

EXHIBIT G

Defendant Virtumundo, Inc.'s First Set of
Interrogatories and Requests for Production
to Plaintiff Omni Innovations, LLC

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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 OMNI'S ANSWERS
AND RESPONSES TO DEFENDANT
VIRTUMUNDO'S FIRST
INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF
DOCUMENTS TO OMNI**

Plaintiff Gordon answers Defendant Virtumundo'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