

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

THE WEATHER UNDERGROUND, INC.,
a Michigan corporation,

Plaintiff,

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

v.

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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NAVIGATION CATALYST SYSTEMS' RULE 26(a) INITIAL DISCLOSURES

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Navigation Catalyst Systems, Inc. (“NCS”) hereby makes its Initial Disclosures to Plaintiff, The Weather Underground.

I. WITNESSES

NCS identifies the following individuals likely to have discoverable information that NCS may use to support its defenses.

Name	Relevance/Testimony
Seth Jacoby, President Can be reached through counsel.	Knowledge of NCS’s automated registration system.
Seth Jacoby, President Can be reached through counsel.	Knowledge of revenue generated by the domain names at issue.

NCS expressly reserves the right to supplement its responses pursuant to Fed. R. Civ. P. 26(e) as its investigation continues.

II. DOCUMENTS

NCS has in its possession, custody, and/or control documents that it may use to support its defenses and which relate to the following categories:

1. NCS’s automated registration system.
2. The revenue generated by the domain names at issue.

NCS expressly reserves the right to supplement its responses pursuant to Fed. R. Civ. P. 26(e) as its investigation continues.

III. COMPUTATION OF DAMAGES

NCS is not seeking damages and, therefore, this section is inapplicable.

IV. INSURANCE


No applicable insurance agreement applies.

CERTIFICATION OF DISCLOSURE

The undersigned certifies that, to the best of his knowledge, information and belief, formed after an inquiry that is reasonable under the circumstances, the above disclosure is complete and correct as of the time it is made.

Dated: January 4, 2010

WILLENKEN WILSON LOH & LIEB LLP



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CERTIFICATE OF SERVICE

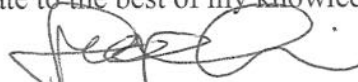
I hereby certify that on the 4th day of January, 2010, I served a copy of the above-referenced document, by first-class mail, with postage fully prepaid thereon, addressed to:

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I certify the foregoing to be true and accurate to the best of my knowledge, information and belief.



Helen Hsiao
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