

EXHIBIT N

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.

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**EPIC MEDIA GROUP, INC.'S OBJECTIONS AND RESPONSES TO SECOND SET OF
INTERROGATORIES**

Pursuant to Federal Rule of Civil Procedure 33, Defendant Epic Media Group, Inc. (“Epic Media”) hereby objects and responds to Plaintiff The Weather Underground, Inc.’s (“Weather Underground”) Second Set of Interrogatories (“Interrogatories”) as follows:

General Objections

The following general objections to Plaintiff’s Interrogatories are incorporated by reference into each and every response to each individual Interrogatory as though fully set forth therein:

1. Epic Media objects to the Interrogatory to the extent it seeks to impose obligations on it greater than or more extensive than those required by the Federal Rules of Civil Procedure.
2. Epic Media objects to the definitions set forth in the Instructions and Definitions as overly broad, unduly burdensome, and intrusive of the attorney-client privilege and attorney work product doctrine.
3. Epic Media objects to the Interrogatory to the extent it calls for the provision of information subject to the attorney-client privilege, the attorney work-product doctrine, or any other applicable privileges. Epic Media will not provide such privileged information. The inadvertent provision of privileged information by Epic Media shall not constitute a waiver of any applicable privilege nor shall the provision of any information be construed as a waiver of any objection to the admissibility of such information.
4. Epic Media objects to the Interrogatory to the extent it is vague and ambiguous.
5. Epic Media objects to the Interrogatory to the extent it is overly broad, unduly burdensome and oppressive.

6. Epic Media objects to the Interrogatory to the extent it seeks information which is not relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

7. Epic Media objects to the Interrogatory to the extent it seeks information equally or more available to, or already in the possession, custody or control of Plaintiff.

8. Epic Media objects to the Interrogatory on the ground and to the extent it seeks trade secret, proprietary or otherwise confidential information.

9. Epic Media objects to the Interrogatories to the extent individual interrogatories are duplicative of each other.

10. Epic Media objects to the Interrogatory to the extent it seeks information not in its possession, custody or control.

11. Epic Media objects to the Interrogatory on the ground that discovery is continuing in this action, and Epic Media has not completed its factual investigation. These responses are made in good faith and after diligent inquiry into the facts and information now known to Epic Media. However, information that may be responsive to the Interrogatory may not yet have been discovered. Accordingly, without asserting an obligation to do so, and without waiving the objections asserted herein, Epic Media reserves the right to amend and/or supplement its responses as and when additional information and/or documents are discovered. Additionally, because Epic Media's responses are based upon information which they have identified to date, they do not preclude Epic Media from relying on facts or documents discovered or generated pursuant to subsequent investigation and discovery.

12. In providing responses and objections to the Interrogatories, Epic Media expressly reserves all of its objections to the use of the responses herein, including but not limited to objections as to the competency, relevance, materiality, and admissibility thereof.

Specific Objections and Responses

INTERROGATORY NO. 6: Please identify all activities performed by Connexus including but not limited to all subsidiaries of Connexus (by way of example only Firstlook), and subsidiaries of those subsidiaries (by way of example only, Basic Fusion and Navigation Catalyst Systems) in the 18 months prior to May 4, 2010, which are now performed by Epic or any company related to Epic (other than Connexus) after May 4, 2010.

ANSWER:

In addition to the foregoing general objections which are expressly incorporated herein, Epic Media objects to the interrogatory on the basis and to the extent that: (i) it is overly broad, (ii) it is vague and ambiguous, and (iii) it seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Epic Media responds as follows: Since the acquisition of Connexus Corporation, the financial and legal departments of Connexus Corporation have been consolidated with those of Epic Advertising such that a single finance team and a single legal team now oversee the finances and legal issues, respectively, of The Epic Media Group and all of its subsidiaries, including Connexus Corporation.

However, the business activities performed by Connexus and its subsidiaries continue to be performed by Connexus and its subsidiaries. That is to say, Firstlook continues to operate as Firstlook and continues performing the same business functions it performed prior to May 4, 2010, and Traffic Marketplace continues to operate as Traffic Marketplace, performing the same business functions it performed prior to May 4, 2010.

INTERROGATORY NO. 7: Please identify all assets owned or controlled by Connexus, including but not limited to all subsidiaries of Connexus (by way of example only Firstlook), and subsidiaries of those subsidiaries (by way of example only, Basic Fusion and Navigation Catalyst Systems) in the 18 months prior to May 4, 2010, which are now owned or controlled by Epic or any company related to Epic (other than Connexus).

ANSWER:

In addition to the foregoing general objections which are expressly incorporated herein, Epic Media objects to the interrogatory on the basis and to the extent that: (i) it is overly broad, (ii) it is vague and ambiguous, and (iii) it seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Epic Media responds as follows: The assets owned or controlled by Connexus and its subsidiaries prior to the acquisition continue to be owned or controlled by Connexus and its subsidiaries. Intercompany cash transfers (e.g., transfers between Connexus and Epic Media) are recorded as intercompany receivables and payables. *See, e.g.,* EPIC005952.

INTERROGATORY NO. 8: To the extent assets in the preceding interrogatory answer are identified as stock or shares or equity in another company (“Equity Company”) (for instance First Look) in the preceding interrogatory, identify all assets owned or controlled by each Equity Company and all of that Equity Company’s subsidiaries in the 18 months prior to May 4, 2010 and which are now owned or controlled by Epic or any company related to Epic.

ANSWER:

In addition to the foregoing general objections which are expressly incorporated herein, Epic Media objects to the interrogatory on the basis and to the extent that: (i) it is overly broad, (ii) it is vague and ambiguous, and (iii) it seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Epic Media responds as follows: This interrogatory is not applicable.

INTERROGATORY NO. 9: Please identify all domain names which were once listed with Navigation Catalyst as registrant, that now list another registrant which is or at any time has been in any way owned by or related to Epic or Connexus.

ANSWER:

In addition to the foregoing general objections which are expressly incorporated herein, Epic Media objects to the interrogatory on the basis and to the extent that: (i) it is overly broad, unduly burdensome, and harassing, (ii) it is vague and ambiguous, and (iii) it seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Epic Media responds as follows: Domain names owned by Navigation Catalyst Systems continue to be owned by Navigation Catalyst Systems.

INTERROGATORY NO. 10: Please state in detail the ownership of all assets, both tangible and intangible, related to Traffic Marketplace before and after the May 4, 2010, merger/combination of Epic and Connexus companies.

ANSWER:

In addition to the foregoing general objections which are expressly incorporated herein, Epic Media objects to the interrogatory on the basis and to the extent that: (i) it is overly broad, unduly burdensome, and harassing, (ii) it is vague and ambiguous, and (iii) it seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Epic Media responds as follows: As a general matter, prior to May 4, 2010, Traffic Marketplace owned fixtures, furniture, computer equipment, and intangible property. Since May 4, 2010, it continues to own fixtures, furniture, computer equipment, and intangible property. The listing of every asset of Traffic Marketplace, an entity that is not a party to this matter, would be extremely burdensome and would require summarizing various documents listing such assets. As a result, and pursuant to Fed. R. Civ. 33(d), Plaintiff is directed to EPIC005958, EPIC005959, EPIC005961, EPIC005962.

INTERROGATORY NO. 11: Please identify all companies in which Epic has an ownership interest, or which have an ownership stake in Epic. To the extent subsidiary companies are identified, identify all subsidiaries to those subsidiaries.

ANSWER:

In addition to the foregoing general objections which are expressly incorporated herein, Epic Media objects to the interrogatory on the basis and to the extent that: (i) it is overly broad, unduly burdensome, and harassing, (ii) it is vague and ambiguous, and (iii) it seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Epic Media responds as follows: Epic Media has a small ownership stake in a company called Longtail Solutions. Epic Media also has various direct and indirect subsidiaries which are listed in EPIC005963-64. At the 30(b)(6) deposition of Epic Media, David Graff also identified various subsidiaries of Firstlook, and his testimony is incorporated herein. Companies with an ownership stake in Epic Media include: TA Associates, Stripes Group, Idealab, Oak, Insight Venture Partners. Pursuant to Fed. R. Civ. P. 33(d), Plaintiff is also directed to the Cap Tables previously provided. EPIC000001-3.

INTERROGATORY NO. 12: Please indicate how much cash Connexus, including but not limited to all subsidiaries of Connexus (by way of example only Firstlook), and subsidiaries of those subsidiaries (by way of example only, Basic Fusion and Navigation Catalyst Systems) had in their bank accounts in each of the 18 months prior to May 4, 2010, and on the first of each month thereafter to today's date.

ANSWER:

In addition to the foregoing general objections which are expressly incorporated herein, Epic Media objects to the interrogatory on the basis and to the extent that: (i) it is overly broad, unduly burdensome, and harassing, (ii) it is vague and ambiguous, and (iii) it seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Epic Media responds as follows: Pursuant to Fed. R. Civ. P. 33(d), Plaintiff is directed to EPIC006152.

INTERROGATORY NO. 13: Please identify all contracts to which Connexus, including but not limited to all subsidiaries of Connexus (by way of example only Firstlook), and subsidiaries of those subsidiaries (by way of example only, Basic Fusion and Navigation Catalyst Systems) was a party in the 18 months prior to May 4, 2010. To the extent any contract rights have been transferred to Epic, please indicate the circumstances and dates on which that occurred.

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ANSWER:

In addition to the foregoing general objections which are expressly incorporated herein, Epic Media objects to the interrogatory on the basis and to the extent that: (i) it is overly broad, unduly burdensome, and harassing, (ii) it is vague and ambiguous, and (iii) it seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, Epic Media responds as follows: No contracts between Connexus or its subsidiaries and third parties have been transferred to Epic Media.

June 30, 2011



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CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of June 2011, I served Defendant Epic Media Group, Inc.'s Objections and Responses to Second Set of Interrogatories via U.S. Mail, first class, postage pre-paid to the following:

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