

EXHIBIT Q

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 SUPPLEMENTAL 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 supplements its objections and responses to Plaintiff The Weather Underground, Inc.’s (“WU”) Second Set of Requests for Production (“Requests”) as follows:

Specific Requests for Production

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.

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SUPPLEMENTAL RESPONSE:

Subject to and without waiving the foregoing objections, Epic Media responds as follows: Epic Media is concurrently producing documents that are responsive to this request.

See EPIC006153-6160.

Dated: July 5, 2011



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CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of July, 2011, I served Defendant Epic Media Group, Inc.'s Supplemental 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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