

# Exhibit H

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10 Attorneys for Defendant/Counter-Plaintiff  
AMERICAN BLIND AND WALLPAPER  
FACTORY, INC.

11  
12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA

14  
15 GOOGLE INC., a Delaware corporation,  
16 Plaintiff,

17 v.

18 AMERICAN BLIND AND WALLPAPER  
FACTORY, INC., a Delaware corporation  
19 d/b/a decoratetoday.com, Inc.; and DOES  
20 1-100, inclusive,

21 Defendants.

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

24 Counterclaimant,

25 v.

26 GOOGLE INC.,  
Counterdefendants.

CASE NO. C 03-5340-JF (EAI)

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

1 NOW COMES Defendant/Counter-Plaintiff, AMERICAN BLIND &  
2 WALLPAPER FACTORY, INC., by and through its attorneys, KELLEY DRYE & WARREN  
3 LLP, and in response to Plaintiff's Interrogatories, states as follows:

4 **INTERROGATORY NO. 1:**

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

9 **ANSWER:** American Blind objects to this interrogatory because it is over  
10 broad, unduly burdensome and not reasonably calculated to lead to the discovery of relevant or  
11 admissible evidence. American Blind also objects to this request to the extent that it calls for the  
12 production of documents protected by the attorney client privilege or the attorney work product  
13 doctrine. Subject to and without waiving these objections, American Blind states that the name  
14 changes that American Blind has undergone reflect the changes in the products being sold by  
15 American Blind at any given time and changes in the marketplace in general. By way of  
16 example, as the company expanded from selling window treatments to selling wall coverings and  
17 window treatments, the name was changed from "American Blind" to "American Blind and  
18 Wallpaper Factory." When the company decided to expand its product offerings to include light  
19 fixtures, pictures and throw rugs, the company changed its name to "American Blind &  
20 Wallpaper & More." During the late 1990's, the company changed its corporate name to  
21 "decoratetoday.com" to include additional products and services then being offered by the  
22 Company and to evidence its strong internet presence. It was subsequently determined that  
23 customers identified with the "American Blind" names too strongly to fully cross over to the  
24 "decoratetoday.com" brand name as the sole brand name. As a result, the name was changed  
25 back to "American Blind, Wallpaper & More" to incorporate the "American Blind" names while  
26 signifying that the company sold more than window treatments and wall coverings. American  
27 Blind refers to documents Bates range ABWF 003054-003772 for a complete list of all the names  
28

1 under which American Blind has done business, including corporate minutes regarding name  
2 changes, corporate name change information and assumed name filings.

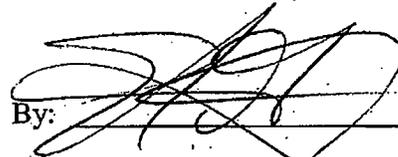
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4 Dated: June 19, 2006

KELLEY DRYE & WARREN LLP

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By: 

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Plaintiff AMERICAN BLIND  
AND WALLPAPER FACTORY,  
INC.

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**PROOF OF SERVICE**

I am a citizen of the United States and a resident of the State of Illinois. I am employed in Cook County, State of Illinois, in the office of a member of the bar of this Court, at whose direction the service was made. I am over the age of eighteen years, and not a party to the within action, My business address is 333 W. Wacker Drive, Suite 2600, Chicago, IL 60606. On the date set forth below, I served the document(s) described below in the manner described below:

**AMERICAN BLIND AND WALLPAPER FACTORY, INC.'S ANSWER TO PLAINTIFF  
GOOGLE INC.'S SECOND SET OF INTERROGATORIES  
VIA FACSIMILE and U.S. MAIL**

Michael H. Page  
Mark A. Lemley  
Klaus H. Hamm  
Ajay S. Krishnan  
Keker & Van Nest, LLP  
710 Sansome Street  
San Francisco, CA 94111

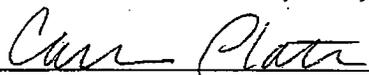
XX (BY FACSIMILE) I am personally and readily familiar with the business practice of Kelley Drye & Warren, LLP for collection and processing of document(s) to be transmitted by facsimile and I caused such document(s) on this date to be transmitted by facsimile to the offices of addressee(s) at the numbers listed below.

(BY FEDERAL EXPRESS) I am personally and readily familiar with the business practice of Kelley Drye & Warren, LLP for collection and processing of correspondence for overnight delivery, and I caused such document(s) described herein to be deposited for delivery to a facility regularly maintained by Federal Express for overnight delivery.

(BY MESSENGER SERVICE) by consigning the document(s) to an authorized courier and/or process server for hand delivery on this date.

XX (BY U.S. MAIL) I am personally and readily familiar with the business practice of Kelley Drye & Warren, LLP for collection and processing of correspondence for mailing with the United States Postal Service, and I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States Postal Service at Chicago, Illinois.

Executed on June 19, 2006, at Chicago, Illinois.

  
\_\_\_\_\_  
Caroline C. Plater