Case 1:16-cv-04115 Document 1-4 Filed 07/25/16 Page 1 of 3 PageID #: 39

1

۲

•

EXHIBIT B

Case 1:16-cv-04115 Document 1-4 Filed 07/25/16 Page 2 of 3 PageID #: 40

Pollack, Brian R.

From:	Jennifer Morse <jenni.morse@simplipresscoffee.com></jenni.morse@simplipresscoffee.com>
Sent:	Friday, October 30, 2015 5:57 PM
To:	Bruce Constantine
Cc:	Pollack, Brian R.
Subject:	RE: ESPRO Intellectual property

Hi Bruce!

Good to hear from you, of course wish it was not under a possible infringement deal. :) Nonetheless, pleasure to meet you.

Would you be able with the actual registered patent applications that you believe we might be infringing so our legal team can review?

I do hope to meet you one day as well. Love not only innovation in coffee and products that add to people's lives! Great job to you and your team.

Cheers,

Jenni Morse | simpli presser & innovator French press experience, beautifully redesigned 424.237.8818 | jenni.morse@simplipresscoffee.com

-----Original Message----From: Bruce Constantine **REDALTED** Sent: Friday, October 30, 2015 10:34 AM To: Jennifer Morse <<u>ienni.morse@simplipresscoffee.com</u>> Cc: Brian R. Pollack <<u>bpollack@daypitney.com</u>> Subject: ESPRO Intellectual property

Jenni Morse, Simpli Press jenni.morse@simplipresscoffee.com www.simpli-press.com Hermosa Beach, CA USA 90254 424-237-8818

By email.

Hi Jenni -

I don't think we have met, but hope we can at some point in the future!

Your upcoming project came to our attention last month, and having reviewed in detail now what the product and designs do, and having reviewed the the documents, videos and show presentations, we believe there are several

Case 1:16-cv-04115 Document 1-4 Filed 07/25/16 Page 3 of 3 PageID #: 41

substantial similarities to patents that have already been issued or filed by ESPRO globally. We take global intellectual property very seriously, and as you might imagine we have invested substantially in protecting it over the last 10 years of our business.

I wanted to reach out and suggest that you consult with your attorneys to ensure you are not violating our rights prior to proceeding with your published designs. I would hate a collision later!

Best regards,

Bruce

Bruce Constantine CEO, Espro Inc. 169-3381 Cambie St Vancouver, BC V5Z 4R3 Canada



@espro www.espro.ca