

UNITED STATES INTERNATIONAL TRADE COMMISSION

Washington, D.C.

In the Matter of

CERTAIN HAND DRYERS AND HOUSINGS FOR
HAND DRYERS

INV. NO. 337-TA-1015

**ORDER NO. 12: INITIAL DETERMINATION GRANTING MOTION TO
TERMINATE THE INVESTIGATION AS TO RESPONDENT
JINHUA KINGWE ELECTRICAL CO. LTD. BASED ON
CONSENT ORDER STIPULATION AND PROPOSED CONSENT
ORDER**

(September 8, 2016)

On August 18, 2016, respondent Jinhua Kingwe Electrical Co. Ltd. (“Kingwe”) moved for termination of this investigation based on entry of a consent order. (Motion No. 1015-005.) Kingwe indicated in its motion that Complainant Excel Dryer, Inc. (“Excel”) does not oppose the motion. (Mot. at 1.) On September 1, 2016, the Commission Investigative Staff (“Staff”) filed a response in support of the motion. As of the date of this order, no other responses have been received.

In accordance with Commission Rule 210.21(c), Kingwe has entered into a “Consent Order Stipulation” and provided a proposed “Consent Order,” both of which are attached hereto as Attachment A.¹ Commission Rule 210.21(c)(3) sets forth certain requirements for the

¹ On August 31, 2016, Kingwe provided a revised Proposed Consent Order that clarified that the investigation would be terminated as to Kingwe as opposed to “in its entirety” as stated in the prior version. The revised Proposed Consent Order is included in Attachment A in lieu of the original.

contents of a consent order stipulation. The Consent Order Stipulation submitted by Kingwe complies with the requirements of Commission Rule 210.21(c)(3).

Specifically, Kingwe agrees that upon entry of the consent order, Kingwe will “cease the importation, distribution, marketing, advertising, sale, or other transfers (other than exportation) in the United States of any hand dryers or housings for hand dryers, as illustrated by example in ¶ 73 of the Complaint, that Excel has alleged infringe the trade dress asserted in the Complaint filed on June 24, 2016 (“Subject Articles”), except under consent or license from Excel, its successors, or assignees.” (*See* Consent Order Stipulation (Ex. A) ¶ 4.) Pursuant to Commission Rule 210.21(c)(3)(i), Kingwe’s Consent Order Stipulation includes:

- (1) an admission of the Commission’s “*in rem* jurisdiction over the articles that are the subject of the Complaint and Notice of Investigation,” *in personam* jurisdiction over Kingwe for purposes of the Consent Order Stipulation and the proposed Consent Order, and “subject matter in this Investigation” (*see* Consent Order Stipulation ¶ 3);
- (2) a statement identifying the trade dress at issue, (*see* Consent Order Stipulation at p. 1, ¶ 4)², and indicating that “Kingwe will cease the importation, distribution, marketing, advertising, sale, or other transfers (other than exportation) in the United States of any hand dryers or housings for hand dryers,” identified by Complainant as subject articles (*see* Consent Order Stipulation ¶ 4);
- (3) an express waiver by Kingwe of all rights to seek judicial review or otherwise challenge or contest the validity of the Consent Order entered pursuant to the Consent Order Stipulation (*see* Consent Order Stipulation ¶ 6);
- (4) Kingwe’s representation that it will cooperate with and will not seek to impede by litigation or other means the Commission’s efforts to gather information under Subpart I of the Commission’s Rules of Practice and

² Kingwe’s Consent Order Stipulation identifies the intellectual property right at issue—the trade dress of Excel’s hand dryers in this instance—by reference to the Complaint. (*see* Consent Order Stipulation at ¶ 4.) Because unregistered trade dress cannot be succinctly identified by reference to a registration number, such as is the case for an issued patent or registered copyright, and because the Complaint sufficiently describes the features of the asserted trade dress, (*see* Compl. at ¶¶ 29–35,) the ALJ finds that the Consent Order Stipulation satisfies 19 C.F.R. § 210.21(c)(3)(B).

Procedure, 19 C.F.R., Chapter II, Subchapter C, Part 210 (*see* Consent Order Stipulation ¶ 7);

- (5) A statement that the enforcement, modification, and revocation of the consent order will be carried out pursuant to Subpart I of Part 210 of Title 19 of the Code of Federal Regulations, incorporating by reference the Commission's Rules of Practice and Procedure (*see* Consent Order Stipulation ¶ 8);
- (6) a statement that the Consent Order Stipulation "is for settlement purposes only and does not constitute admission by Kingwe that an unfair act or infringement has been committed," (*see* Consent Order Stipulation ¶ 9); and
- (7) a statement that the Consent Order shall have the same force and effect and may be enforced, modified, or revoked in the same manner as is provided in section 337 of the Tariff Act of 1930 and 19 C.F.R. Part 210 for other Commission actions, and that the Commission may require periodic compliance reports pursuant to Subpart 1 of 19 C.F.R. Part 210 to be submitted by the person entering into the consent order stipulation. (*See* Consent Order Stipulation ¶ 10.)

Because this is an intellectual property-based investigation, the Consent Order Stipulation also contains a statement, pursuant to Commission Rule 210.21(c)(3)(ii), that:

- (1) the Consent Order shall not apply with respect to any claim of a trade dress right that has been adjudicated invalid or unenforceable by the Commission or a court or agency of competent jurisdiction, provided that such finding or judgment has become final and nonreviewable. (*see* Consent Order Stipulation ¶ 11), and
- (2) a representation by Kingwe that it will not seek to challenge the validity or enforceability of the trade dress rights that form the basis for the complaint in any administrative or judicial proceeding to enforce the Consent Order (*see* Consent Order Stipulation ¶ 12).

In accordance with Rule 210.21(c) the Motion to Terminate Based on Consent Order Stipulation further states that "[t]here are no agreements, written or oral, express or implied between the parties concerning the subject matter of the investigation." (*See* Mot. at 2.)

Commission Rule 210.50(b)(2) provides that in the case of a proposed termination by settlement agreement or consent order, the parties may file statements regarding the impact of

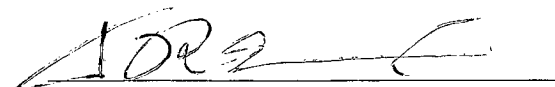
the proposed termination on the public interest, and the administrative law judge may hear argument, although no discovery may be compelled, with respect to issues relating solely to the public interest. In any initial determination terminating an investigation by settlement agreement or consent order, the administrative law judge is directed to consider and make appropriate findings regarding the effect of the proposed settlement on the public health and welfare, competitive conditions in the United States economy, the production of like or directly competitive articles in the United States, and United States consumers. In its motion, Kingwe asserts that termination of this investigation is in the public interest. (*See* Mot. at 2.) “The Staff is likewise of the view that the public interest favors termination of Kingwe to conserve public resources.” (Staff Resp. at 6.)

Based on the pleadings filed in connection with the motion to terminate the investigation, the ALJ finds that there is no indication that termination of this investigation as to Kingwe based on the Consent Order Stipulation would have an adverse impact on the public interest. In addition, the termination of the investigation as to Kingwe, such as that proposed by the motion, is generally in the public interest.

Accordingly, Motion No. 1015-005 is **GRANTED**. This initial determination, along with supporting documentation, is hereby certified to the Commission.

Pursuant to 19 C.F.R. § 210.42(h), this Initial Determination shall become the determination of the Commission unless a party files a petition for review of the Initial Determination pursuant to 19 C.F.R. § 210.43(a), or the Commission, pursuant to 19 C.F.R. § 210.44, orders, on its own motion, a review of the Initial Determination or certain issues here.

SO ORDERED.



Theodore R. Essex
Administrative Law Judge

ATTACHMENT A

UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, DC

Before The Honorable Theodore R. Essex
Administrative Law Judge

IN THE MATTER OF

CERTAIN HAND DRYERS AND
HOUSINGS FOR HAND DRYERS

Investigation No. 337-TA-1015

**RESPONDENT JINHUA KINGWE ELECTRICAL CO. LTD.'S MOTION TO
(1) TERMINATE INVESTIGATION BASED ON CONSENT ORDER STIPULATION
AND PROPOSED CONSENT ORDER AND
(2) STAY THE INVESTIGATION IN ITS ENTIRETY PENDING RESOLUTION OF
THE MOTION TO TERMINATE**

Pursuant to Commission Rules 210.21(a)(2) & (c)(1)(ii), 19 C.F.R. § 210.21(a)(2) & (c)(1)(ii), Respondent Jinhua Kingwe Electrical Co. Ltd. (“Kingwe”) hereby moves to terminate this investigation based on the attached Consent Order Stipulation (“Stipulation”) (Ex. A) and Proposed Consent Order (Ex. B). Kingwe also moves unopposed to stay this Investigation in its entirety, pending resolution of the motion to terminate. This investigation was instituted on July 26, 2016, and the Notice of Institution published in the *Federal Register* on August 1, 2016. See 81 Fed. Reg. 50549 (2016).

GROUND RULE 3.2 CERTIFICATION

Counsel for Kingwe certifies that they have contacted counsel for Complainant Excel Dryer, Inc. (“Excel”) and the Office of Unfair Import Investigations (“OUII”) regarding the motion to terminate and stay this Investigation. Excel does not oppose the motion to terminate or the motion to stay. OUII does not oppose the motion to stay and will take a position on the motion to terminate after reviewing the papers.

I. MOTION TO TERMINATE BASED ON CONSENT ORDER STIPULATION

Kingwe stipulates to the entry of the Proposed Consent Order and requests that the Proposed Consent Order be entered for the purpose of resolving the investigation. “Termination by consent order need not constitute a determination as to violation of section 337,” 19 C.F.R. §§ 210.21(c)(2)(ii) and 210.21(c)(3)(i)(F), and Kingwe has entered into the Stipulation without conceding that an unfair act has been committed. There are no agreements, written or oral, express or implied between the parties concerning the subject matter of the investigation.

The ALJ should grant the instant motion to terminate the investigation as to Kingwe. Commission Rule 210.21(c)(1)(ii) provides that, at any time prior to the commencement of the hearing in an investigation, one or more of the respondents may move to terminate the investigation by consent order. *See* 19 C.F.R. § 210.21(a)(2) (“Any party may move at any time to terminate an investigation . . . as to any or all respondents on the basis of . . . a consent order”); Comm’n Comments on Rule 210.21(c), 57 Fed. Reg. 52830, 52838 (Nov. 5, 1992). This motion is timely filed well in advance of the commencement of the hearing; indeed, the Commission instituted this investigation within the last month. Kingwe seeks to conclude this investigation without additional expense, risk, or disruption, and the Stipulation, attached as Exhibit A, contains the admissions, waivers, statements, and other requirements under Commission Rule 210.21(c)(3). Entry of this consent order will also not impose an undue burden on the public health and welfare, competitive conditions in the United States economy, production of like or directly competitive articles in the United States, or U.S. consumers. 19 C.F.R. § 210.50(b)(2).

Commission Rule 210.21 authorizes the Administrative Law Judge to terminate an investigation. It is in the interest of the public and administrative economy to grant this motion.

Commission policy and the public interest generally favor termination by consent, which preserves resources for both the Commission and the private parties, and termination based on a consent order is routinely granted. *See, e.g., Certain Safety Eyewear & Components Thereof*, Inv. No. 337-TA-433, Order No. 37 at 2 (Nov. 3, 2000); *Certain Synchronous Dynamic Random Access Memory Devices, Microprocessors & Prods. Containing Same*, Inv. No. 337-TA-431, Order No. 11 at 2 (July 13, 2000); *Certain Integrated Circuit Chipsets & Prods. Containing Same*, Inv. No. 337-TA-428, Order No. 16 at 5 (Aug. 22, 2000); *Certain Telephonic Digital Added Mainline Sys., Components Thereof & Prods. Containing Same*, No. 337-TA-400, Notice to the Parties at 3 (Feb. 12, 1998); *Certain Screen Printing Machines, Vision Alignment Devices Used Therein, & Component Parts Thereof*, Inv. No. 337-TA-394, Order No. 13 at 4 (Oct. 6, 1997).

For the foregoing reasons, Kingwe respectfully requests that that the ALJ issue an Initial Determination granting the motion to terminate the investigation as to Kingwe and entering the attached Proposed Consent Order.

II. MOTION TO STAY THE INVESTIGATION IN ITS ENTIRETY

Kingwe also moves to stay this Investigation in its entirety, pending resolution of the motion to terminate. A stay will conserve the resources of the parties and the Commission. Specifically, Kingwe's responses to Excel's first discovery requests are due on August 22, 2016; Kingwe's response to the Complaint and Notice of Investigation is due August 22, 2016; the ALJ has directed the parties to file a joint discovery statement on or before August 22, 2016 (*see* Order No. 2); and the ALJ has scheduled a preliminary conference for September 8, 2016 (*id.*). Staying this Investigation will save the parties the significant time and expense required to complete tasks that will become unnecessary if the motion to terminate is granted.

Requests for stays are routinely granted under similar circumstances. *See, e.g., Certain Electric Skin Care Devices, Brushes & Chargers Therefore, & Kits Containing the Same*, Inv. No. 337-TA-959, Order No. 26 (Nov. 10, 2015); *Certain Beverage Brewing Capsules, Components Thereof, & Prods. Containing the Same*, Inv. No. 337-TA-929, Order No. 17 (Mar. 18, 2015) (Essex, ALJ); *Certain Lighting Control Devices Including Dimmer Switches & Parts Thereof*, Inv. No. 337-TA-676, Order No. 7 (July 10, 2009).

For the foregoing reasons, Kingwe respectfully requests that that the ALJ stay this Investigation in its entirety, pending resolution of the motion to terminate.

Dated: August 17, 2016

By: /s/ Jordan L. Coyle
Jordan Coyle
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Attorneys for Respondent Jinhua Kingwe Electrical Co. Ltd.

EXHIBIT A

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, DC**

**Before The Honorable Theodore R. Essex
Administrative Law Judge**

IN THE MATTER OF

**CERTAIN HAND DRYERS AND
HOUSINGS FOR HAND DRYERS**

Investigation No. 337-TA-1015

**RESPONDENT JINHUA KINGWE ELECTRICAL CO. LTD.'S CONSENT ORDER
STIPULATION**

Concurrent with the motion to terminate, Respondent Jinhua Kingwe Electrical Co. Ltd. ("Kingwe") hereby respectfully submits this Consent Order Stipulation.

On January 8, 2016, Complainant Excel Dryer, Inc. ("Excel") filed a Complaint with the United States International Trade Commission against Kingwe and other respondents. The complaint alleges violations of section 337 based upon the importation into the United States, or in the sale of certain hand dryers and housings for hand dryers by reason of trade dress infringement, the threat or effect of which is to destroy or substantially injure an industry in the United States. The Commission instituted this Investigation on July 26, 2016, and the Notice of Institution published in the *Federal Register* on August 1, 2016. *See* 81 Fed. Reg. 50549 (2016).

Pursuant to 19 C.F.R. § 210.21(c)(1) and 210.21(c)(3), Kingwe hereby stipulates that:

1. Kingwe is a corporation organized and existing under the laws of the Peoples Republic of China and is located at No. 1600, West Wujiang Road, Jinhua City, Zhejiang Province, 321018, China.

2. Kingwe stipulates to the entry of a Consent Order as outlined below and as expressed in the accompanying Proposed Consent Order.

3. Kingwe admits and acknowledges that the Commission has *in rem* jurisdiction over the articles that are the subject of the Complaint and Notice of Investigation. Kingwe admits and acknowledges that the Commission has *in personam* jurisdiction over it for the purposes of this Stipulation and the Consent Order. Kingwe admits and acknowledges that the Commission has subject matter jurisdiction in this Investigation.

4. Upon entry of the Consent Order, Kingwe will cease the importation, distribution, marketing, advertising, sale, or other transfers (other than exportation) in the United States of any hand dryers or housings for hand dryers, as illustrated by example in ¶ 73 of the Complaint, that Excel has alleged infringe the trade dress asserted in the Complaint filed on June 24, 2016 (“Subject Articles”), except under consent or license from Excel, its successors, or assignees.

5. Upon entry of the Consent Order, to the extent that Kingwe has any inventory of Subject Articles in the United States intended for sale in the United States, Kingwe will re-export or have such commercial inventory re-exported outside of the United States.

6. Kingwe expressly waives all rights to seek judicial review or otherwise challenge or contest the validity of the Consent Order.

7. Kingwe will cooperate with and will not seek to impede by litigation or other means the Commission’s efforts to gather information under Subpart I of Part 210, Title 19 of the Code of Federal Regulations.

8. The enforcement, modification, and revocation of the Consent Order will be carried out pursuant to Subpart I of Part 210, Title 19 Code of Federal Regulations, incorporating by reference the Commission’s Rules of Practice and Procedure.

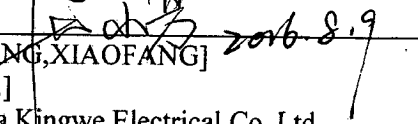
9. Kingwe's signing of this Stipulation is for settlement purposes only and does not constitute admission by Kingwe that an unfair act or infringement has been committed or that Kingwe will not sell for importation, import, distribute, market, advertise, sell, or otherwise transfer any hand dryer product in the United States at all.

10. The Consent Order shall have the same force and effect and may be enforced, modified, or revoked in the same manner as is provided in section 337 of the Tariff Act of 1930 and Part 210, Title 19 of the Code of Federal Regulations, and the Commission may require periodic compliance reports pursuant to subpart I of Part 210, Title 19 Code of Federal Regulations.

11. The Consent Order shall not apply with respect to any trade dress that has been adjudicated invalid or unenforceable by the Commission or a court or agency of competent jurisdiction, provided that such finding or judgment has become final and nonreviewable.

12. Kingwe will not seek to challenge the validity of the trade dress rights in any administrative or judicial proceeding to enforce the Consent Order.

Dated: August 9, 2016

By:  2016.8.9
[ZHANG, XIAOFANG]
[G.M.]
Jinhua Kingwe Electrical Co. Ltd.
No. 1600, West Wujiang Road, Jinhua City,
Zhejiang Province, 321018, China



August 31, 2016

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The Honorable Lisa Barton
Secretary to the Commission
U.S. International Trade Commission
500 E Street S.W. Room 112-A
Washington, D.C. 20436

Jordan L. Coyle

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**Re: *Certain Hand Dryers and Housings for Hand Dryers,*
ITC Inv. No. 337-TA-1015**

Dear Secretary Barton:

Attached for filing in the referenced Investigation, please find a revised copy of Exhibit B to Respondent Jinhua Kingwe Electrical Co. Ltd.'s motion to terminate this investigation as to Kingwe on the basis of consent order stipulation. Kingwe has revised Section I. of Exhibit B to note that the investigation is terminated specifically as to Kingwe, not in its entirety.

Please contact me if you have any questions.

Respectfully submitted,

/s/ Jordan L. Coyle

Jordan L. Coyle

EXHIBIT B

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, DC**

**Before The Honorable Theodore R. Essex
Administrative Law Judge**

IN THE MATTER OF

**CERTAIN HAND DRYERS AND
HOUSINGS FOR HAND DRYERS**

Investigation No. 337-TA-1015

[PROPOSED] CONSENT ORDER

The United States International Trade Commission has instituted an investigation at the request of Excel Dryer, Inc. (“Excel”) against Respondent Jinhua Kingwe Electrical Co. Ltd. (“Kingwe”). The complaint alleges violations of section 337 based upon the importation into the United States, or in the sale of certain hand dryers and housings for hand dryers by reason of trade dress infringement, the threat or effect of which is to destroy or substantially injure an industry in the United States. The Commission instituted this Investigation on July 26, 2016, and the Notice of Institution published in the Federal Register on August 1, 2016. *See* 81 Fed. Reg. 50549 (2016).

Without admitting that an unfair act or infringement has been committed or that Kingwe will not sell for importation, import, distribute, market, advertise, sell, or otherwise transfer any kind of hand dryer product in the United States at all, Kingwe has executed a consent order stipulation and moved for an Initial Determination terminating this investigation as to itself by entry of a consent order. Kingwe has executed a Consent Order Stipulation consistent with Commission Rules.

Pursuant to 19 C.F.R. § 210.21(c), the motion is hereby GRANTED and the following is SO ORDERED:

A. Kingwe has admitted and acknowledged that the Commission has *in rem* jurisdiction over the articles that are the subject of the Complaint and Notice of Investigation. Kingwe has admitted and acknowledged that the Commission has *in personam* jurisdiction over it for the purposes of this Stipulation and the Consent Order. Kingwe has admitted and acknowledged that the Commission has subject matter jurisdiction in this Investigation.

B. Effective immediately upon the entry of this Consent Order, Kingwe shall not sell for importation, import, or sell after importation in the United States any hand dryers or housings for hand dryers, as illustrated by example in ¶ 73 of the Complaint, that Excel has alleged infringe the trade dress asserted in the Complaint filed on June 24, 2016 (“Subject Articles”), except under consent or license from Excel, its successors, or assignees, directly or indirectly, and shall not aid, abet, encourage, participate in, or induce the sale for importation, the importation, or the sale after importation of the Subject Articles in the United States except under consent or license from Excel.

C. Upon entry of the Consent Order, to the extent that Kingwe has any inventory of Subject Articles in the United States intended for sale in the United States, Kingwe will re-export or have such commercial inventory re-exported outside of the United States.

D. Effective immediately upon the entry of this Consent Order, Kingwe shall cease and desist from importing into the United States and distributing Subject Articles alleged by the Complaint filed on June 24, 2016 to infringe the asserted trade dress.

E. Kingwe shall be precluded from seeking judicial review or otherwise challenging or contesting the validity of this Consent Order.

F. Kingwe shall cooperate with and shall not seek to impede by litigation or other means the Commission's efforts to gather information under subpart I of the Commission's Rules of Practice and Procedure, 19 CFR part 210.

G. Kingwe and its officers, directors, employees, agents, and any entity or individual acting on its behalf and with its authority shall not seek to challenge the validity or enforceability of the asserted trade dress in any administrative or judicial proceeding to enforce the Consent Order.

H. If the asserted trade dress is held invalid or unenforceable by a court or agency of competent jurisdiction or as to any article that has been found or adjudicated not to infringe the asserted trade dress in a final decision, no longer subject to appeal, this Consent Order shall become null and void as to such invalid or unenforceable trade dress.

I. This Investigation is hereby terminated as to Kingwe, provided, however, that enforcement, modification, or revocation of the Consent Order shall be carried out pursuant to Subpart I of the Commission's Rules of Practice and Procedure, 19 CFR part 210.

BY ORDER OF THE COMMISSION:

Date:

Lisa Barton, Secretary
U.S. International Trade Commission

PUBLIC CERTIFICATE OF SERVICE

I, Lisa R. Barton, hereby certify that the attached **ORDER 12** has been served by hand upon the Commission Investigative Attorney, Monisha Deka, Esq., and the following parties as indicated, on **September 8, 2016**.



Lisa R. Barton, Secretary
U.S. International Trade Commission
500 E Street, SW, Room 112
Washington, DC 20436

On Behalf of Complainant Excel Dryer, Inc.:

Andrew F. Pratt, Esq.
VENABLE LLP
575 Seventh Street, NW
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- Via Hand Delivery
- Via Express Delivery
- Via First Class Mail
- Other: _____

On Behalf of Respondent Jinhua Kingwe Electrical Co. Ltd. and Alpine Industries, Inc.:

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- Via Hand Delivery
- Via Express Delivery
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- Other: _____

On Behalf of Respondent ACL Group (Intl.) Ltd.:

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On Behalf of Respondent Zhejiang Aike Appliance Co., Ltd.:

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- Via Hand Delivery
- Via Express Delivery
- Via First Class Mail
- Other: _____

CERTAIN HAND DRYERS AND HOUSINGS FOR HAND DRYERS

Inv. No. 337-TA-1015

Certificate of Service – Page 2

On Behalf of Respondents FactoryDirectSale and Toolsempire:

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- Via Express Delivery
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- Other: _____

Respondents:

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- Via First Class Mail
- Other: _____

Penson & Co.
Room 1011
N 218 Hengfeng Road
Zhabei District, Shanghai
China

- Via Hand Delivery
- Via Express Delivery
- Via First Class Mail
- Other: _____

Taizhou Dihour Electrical Appliances Co. Ltd. (a/k/a Dihour)
North Dashi Class I Highway
Daxi Town, Wenling City
ZheJiang Province 317525
China

- Via Hand Delivery
- Via Express Delivery
- Via First Class Mail
- Other: _____

TC Bunny Co., Ltd.
Room 201, Building 418, Madang Road
Shanghai
China

- Via Hand Delivery
- Via Express Delivery
- Via First Class Mail
- Other: _____

Vinovo
Sovereign Industrial Jiaxing Co., Ltd.
No. 111 Xiuxin Rd.
Xiuzhou Industrial Park
Jiaxing Zhejiang Jiaxing 314000
China

- Via Hand Delivery
- Via Express Delivery
- Via First Class Mail
- Other: _____

US Air Hand Dryer
c/o Kristen Nguyen
9221 Rose Parade Way
Sacramento, CA 95826

- Via Hand Delivery
- Via Express Delivery
- Via First Class Mail
- Other: _____