

EXHIBIT O

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 FIRST SET OF
REQUESTS FOR PRODUCTION**

Pursuant to Federal Rule of Civil Procedure 34, defendant Epic Media Group, Inc. (“Epic Media”) hereby objects and responds to Plaintiff The Weather Underground, Inc.’s (“WU”) First Set of Requests for Production (“Requests”) as follows:

General Objections

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

1. Epic Media objects to the Request 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.

3. Epic Media objects to the Requests to the extent it calls for the production of documents subject to the attorney-client privilege, the attorney work-product doctrine, or any other applicable privileges. Epic Media will not produce such privileged information. The inadvertent production of privileged documents 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 Request to the extent it is vague and ambiguous.

5. Epic Media objects to the Request to the extent it is overly broad, unduly burdensome and oppressive.

6. Epic Media objects to the Requests to the extent it seeks documents which are 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 Request to the extent it seeks documents equally or more available to, or already in the possession, custody or control of WU.

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

9. Epic Media objects to the Request to the extent individual requests are duplicative of each other.

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

11. Epic Media objects to the Request to the extent it fails to describe specifically each document or reasonably particularize each category of documents requested.

12. Epic Media objects to the Request 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, documents that may be responsive to the Request 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.

13. Epic Media's objections to the production of any document or category of documents described in the Request, or agreement to produce any such documents, is not and shall not be construed as an admission by Epic Media that any such documents or category of documents exist. Where Epic Media indicates that it will produce responsive documents, such documents will be produced if and to the extent any such documents are in its possession, custody or control.

14. In providing responses and objections to WU's Request, Epic Media expressly reserves all of their objections to the use of the responses herein, including but not limited to objections as to the competency, relevance, materiality, and admissibility thereof.

Specific Requests for Production

REQUEST FOR PRODUCTION NO. 1: Please provide a copy of the Merger Agreement as referenced in the May 4, 2010, Azoogole, Inc., Amended and Restated Certificate of Incorporation (attached to this request for reference), together with all prior drafts and subsequent amendments to the Merger Agreement, and any document which modifies or replaces the Merger Agreement, together with all prior drafts and subsequent amendments of such documents.

RESPONSE:

In addition to the foregoing general objections, Epic Media objects on the ground and to the extent that the request calls for documents which are subject to the attorney-client privilege and/or attorney work product doctrine.

Subject to and without waiving the foregoing general objections, Epic Media responds as follows: Epic Media will produce the Merger Agreement. Epic Media will not produce the requested drafts as those drafts, which were prepared and edited by outside counsel in conjunction and communication with their clients, are protected from disclosure by the attorney work product doctrine and the attorney-client privilege.

REQUEST FOR PRODUCTION NO. 2: Please produce all documents including all correspondence relating to the creation of Emerald Acquisition One Corporation, and the merger of Emerald Acquisition One Corporation with Connexus Corporation.

RESPONSE:

In addition to the foregoing general objections which are expressly incorporated herein, Epic Media objects to this request on the grounds and to the extent that: (i) the request is overly broad, unduly burdensome, and harassing and (ii) the request calls for information that is protected by the attorney-client privilege and/or attorney work product doctrine.

Subject to and without waiving the foregoing objections, Epic Media responds as follows: Epic Media will not produce communications between counsel which are protected against disclosure by the attorney work product doctrine and/or attorney client privilege. Epic Media is searching for non-privileged, responsive communications and will produce such communications, if any.

REQUEST FOR PRODUCTION NO. 3: Please produce the minutes of any Board Meeting and any and all communications between or among Defendants from July 1, 2009 to the present, which refer or relate to:

- (a) This Action;
- (b) The Weather Underground;
- (c) wunderground.com, or;
- (d) the Domains at Issue.

RESPONSE:

In addition to the foregoing general objections which are expressly incorporated herein, Epic Media objects to this request on the grounds and to the extent that the request calls for information that is protected by the attorney-client privilege and/or attorney work product doctrine.

Subject to and without waiving the foregoing objections, Epic Media responds as follows: Epic Media has identified slides in two Board of Director presentations dated July 29, 2010 and January 25, 2011 which make reference to this matter. Said slides were prepared by David Graff, General Counsel to Epic Media. As such, they are protected by the attorney-client privilege and will not be produced.

REQUEST FOR PRODUCTION NO. 4: Please produce any and all communications between Epic Media Group, Inc., and each Defendant from July 1, 2009 to the present which reference the terms “trademark infringement” or “cybersquatting”.

RESPONSE:

In addition to the foregoing general objections which are expressly incorporated herein, Epic Media objects to this request on the grounds and to the extent that: (i) the request is overly broad, unduly burdensome, and harassing, (ii) the request is vague and ambiguous, and (iii) the request calls for information that is protected by the attorney-client privilege and/or attorney work product doctrine.

Subject to and without waiving the foregoing objections, Epic Media responds as follows: Epic is conducting a search for communications referencing the terms “trademark

infringement” and “cybersquatting” and will produce non-privileged, responsive documents in response to this request.

REQUEST FOR PRODUCTION NO. 5: Please provide all documents that refer or relate to the merger of Epic Media Group, Inc., with any of the Defendants and all documents that refer or related to the acquisition by Epic Media Group, Inc., of any of the Defendants.

RESPONSE:

In addition to the foregoing general objections which are expressly incorporated herein, Epic Media objects to this request on the grounds and to the extent that: (i) the request is overly broad, unduly burdensome, and harassing, (ii) the request is vague and ambiguous, (iii) the request is duplicative of Request No. 1, and (iv) the request calls for information that is protected by the attorney-client privilege and/or attorney work product doctrine.

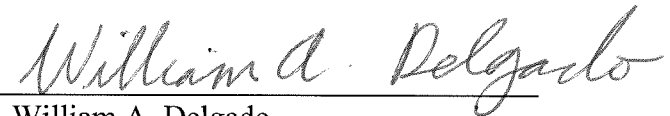
REQUEST FOR PRODUCTION NO. 6: Provide all documents identified in your response to Plaintiff’s First Set of Interrogatories to Defendants.

RESPONSE:

In addition to the foregoing general objections which are expressly incorporated herein, Epic Media objects to this request on the grounds and to the extent that: (i) the request is overly broad, unduly burdensome, and harassing, (ii) the request is vague and ambiguous, and (iii) the request calls for information that is protected by the attorney-client privilege and/or attorney work product doctrine.

Subject to and without waiving the foregoing objections, Epic Media responds as follows: Epic Media will produce all responsive, non-privileged documents in its possession, custody, and/or control, if any.

Dated: May 16, 2011



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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of May, 2011, I served Defendant Epic Media Group, Inc.'s Objections and Responses to First Set of Requests for Production via U.S. Mail, first class, postage pre-paid to the following:

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