

Exhibit G

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6 Attorneys for Plaintiff and Counterdefendant
GOOGLE INC.
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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11

12 GOOGLE INC., a Delaware corporation,
13 Plaintiff,
14 v.

Case No. C 03-5340-JF (EAI)

**GOOGLE INC.'S SECOND SET OF
INTERROGATORIES TO AMERICAN
BLIND & WALLPAPER FACTORY, INC.**

15 AMERICAN BLIND & WALLPAPER
FACTORY, INC., a Delaware corporation
16 d/b/a decoratetoday.com, Inc.; and DOES 1-
100, inclusive,
17 Defendants.

18 AMERICAN BLIND & WALLPAPER
FACTORY, INC., a Delaware corporation
19 d/b/a decoratetoday.com, Inc.

20 Counterclaimant,
21 v.

22 GOOGLE, INC.,
23 Counterdefendants.
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1 PROPOUNDING PARTY: Plaintiff GOOGLE INC.
 2 RESPONDING PARTY: Defendant AMERICAN BLIND & WALLPAPER
 3 FACTORY, INC.
 4 SET NO.: Two

5 Pursuant to Federal Rule of Civil Procedure 33, Plaintiff Google Inc. ("Google") requests
 6 that Defendant American Blind & Wallpaper Factory, Inc. ("American Blind") respond to the
 7 following interrogatories separately, fully and under oath within 30 days of their service.

8 **DEFINITIONS**

9 1. "AMERICAN BLIND" means American Blind, its subsidiaries, divisions,
 10 predecessor and successor companies, affiliates, parents, any joint venture to which it may be a
 11 party, and/or each of its employees, agents, officers, directors, representatives, consultants,
 12 accountants and attorneys, including any person who served in any such capacity at any time.

13 2. The term "STATE" means to state with particularity all facts known that bear
 14 upon or are related to the matter that is the subject of the inquiry, using the simplest and most
 15 factual statements of which you are capable.

16 3. The words "and" and "or" shall be construed in the conjunctive or disjunctive,
 17 whichever makes the request more inclusive.

18 4. "Any" shall mean one or more; "each" shall mean "each and every."

19 **INSTRUCTIONS**

20 1. If American Blind elects to answer any interrogatory pursuant to Federal Rule of
 21 Civil Procedure 33(d), Google requests that American Blind identify the particular documents
 22 relating to the subject matter of the specific interrogatory, and separately for each document, the
 23 date the document bears, the title of the document, if any, the identity of the authors of the
 24 document, the identity of each addressee or recipient of the document, the type and subject
 25 matter of the document and the present location or custodian of the document.

26 2. If American Blind cannot answer an interrogatory in full, American Blind is
 27 hereby directed to answer it to the fullest extent possible, specify the reasons for its inability to
 28

1 answer the remainder, and state whatever information or knowledge American Blind has
2 concerning the unanswered portion.

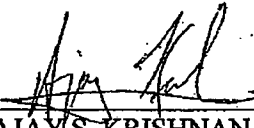
3 **INTERROGATORIES**

4 **INTERROGATORY NO. 1:**

5 For each name that AMERICAN BLIND has used, in communications with customers
6 and/or potential customers, to refer to its retail business, STATE the name that was used, the
7 dates that AMERICAN BLIND began and ceased using the name, and the reasons for adopting
8 and ceasing to use each name.

9 Dated: May 10, 2006

KEKER & VAN NEST, LLP

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11 By: 
12 _____
13 AJAY S. KRISHNAN
14 Attorneys for Plaintiff and Counterdefendant
15 GOOGLE INC.
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PROOF OF SERVICE

I am employed in the City and County of San Francisco, State of California in the office of a member of the bar of this court at whose direction the following service was made. I am over the age of eighteen years and not a party to the within action. My business address is Keker & Van Nest, LLP, 710 Sansome Street, San Francisco, California 94111. On March 20, 2006, I served the following document:

GOOGLE INC.'S SECOND SET OF INTERROGATORIES TO AMERICAN BLIND & WALLPAPER FACTORY, INC.


by **ATTORNEY SERVICE**, by placing a true and correct copy in a sealed envelope addressed as shown below, and dispatching a registered agent of process with instructions to hand carry the above and make delivery to the following during normal business hours, by leaving the package with the person whose name is shown or the person authorized to accept courier deliveries on behalf of the addressee.

Robert N. Phillips, Esq.
Howrey Simon Arnold & White, LLP
525 Market Street, Suite 3600
San Francisco, CA 94105-2708

by **PDF TRANSMISSION AND UNITED STATES MAIL**, by transmitting via PDF on this date. A true and correct copy of same was placed in a sealed envelope addressed as shown below. I am readily familiar with the practice of Keker & Van Nest, LLP for collection and processing of correspondence for mailing. According to that practice, items are deposited with the United States Postal Service at San Francisco, California on that same day with postage thereon fully prepaid. I am aware that, on motion of the party served, service is presumed invalid if the postal cancellation date or the postage meter date is more than one day after the date of deposit for mailing stated in this affidavit.

Caroline C. Plater, Esq.
David A. Rammelt, Esq.
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drammelt@kellydrye.com

Executed on May 10, 2006, at San Francisco, California. I declare under penalty of perjury under the laws of the State of California that the above is true and correct.



Shelby L. Brock