

Exhibit 85

to the Declaration of Brendan T. Kehoe, Esq. In Support of The Associated Press's Memorandum of Law In Opposition to One 3 Two, Inc.'s (d/b/a Obey Clothing) Motion for Summary Judgment

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHEPARD FAIREY AND OBEY
GIANT
ART, INC.,

Plaintiffs,
v.

THE ASSOCIATED PRESS,

Defendant and
Counterclaim
Plaintiff,
v.

SHEPARD FAIREY, OBEY GIANT
ART,
INC., OBEY GIANT LLC, STUDIO
NUMBER ONE, INC., and ONE 3
TWO,
INC. (d/b/a OBEY CLOTHING),

Counterclaim Defendants.
And

MANNIE GARCIA,

Defendant, Counterclaim
Plaintiff and Cross-claim
Plaintiff/Defendant,
v.

ECF

Case No. 09-01123 (AKH)

**COUNTERCLAIM DEFENDANT
ONE 3 TWO'S SUPPLEMENTAL
RESPONSES AND OBJECTIONS
TO FIRST SET OF REQUESTS
FOR PRODUCTION
PROPOUNDED BY DEFENDANT,
COUNTERCLAIM PLAINTIFF
AND CROSS-CLAIM
PLAINTIFF/DEFENDANT THE
ASSOCIATED PRESS**

SHEPARD FAIREY and OBEY
GIANT
ART, INC.,

Counterclaim Defendants,

And

THE ASSOCIATED PRESS,

Cross-claim
Plaintiff/Defendant.

PROPOUNDING PARTY: Defendant, Counterclaim Plaintiff and Cross-claim Plaintiff/Defendant THE ASSOCIATED PRESS

RESPONDING PARTY: Counterclaim Defendant ONE 3 TWO, INC.

SET NO.: One

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

Pursuant to Federal Rules of Civil Procedure 34 and 26(e)(1), Counterclaim Defendant Obey Clothing d/b/a One 3 Two, Inc. d/b/a Obey Clothing (“One 3 Two”) hereby supplements its responses and objections to the First Set of Requests for Production propounded by Defendant, Counterclaim Plaintiff and Cross-claim Plaintiff/Defendant The Associated Press (“the AP”) as follows:

GENERAL OBJECTIONS

1. One 3 Two’s discovery, internal investigation, and preparation for the trial of this matter are not completed as of the date of these Responses and Objections and are continuing. One 3 Two anticipates that discovery, internal investigation, and preparation for trial will reveal additional information not presently known to it, but upon which it may rely. These Responses and Objections to the AP’s First Set of Requests for Production (the “First Requests”) are based upon information currently known or believed to be true by One 3 Two. One 3 Two reserves the right to modify or supplement its Responses and Objections upon completion of its discovery, internal investigation, and preparation for the trial of this matter, and to use at trial, or in any motion or deposition, any documents, facts, or supporting evidence of any sort later developed or discovered.

2. One 3 Two objects to the Requests to the extent that they seek to impose obligations in addition to those imposed by the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the Southern District of New York.

3. One 3 Two objects to the Requests as overbroad, unduly burdensome and unwarranted.

4. One 3 Two objects to each Request to the extent that it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. Any disclosure of privileged information would be inadvertent and should not be deemed a waiver of any privilege.

5. One 3 Two objects to each Request to the extent that it seeks proprietary business information, trade secrets, or other confidential information. Documents containing such confidential information will be designated as “CONFIDENTIAL” pursuant to the terms of the Stipulated Protective Order filed on August 14, 2009 (“Stipulated Protective Order”).

6. One 3 Two objects to each Request to the extent that it seeks information from persons, companies, or entities other than One 3 Two. One 3 Two further objects to the extent each Request seeks information not within One 3 Two’s custody, control, or possession or that is equally available to the AP or more easily obtainable from another source.

7. One 3 Two objects to each Request to the extent that it does not specify dates and thus is overbroad and/or ambiguous.

8. One 3 Two objects to each Request to the extent that it contains words and/or phrases that are not defined, thereby rendering the Request overbroad, vague and ambiguous.

9. One 3 Two objects to each Request to the extent that it does not specify the documents requested with reasonable particularity.

10. One 3 Two objects generally to the Requests to the extent that they seek to have One 3 Two furnish information and identify documents that are a matter of the public record, and therefore, are equally available to the AP as they are to One 3 Two.

11. One 3 Two objects to each Request to the extent it seeks the same documents requested by the AP in the Deposition Subpoena for Production of Business Records to One 3 Two dated August 19, 2009 (the “AP’s Deposition Subpoena”). To the extent that One 3 Two already provided the AP with documents responsive to the AP’s Deposition Subpoena, those documents will not be produced again.

12. One 3 Two objects to the definition of the term “OBEY CLOTHING,” “YOU,” and “YOUR” as vague, ambiguous, overbroad, burdensome, and oppressive to the extent that it includes any “affiliates” of One 3 Two.

13. One 3 Two objects to the definition of the term “SHEPARD FAIREY AND/OR OBEY GIANT” as vague, ambiguous, overbroad, burdensome, and oppressive.

14. Any responses to these Requests provided by One 3 Two are solely for the purpose of this litigation. Any attempt by the AP or any other person or entity to use or disseminate the Responses, the information contained in the Responses, or the documents produced in this litigation beyond this litigation is objected to as improper and will be subject to appropriate action.

15. By these Responses, One 3 Two does not, and does not intend to:
(1) waive any objections as to the admissibility of evidence or the competency of, relevancy of, materiality of, or privilege attaching to any information disclosed in

these responses; or (2) waive the right to object to other discovery requests or undertakings involving or reflecting the subject matter requested herein. These Responses do not constitute, nor should they be construed as, admissions with respect to the relevancy or admissibility of any evidence or document identified herein or the truth or accuracy of any statement, characterization, or other information contained in such document. One 3 Two expressly does not concede the relevance or materiality of any of these responses or the subject matter to which they refer.

RESPONSES TO THE FIRST SET OF REQUESTS FOR PRODUCTION

During the course of One 3 Two's search for responsive documents, it has discovered that certain electronically-stored documents (i.e. emails) are no longer in the possession, custody, or control of One 3 Two. First, Don Juncal no longer has in his possession, custody, or control any emails dated prior to April 23, 2008. On or around April 23, 2008, Mr. Juncal obtained a new computer. He did not have his emails transferred from his old computer to the new computer. Further, One 3 Two has determined that Mr. Juncal's old computer containing emails prior to April 23, 2008 is no longer in the possession, custody, or control of One 3 Two. Given the age of the computer, One 3 Two elected to retire the old computer in or around April 23, 2008. Next, One 3 Two has determined that beginning in January 2008, Chris Broders' computer experienced technical difficulties that caused him to lose certain emails. Prior to January 3, 2008, Mr. Broders used a single email program, Microsoft Entourage, for business-related emails. At that time, he attempted to upgrade the email program, and the database became corrupted. Mr. Broders also began using a second email program, Mac Mail, for business-related emails on or about January 4, 2008. Mr. Broders has attempted to rebuild his database from Microsoft Entourage several times but with no success. As a result of these technical problems, it appears that certain emails sent to and from Mr.

Broders were lost, but the precise time period for which emails were lost is uncertain. One 3 Two has performed a commercially reasonable search to locate copies of emails sent by and to Mr. Juncal and Mr. Broders during the time periods in question and has produced all such documents One 3 Two has been able to locate as a result of that search.

Notwithstanding and without waiving any of its General Objections, which are incorporated into each of its Responses as though set forth in full, One 3 Two responds as follows:

DOCUMENT REQUESTS

REQUEST FOR PRODUCTION NO. 1

DOCUMENTS sufficient to show the formation of OBEY CLOTHING.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1

One 3 Two objects to this Request on the grounds that the phrase “formation of OBEY CLOTHING” is undefined and thus vague and ambiguous. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. One 3 Two further objects to this Request to the extent it seeks the same documents requested by the AP in the Deposition Subpoena. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two will produce documents sufficient to identify the circumstances concerning its formation to the extent that such documents were not previously produced in response to the AP’s Deposition Subpoena.

REQUEST FOR PRODUCTION NO. 2

DOCUMENTS sufficient to show the organizational structure of OBEY CLOTHING.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2

One 3 Two objects to this Request on the grounds that the phrase “organizational structure of OBEY CLOTHING” is undefined and thus vague and ambiguous. One 3 Two objects to this Request as overbroad in that it is not limited as to time or subject matter. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. One 3 Two further objects to this Request to the extent it seeks the same documents requested by the AP in the Deposition Subpoena. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two will produce documents sufficient to show its organizational structure to the extent that such documents were not previously produced in response to the AP’s Deposition Subpoena.

REQUEST FOR PRODUCTION NO. 3

DOCUMENTS sufficient to show the relationship between OBEY CLOTHING and SHEPARD FAIREY AND/OR OBEY GIANT.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3

One 3 Two objects to this Request on the grounds that the term “relationship” is undefined and thus vague and ambiguous. One 3 Two objects to this Request as overbroad in that it is not limited as to time or subject matter. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. One 3 Two further objects to this Request to the extent it seeks the same documents requested by the AP in the Deposition Subpoena. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two will produce documents sufficient to show the relationship between One 3 Two and Shepard Fairey and/or

Obey Giant to the extent that such documents were not previously produced in response to the AP's Deposition Subpoena.

REQUEST FOR PRODUCTION NO. 4

ALL COMMUNICATIONS with SHEPARD FAIREY AND/OR OBEY GIANT CONCERNING the OBAMA GRAPHICS or OBAMA MERCHANDISE.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4

One 3 Two objects to this Request on the ground that it is impermissibly compound. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. One 3 Two further objects to this Request to the extent it seeks the same documents requested by the AP in the Deposition Subpoena. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two will produce all responsive non-privileged documents in its possession, custody, or control to the extent that such documents were not previously produced in response to the AP's Deposition Subpoena.

REQUEST FOR PRODUCTION NO. 5

ALL COMMUNICATIONS with any other PERSON CONCERNING the OBAMA GRAPHICS, the OBAMA MERCHANDISE, the CLOONEY PHOTO, the OBAMA PHOTO, or THE AP since January 1, 2008.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5

One 3 Two objects to this Request as overbroad and burdensome. One 3 Two further objects to this Request to the extent that the documents sought are equally available to the parties in this litigation. One 3 Two further objects to this Request on the ground that it is impermissibly compound. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not

provide any privileged and/or protected information. One 3 Two further objects to this Request to the extent it seeks the same documents requested by the AP in the Deposition Subpoena. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two will produce all responsive non-privileged documents in its possession, custody, or control to the extent that such documents were not previously produced in response to the AP's Deposition Subpoena.

REQUEST FOR PRODUCTION NO. 6

ALL DOCUMENTS CONCERNING any actual or contemplated contracts (whether oral or written), agreements, work-for-hire arrangements, or agreements for payment or revenues between OBEY CLOTHING and SHEPARD FAIREY AND/OR OBEY GIANT.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6

One 3 Two objects to this Request on the ground that the terms "actual or contemplated contracts," "agreements," "work for hire arrangements," or "agreements for payment or revenues" are undefined and thus vague and ambiguous. One 3 Two further objects to this Request as overbroad and burdensome. One 3 Two further objects to this Request on the ground that it is impermissibly compound. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. One 3 Two further objects to this Request to the extent it seeks the same documents requested by the AP in the Deposition Subpoena. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two will produce all responsive non-privileged documents in its possession, custody, or control to the extent that such documents were not previously produced in response to the AP's Deposition Subpoena.

REQUEST FOR PRODUCTION NO. 7

ALL DOCUMENTS CONCERNING the OBAMA GRAPHICS, including without limitation documents relating to the use, display, distribution, selection, creation, conception, derivation, design, development, manufacture, or licensing of the OBAMA GRAPHICS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7

One 3 Two objects to this Request on the ground that the terms “use, display, distribution, selection, creation, conception, derivation, design, development, manufacture, [and] licensing” are undefined and thus vague and ambiguous. One 3 Two also objects to the extent that the documents sought are not within One 3 Two’s custody. One 3 Two further objects to this Request on the ground that it is impermissibly compound. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. One 3 Two further objects to this Request to the extent it seeks the same documents requested by the AP in the Deposition Subpoena. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two will produce all responsive non-privileged documents in its possession, custody, or control to the extent that such documents were not previously produced in response to the AP’s Deposition Subpoena.

REQUEST FOR PRODUCTION NO. 8

ALL DOCUMENTS CONCERNING the OBAMA MERCHANDISE, including without limitation documents relating to the use, display, distribution, selection, creation, conception, derivation, design, development, or manufacture, or licensing of the OBAMA MERCHANDISE.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8

One 3 Two objects to this Request on the ground that the terms “use, display, distribution, selection, creation, conception, derivation, design, development, manufacture, [and] licensing” are undefined and thus vague and ambiguous. One 3 Two also objects to the extent that the documents sought are not within One 3 Two’s custody. One 3 Two further objects to this Request on the ground that it is impermissibly compound. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. One 3 Two further objects to this Request to the extent it seeks the same documents requested by the AP in the Deposition Subpoena. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two will produce all responsive non-privileged documents in its possession, custody, or control to the extent that such documents were not previously produced in response to the AP’s Deposition Subpoena.

REQUEST FOR PRODUCTION NO. 9

ALL DOCUMENTS CONCERNING profits, revenues, royalties, or fees collected by OBEY CLOTHING from any PERSON relating to the OBAMA GRAPHICS or the OBAMA MERCHANDISE, including without limitation any actual or anticipated revenues or payments paid by OBEY CLOTHING to SHEPARD FAIREY AND/OR OBEY GIANT or any other PERSON.

RESPONSE TO REQUEST FOR PRODUCTION NO. 9

One 3 Two objects to this Request on the ground that the terms “profits, revenues, royalties, [and] fees” and “actual or anticipated revenues or payments” are undefined and thus vague and ambiguous. One 3 Two further objects to this Request on the ground that it is impermissibly compound. One 3 Two also objects to this Request to the extent it purports to seek information protected by the

attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. One 3 Two further objects to this Request to the extent it seeks the same documents requested by the AP in the Deposition Subpoena. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two will produce documents sufficient to show profits, revenues, royalties or fees collected by One 3 Two from any person relating to the Obama Graphics or the Obama Merchandise.

REQUEST FOR PRODUCTION NO. 10

ALL DOCUMENTS CONCERNING revenues, costs, royalties, or fees paid by OBEY CLOTHING to any PERSON, including without limitation SHEPARD FAIREY AND/OR OBEY GIANT, relating to the OBAMA GRAPHICS or the OBAMA MERCHANDISE.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10

One 3 Two objects to this Request on the ground that the terms “revenues, costs, royalties [and] fees” are undefined and thus vague and ambiguous. One 3 Two further objects to this Request on the ground that it is impermissibly compound. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. One 3 Two further objects to this Request to the extent it seeks the same documents requested by the AP in the Deposition Subpoena. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two will produce documents sufficient to show revenues, costs, royalties, or fees paid by One 3 Two to Shepard Fairey and/or Obey Giant relating to the Obama Graphics or the Obama Merchandise.

REQUEST FOR PRODUCTION NO. 11

DOCUMENTS sufficient to show the current ownership, board of directors, and corporate officers of OBEY CLOTHING.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11

One 3 Two objects to this Request on the ground that it is impermissibly compound. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two will produce documents sufficient to show the current ownership, board of directors, and corporate officers of One 3 Two.

REQUEST FOR PRODUCTION NO. 12

DOCUMENTS sufficient to show any liability insurance policy held by OBEY CLOTHING.

RESPONSE TO REQUEST FOR PRODUCTION NO. 12

One 3 Two objects to this Request on the ground that the term "liability insurance policy" is undefined and thus vague and ambiguous. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two will produce documents sufficient to show any liability insurance policy held by One 3 Two.

REQUEST FOR PRODUCTION NO. 13

DOCUMENTS sufficient to show any INDEMNIFICATION agreement between OBEY CLOTHING and SHEPARD FAIREY AND/OR OBEY GIANT CONCERNING OBEY CLOTHING's use, marketing, or sale of any designs, graphics, or works created by SHEPARD FAIREY AND/OR OBEY GIANT, including without limitation the OBAMA GRAPHICS or the OBAMA MERCHANDISE.

RESPONSE TO REQUEST FOR PRODUCTION NO. 13

One 3 Two objects to this Request on the ground that the terms “use, marketing, [and] sale” and “designs, graphics, [and] works” are undefined and thus vague and ambiguous. One 3 Two further objects to this Request as impermissibly compound. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two will produce documents sufficient to show any indemnification agreement between One 3 Two and Shepard Fairey and/or Obey Giant concerning One 3 Two’s use, marketing, or sale of any designs, graphics, or works created by Shepard Fairey and/or Obey Giant.

REQUEST FOR PRODUCTION NO. 14

DOCUMENTS sufficient to show all client or prospective client pitch or promotional materials from 2006 through the present.

RESPONSE TO REQUEST FOR PRODUCTION NO. 14

One 3 Two objects to this Request on the ground that the terms “client [and] prospective client pitch [and] promotional materials” are undefined and thus vague and ambiguous. This Request is also overbroad, vague, and ambiguous to the extent it fails to identify whose promotional materials it is seeking. One 3 Two also objects to this Request on the ground that it is overbroad as to time and subject matter. One 3 Two further objects to this Request on the ground that it is impermissibly compound. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two will produce documents sufficient to show all

client or prospective client pitch or promotional materials from 2006 through present, but only to the extent such documents relate or refer to the Obama Merchandise.

REQUEST FOR PRODUCTION NO. 15

DOCUMENTS sufficient to show all press releases, sales or promotional materials, marketing brochures, print or Web advertising, or other advertising media or campaigns REFERRING OR RELATING TO the OBAMA POSTERS or the OBAMA MERCHANDISE.

RESPONSE TO REQUEST FOR PRODUCTION NO. 15

One 3 Two objects to this Request on the ground that the terms “press releases, sales [and] promotional materials, marketing brochures, print [and] Web advertising, [and] advertising media [and] campaigns” are undefined and thus vague and ambiguous. One 3 Two also objects to the extent that the documents sought are not within One 3 Two’s custody. One 3 Two further objects to this Request on the ground that it is impermissibly compound. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two will produce documents sufficient to show all press releases, sales or promotional materials, marketing brochures, print or Web advertising, or other advertising media or campaigns referring or relating to the Obama Posters or the Obama Merchandise.

REQUEST FOR PRODUCTION NO. 16

DOCUMENTS sufficient to show all press releases, sales or promotional materials, marketing brochures, print or Web advertising, or other advertising media or campaigns REFERRING OR RELATING TO the FRIEDMAN

MERCHANDISE, the ISRAEL/PALESTINE MERCHANDISE, the MEDEROS MERCHANDISE, or the ROCKOFF MERCHANDISE.

RESPONSE TO REQUEST FOR PRODUCTION NO. 16

One 3 Two objects to this Request on the ground that the terms “press releases, sales [and] promotional materials, marketing brochures, print [and] Web advertising, [and] advertising media [and] campaigns” are undefined and thus vague and ambiguous. One 3 Two also objects to the extent that the documents sought are not within One 3 Two’s custody. One 3 Two further objects to this Request on the ground that it is impermissibly compound. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. Subject to and without waiving the foregoing general and specific objections, One 3 Two is willing to meet and confer with the AP to narrow the scope of this Request so that it includes only documents properly subject to disclosure in this action.

REQUEST FOR PRODUCTION NO. 17

DOCUMENTS sufficient to show all COMMUNICATIONS with the United States Copyright Office or the United States Patent & Trademark Office CONCERNING OBEY CLOTHING’s intellectual property rights and assets, including without limitation any copyright or trademark registration application and related correspondence, since January 1, 2006.

RESPONSE TO REQUEST FOR PRODUCTION NO. 17

One 3 Two objects to this Request on the ground that the terms “intellectual property rights and assets [and] copyright or trademark registration [and] related correspondence” are undefined and thus vague and ambiguous. One 3 Two also objects to this Request as overbroad as to time and subject matter. One 3 Two further objects to this Request on the ground that it is impermissibly compound.

One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. One 3 Two further objects to this Request to the extent that it seeks confidential proprietary documents. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two responds that it has no documents in its possession, custody, or control responsive to this Request.

REQUEST FOR PRODUCTION NO. 18

DOCUMENTS sufficient to show the management and enforcement of OBEY CLOTHING's intellectual property rights, including without limitation all cease-and-desist letters, demands, complaints, or causes of action sent, or asserted by, or on behalf of OBEY CLOTHING, since January 1, 2006.

RESPONSE TO REQUEST FOR PRODUCTION NO. 18

One 3 Two objects to this Request on the ground that the terms "management," "enforcement," "intellectual property rights" and "cease-and desist letters, demands, complaints, [and] causes of action" are undefined and thus vague and ambiguous. One 3 Two further objects to this Request on the ground that it is impermissibly compound. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two will produce documents sufficient to show the management and enforcement of One 3 Two's intellectual property rights.

REQUEST FOR PRODUCTION NO. 19

DOCUMENTS sufficient to show any licensing or royalty agreements between OBEY CLOTHING and any PERSON to use that PERSON's designs, graphics, or works on clothing, accessories, or merchandise sold by OBEY

CLOTHING, including without limitation all payments made to any PERSON for the use of that PERSON's designs, graphics, or works on clothing, accessories, or merchandise sold by OBEY CLOTHING.

RESPONSE TO REQUEST FOR PRODUCTION NO. 19

One 3 Two objects to this Request on the ground that the terms "licensing or royalty agreements" and "designs, graphics, [and] works on clothing, accessories, [and] merchandise," are undefined and thus vague and ambiguous. One 3 Two further objects to this Request as overbroad as to subject matter insofar as it requests documents relating to third parties who are not named in this litigation and will only produce documents relating to Shepard Fairey, Obey Giant Art, Inc., Obey Giant LLC and Studio Number One, Inc. One 3 Two further objects to this Request on the ground that it is impermissibly compound. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two will produce documents sufficient to show any licensing or royalty agreements between One 3 Two and Shepard Fairey, Obey Giant Art, Inc., Obey Giant LLC and/or Studio Number One, Inc.

REQUEST FOR PRODUCTION NO. 20

All COMMUNICATIONS with SHEPARD FAIREY AND/OR OBEY GIANT, Glen E. Friedman, or any other PERSON CONCERNING the FRIEDMAN GRAPHICS or the FRIEDMAN MERCHANDISE.

RESPONSE TO REQUEST FOR PRODUCTION NO. 20

One 3 Two objects to this Request as overbroad as to subject matter and time. One 3 Two further objects to this Request on the ground that it is impermissibly compound. One 3 Two also objects to this Request to the extent it

purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two is willing to meet and confer with the AP to narrow the scope of this Request so that it includes only documents properly subject to disclosure in this action.

REQUEST FOR PRODUCTION NO. 21

 All COMMUNICATIONS with SHEPARD FAIREY AND/OR OBEY GIANT, THE AP, or any other PERSON CONCERNING the ISRAEL/PALESTINE GRAPHIC or the ISRAEL/PALESTINE MERCHANDISE.

RESPONSE TO REQUEST FOR PRODUCTION NO. 21

 One 3 Two objects to this Request as overbroad as to subject matter and time. One 3 Two further objects to this Request on the ground that it is impermissibly compound. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two is willing to meet and confer with the AP to narrow the scope of this Request so that it includes only documents properly subject to disclosure in this action.

REQUEST FOR PRODUCTION NO. 22

 All COMMUNICATIONS with SHEPARD FAIREY AND/OR OBEY GIANT, Lincoln Cushing, or any other PERSON CONCERNING the MEDEROS GRAPHICS or the MEDEROS MERCHANDISE.

RESPONSE TO REQUEST FOR PRODUCTION NO. 22

 One 3 Two objects to this Request as overbroad as to subject matter and time. One 3 Two further objects to this Request on the ground that it is

impermissibly compound. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two is willing to meet and confer with the AP to narrow the scope of this Request so that it includes only documents properly subject to disclosure in this action.

REQUEST FOR PRODUCTION NO. 23

ALL COMMUNICATIONS with SHEPARD FAIREY AND/OR OBEY GIANT or any other PERSON CONCERNING the ROCKOFF GRAPHICS or the ROCKOFF MERCHANDISE, including without limitation all COMMUNICATIONS with Al Rockoff, Cory Sontag, or any other PERSON purporting to act on behalf of Al Rockoff.

RESPONSE TO REQUEST FOR PRODUCTION NO. 23

One 3 Two objects to this Request as overbroad as to subject matter and time. One 3 Two further objects to this Request on the ground that it is impermissibly compound. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two is willing to meet and confer with the AP to narrow the scope of this Request so that it includes only documents properly subject to disclosure in this action.

REQUEST FOR PRODUCTION NO. 24

DOCUMENTS sufficient to show the use, display, distribution, selection, creation, conception, derivation, design, development, manufacture, or licensing of the FRIEDMAN GRAPHICS or the FRIEDMAN MERCHANDISE.

RESPONSE TO REQUEST FOR PRODUCTION NO. 24

One 3 Two objects to this Request on the ground that the terms “use, display, distribution, selection, creation, conception, derivation, design, development, manufacture, [and] licensing” are undefined and thus vague and ambiguous. One 3 Two further objects to this Request as overbroad as to subject matter and time. One 3 Two further objects to this Request on the ground that it is impermissibly compound. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two is willing to meet and confer with the AP to narrow the scope of this Request so that it includes only documents properly subject to disclosure in this action.

REQUEST FOR PRODUCTION NO. 25

DOCUMENTS sufficient to show the use, display, distribution, selection, creation, conception, derivation, design, development, manufacture, or licensing of the ISRAEL/PALESTINE GRAPHIC or the ISRAEL/PALESTINE MERCHANDISE.

RESPONSE TO REQUEST FOR PRODUCTION NO. 25

One 3 Two objects to this Request on the ground that the terms “use, display, distribution, selection, creation, conception, derivation, design, development, manufacture, [and] licensing” are undefined and thus vague and ambiguous. One 3 Two further objects to this Request as overbroad as to subject matter and time. One 3 Two further objects to this Request on the ground that it is impermissibly compound. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected

information. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two is willing to meet and confer with the AP to narrow the scope of this Request so that it includes only documents properly subject to disclosure in this action.

REQUEST FOR PRODUCTION NO. 26

DOCUMENTS sufficient to show the use, display, distribution, selection, creation, conception, derivation, design, development, manufacture, or licensing of the MEDEROS GRAPHICS or the MEDEROS MERCHANDISE.

RESPONSE TO REQUEST FOR PRODUCTION NO. 26

One 3 Two objects to this Request on the ground that the terms “use, display, distribution, selection, creation, conception, derivation, design, development, manufacture, [and] licensing” are undefined and thus vague and ambiguous. One 3 Two further objects to this Request as overbroad as to subject matter and time. One 3 Two further objects to this Request on the ground that it is impermissibly compound. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two is willing to meet and confer with the AP to narrow the scope of this Request so that it includes only documents properly subject to disclosure in this action.

REQUEST FOR PRODUCTION NO. 27

DOCUMENTS sufficient to show the use, display, distribution, selection, creation, conception, derivation, design, development, manufacture, or licensing of the ROCKOFF GRAPHICS or the ROCKOFF MERCHANDISE.

RESPONSE TO REQUEST FOR PRODUCTION NO. 27

One 3 Two objects to this Request on the ground that the terms “use, display, distribution, selection, creation, conception, derivation, design, development, manufacture, [and] licensing” are undefined and thus vague and ambiguous. One 3 Two further objects to this Request as overbroad as to subject matter and time. One 3 Two further objects to this Request on the ground that it is impermissibly compound. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two is willing to meet and confer with the AP to narrow the scope of this Request so that it includes only documents properly subject to disclosure in this action.

REQUEST FOR PRODUCTION NO. 28

DOCUMENTS sufficient to show any actual or anticipated gross or net revenues, profits, royalties, or fees collected (on a per-customer basis and in the aggregate) REFERRING OR RELATING TO the FRIEDMAN MERCHANDISE, the ISRAEL/PALESTINE MERCHANDISE, the MEDEROS MERCHANDISE, or the ROCKOFF MERCHANDISE.

RESPONSE TO REQUEST FOR PRODUCTION NO. 28

One 3 Two objects to this Request on the ground that the terms “gross [and] net revenues, profits, royalties, [and] fees collected” are undefined and thus vague and ambiguous. One 3 Two further objects to this Request as overbroad as to subject matter and time. One 3 Two further objects to this Request on the ground that it is impermissibly compound. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or

protected information. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two is willing to meet and confer with the AP to narrow the scope of this Request so that it includes only documents properly subject to disclosure in this action.

REQUEST FOR PRODUCTION NO. 29

DOCUMENTS sufficient to show any actual or anticipated gross or net revenues, profits, royalties, or fees collected (on a per-customer basis and in the aggregate) REFERRING OR RELATING TO the OBAMA GRAPHICS or the OBAMA MERCHANDISE.

RESPONSE TO REQUEST FOR PRODUCTION NO. 29

One 3 Two objects to this Request on the ground that the terms “gross [and] net revenues, profits, royalties, [and] fees collected” are undefined and thus vague and ambiguous. One 3 Two further objects to this Request on the ground that it is impermissibly compound. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two will produce documents sufficient to show any actual or anticipated gross or net revenues, profits, royalties, or fees collected relating to the Obama Graphics or the Obama Merchandise to the extent that such documents were not previously produced in response to the AP’s Deposition Subpoena.

REQUEST FOR PRODUCTION NO. 30

DOCUMENTS sufficient to show all costs or expenses, including without limitation all overhead costs, attributed to the OBAMA MERCHANDISE (on a per-unit basis and in the aggregate).

RESPONSE TO REQUEST FOR PRODUCTION NO. 30

One 3 Two objects to this Request on the ground that the terms “costs [and] expenses,” “overhead costs,” and “attributed” are undefined and thus vague and ambiguous. One 3 Two further objects to this Request on the ground that it is impermissibly compound. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two will produce documents sufficient to show all costs or expenses attributed to the Obama Merchandise to the extent that such documents were not previously produced in response to the AP’s Deposition Subpoena.

REQUEST FOR PRODUCTION NO. 31

DOCUMENTS sufficient to show all costs, including without limitation all overhead costs, attributed to the FRIEDMAN MERCHANDISE, the ISRAEL/PALESTINE MERCHANDISE, the MEDEROS MERCHANDISE, and the ROCKOFF MERCHANDISE (on a per-unit basis and in the aggregate).

RESPONSE TO REQUEST FOR PRODUCTION NO. 31

One 3 Two objects to this Request on the ground that the terms “costs” “overhead costs,” and “attributed” are undefined and thus vague and ambiguous. One 3 Two further objects to this Request as overbroad as to time and subject matter. One 3 Two further objects to this Request on the ground that it is impermissibly compound. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two is willing to meet and confer with the AP to narrow

the scope of this Request so that it includes only documents properly subject to disclosure in this action.

REQUEST FOR PRODUCTION NO. 32

All DOCUMENTS CONCERNING the events, projects, activities, and amounts identified in the document bearing the heading “OBAMA SPECIAL PROJECTS,” which was produced bearing the Bates number OBCL00181.

RESPONSE TO REQUEST FOR PRODUCTION NO. 32

One 3 Two objects to this Request on the ground that the terms “events, projects, activities [and] amounts” are undefined and thus vague and ambiguous. One 3 Two further objects to this Request on the ground that it is impermissibly compound. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two will produce all responsive non-privileged documents in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 33

DOCUMENTS sufficient to show any and all amounts paid by OBEY CLOTHING to SHEPARD FAIREY AND/OR OBEY GIANT from 2006 through 2009 (on a year-by-year basis and in the aggregate).

RESPONSE TO REQUEST FOR PRODUCTION NO. 33

One 3 Two objects to this Request on the ground that the phrase “amounts paid” is undefined and thus vague and ambiguous. One 3 Two further objects to this Request on the ground that it is overbroad as to subject matter and time and it will only produce documents relating to the Obama Merchandise. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not

provide any privileged and/or protected information. One 3 Two further objects to this Request to the extent that it seeks financial or confidential proprietary documents. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two will produce documents sufficient to show amounts paid by One 3 Two to Shepard Fairey and/or Obey Giant relating to the Obama Merchandise.

REQUEST FOR PRODUCTION NO. 34

DOCUMENTS sufficient to show all DONATIONS made by or on behalf of OBEY CLOTHING, including without limitation DOCUMENTS sufficient to show the monetary equivalent or value of such DONATIONS (on a per-unit basis and in the aggregate).

RESPONSE TO REQUEST FOR PRODUCTION NO. 34

One 3 Two objects to this Request on the ground that the phrase “monetary equivalent” and the term “value” are undefined and thus vague and ambiguous. One 3 Two further objects to this Request on the ground that it is overbroad as to subject matter and time. Subject to and without waiving any of the foregoing general and specific objections, One 3 Two will produce documents sufficient to show Donations made by or on behalf of One 3 Two, but only to the extent such documents relate to the Obama Merchandise.

REQUEST FOR PRODUCTION NO. 35

DOCUMENTS sufficient to show OBEY CLOTHING’s federal, state, and local income tax returns for the time periods during which OBEY CLOTHING produced, manufactured, printed, distributed, marketed, or sold the OBAMA MERCHANDISE.

RESPONSE TO REQUEST FOR PRODUCTION NO. 35

One 3 Two objects to this Request on the ground that the terms “produced, manufactured, printed, distributed, marketed [and] sold” are undefined and thus

vague and ambiguous. One 3 Two further objects to this Request on the ground that it is overbroad as to subject matter. One 3 Two further objects to this Request as impermissibly compound. One 3 Two also objects to this Request to the extent it purports to seek information protected by the attorney-client privilege or the work product doctrine, and One 3 Two will not provide any privileged and/or protected information. One 3 Two further objects to this Request to the extent that it seeks financial or confidential proprietary documents. Based upon the above objections, One 3 Two refuses to provide responsive documents, if any, in its possession, custody, or control.

REQUEST FOR PRODUCTION NO. 36

DOCUMENTS sufficient to show OBEY CLOTHING's annual financial statements for 2006 through the present.

RESPONSE TO REQUEST FOR PRODUCTION NO. 36

One 3 Two objects to this Request on the ground that the phrase "annual financial statements" are undefined and thus vague and ambiguous. One 3 Two further objects to this Request on the ground that it is overbroad as to subject matter and time. One 3 Two further objects to this Request to the extent that it seeks financial or confidential proprietary documents. Based upon the above

objections, One 3 Two refuses to provide responsive documents, if any, in its possession, custody, or control.

Dated: Los Angeles, California
March 12, 2010

Respectfully submitted,

By Robyn C.
Robyn C. Crowther
(admitted pro hac vice)
Jeanne A. Fugate
(admitted pro hac vice)
Laurie C. Martindale
(admitted pro hac vice)
Caldwell Leslie & Proctor, PC
1000 Wilshire Boulevard, Suite 600
Los Angeles, California 90017-2463
Telephone: (213) 629-9040
Facsimile: (213) 629-9022
crowther@caldwell-leslie.com
fugate@caldwell-leslie.com
martindale@caldwell-leslie.com

Theresa Trzaskoma
Charles Michael
Brune & Richard LLP
80 Broad Street
New York, NY 10004
Telephone: (212) 668-1900
Facsimile: (212) 668-0315
ttrzaskoma@bruneandrichard.com
cmichael@bruneandrichard.com

*Counsel for Counterclaim Defendant
One 3 Two, Inc. (d/b/a Obey
Clothing)*

PROOF OF SERVICE

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

3 At the time of service, I was over 18 years of age and **not a party to this action**. I am
employed in the County of Los Angeles, State of California. My business address is 1000
4 Wilshire Boulevard, Suite 600, Los Angeles, California 90017-2463.

5 On March 12, 2010, I served true copies of the following document(s) described as
6 **COUNTERCLAIM DEFENDANT ONE 3 TWO'S SUPPLEMENTAL RESPONSES AND**
7 **OBJECTIONS TO FIRST SET OF REQUESTS FOR PRODUCTION PROPOUNDED BY**
DEFENDANT, COUNTERCLAIM PLAINTIFF AND CROSS-CLAIM
PLAINTIFF/DEFENDANT THE ASSOCIATED PRESS on the interested parties in this action
as follows:

SEE ATTACHED SERVICE LIST

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address harper@caldwell-leslie.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

12 I declare under penalty of perjury under the laws of the United States of America that the
13 foregoing is true and correct and that I am employed in the office of a member of the bar of this
Court at whose direction the service was made.

14 Executed on March 12, 2010, at Los Angeles, California.

Los Angeles, California.

1 Bradford E. Kile
2 Robert J. McManus
3 Matthew P. Thielemann
4 Kile Goekjian Reed & McManus, PLLC
5 1200 New Hampshire Avenue, N.W.,
6 Suite 570
7 Washington, DC 20036
8 T: (202) 659-8000
9 T: (202) 659-8822
10 bkile@kgmrlaw.com
11 rmcmoran@kgmrlaw.com
12 mthielemann@kgmrlaw.com

13 Geoffrey Stewart
14 Damon M. Lewis
15 Katherine Stern
16 Jones Day
17 51 Louisiana Avenue, N.W.
18 Washington, D.C. 20001-2113
19 T: (202) 879-5445
20 F: (202) 626-1700
21 gstewart@jonesday.com
22 dmlewis@jonesday.com
23 kstern@jonesday.com

24 Meir Feder
25 Chris J. Lopata
26 Jones Day (NYC)
27 222 East 41st Street
28 New York, New York 10017
T: (212) 326-3939
F: (212) 755-7306
mfeder@jonesday.com
cjlopata@jonesday.com

29 William Fisher
30 John Palfrey
31 Harvard Law School
32 1575 Massachusetts Avenue
33 Cambridge, MA 02138
34 T: (617) 495-0957
35 F: (617) 496-4947
36 tfisher@law.harvard.edu
37 jpalfrey@law.harvard.edu

38

39

40

41

42

43

44

45

46

47

48

49

50

51

52

53

54

55

56

57

58

59

60

61

62

63

64

65

66

67

68

69

70

71

72

73

74

75

76

77

78

79

80

81

82

83

84

85

86

87

88

89

90

91

92

93

94

95

96

97

98

99

100

101

102

103

104

105

106

107

108

109

110

111

112

113

114

115

116

117

118

119

120

121

122

123

124

125

126

127

128

129

130

131

132

133

134

135

136

137

138

139

140

141

142

143

144

145

146

147

148

149

150

151

152

153

154

155

156

157

158

159

160

161

162

163

164

165

166

167

168

169

170

171

172

173

174

175

176

177

178

179

180

181

182

183

184

185

186

187

188

189

190

191

192

193

194

195

196

197

198

199

200

201

202

203

204

205

206

207

208

209

210

211

212

213

214

215

216

217

218

219

220

221

222

223

224

225

226

227

228

229

230

231

232

233

234

235

236

237

238

239

240

241

242

243

244

245

246

247

248

249

250

251

252

253

254

255

256

257

258

259

260

261

262

263

264

265

266

267

268

269

270

271

272

273

274

275

276

277

278

279

280

281

282

283

284

285

286

287

288

289

290

291

292

293

294

295

296

297

298

299

300

301

302

303

304

305

306

307

308

309

310

311

312

313

314

315

316

317

318

319

320

321

322

323

324

325

326

327

328

329

330

331

332

333

334

335

336

337

338

339

340

341

342

343

344

345

346

347

348

349

350

351

352

353

354

355

356

357

358

359

360

361

362

363

364

365

366

367

368

369

370

371

372

373

374

375

376

377

378

379

380

381

382

383

384

385

386

387

388

389

390

391

392

393

394

395

396

397

398

399

400

401

402

403

404

405

406

407

408

409

410

411

412

413

414

415

416

417

418

419

420

421

422

423

424

425

426

427

428

429

430

431

432

433

434

435

436

437

438

439

440

441

442

443

444

445

446

447

448

449

450

451

452

453

454

455

456

457

458

459

460

461

462

463

464

465

466

467

468

469

470

471

472

473

474

475

476

477

478

479

480

481

482

483

484

485

486

487

488

489

490

491

492

493

494

495

496

497

498

499

500

501

502

503

504

505

506

507

508

509

510

511

512

513

514

515

516

517

518

519

520

521

522

523

524

525

526

527

528

529

530

531

532

533

534

535

536

537

538

539

540

541

542

543

544

545

546

547

548

549

550

551

552

553

554

555

556

557

558

559

560

561

562

563

564

565

566

567

568

569

570

571

572

573

574

575

576

577

578

579

580

581

582

583

584

585

586

587

588

589

590

591

592

593

594

595

596

597

598

599

600

601

602

603

604

605

606

607

608

609

610

611

612

613

614

615

616

617

618

619

620

621

622

623

624

625

626

627

628

629

630

631

632

633

634

635

636

637

638

639

640

641

642

643

644

645

646

647

648

649

650

651

652

653

654

655

656

657

658

659

660

661

662

663

664

665

666

667

668

669

660

661

662

663

664

665

666

667

668

669

670

671

672

673

674

675

676

677

678

679

680

681

682

683

684

685

686

687

688

689

690

691

692

693

694

695

696

697

698

699

700

701

702

703

704

705

706

707

708

709

710

711

712

713

714

715

716

717

718

719

720

721

722

723

724

725

726

727

728

729

730

731

732

733

734

735

736

737

738

739

730

731

732

733

734

735

736

737

738

739

740

741

742

743

744

745

746

747

748

749

740

741

742

743

744

745

746

747

748

749

750

751

752

753

754

755

756

757

758

759

750

751

752

753

754

755

756

757

758

759

760

761

762

763

764

765

766

767

768

769

760

761

762

763

764

765

766

767

768

769

770

771

772

773

774

775

776

777

778

779

770

771

772

773

774

775

776

777

778

779

780

781

782

783

784

785

786

787

788

789

780

781

782

783

784

785

786

787

788

789

790

791

792

793

794

795

796

797

798

799

790

791

792

793

794

795

796

797

798

799

800

801

802

803

804

805

806

807

808

809

800

801

802

803

804

805

806

807

808

809

810

811

812

813

814

815

816

817

818

819

810

811

812

813

814

815

816

817

818

819

820

821

822

823

824

825

826

827

828

829

820

821

822

823

824

825

826

827

828

829

830

831

832

833

834

835

836

837

838

839

830

831

832

833

834

835

836

837

838

839

840

841

842

843

844

845

846

847

848

849

840

841

842

843

844

845

846

847

848

849

850

851

852

853

854

855

856

857

858

859

850

851

852

853

854

855

856

857

858

859

860

861

862

863

864

865

866

867

868

869

860

861

862

863

864

865

866

867

868

869

870

871

872

873

874

875

876

877

878

879

870

871

872

873

874

875

876

877

878

879

880

881

882

883

884

885

886

887

888

889

880

881

882

883

884

885

886

887

888

889

890

891

892

893

894

895

896

897

898

899

890

891

892

893

894

895

896

897

898

899

900

901

902

903

904

905

906

907

908

909

900

901

902

903

904

905

906

907

908

909

910

911

912

913

914

915

916

917

918

919

910

911

912

913

914

915

916

917

918

919

920

921

922

923

924

925

926

927

928

929

920

921

922

923

924

925

926

927

928

929

930

931

932

933

934

935

936

937

938

939

930

931

932

933

934

935

936

937

938

939

940

941

942

943

944

945

946

947

948

949

940

941

942

943

944

945

946

947

948

949

950

951

952

953

954

955

956

957

958

959

950

951

952

953

954

955

956

957

958

959

960

961

962

963

964

965

966

967

968

969

960

961

962

963

964

965

966

967

968

969

970

971

972

973

974

975

976

977

978

979

970

971

972

973

974

975

976

977

978

979

980

981

982

983

984

985

986

987

988

989

980

981

982

983

984

985

986

987

988

989

990

991

992

993

994

995

996

997

998

999

1000

1001

1002

1003

1004

1005

1006

1007

1008

1009

1000

1001

1002

1003

1004

1005

1006

1007

1008

1009

1010

1011

1012

1013

1014

1015

1016

1017

1018

1019

1010

1011

1012

1013

1014

1015

1016

1017

1018

1019

1020

1021

1022

1023

1024

1025

1026

1027

1028

1029

1020

1021

1022

1023

1024

1025

1026

1027

1028

1029

1030

1031

1032

1033

1034

1035

1036

1037

1038

1039

1030

1031

1032

1033

1034

1035

1036

1037

1038

1039

1040

1041

1042

1043

1044

1045

1046

1047

1048

1049

1040

1041

1042

1043

1044

1045

1046

1 Theresa Trzaskoma
2 Charles Michael
3 Brune & Richard LLP
4 80 Broad Street
5 New York, NY 10004
6 T: (212) 668-1900
7 F: (212) 668-0315
8 ttrzaskoma@bruneandrichard.com
9 cmichael@bruneandrichard.com

10 Counsel for:
11 One 3 Two, Inc. d/b/a Obey Clothing
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28