

EXHIBIT G



ATTORNEYS & ADVISORS

March 15, 2010

VIA EMAIL AND US MAIL

William A. Delgado
Willenken Wilson Loh & Lieb LLP
707 Wilshire Boulevard, Suite 3850
Los Angeles, CA 90017

**Re: *Weather Underground v. Navigation Catalyst Systems, et.al.*
Communications per F.R.C.P. 37(a)(1) – Responses to Plaintiff's First Set of
*Interrogatories***

Dear Mr. Delgado:

This letter is sent in compliance with F.R.C.P. 37(a)(1). Because NCS has essentially objected to the production of virtually all of relevant documents in this case, without a good faith basis for doing so, and appears to be actively concealing documents through your affiliated companies, we would ask that you stipulate to an order consistent with the below requests. Recall our agreement to provide NCS an extension to respond to this discovery was NCS assurances that it would provide good faith responses. (*Exhibit A; Correspondence re extension*). At this point, we have little faith that NCS intends on voluntarily producing the documents requested, and, even more troubling, intends on using the artifice of 'no employees' and hiding documents in First Look, Basic Fusion and Connexus for not other purpose than to obstruct legitimate discovery. As you know, discovery timelines are short, experts need to be disclosed and there is no time for obstruction under the court's scheduling order.

While we expect you will argue that you need significant time to respond to this request, we believe that you had more than enough time to formulate your responses and objections (i.e. it has almost been two months since we served this discovery). If we do not hear in writing that NCS is willing to the demands contained herein by Friday, March 19, 2010, we will move forward with a motion to compel.

1. With regard to your General Objection No. 3, our definition indicated: "The words 'You', 'Your', 'NCS' and 'Defendant' as used herein refer to Navigation Catalyst Systems, Inc and any and all parent companies, subsidiaries, divisions, and each of those Company's officers, directors, employees, agents, contract consultants, attorneys and affiliates."

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You provided the following objection to this statement: "NCS objects to the definition of 'You,' 'Your,' 'NCS,' and 'Defendant' as overbroad. NCS shall interpret these words to refer solely to NCS."

We note that you have not objected to our use of the word "Company" which includes Firstlook, Connexus and Basic Fusion, as well as other affiliated companies.

Plaintiff's Position: It is clear at this point that NCS, Firstlook, Basic Fusion and Connexus were specifically set up by Connexus were set up in order to insulate NCS from judgments, limit access to discovery and create these types of artificial barriers in litigation. Because your objection is frivolous in the first instance, we would ask that you stipulate to withdraw this and related objections made throughout your Responses, and order to produce the requested documents within 14 days.

2. Your General Objections Nos. 4, 5, 6, 7, 9, and 11 are all specific objections which would need to be made in the context of individual discovery requests.

Plaintiff's Position: Essentially, you have said that you object to producing documents which are "vague and ambiguous" (your Objection No. 4). Please agree to withdraw these General Objections.

3. With regard to Defendant's General Objection No. 7, you have indicated: "NCS 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."

Plaintiff's Position: There is no objection which would allow you to preclude us to seeing documents or version of documents in your control which you "guess" might also be in our possession. If you have documents that are reasonably identifiable, you have an obligation to produce them, even if they might also be in the possession of Weather Underground. We hereby demand you withdraw this Objection.

4. With regard to your response to Interrogatory No. 1, we asked that you "Identify the person(s) answering/responding, or assisting in answering/responding, these First Interrogatories and the Plaintiff's First Request for Production."

You responded as follows: "NCs objects to this interrogatory to the extent 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. In addition, NCS objects to this interrogatory insofar as it requests the disclosure of information protected by the attorney-client privilege, the attorney work product doctrine, or other applicable privilege or doctrine. Subject to and

without waiving the foregoing objections, NCS responds as follows: William Delgado and Chris Pirrone.”

Plaintiff’s Position: We would ask that you stipulate to withdraw your objections and provide full responses within 7 days.

5. With regard to your response to Interrogatory No. 2, we asked that you “Identify all current and former employees, managers, officers, board members, representatives, agents and independent contractors who have worked or been employed by for NCS, at any time, from company inception to present.”

You responded as follows: “NCS objects to this interrogatory to the extent it seeks information neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. NCS also objects to this interrogatory to the extent it is vague or ambiguous. NCS further objects on the grounds that it is overbroad, burdensome and oppressive in scope, particularly as to time. Moreover, NCS objects to this interrogatory on the grounds that it seeks confidential trade and business data and other non-public, proprietary and confidential information protected from disclosure by applicable law. NCS also objects to the extent the interrogatory seeks confidential information of current and former employees of NCS and/or other third parties on the ground that providing such information would invade the legally protected rights of employees and/or third parties including but not limited to their right to privacy. NCS further objects on the ground that the interrogatory is compound, conjunctive or disjunctive. Subject to and without waiving the foregoing objections, NCS responds as follows: Seth Jacoby, Donald Misino, Lily Stevenson, and Dennie Rhee have performed work on behalf of NCS.”

Plaintiff’s Position: We ask that you review your response as it is not credible. We would ask that you stipulate to withdraw your objections and provide full responses within 7 days.

6. With regard to your response to Interrogatory No. 3, we asked that you “Identify any Software presently or previously used by You to register domain names, perform trademark availability or clearance searches, or any other function related to the selection, registration, and/or cancellation of a domain name(s).”

You responded as follows: “NCS objects to this interrogatory to the extent it is vague and ambiguous. NCS objects to this interrogatory on the grounds that it seeks confidential trade and business data and other non-public, proprietary and confidential information protected from disclosure by

applicable law. NCS further objects on the ground that the interrogatory is compound, conjunctive or disjunctive. Subject to and without waiving these objections, NCS responds as follows: NCS uses internally created software to register domain names, review potential domain registrations to determine if it may be confusingly similar to a trademark, and perform other functions related to the selection, registration, and/or cancellation of a domain name.”

Plaintiff’s Position: We ask that you revise your response to include all information consistent with the definition of “You and Your” and “Company.” We would ask that you stipulate to withdraw your objections and provide full responses within 7 days.

7. With regard to your response to Interrogatory No. 4, we asked that you “Identify any Software presently or previously used by You to park, optimize, analyze (including reporting or analytics) and/or monetize domain name(s).”

You responded as follows: “NCS objects to this interrogatory to the extent it is vague and ambiguous. NCS further objects on the grounds that it calls for information that is not in its possession, custody, or control. Moreover, NCS objects to this interrogatory on the grounds that it seeks confidential trade and business data and other non-public, proprietary and confidential information protected from disclosure by applicable law. NCS further objects on the ground that the interrogatory is compound, conjunctive or disjunctive. Subject to and without waiving these objections, NCS responds as follows: Domain name optimization is performed by Firstlook. Firstlook uses internally developed software, named Firstyield, to optimize and analyze domain names owned by NCS.”

Plaintiff’s Position: We ask that you revise your response to include all information consistent with the definition of “You and Your” and “Company.” We would ask that you stipulate to withdraw your objections and provide full responses within 7 days.

8. With regard to your response to Interrogatory No. 5, we asked that you “Identify any Software presently or previously used by You to analyze web site traffic statistics, visitor paths, hyperlink clicks and/or revenue of Registered Domains.”

You responded as follows: “NCS objects to this interrogatory to the extent it is vague and ambiguous. NCS further objects on the grounds that it calls for information that is not in its possession, custody, or control. Moreover, NCS objects to this interrogatory on the grounds that it seeks confidential trade and business data and other non-public, proprietary and confidential information protected from disclosure by applicable law. NCS further objects

on the ground that the interrogatory is compound, conjunctive or disjunctive. Subject to and without waiving these objections, NCS responds as follows: Firstyield is the name used for the internally developed software used by Firstlook. Firstyield provides basic statistics that are used to optimize and analyze domain names owned by NCS.”

Plaintiff’s Position: We ask that you revise your response to include all information consistent with the definition of “You and Your” and “Company.” We would ask that you stipulate to withdraw your objections and provide full responses within 7 days.

9. With regard to your response to Interrogatory No. 6, we asked that you “Identify all lawsuits, arbitrations or adversarial proceedings in which You have been involved, as named Plaintiff or Defendant, Complainant or Respondent, or otherwise, from inception to present.”

You responded as follows: “NCS objects to this interrogatory to the extent that 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. NCS also objects to this interrogatory to the extent it is vague and ambiguous. NCS further objects on the grounds that it is overbroad, burdensome and oppressive in scope. NCS further objects on the ground that it is compound, conjunctive or disjunctive. NCS further objects on the grounds that the interrogatory seeks information that is publicly available. NCS further objects on the grounds that the interrogatory seeks an abstract, compilation, and/or summary of information publicly available to all parties and the effort of compiling or summarizing that information would be substantially the same for both parties. Subject to and without waiving these objections, NCS responds as follows: *Mesa Garage Doors v. Navigation Catalyst Systems, Inc., et al.*, Case No. 09-CV-0053 (C.D. Cal.); *Verizon California Inc., et al v. Navigation Catalyst Systems, Inc., et al.*, 08-CV-2463 (C.D. Cal.); *Rodman & Renshaw, LLC v, Navigation Catalyst Systems, Inc.*, Case No. 08-CV-1081; *Kaplan, Inc., v. Navigation Catalyst Systems, Inc.*, Case No. 08-CV-0439 (C.D. Cal.); *Station Casinos, Inc. v. Navigation Catalyst Systems, Inc.*, Case No. 06-CV-1401 (D. Nev.); *Virgin Enterprises Limited v. Navigation Catalyst Systems, Inc., et al.*, Case No. 06-CV-3651 (S.D.N.Y.); *Wynn Resort Holdings, LLC v. Navigation Catalyst Systems, Inc.*, Case No. 05-CV-0924 (D. Nev.); *Wachovia Corporation v. Navigation Catalyst Systems Inc.*, Case No. 04-CV-10087 (C.D. Cal.); *Federated Western Properties Inc., et al v. Navigation Catalyst Systems Inc.*, Case No. 04-CV-1171 (C.D. Cal.); *Miccosukee Tribe of Indians of Florida v. Navigation Catalyst Systems, Inc.*, Case No. 09-CV-23444 (S.D. Fla.). For UDRP proceedings, please

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see the attached Exhibit A. which contains search results from NAF and WIPO for proceedings in which NCS was a respondent.”

Plaintiff’s Position: We would ask that you stipulate to withdraw your objections and provide full responses within 7 days.

10. With regard to your response to Interrogatory No. 7, we asked that you “Identify all processes, policies or procedures You use, or have used, to identify, select, register, delete/purge, blacklist and park domain names. If the process, policy or procedures has changed in any regard since company inception, please Identify each process, the people involved in the change, all documents related to the change and the dates each process was in place.”

You responded as follows: “NCS objects to this interrogatory to the extent that it is vague and ambiguous. NCS further objects on the grounds that it is overbroad, burdensome and oppressive in scope. Moreover, NCS objects to this interrogatory on the grounds that it seeks confidential trade and business data and other non-public, proprietary and confidential information protected from disclosure by applicable law. NCS further objects on the ground that it is compound, conjunctive or disjunctive. NCS also objects that the terms “identify, select, register delete/purge, blacklist and park domain names” as used in this interrogatory are ambiguous, unintelligible and open to a variety of meanings. Subject to and without waiving these objections, NCS responds as follows: Between November 2006 and July 2009, NCS used a proprietary automated tool to add un-owned domain names during the ICANN Add Grace Period. The domain registration engine would use a “blacklist” database to reject from the automated registration process any domain names which contained the exact domain or character string on the blacklist. The blacklist was regularly added to and updated and, as of the date that NCS ceased registering domain names through an automated process, contained hundreds of character strings against which domain names would be checked. In addition, beginning in 2007, NCS would use a human screener to review registered domain names during the five-day Add Grace Period to manually screen each domain for potential trademark conflicts. When a domain name was identified by a human screener as a potential trademark conflict, it was immediately returned to the registry. In 2008, NCS added a second human screener to re-review the first screener’s review of all registered domains. Beginning in 2008, screeners used an internal automated tool that integrated the USPTO trademark database so that domain names could be checked against the database. Any domain name that was rejected by the screener was added to the blacklist database so that it could not be registered again in

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the future. Lastly, NCS hired additional human screeners in May 2008 to review the entire NCS portfolio for domain names that were arguably confusingly similar to the trademarks of others. By virtue of that process, NCS identified and deleted domain names that were arguably derivations of trademarks and updated the blacklist with those domain names.”

Plaintiff's Position: We ask that you revise your response to include all information consistent with the definition of “You and Your” and “Company.” We would ask that you stipulate to withdraw your objections and provide full responses within 7 days.

Sincerely,

Traverse Legal, PLC

A handwritten signature in black ink, appearing to be 'ES' with a large flourish.

Enrico Schaefer
enrico@traverselegal.com

ES/cad
Cc: All counsel of record