

EXHIBIT P

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
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”) Second 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. 8: Please produce any and all documents between Connexus and Epic which in any way relate to liability or potential liability of Connexus to Plaintiff for alleged cybersquatting or trademark infringement.

RESPONSE:

In addition to the foregoing general objections which are expressly incorporated herein, Epic Media objects to the request on the basis and to the extent that: (i) it is vague, and ambiguous and (ii) it seeks information that is protected against disclosure by the attorney-client privilege and/or attorney work product doctrine.

Subject to and without waiving the foregoing objections, Epic Media responds as follows: As Epic Media understands this request, there are no non-privileged documents which would be responsive to the request.

REQUEST FOR PRODUCTION NO. 9: Please produce any and all documents between Connexus and Epic which in any way relate to liability or potential liability of Connexus to third party trademark holders for alleged cybersquatting or trademark infringement.

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RESPONSE:

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

Subject to and without waiving the foregoing objections, Epic Media responds as follows: As Epic Media understands this request, there are no non-privileged documents which would be responsive to the request.

REQUEST FOR PRODUCTION NO. 10: Please produce any and all documents reflecting annual, quarterly and monthly Profit and Loss statements and Balance Sheets for Connexus, and all companies related to Connexus for 2009 – 2011.

RESPONSE:

In addition to the foregoing general objections which are expressly incorporated herein, Epic Media objects to the request on the basis and to the extent that: (i) it is vague and ambiguous and (ii) it is overly broad, unduly burdensome, and harassing.

Subject to and without waiving the foregoing objections, Epic Media responds as follows: Epic Media is still investigating what documents can be produced in response to this request and will supplement this request accordingly.

REQUEST FOR PRODUCTION NO. 11: Please produce any and all documents reflecting Asset lists and schedules (for depreciation purposes or otherwise) for Connexus and all companies related to Connexus for 2009-2011.

RESPONSE:

In addition to the foregoing general objections which are expressly incorporated herein, Epic Media objects to the request on the basis and to the extent that: (i) it is vague and ambiguous and (ii) it is overly broad, unduly burdensome, and harassing.

Subject to and without waiving the foregoing objections, Epic Media responds as follows: Epic Media produced readily available asset schedules and depreciation lists on June 20, 2011.

REQUEST FOR PRODUCTION NO. 12: Please produce any and all documents reflecting assets obtained or transferred to Epic to date as a result of the consummation of the Merger Agreement.

RESPONSE:

In addition to the foregoing general objections which are expressly incorporated herein, Epic Media objects to the request on the basis and to the extent that: (i) it is vague and ambiguous and (ii) it is overly broad, unduly burdensome, and harassing.

Subject to and without waiving the foregoing objections, Epic Media responds as follows: As Epic Media understands this request, there are no such documents.

REQUEST FOR PRODUCTION NO. 13: Please produce any and all documents reflecting consideration paid by Epic, for any such assets obtained or transferred to Epic, to date as a result of the consummation of the Merger Agreement.

RESPONSE:

In addition to the foregoing general objections which are expressly incorporated herein, Epic Media objects to the request on the basis and to the extent that: (i) it is vague and ambiguous and (ii) it is overly broad, unduly burdensome, and harassing.

Subject to and without waiving the foregoing objections, Epic Media responds as follows: As Epic Media understands this request, there are no such documents.

REQUEST FOR PRODUCTION NO. 14: Please produce any and all documents created after the May 4, 2010 closing Epic/Connexus merger/acquisition which refer or relate to the issue of the holdback of funds as provided in Article 9 of the Merger Agreement dated March 24, 2010.

RESPONSE:

In addition to the foregoing general objections which are expressly incorporated herein, Epic Media objects to the request on the basis and to the extent that: (i) it is vague and ambiguous, (ii) it is overly broad, unduly burdensome, and harassing, and (iii) it seeks information that is protected against disclosure by the attorney client privilege and the attorney work product doctrine.

Subject to and without waiving the foregoing objections, Epic Media responds as follows: At present, there are no documents which are responsive to this request.


REQUEST FOR PRODUCTION NO. 15: Please produce any and all documents referred to or related to your responses to the Request For Production filed contemporaneously herewith.

RESPONSE:

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 vague, ambiguous and unintelligible and (ii) it seeks information that is protected against disclosure by the attorney client privilege and attorney work product doctrine.

Subject to and without waiving the foregoing objections, Epic Media responds as follows: To the extent the request intended to reference the Second Set of Interrogatories, Epic Media will produce responsive, non-privileged documents in its possession, custody, and/or control.

Dated: 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 Requests for Production via U.S. Mail, first class, postage pre-paid to the following:

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