

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ZANGO, INC. f/k/a/ 180SOLUTIONS,  
INC., a Washington corporation, a/k/a/  
METRICSDIRECT,

Plaintiff,

v.

MAINSTREAM ADVERTISING, a  
California corporation,

Defendant.

No. C07-507 MJP

DEFENDANT'S INITIAL  
DISCLOSURE PURSUANT TO  
FRCP 26(a)

**A. Persons With Discoverable Information**

1. Daniel Kay, Mainstream Advertising, Inc., 6345 Balboa Blvd Ste 225, Encino, CA 91316-1510, 800-993-3932. Information regarding contract negotiations, knowledge regarding damages to business.

2. James Morin, Mainstream Advertising, Inc., 6345 Balboa Blvd Ste 225, Encino, CA 91316-1510, 818-888-5932 ext 5. Information regarding billing/invoices, and working on account services.

3. All employees and directors working at Mainstream Advertising.

**B. Documents**

The documents which Defendant will use to support its claims consist of contract documents and records relating to performance, if any, under the contract documents.

**C. Damages**

Defendant is seeking the damages in an amount to be proven at trial for impact to business relations with clients for Zango's click fraud practices.

DATED this 18<sup>th</sup> day of June, 2007.

**Ferring & DeLue LLP**

By /s Daniel D. DeLue

Michael H. Ferring, WSBA #19399

Daniel D. DeLue, WSBA #29357

Attorneys for Defendant

Ferring & DeLue LLP

600 Stewart St Ste 1115

Seattle, WA 98101-1242

Telephone: (206) 508-3804

Fax: (206) 508-3817

E-mail: dan@ferringdelue.com

**CERTIFICATE OF SERVICE**

I, LYNN MAGNUSON, hereby certify and declare under penalty of perjury under the laws of the State of Washington, that a true and accurate copy of the foregoing pleading was electronically filed with the Clerk of the Court for the United States District Court, Western District of Washington at Seattle, using the CM/ECF system which will send notification of such filing to the following:

**Charles P. Moure**

charles@harrismoure.com, harrismoure@yahoo.com

1 **Daniel P. Harris**

2 dan@harrismoure.com, harrismoure@yahoo.com, harrisdanp@hotmail.com

3 DATED this 18<sup>th</sup> day of June, 2007.

4 *Ferring & DeLue LLP*

5  
6 By s/Lynn Magnuson

7 Lynn Magnuson

8 Paralegal

9 Ferring & DeLue LLP

10 600 Stewart St Ste 1115

11 Seattle, WA 98101-1242

12 Telephone: (206) 508-3804

13 Fax: (206) 508-3817

14 E-mail: lynn@ferringdelue.com