# **EXHIBIT F**

### 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 CATALSYST 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' SUPPLEMENTAL 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 Supplemental 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	NCS's answer in this action; NCS's
Can be reached through counsel.	intellectual property rights; NCS's online business; NCS's Internet directory and search capability services; NCS's automated use of the Add Grace Period; NCS's due diligence screening practices generally; NCS's blacklist database to prevent registration of potential
	trademarks; NCS's human screening practices to prevent registration of potential trademarks; NCS's domain name registration practices; NCS's automated tool based on the USPTO database to assist screeners by identifying domains that may be registered trademarks; NCS's practice of eliminating and deleting derivates of trademarks; NCS's policy of transferring disputed domain names to third parties where justified; NCS's search of its portfolio upon receipt of Plaintiff's complaint and offer to transfer of domains; the mechanism by which advertisements are published on NCS's web pages; and knowledge of revenue generated by the domain names at issue.
Donald Misino, Software Architect	Architect of the domain related software
Can be reached through counsel.	operated by NCS. Can testify regarding the operation of the software.
Lily Stevenson, Compliance Manager Can be reached through counsel.	Manages compliance related to NCS domain names. Can testify regarding trademark review of domain names.

Dennie Rhee, Operations Manager	Manages operations for NCS. Can testify
Can be reached through counsel.	regarding purchases of names.

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 including:
  - a. NCS's registration software modules.
  - b. Trademark review instructions.
  - c. The NCS blacklist.
  - d. Data on the domain name registration of the domain names at issue.
- 2. Revenue reports showing the revenue generated by the domain names at issue.
- 3. Document retention policy.

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.

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#### 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: February 26, 2010

WILLENKEN WILSON LOH & LIEB LLP

By: William A. Delgado Lead Counsel for Defendants 707 Wilshire Blvd., Suite 3850 Los Angeles, CA 90017

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#### CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of February, 2010, I served Defendant Navigation Catalyst Systems, Inc.'s Supplemental Rule 26(a) Initial Disclosures via electronic mail and U.S. Mail, first class, postage pre-paid on:

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