar outsole designs to the Chuck Taylor All Star outsole tread designs.

Your company's use of Converse's trademarks violates Converse's federally registered trademark rights, and constitutes infringement and unfair competition under federal, state, and common law. Therefore, we request that you immediately stop promoting and selling these infringing shoes.

Third, this letter provides you with notice that NIKE owns common law trademark rights and a series of United States Trademark Registrations in the appearance of its NIKE Dunk shoes, including its Dunk "low" and "high" shoe designs. Copies of the Certificates of Registration relating to the Dunk "low" and "high" designs, Trademark Registration Nos. 3,711,303 and 3,711,305, are enclosed.

Based on our investigations at the current WSA trade show in Las Vegas, we also learned that your company is infringing NIKE's trademark rights in its Dunk "low" and "high" shoe designs by promoting and selling shoes bearing confusingly similar designs to the NIKE Dunk "low" and "high" designs. Unfortunately, we were not able to locate any identifying model names or numbers on these shoes.

Your company's use of the NIKE Dunk trademarks is a violation of NIKE's federally registered trademark rights, and constitutes infringement and unfair competition under federal, state, and common law. Please immediately stop promoting and selling these infringing shoes.

Finally, the QiLoo catalog that you are currently distributing at the WSA trade show advertises and promotes shoes identified by model number QL-23416. As we have twice previously advised you, these shoes bear a confusingly similar design to NIKE's trade hark in its Air Force 1 "low" shoe design, including U.S. Trademark Registration No. 3,451,905, a copy of which is enclosed. Your company's continued use of this NIKE trademark is a willful violation of NIKE's federally registered trademark rights, and constitutes unfair competition and dilution under both federal, state, and common law. Again, we ask that you immediately stop all use of NIKE's trademarks and stop advertising and selling your infringing shoes.

We have now had to advise QiLoo that it is infringing NIKE's intellectual property rights at the WSA trade shows on at least July 30, 2008, August 1, 2009, and February 3, 2010. Indeed, we have now notified three times that your shoe model number QL-26294, infringes U.S. Patent No. D586,548, and that your shoe model number QL-23416 violates NIKE's trademark rights in its Air Force 1 "low" shoe design.

Under the circumstances, we insist that you enter into a written settlement agreement acknowledging your infringements and agreeing to immediately stop infringing NIKE's rights. Please contact me immediately at 503-671-6453 so that we can discuss this matter.

This letter is without prejudice to NIKE's or Converse's right to take any action against QiLoo, and NIKE and Converse specifically reserve any and all rights and remedies available to them.

Very truly yours,

Jennifer Yokoyama

Assistant General Counsel - IP Litigation

cc: Via hand delivery at the WSA Shoe Show in Las Vegas, Nevada.