

EXHIBIT E

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

THE WEATHER UNDERGROUND, INC.,
a Michigan corporation,

Plaintiff,

vs.

Case No. 2:09-CV-10756
Hon. Marianne O. Battani

NAVIGATION CATALYST SYSTEMS, INC.,
a Delaware corporation; BASIC FUSION, INC.,
a Delaware corporation; CONNEXUS CORP.,
a Delaware corporation; and FIRSTLOOK, INC.,
a Delaware corporation,

Defendants.

Enrico Schaefer (P43506)
Brian A. Hall (P70865)
TRAVERSE LEGAL, PLC
810 Cottageview Drive, Unit G-20
Traverse City, MI 49686
231-932-0411
enrico.schaefer@traverselegal.com
brianhall@traverselegal.com
Lead Attorneys for Plaintiff

Anthony P. Patti (P43729)
HOOPER HATHAWAY, PC
126 South Main Street
Ann Arbor, MI 48104
734-662-4426
apatti@hooperhathaway.com
Attorneys for Plaintiff

William A. Delgado
WILLENKEN WILSON LOH & LIEB LLP
707 Wilshire Boulevard, Suite 3850
Los Angeles, CA 90017
(213) 955-9240
williamdelgado@willenken.com
Lead Counsel for Defendants

Nicholas J. Stasevich (P41896)
Benjamin K. Steffans (P69712)
BUTZEL LONG, P.C.
150 West Jefferson, Suite 100
Detroit, MI 48226
(313) 225-7000
stasevich@butzel.com
steffans@butzel.com
Local Counsel for Defendants

**NAVIGATION CATALYST SYSTEMS, INC.'S SUPPLEMENTAL RESPONSES TO
FIRST SET OF REQUESTS FOR PRODUCTION**

to domain name registration and/or monetization for the Relevant Time Period in its possession, custody, and/or control and is producing the documents concurrently herewith.

14. Produce all organizational charts or other Documents identifying employee, officer and/or director positions at Defendant's company from inception through present.

SUPPLEMENTAL RESPONSE:

NCS has conducted a reasonable and diligent search for all non-privileged documents in its possession, custody, and/or control that are responsive to this request and is concurrently producing such documents herewith.

15. Produce corporate records of Defendant, including bylaws, articles, membership agreements, certificates of incorporation, stock certificates, license resolutions, minutes and all Documents which evidence that Defendant has obeyed the corporate formalities in the operation of their business from inception to present.

SUPPLEMENTAL RESPONSE:

NCS has conducted a reasonable and diligent search for all non-privileged documents in its possession, custody, and/or control that are responsive to this request and is concurrently producing such documents herewith.

16. Produce all Documents related to the business relationship between NCS and Basic Fusion. Inc., NCS and Connexus Corp., and NCS and Firstlook, Inc., including but not limited to:

- a. Documents showing money paid to or between each company for each year from inception to the present;
- b. Contracts and other agreements between the Companies;
- c. Invoices by and between the Companies;
- d. Any and all correspondence, faxes, or written documents relating to business between the companies.

SUPPLEMENTAL RESPONSE:

Pursuant to the Order, NCS was to produce documents which showed all monies paid to and between each company from 2004 to 2009. NCS confirms that no such documents exist.

Pursuant to the Order, NCS was to produce contracts and agreements between the companies. NCS confirms that the already-produced Basic Fusion Registration Agreement (NCS000221-227) and the Firstlook Domain Parking Agreement (NCS000228-236) are the only responsive documents.

Pursuant to the Order, NCS was to create an e-mail database of all e-mails by and between NCS and each company for a search to be crafted by counsel. There is no employee of Connexus Corporation, Firstlook, Basic Fusion, or Navigation Catalyst Systems having an e-mail from an e-mail address originating from Navigation Catalyst Systems (i.e., ending in @navigationcatalyst.com) and, as such, no e-mails between Navigation Catalyst Systems and any of the other companies.

17. Produce all notes, emails, agendas, minutes or other Documents referring or relating to meetings, whether electronic, telephonic or in person, between Defendant and Basic Fusion, Inc.

SUPPLEMENTAL RESPONSE:

NCS has conducted a reasonable and diligent search and confirms it has not located any responsive, non-privileged documents in its possession, custody, and/or control.

18. Produce all notes, emails, agendas, minutes or other Documents referring or relating to meetings, whether electronic, telephonic or in person, between Defendant and Connexus Corp.

SUPPLEMENTAL RESPONSE:

NCS has conducted a reasonable and diligent search and confirms it has not located any responsive, non-privileged documents in its possession, custody, and/or control.

19. Produce all notes, emails, agendas, minutes or other Documents referring or relating to meetings, whether electronic, telephonic or in person, between Defendant and Firstlook, Inc.

SUPPLEMENTAL RESPONSE:

NCS has conducted a reasonable and diligent search and confirms it has not located any responsive, non-privileged documents in its possession, custody, and/or control.

21. Produce any and all Software code identified by you in Plaintiffs First Interrogatories, Interrogatory Numbers 3-5.

SUPPLEMENTAL RESPONSE:

The internally developed software utilized by Navigation Catalyst Systems to register domain names was previously produced. The internally developed software utilized by Firstlook and referenced in response to Plaintiff's Interrogatories is being produced concurrently herewith.