

1 **Risi**
 2 **sold on Bluefly?**
 3 A. I cannot say by looking at these
 4 pictures. What I can say by looking at these is
 5 that the price is not too much different from
 6 what they consider the full retail price,
 7 because it's only a 20 percent saving compared
 8 to a full price.
 9 And I might even assume that these
 10 could be good merchandise that has been bought
 11 maybe in some other markets and sold in the U.S.
 12 market.
 13 **Q. Okay. You don't have any reason**
 14 **to believe, as you sit here today, that the**
 15 **Gucci merchandise advertised on Bluefly dot-com**
 16 **is counterfeit, correct?**
 17 A. No. I cannot say the contrary as
 18 well.
 19 **Q. All right. And has Gucci sent a**
 20 **complaint letter, a cease and desist letter to**
 21 **Bluefly?**
 22 A. I don't see here, because I
 23 believe that this is still under internal
 24 investigation.
 25 **Q. Okay. When you say "you don't see**

1 **Risi**
 2 **it here," you are referring to the list of**
 3 **Exhibit Risi 2, correct?**
 4 A. Correct.
 5 **Q. Okay. All right.**
 6 **But it is -- it is possible that**
 7 **there are websites out there advertising**
 8 **legitimate Gucci products at a discount, which**
 9 **they didn't obtain through an -- they obtained**
 10 **through an unauthorized source. Isn't that**
 11 **correct? Let me rephrase the question.**
 12 **It is the case that there are**
 13 **websites out there advertising legitimate Gucci**
 14 **products at a discount?**
 15 A. Yes. But depends of the discount.
 16 **Q. Right. And you think that a**
 17 **20 percent discount may represent legitimate**
 18 **Gucci merchandise at a discount?**
 19 A. I am not saying that it might
 20 represent. But, for sure, a 90 percent
 21 discount, or a clear evidence on the website
 22 where they say it is a replica, let me believe
 23 that the information -- let's say the situation
 24 is different.
 25 **Q. Okay. Let me ask you about**

1 **Risi**
 2 **something else, Mr. Risi. Tell me when you are**
 3 **ready.**
 4 A. Ready.
 5 **Q. Okay. I had asked you earlier**
 6 **about, or you raised the subject of Lee Luxury**
 7 **Bags as being a website that you think has been**
 8 **sued, correct?**
 9 A. Correct.
 10 **Q. Okay. And you were telling me**
 11 **that you assumed that they were still in**
 12 **business, correct?**
 13 A. I didn't say anything like that --
 14 **Q. Okay.**
 15 A. -- that I am aware.
 16 **Q. Oh. I see. All right.**
 17 **Is there anything inconsistent**
 18 **with your knowledge or recollection, the**
 19 **statement that Woodforest provided credit card**
 20 **processing services for Lee Luxury Bags only**
 21 **from the dates of December 2006 until January of**
 22 **2007?**
 23 **Do you know -- do you know that to**
 24 **be incorrect?**
 25 A. I don't know.

1 **Risi**
 2 **Q. All right. You don't have any**
 3 **information then that Woodforest National Bank**
 4 **provided credit card processing services for Lee**
 5 **Luxury Bags at any time after January of 2007.**
 6 **Would that be fair?**
 7 A. I don't know.
 8 **Q. Okay. But just to be clear, if**
 9 **you have any such information, I want you to**
 10 **tell me it.**
 11 A. I don't -- to be honest, I don't
 12 know.
 13 Either if this information is
 14 included in the -- in the Mr. Counley's
 15 deposition, otherwise I am not aware about it --
 16 **Q. Okay. So --**
 17 A. -- from my point of view.
 18 **Q. Right. We can put the Counley**
 19 **deposition aside. I am not asking about that,**
 20 **but I am asking about your own knowledge.**
 21 **You are not aware of any**
 22 **information that would be inconsistent with a**
 23 **statement that Woodforest National Bank did not**
 24 **process credit card payments for Lee Luxury Bags**
 25 **after January of 2007?**