

## EXHIBIT F

Plaintiff Gordon's Answers and Responses  
to Defendant Adknowledge's First  
Interrogatories and Requests for Production  
of Documents to Gordon, pp. 1, 4

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JAMES S. GORDON, Jr., a married individual, d/b/a 'GORDONWORKS.COM'; OMNI INNOVATIONS, LLC, a Washington limited liability company;

**Plaintiffs,**

v.

VIRTUMUNDO, INC., a Delaware corporation d/b/a ADKNOWLEDGEMAIL.COM; ADKNOWLEDGE, INC., a Delaware corporation, d/b/a ADKNOWLEDGEMAIL.COM; SCOTT LYNN and individual and his marital community; and JOHN DOES I-X,

**Defendants.**

NO. CV06-0204JCC

**PLAINTIFF GORDON'S ANSWERS AND RESPONSES TO DEFENDANT ADKNOWLEDGE'S FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO GORDON**

Plaintiff Gordon answers Defendant Adknowledge, Inc.'s First Interrogatories and Requests For Production of Documents as follows:

**GENERAL OBJECTIONS**

1. Plaintiff objects to each interrogatory to the extent that it seeks material or information that is privileged as an attorney-client communication. This objection hereinafter will be referred to as the "**Attorney-Client Privilege Objection.**"
2. Plaintiff objects to each interrogatory to the extent that it seeks material or information prepared by or developed at the direction of counsel insofar as it is

PLAINTIFF GORDON'S RESPONSES TO DEFENDANT AKI'S INTERROGATORIES - 1

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I, James S. Gordon, Jr., am the principal member/owner of plaintiff Omni and hereby declare under penalty of perjury under the laws of the State of Washington that I have read the foregoing Answers to Interrogatories and Responses, know the content thereof and believe the same to be true and complete.



**James Gordon, Jr. on behalf of Omni Innovations, LLC**  
**plaintiff/declarant**

Attorney's Certificate

The undersigned attorney for Plaintiff has read the foregoing Answers to Interrogatories and Responses to Requests for Production and states that they are in compliance with CR 26(g).

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2006.

\_\_\_\_\_  
Robert J. Siegel WSBA#17312  
Attorney for Plaintiff