

# INTELLECUAL PROPERTY HIGH COURT OF KOREA

## FIFTH - FIRST DIVISION

### DECISION

Case No.	2021Heo3215	Scope of Rights Confirmation (Trademark)
Plaintiff	A	
	Switzerland	
	CEO B	
	Attorney for Plaintiff	
	Attorney Min Jeong Park	
Defendant	C	
	Place of Service	
Date of Closing Argument	Oct. 14, 2021	
Decision Date	Dec. 2, 2021	

### ORDER

1. The IPTAB Decision 2020Dang2751, decided on Apr. 14, 2021, shall be revoked.
2. The cost arising from this litigation shall be borne by the Defendant.

### PLAINTIFF'S DEMAND

As ordered.

### OPINION

#### 1. Background

##### A. Plaintiff's Registered Trademark and Service Mark (Plaintiff's Exhibit 1)

- Registration Number/ Filing Date of Application/ Date of Registration Decision/  
Date of Registration: Trademark and Service Mark Registration No. 0053166/  
Oct. 29, 2013/ Nov. 24, 2014/ Jan. 6, 2015



- Mark at Issue:

- Designated Goods

- Category of Goods: Class 14 (jewels, accessories of jewelry)
- Category of Goods: Class 16 (brochures, catalogues, leaflets)
- Category of Services: Class 35 (retail store services in the field of jewelry)

**B. Mark Subject to Confirmation (hereinafter, the “Mark for Review”)**



- Mark at Issue

- Goods bearing the mark: Pendants

- Users: Defendant

**C. IPTAB Decision**

On Sep. 8, 2020, the Defendant filed a petition for a defensive trial to confirm the scope of rights against the Plaintiff, who is a holder of the right of the Registered Trademark and Service Mark at Issue, as IPTAB 2020Dang2751, arguing that the Mark for Review does not fall within the scope of the right of the Registered Trademark and Service Mark at Issue.

In this regard, on Apr. 14, 2021, the IPTAB rendered its decision to admit the Plaintiff’s petition for a trial in that “since it may not be said that the Mark for Review was used as a trademark, the Mark for Review does not fall within the scope of rights of the Registered Trademark and Service Mark at Issue without the need to further examine the Plaintiff’s remaining arguments, such as the similarity of the Mark for Review and the Registered Trademark and Service Mark at Issue”.

[Factual Basis] Undisputed facts, statements in Plaintiff’s Exhibits 1 and 3, purport of the overall argument.

**2. Whether IPTAB Erred**

**A. Summary of Parties’ Arguments and Questions Presented**

- 1) Summary of Plaintiff’s Arguments

The Mark for Review was used as a trademark and is very similar to the Registered Trademark and Service Mark at Issue in terms of the mark and goods bearing the trademark. Further, it is highly likely that the Mark for Review would be misunderstood or cause confusion as to its source, because the Registered Trademark and Service Mark at Issue are well known and famous. Thus, the Mark for Review falls within the scope of rights of the Registered Trademark and Service Mark at Issue. Therefore, the IPTAB decision is inconsistent with the above analysis and shall not be upheld.

2) Summary of Defendant's Arguments

The Mark for Review was used not as a trademark but as a design. Also, the Mark for Review is different from and not similar to the Registered Trademark and Service Mark at Issue in terms of appearance. Thus, the Mark for Review does not fall within the scope of rights of the Registered Trademark and Service Mark at Issue. Therefore, the IPTAB decision is consistent with the above analysis and shall be upheld.

3) Questions Presented

Questions presented were whether the Mark for Review was used as a trademark and whether the Mark for Review is similar to the Registered Trademark and Service Mark at Issue. Hereinafter, the following will be examined: whether the Mark for Review was used as a trademark; and furthermore, whether the Mark for Review is similar to the Registered Trademark and Service Mark at Issue.

**B. Whether the Mark for Review was used as a trademark**

1) Relevant Law

A mark subject to a trial to confirm the scope of trademark rights shall be used as a trademark to fall within the scope of rights of a registered trademark. Thus, where it may be deemed that a mark is used to identify goods or indicate a source thereof, which may be an essential function of a trademark, the mark shall be regarded to be used as a trademark (Supreme Court Decision 2006Hu2295, decided Jul. 10, 2008).

Since a design and a trademark are not exclusive or selective, even a form or a pattern which could become a design shall be regarded to be used as a trademark, provided that it is used to identify the source of goods. Also, it shall be determined whether a mark indicated in actual business is being used as an identifier of goods in light of its relationship with goods to which the mark is applied as a trademark, manner of use of the mark (location, size, etc. indicated on goods, etc.), well-known status and fame of the registered trademark, intention and course of use of a user, etc. (Supreme Court Decision 2010Da58261, decided Mar. 28, 2013).

2) Established Facts

The following facts are recognized in light of statements and images in Plaintiff's Exhibits 4 through 10, 12 through 16, 19, and 20 (including hyphenated numbers,

if any; hereinafter the same shall apply), and the purport of the overall argument:

- a) Since the Plaintiff, as an enterprise specialized in jewelry, watches, and perfume established in France in 1906, released in 1968 the “Alhambra” collection necklace in which the Registered Trademark and Service Mark at Issue were used, where four round petals made of jewelry and their edges are decorated with small golden beads with a four-leaf clover, the Plaintiff has continued to use the Registered Trademark and Service Mark at Issue in rings, bracelets, earrings, pendants, watches, etc. (the group of goods to which the Registered Trademark and Service Mark at Issue are applied are referred to as the “Alhambra Collection”). The Alhambra Collection has been displayed, advertised, and marketed in Korea since April 2002.
- b) The Plaintiff’s sales of the Alhambra Collection in Korea from 2013 to 2019 and the advertising expenses for the Alhambra Collection in Korea from 2012 to 2019 (those from 2015 to 2018 are excluded) are as follows:

<b>Fiscal year</b>	<b>Sales (in billion won)</b>	<b>Advertising expenses (in million won)</b>
2012	-	80
2013	10.8	94
2014	13.9	154
2015	12.7	-
2016	14.2	150
2017	21.7	97
2018	28.7	-
2019	36.3	684
<b>Total</b>	<b>138.3</b>	<b>1,259</b>

- c) The Alhambra Collection has been worn by the following: prominent political figures, such as the first lady of France, the wife of the Vice President of the U.S.A., etc.; famous actresses, such as D, E, F, G, H, I, J, etc.; and famous singers, such as L, etc. The Plaintiff has also continued to post advertisements in various fashion magazines in Korea as specified in [Attached Form 1].
- d) The Alhambra Collection was introduced from 2011 to 2019 through articles in various press media in Korea, such as N, O, P, Q, R, S, T, U, etc., as follows: “W, ... necklaces or earrings with four-leaf clover pendant are selected as a

favorite design even by females in Korea”; “fake Alhambra Collection is observed on the streets from time to time. This shows that it is becoming popular and that the demand therefor is increasing”; “Alhambra (...), one of the typical jewelry lines with popularity”; “Many celebrities wear the Alhambra lines of A, such as necklaces or earrings with a four-leaf clover pattern”; and “the Alhambra Collection, one of the best sellers first produced in 1968, has continued to be loved for more than 50 years”.

- e) In the consumer perception survey conducted on May 10, 2019 as to the Plaintiff’s Registered Trademark and Service Mark at Issue and 3D mark “



” (Trademark Reg. No. 40-1522518) with identical plane view type for females at the ages of 25 through 54 who have purchased luxury jewelry in the last two years or would purchase luxury jewelry in two years, 92.4% of the respondents answered that they had seen the trademarks, and 74.0% of the respondents perceived the trademarks as goods of the specific brand. Also, 48.2% of the respondents answered that they knew the brand of goods with the presented image. Further, of the respondents who answered that they knew the brand of goods with the presented image, 60.6% (29.2% of the respondents as a whole)<sup>1</sup> directly answered without choice that the name of brand is “W”.

- f) Also, as illustrated in [Attached Form 1], on or around the date of the IPTAB Decision, pendant necklaces, earrings, and bracelets with shapes very similar to those of the Registered Trademark and Service Mark at Issue were sold in Korea under the name of “A, “A CI”, etc.

Also, as to the Defendant’s products to which the Mark at Issue was applied (14 K four-leaf clover necklaces), consumers commented on the website X as follows: “they are too expensive to purchase”; “A CI” necklaces are so beautiful but way too expensive to purchase. In the meantime, I finally found goods similar thereto! Furthermore, these are affordable”; and “I am fascinated with the A style”.

Even in the Q&A of the website X for the Defendant’s goods to which the Design for Review was applied, the Defendant answered “do you mean clover earrings?” regarding a customer’s question of “do you have “A” design earrings?” Also, the Defendant answered that “our goods are substantially different from “A” products. If the rear side is filled, a price would rise by 200–300 thousand won. Thus, we had to make a choice to make them lighter and more affordable” in response to a customer’s question, noting that “the rear side is empty and this product is too different from genuine goods”.

<sup>1</sup>

48.2% × 60.6% = about 29.2%.

- g) The Plaintiff sent a warning requesting that the display and sales of the imitating goods be stopped to businesses that sold necklaces, etc. whose forms are similar to the Alhambra Collection to which the Registered Trademark and Service Mark at Issue are applied. Further, the imitating businesses admitted that the following acts infringe the Plaintiff's Registered Trademark and Service Mark at Issue: (a) the Plaintiff is a lawful holder of a right to the Registered Trademark and Service Mark at Issue; (b) the Registered Trademark and Service Mark at Issue are well known to consumers at home and abroad; and (c) goods, such as bracelets, necklaces, etc. whose forms are identical or similar to the Registered Trademark and Service Mark at Issue are sold. Also, the imitating businesses committed to stopping acts of selling imitating goods, etc. without delay and acts of infringing the Registered Trademark and Service Mark at Issue.

3) Analysis

In light of the facts established above, the purport of the overall argument, and the legal principles examined above, it would be reasonable to regard the Mark for Review as acting as an indicator of source and thus being used as a trademark. It is difficult to regard otherwise, even if the Defendant indicated "Y", its own trademark, on its website, product package, guarantee, etc. Thus, the Defendant's arguments premised otherwise are without merit.

- a) It would be reasonable to deem that the Registered Trademark and Service Mark at Issue were widely known on or around Apr. 14, 2021, which is the date of the IPTAB Decision, as an indicator of source to domestic consumers and traders of the designated goods, such as jewelry, jewelry accessories, etc. in light of the facts established above and, in particular, the following: a period of time during which the Registered Trademark and Service Mark at Issue were used in Korea (for about 19 years); domestic sales (about 20 billion won every year); advertising expenses (about 0.2 billion won every year); press releases and promotion; consumer perception surveys; and the fact that consumers perceive the Defendant's products as imitations of the Plaintiff's products to which a form identical to the Registered Trademark and Service Mark at Issue are applied.
- b) The Mark for Review forms an overall shape, such as decoration, etc. of necklace pendants, earrings, and bracelets, and attracts consumers' attention. However, in the marketplace, the decoration, etc. of necklace pendants, earrings, and bracelets are not perceived only as a simple design but often recognized as an identifier in which a pattern of the relevant pendant or decoration is distinguished from products of others. Such a tendency is often more prominent in expensive jewelry.
- c) Consumers associate the Defendant's necklaces, etc. to which the Mark for Review is applied directly with the Plaintiff's Alhambra Collection or the Registered Trademark and Service Mark at Issue. Also, it seems that the

Defendant knowingly imitated the Plaintiff's Alhambra Collection and produced its own products by imitating the same.

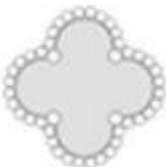

**C. Similarity of the Registered Trademark and Service Mark at Issue and the Mark for Review**

1) Standards for Judgement

The similarity of trademarks shall be determined based on the apprehension of misunderstanding and/or confusion in transactions by comparing their appearance, names, and concepts in objective, comprehensive, and recollective manner. In particular, if the dominant impression of figurative marks is so identical or similar that the ordinary consumers would be misunderstood or confused as to the source of goods, the figurative marks shall be regarded as similar. Also, the similarity of marks shall be determined by looking at whether an ordinary consumer who sees the two marks at different times and places would confuse one mark with the other, rather than comparing them side by side. Where two marks would cause ordinary consumers to misunderstand or confuse the source of goods in light of the impression, recollection, association, etc. imparted by their appearance, title, concept, etc., they shall be regarded as similar (Supreme Court Decision, 2015Hu134, decided Jul. 14, 2016). This legal principle is applied to 3D marks without change. However, 3D marks could be perceived differently depending on a direction of viewing. Thus, where an appearance of a 3D mark perceived from a certain direction is relatively distinctive, if the appearance from the direction is similar to that of a plane mark or other 3D mark, the 3D mark may be regarded as similar.

2) Analysis

In light of the circumstances stated below, the dominant impressions imparted by the appearance of the Registered Trademark and Service Mark at Issue and that of the Mark for Review are identical or similar. Thus, it would be reasonable to deem that if the two marks are used together on identical or similar goods, ordinary consumers and traders would misunderstand or confuse the source of the goods. Thus, the two marks are similar. Therefore, the Defendant's argument, premised otherwise, that the two marks are not similar is without merit.

Registered Trademark and Service Mark at Issue	Plane Shape of the Mark for Review
	

- a) It would be reasonable to deem that a plane shape of the Mark for Review is more distinctive than other parts, in light of the following facts: the plane

shape consists a significant part of the overall shape of the Mark for Review; the plane shape is more conspicuous than other parts; and the plane shape contributes to the formation of the concept of a “simplified four-leaf clover”.

With these premises, in terms of the plane shapes in the Registered Trademark and Service Mark at Issue and the Mark for Review, both marks have the four-leaf clover as their motif and simplify and abstract the same. More specifically, the two marks have the following commonalities: (1) the lower parts of four leaves are not separated but combined; (2) the four leaves are simply expressed in a shape of circle or semi-circle; (3) the four leaves do not have veins; and (4) a number of small beads fill the edges of the figure, and these parts are conspicuous in both marks.

- b) Meanwhile, the two marks have the following differences: (1) a small bead at a vertex at which the leaves meet one another; and (2) nine or ten beads fill an edge of each leaf. However, these differences are so minor that they could not be perceived without close examination. Thus, these differences would almost not be perceived if the two marks are examined in a comprehensive, objective, and recollective manner. In particular, this would be the case even more in light of the fact that the size of the decoration in necklace pendants, earrings, bracelets, etc. to which both marks are applied is only about 1 cm.
- c) The Defendant argues to the effect that the two marks are not similar in terms of appearance in that in the Mark for Review, ten small beads are connected in a form of cylinder at the top and bottom thereof, whereas, in the Registered Trademark and Service Mark at Issue, the small beads are not connected to one another.

However, it is difficult to deem that the two marks are not similar in terms of appearance, as argued by the Defendant, in light of the following: as examined above, a plane shape of the Mark for Review is more distinctive than any other parts; the plane shapes in the Registered Trademark and Service Mark at Issue and the Mark for Review have commonalities as examined in a) above; thus, it seems that ordinary consumers and traders would feel that the two marks are similar in terms of appearance; and the circumstances argued by the Defendant could be known only if a side of the Mark of Review is examined closely and thus would contribute less to the distinctiveness of appearance compared to the plane shape.

- d) As examined in the facts established above, even ordinary consumers of the Defendant’s goods directly associated the Defendant’s goods with the Plaintiff’s Alhambra Collection or the Registered Trademark and Service Mark at Issue. Thus, it would be reasonable to deem that the Registered Trademark and Service Mark at Issue and the Mark for Review are very similar in terms of appearance.

**D. Identity or Similarity of the Designated Goods and the Goods to which designs are applied**



The “pendant” to which the Mark at Issue is applied means the jewelry accessory used in necklaces, bracelets, etc. or the “necklaces hanging down over the chest with jewelry decoration at the center” in itself. Further, the “pendant” falls within the scope of “jewelry”, an “accessory of jewelry”, etc., which are the goods designated for the Registered Trademark and Service Mark at Issue. Thus, the goods to which the Mark for Review is applied and the designated goods of the Registered Trademark and Service Mark at Issue are identical.

**E. Summary of Discussion**

As examined above, the Mark for Review was used not only as a design but also as a trademark in the Defendant’s goods. Further, its mark is similar to the Registered Trademark and Service Mark at Issue. Also, goods to which the mark is applied are identical to the designated goods of the Registered Trademark and Service Mark at Issue. Thus, the Mark for Review falls within the scope of rights of the Registered Trademark and Service Mark at Issue. Therefore, the IPTAB decision is not consistent with the above analysis and shall not be upheld.



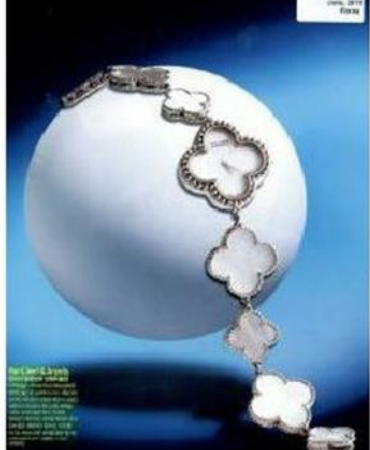
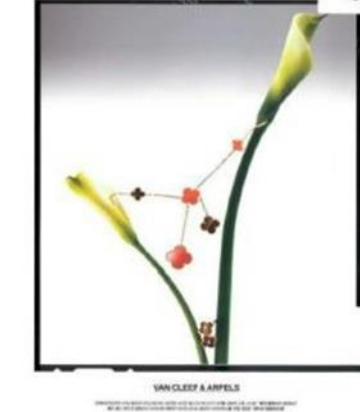


**3. Conclusion**

The Plaintiff’s claim to revoke the IPTAB decision is with merit and is therefore upheld. It is decided as ordered.







Presiding	Judge	Hyeong Geun Lee
	Judge	Donggyu Kim
	Judge	Sungyop Woo

[Attached Form 1]

**Advertisements of the Alhambra product lines posted in domestic fashion magazines by the Plaintiff**

LUX IN SEOUL (2009 )	InStyle Wedding (2010 )	Wedding 21 (2011 )
		
Luna Golf (2012 )	Wedding 21 (2013 )	The Wedding (2014 )
		


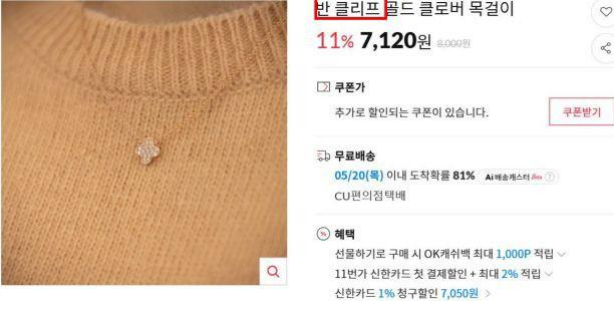


[Margin to insert figures]

Luxury (2015 )	Riche (2016 )	Wedding 21 (2017 )
		
Marie Claire (2018 )	SINGLES (2019 )	MAISON (2019 )
		

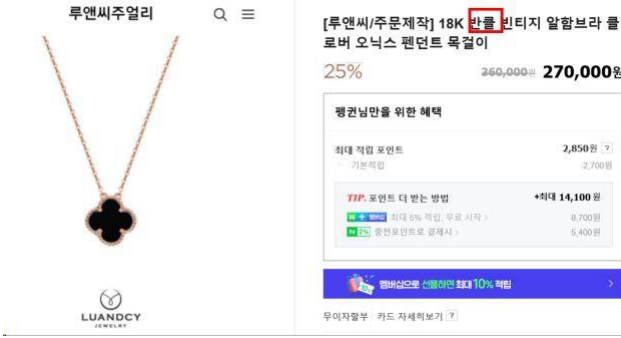

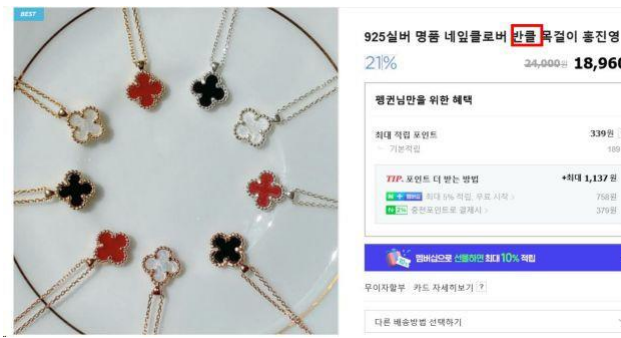

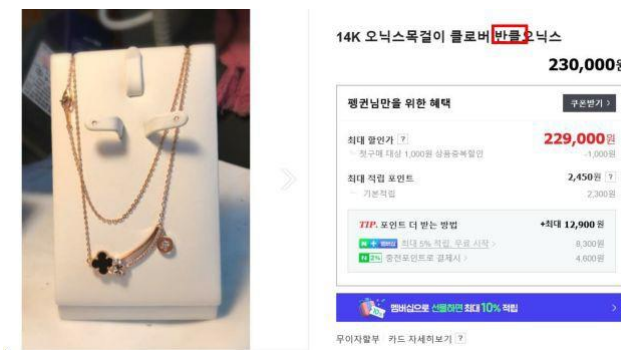
End.






[Attached Form 2]






Sales under the title of “A(necklaces)”, “A CI (necklaces)”, etc.





Evidence No.	Posts on websites
Plaintiff's Exhibit 10-1	 <p>반클리프 클로버 실버925 목걸이 17,900원</p> <p>적립금 895원 (5%) 배송방법 택배 배송비 조건부 무료 (배송지역)</p> <p>적립 : [종이] 종이를 선택해 주세요.</p> <p>1. 최優良인적 지수를 선택하시길 바랍니다 (당첨자 추가됩니다.)</p> <p>참여금액</p> <p>♡ 장바구니 담기</p> <p>구매하기 (Q&amp;A) (8)</p> <p>A</p>
Plaintiff's Exhibit 10-2	 <p>반클리프 골드 클로버 목걸이 11% 7,120원 8,000원</p> <p><input type="checkbox"/> 쿠폰가 추가로 할인되는 쿠폰이 있습니다. <a href="#">쿠폰받기</a></p> <p><input checked="" type="checkbox"/> 무료배송 05/20(목) 이내 도착확률 81% AI 배송게스트인 <a href="#">AI</a> CU원의정택배</p> <p><input checked="" type="radio"/> 혜택 선물하기로 구매 시 OK캐쉬백 최대 1,000P 적립 ✓ 11번가 신한카드 첫 결제할인 + 최대 2% 적립 ✓ 신한카드 1% 청구할인 7,050원 &gt;</p> <p>A</p>
Plaintiff's Exhibit 10-3	 <p>반클리프 할함 마더오브펄 목걸이 (고릴라ver.) 10% 400,000원 360,000원</p> <p>평판님만을 위한 혜택</p> <p>최대 적립 포인트 3,750원 ? 기본적립 3,800원</p> <p>TIP. 포인트 더 받는 방법 *최대 16,800원</p> <p>1. 5% 적립 최대 5% 적립, 무료 시식 &gt; 9,800원 2. 1% 적립 최대 1% 적립, 무료 시식 &gt; 7,200원</p> <p>멤버십으로 선결제하면 최대 10% 적립 &gt;</p> <p>무이자할부 카드 자세히보기 &gt;</p> <p>A CI</p>
Plaintiff's Exhibit 10-4	 <p>14k 반클리프 목걸이, 귀걸이, 팔찌 205,000원</p> <p>평판님만을 위한 혜택</p> <p>최대 적립 포인트 2,300원 ? 기본적립 2,200원</p> <p>TIP. 포인트 더 받는 방법 *최대 12,150원</p> <p>1. 5% 적립 최대 5% 적립, 무료 시식 &gt; 8,800원 2. 1% 적립 최대 1% 적립, 무료 시식 &gt; 4,350원</p> <p>멤버십으로 선결제하면 최대 10% 적립 &gt;</p> <p>무이자할부 카드 자세히보기 &gt;</p> <p>적립혜택 : 무료배송 평판님만을 위한 혜택 &gt;</p> <p>A CI</p>



<p>Plaintiff's Exhibit 10-5</p>	 <p>[루앤씨/주문제작] 18K 반을 빈티지 알함브라 클로버 오픈스 펜던트 목걸이</p> <p>25% 360,000원 → 270,000원</p> <p>평권님만을 위한 혜택</p> <p>최대 적립 포인트 2,850원 기본적립 2,700원</p> <p>TIP. 포인트 더 받는 방법 +최대 14,100원</p> <p>▶ 5% 적립 (최대 5% 적립, 무료 시작) ▶ 5% 적립 (최대 5% 적립, 무료 시작) ▶ 5% 적립 (최대 5% 적립, 무료 시작)</p> <p>멤버십으로 신생아면 최대 10% 적립</p> <p>무이자할부 카드 자세히보기</p> <p>A</p>
<p>Plaintiff's Exhibit 10-6</p>	 <p>14K 18K 반을 화이트자개 목걸이(CLMN4) 명품 목걸이 여자목걸이 여자선물</p> <p>10% 345,000원 → 310,000원</p> <p>평권님만을 위한 혜택</p> <p>최대 할인가 305,000원 최대 적립 포인트 3,250원 기본적립 3,100원</p> <p>TIP. 포인트 더 받는 방법 +최대 15,300원</p> <p>▶ 5% 적립 (최대 5% 적립, 무료 시작) ▶ 5% 적립 (최대 5% 적립, 무료 시작) ▶ 5% 적립 (최대 5% 적립, 무료 시작)</p> <p>멤버십으로 신생아면 최대 10% 적립</p> <p>무이자할부 카드 자세히보기</p> <p>A</p>
<p>Plaintiff's Exhibit 10-7</p>	 <p>925실버 명품 네일클로버 반을 목걸이 흥진영</p> <p>21% 24,000원 → 18,960원</p> <p>평권님만을 위한 혜택</p> <p>최대 적립 포인트 339원 기본적립 189원</p> <p>TIP. 포인트 더 받는 방법 +최대 1,137원</p> <p>▶ 5% 적립 (최대 5% 적립, 무료 시작) ▶ 5% 적립 (최대 5% 적립, 무료 시작) ▶ 5% 적립 (최대 5% 적립, 무료 시작)</p> <p>멤버십으로 신생아면 최대 10% 적립</p> <p>무이자할부 카드 자세히보기</p> <p>다른 배송방법 선택하기</p> <p>A CI</p>
<p>Plaintiff's Exhibit 10-8</p>	 <p>14K 반을 자개 클로버 펜던트 목걸이</p> <p>원산지: 화이트 자개와 블랙 오픈스를 하나의 펜던트에 담았다 (14K 목걸이)</p> <p>판매가 384,000원</p> <p>구매제한: 옵션당 최소 1개</p> <p>구매금액: 1,840원 (배송: 3,840원)</p> <p>배송비: 0원 (조건별배송)</p> <p>배송지: 서울 / 주문시결제(선결제)</p> <p>상품코드: 1000000043</p> <p>상품 무게: 3.6g</p> <p>소재: 14K GOLD (58.5%)</p> <p>A CI</p>
<p>Plaintiff's Exhibit 10-9</p>	 <p>14K 오픈스목걸이 클로버 반을 오픈스</p> <p>230,000원</p> <p>평권님만을 위한 혜택</p> <p>최대 할인가 229,000원 최대 적립 포인트 2,450원 기본적립 2,300원</p> <p>TIP. 포인트 더 받는 방법 +최대 12,900원</p> <p>▶ 5% 적립 (최대 5% 적립, 무료 시작) ▶ 5% 적립 (최대 5% 적립, 무료 시작) ▶ 5% 적립 (최대 5% 적립, 무료 시작)</p> <p>멤버십으로 신생아면 최대 10% 적립</p> <p>무이자할부 카드 자세히보기</p> <p>A CI</p>

<p>Plaintiff's Exhibit 10-10</p>	 <div data-bbox="821 230 1125 551"> <p>로맨폴리 <b>반을</b> 목걸이</p> <p>98,000원</p> <p>평권님만을 위한 혜택</p> <p>최대 적립 포인트 1,130원 (기본적립 560원)</p> <p>TIP. 포인트 더 받는 방법</p> <ul style="list-style-type: none"> <li>최대 5% 적립, 무료 시작</li> <li>충전포인트로 결제시</li> </ul> <p>+최대 5,880원</p> <p>3,920원</p> <p>1,960원</p> <p>멤버십으로 신생아인 최대 10% 적립</p> <p>무이자할부 카드 자세히보기</p> <p>택배배송 2,500원 (주문시 결제)</p> <p>100,000원 이상 구매 시 무료</p> </div> <p>A CI</p>
<p>Plaintiff's Exhibit 10-11</p>	 <div data-bbox="821 607 1125 880"> <p>써지컬스틸 <b>반을</b> 자개 네일클로버 스윗 목걸이 데일리 착용</p> <p>20,500원</p> <p>평권님만을 위한 혜택</p> <p>최대 적립 포인트 730원 (기본적립 205원)</p> <p>TIP. 포인트 더 받는 방법</p> <ul style="list-style-type: none"> <li>최대 5% 적립, 무료 시작</li> <li>충전포인트로 결제시</li> </ul> <p>+최대 1,230원</p> <p>820원</p> <p>410원</p> <p>멤버십으로 신생아인 최대 10% 적립</p> </div> <p>A CI</p>
<p>Plaintiff's Exhibit 10-12</p>	 <div data-bbox="837 934 1125 1263"> <p>티나 &gt;</p> <p>[카탈로그] [티나 <b>반을</b> 목걸이]</p> <p>29,900원</p> <p>5만원 ↑ 구매 시 5% 청구할인 (국민카드)</p> <p>배송정보</p> <p>택배(주문제작상품) (무료배송)</p> <p>알림회원 29p</p> <p>LCLUB회원</p> <p>PREMIUM LCLUB회원 299p</p> <p>HERITAGE LCLUB회원</p> <p>LCLUB가입</p> <p>단일상품</p> <p>- 1 +</p> </div> <p>A CI necklaces</p>
<p>Plaintiff's Exhibit 10-13</p>	 <div data-bbox="821 1328 1125 1644"> <p><b>반을</b> 목걸이 30K 골드 / 실버 목걸이 ( silver 925 )</p> <p>25%</p> <p>54,000원 40,500원</p> <p>평권님만을 위한 혜택</p> <p>최대 적립 포인트 555원 (기본적립 405원)</p> <p>TIP. 포인트 더 받는 방법</p> <ul style="list-style-type: none"> <li>최대 5% 적립, 무료 시작</li> <li>충전포인트로 결제시</li> </ul> <p>+최대 2,430원</p> <p>1,020원</p> <p>910원</p> <p>멤버십으로 신생아인 최대 10% 적립</p> <p>무이자할부 카드 자세히보기</p> <p>택배배송 3,000원 (주문시 결제)</p> </div> <p>A CI necklaces</p>
<p>Plaintiff's Exhibit 10-14</p>	 <div data-bbox="821 1718 1125 2040"> <p>실버 925 <b>반을</b> 클로버 목걸이</p> <p>30%</p> <p>22,440원 15,700원</p> <p>평권님만을 위한 혜택</p> <p>후원받기</p> <p>최대 할인 14,130원</p> <p>최구매 대상 10% 상품유역할인 -1,570원</p> <p>최대 적립 포인트 907원 (기본적립 157원)</p> <p>TIP. 포인트 더 받는 방법</p> <ul style="list-style-type: none"> <li>최대 5% 적립, 무료 시작</li> <li>충전포인트로 결제시</li> </ul> <p>+최대 942원</p> <p>628원</p> <p>314원</p> <p>멤버십으로 신생아인 최대 10% 적립</p> <p>무이자할부 카드 자세히보기</p> </div> <p>A CI</p>

<p>Plaintiff's Exhibit 10-15</p>	 <p>마이비주얼 실버 반클 약면 자개 커널리언 오 닉스 말라카이트 네잎 클로버 목걸이</p> <p>6% 45,000원 42,000원</p> <p>평권님만을 위한 혜택</p> <table border="1"> <tr> <td>최대 할인가</td> <td>41,000원</td> </tr> <tr> <td>최대 적립 포인트</td> <td>880원</td> </tr> </table> <p>TIP. 포인트 더 받는 방법</p> <table border="1"> <tr> <td>최대 5% 적립, 무료 배송</td> <td>1,000원</td> </tr> <tr> <td>충전포인트로 결제시</td> <td>880원</td> </tr> </table> <p>A CI</p>	최대 할인가	41,000원	최대 적립 포인트	880원	최대 5% 적립, 무료 배송	1,000원	충전포인트로 결제시	880원
최대 할인가	41,000원								
최대 적립 포인트	880원								
최대 5% 적립, 무료 배송	1,000원								
충전포인트로 결제시	880원								
<p>Plaintiff's Exhibit 10-16</p>	 <p>반클 클로버 오닉스 목걸이</p> <p>25,200원</p> <p>평권님만을 위한 혜택</p> <table border="1"> <tr> <td>최대 적립 포인트</td> <td>402원</td> </tr> <tr> <td>기본적립</td> <td>262원</td> </tr> </table> <p>TIP. 포인트 더 받는 방법</p> <table border="1"> <tr> <td>최대 5% 적립, 무료 배송</td> <td>1,000원</td> </tr> <tr> <td>충전포인트로 결제시</td> <td>504원</td> </tr> </table> <p>A CI</p>	최대 적립 포인트	402원	기본적립	262원	최대 5% 적립, 무료 배송	1,000원	충전포인트로 결제시	504원
최대 적립 포인트	402원								
기본적립	262원								
최대 5% 적립, 무료 배송	1,000원								
충전포인트로 결제시	504원								
<p>Plaintiff's Exhibit 10-17</p>	 <p>[92.5실버] 더블로 반클st 목걸이 귀걸이 팔찌 세트 주얼리 아이템 명품스타일</p> <p>22,900원</p> <p>평권님만을 위한 혜택</p> <table border="1"> <tr> <td>최대 적립 포인트</td> <td>379원</td> </tr> <tr> <td>기본적립</td> <td>229원</td> </tr> </table> <p>TIP. 포인트 더 받는 방법</p> <table border="1"> <tr> <td>최대 5% 적립, 무료 배송</td> <td>910원</td> </tr> <tr> <td>충전포인트로 결제시</td> <td>468원</td> </tr> </table> <p>A CI-style necklaces</p>	최대 적립 포인트	379원	기본적립	229원	최대 5% 적립, 무료 배송	910원	충전포인트로 결제시	468원
최대 적립 포인트	379원								
기본적립	229원								
최대 5% 적립, 무료 배송	910원								
충전포인트로 결제시	468원								
<p>Plaintiff's Exhibit 10-18</p>	 <p>크로바 반클 레드 톱 목걸이 골드 체인</p> <p>10% 22,000원 19,800원</p> <p>평권님만을 위한 혜택</p> <table border="1"> <tr> <td>최대 적립 포인트</td> <td>548원</td> </tr> <tr> <td>기본적립</td> <td>168원</td> </tr> </table> <p>TIP. 포인트 더 받는 방법</p> <table border="1"> <tr> <td>최대 5% 적립, 무료 배송</td> <td>792원</td> </tr> <tr> <td>충전포인트로 결제시</td> <td>396원</td> </tr> </table> <p>A CI</p>	최대 적립 포인트	548원	기본적립	168원	최대 5% 적립, 무료 배송	792원	충전포인트로 결제시	396원
최대 적립 포인트	548원								
기본적립	168원								
최대 5% 적립, 무료 배송	792원								
충전포인트로 결제시	396원								
<p>Plaintiff's Exhibit 10-19</p>	 <p>반클 아펠 빈티지 목걸이</p> <p>3% 25,600원 24,900원 즉시할인가</p> <p>최대 249원 적립</p> <p>무료배송 (같은 판매자 상품 100,000원 이상 구매 시) 그 외 배송비 2,500원 토요일 5/22 도착 예정</p> <p>판매자: 데이글린트 &lt; 판매자 상품 보기 &gt;</p> <p>택배사: 한진택배</p> <p>색상: 로즈골드</p> <p>캐시적립 혜택 ① 최대 249원 적립</p> <p>A CI</p>								

<p>Plaintiff's Exhibit 10-20</p>	<div data-bbox="499 286 831 622">  </div> <div data-bbox="831 286 1150 651"> <p>[슈가플레이스] 반클로안석목걸이귀걸이</p> <p>10% 66,000 = <b>59,400원</b></p> <p>평권님만을 위한 혜택</p> <table border="1"> <tr> <td>최대 적립 포인트</td> <td>744원 [?] 기본적립 594원</td> </tr> <tr> <td colspan="2"> <b>TTP. 포인트 더 받는 방법</b> </td> </tr> <tr> <td>최대 4% 적립, 무료 시착</td> <td>+최대 3,564원</td> </tr> <tr> <td>충전포인트로 결제시</td> <td>2,376원</td> </tr> <tr> <td></td> <td>1,188원</td> </tr> </table> <p>평화님으로 신청하면 최대 10% 적립</p> <p>무이자월부 카드 자세히보기</p> <p>주문확인 후 제작 상품 이 상품은 주문확인 후 제작을 시작하는 상품으로 결제완료 후 2일 이내 발송예정 (공정일 기준)</p> </div>	최대 적립 포인트	744원 [?] 기본적립 594원	<b>TTP. 포인트 더 받는 방법</b>		최대 4% 적립, 무료 시착	+최대 3,564원	충전포인트로 결제시	2,376원		1,188원				
최대 적립 포인트	744원 [?] 기본적립 594원														
<b>TTP. 포인트 더 받는 방법</b>															
최대 4% 적립, 무료 시착	+최대 3,564원														
충전포인트로 결제시	2,376원														
	1,188원														
<p>Plaintiff's Exhibit 10-21</p>	<div data-bbox="499 698 820 1030">  </div> <div data-bbox="820 698 1139 1037"> <p>[레이지버드] 반클로로버 목걸이</p> <p>42% 13,000 = <b>6,900원</b></p> <p>평권님만을 위한 혜택</p> <table border="1"> <tr> <td>최대 적립 포인트</td> <td>219원 [?] 기본적립 89원</td> </tr> <tr> <td colspan="2"> <b>TTP. 포인트 더 받는 방법</b> </td> </tr> <tr> <td>최대 5% 적립, 무료 시착</td> <td>+최대 414원</td> </tr> <tr> <td>충전포인트로 결제시</td> <td>276원</td> </tr> <tr> <td></td> <td>138원</td> </tr> </table> <p>평화님으로 신청하면 최대 10% 적립</p> <p>무이자월부 카드 자세히보기</p> <p>적대매출 3,000원 (주문시 결제) 30,000원 이상 구매 시 무료 / 3000</p> </div>	최대 적립 포인트	219원 [?] 기본적립 89원	<b>TTP. 포인트 더 받는 방법</b>		최대 5% 적립, 무료 시착	+최대 414원	충전포인트로 결제시	276원		138원				
최대 적립 포인트	219원 [?] 기본적립 89원														
<b>TTP. 포인트 더 받는 방법</b>															
최대 5% 적립, 무료 시착	+최대 414원														
충전포인트로 결제시	276원														
	138원														
<p>Plaintiff's Exhibit 10-22</p>	<div data-bbox="499 1086 820 1400">  </div> <div data-bbox="820 1086 1150 1400"> <p>트레이드메이</p> <p>18k도금 양면 반클로로버 펜던트 드롭 채굴 목걸이</p> <p>90,500원</p> <p>1% <b>89,590원</b></p> <p>예약배송 상품으로 배송기간 2주 소요</p> <p>예약 - 무료배송</p> <p>스마일클럽 최대 2.3% 캐시 적립</p> <p>인증정보</p> <p>할인가는 주문 : 10,000원 주문하기</p> </div>														
<p>Plaintiff's Exhibit 10-23</p>	<div data-bbox="499 1451 772 1796">  </div> <div data-bbox="820 1451 1150 1796"> <p>반클로로버 목걸이 무니젤 연예인 명품스타일 크로버 알러지방지(3color)</p> <p><b>31,900원</b></p> <p>평권님만을 위한 혜택</p> <table border="1"> <tr> <td>최대 할인기</td> <td>30,900원</td> </tr> <tr> <td colspan="2">         스토어점 고객 1,000원 할바구니할인 -1,000원       </td> </tr> <tr> <td>최대 적립 포인트</td> <td>1,107원 [?] 기본적립 319원</td> </tr> <tr> <td colspan="2"> <b>TTP. 포인트 더 받는 방법</b> </td> </tr> <tr> <td>최대 5% 적립, 무료 시착</td> <td>+최대 1,914원</td> </tr> <tr> <td>충전포인트로 결제시</td> <td>1,276원</td> </tr> <tr> <td></td> <td>638원</td> </tr> </table> <p>평화님으로 신청하면 최대 10% 적립</p> </div>	최대 할인기	30,900원	스토어점 고객 1,000원 할바구니할인 -1,000원		최대 적립 포인트	1,107원 [?] 기본적립 319원	<b>TTP. 포인트 더 받는 방법</b>		최대 5% 적립, 무료 시착	+최대 1,914원	충전포인트로 결제시	1,276원		638원
최대 할인기	30,900원														
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최대 5% 적립, 무료 시착	+최대 1,914원														
충전포인트로 결제시	1,276원														
	638원														



Plaintiff's Exhibit 10-24



[주얼링크 무배] 14K 18K **반물** 클로버 목걸이 큐빅 블랙큐빅 포인트 네임클로버

**378,000원**

평권님만을 위한 혜택 [쿠폰받기 >](#)

최대 할인가 < > **340,200원**  
정구매 대상 10% 상품충족할인 -37,800원

최대 적립 포인트 < > **6,930원**  
기본적립 3,780원

**TIP. 포인트 더 받는 방법** **+최대 17,340원**

최대 5% 적립, 무료 시착 > 9,780원

증정포인트로 결제시 > 7,560원

멤버십으로 **신용카드 최대 10% 적립** >

A Cl

End.