

THE HONORABLE JUDGE MARSHA PECHMAN

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Zango, Inc., f/k/a 180solutions, Inc., a Washington corporation, a/k/a MetricsDirect,)	ZANGO, INC'S INITIAL
)	DISCLOSURES PURSUANT TO
Plaintiff,)	FRCP 26(A)(1)
)	
v.)	No. CV 7-507
)	
Mainstream Advertising, a California Corporation,)	
)	
Defendant.)	

Plaintiff submits its initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) as follows:

A. In addition to witnesses listed by Defendant Mainstream Advertising, plaintiff Zango, Inc. currently believes the following persons are likely to have discoverable information:

1. Treves Hokama
Zango, Inc.
3600 136th Place SE
Bellevue, WA 98006
425.279.1200

Treves Hokama may obtain discoverable information regarding liability and/or damage issues including but not limited to Mainstream's failure to pay \$588,184.37 for internet marketing services provided by plaintiff Zango, Inc.

Harris & Moure
A Professional Limited Liability Corporation
 720 Olive Way, Suite 1000
 Seattle, WA 98101
 Phone: (206) 224-5657
 Fax: (206) 224-5659

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

2. Tareq Barkawi
Zango, Inc.
3600 136th Place SE
Bellevue, WA 98006
425.279.1200

Tareq Barkawi may obtain discoverable information regarding liability and/or damage issues including but not limited to Mainstream's failure to pay \$588,184.37 for internet marketing services provided by plaintiff Zango, Inc.

3. Erin Yoshina
Zango, Inc.
3600 136th Place SE
Bellevue, WA 98006
425.279.1200

Erin Yoshina may obtain discoverable information regarding liability and/or damage issues including but not limited to Mainstream's failure to pay \$588,184.37 for internet marketing services provided by plaintiff Zango, Inc.

4. James Morin
Senior Accountant
Mainstream Advertising, Inc.
6320 Canoga Ave. Suite 250
Woodland Hills, CA 91367
818-888-5932 ext.225 (P)
818-992-4776 (F)

James Morin may obtain discoverable information regarding liability and/or damage issues including but not limited to Mainstream's failure to pay \$588,184.37 for internet marketing services provided by plaintiff Zango, Inc.

5. Daniel Kay
Mainstream Advertising, Inc.
6320 Canoga Ave. Suite 250
Woodland Hills, CA 91367
818-888-5932 (P)
818-992-4776 (F)

Daniel Kay may obtain discoverable information regarding liability and/or damage issues including but not limited to Mainstream's failure to pay \$588,184.37 for internet marketing services provided by plaintiff Zango, Inc.

1 6. Jakline G.
2 Mainstream Advertising, Inc.
3 6320 Canoga Ave. Suite 250
4 Woodland Hills, CA 91367
5 818-888-5932 (P)
6 818-992-4776 (F)

7 Jakline G. may obtain discoverable information regarding liability and/or damage issues
8 including but not limited to Mainstream's failure to pay \$588,184.37 for internet marketing
9 services provided by plaintiff Zango, Inc.

10 7. Other persons identified in discovery responses and documents obtained in discovery may
11 possess discoverable information regarding liability and/or damages issues.

12 8. Plaintiff reserves the right to identify other individuals within the scope of
13 FRCP 26(a)(1)(A) as discovery and investigation continue.

14 B. In addition to the documents and tangible items identified by defendants, plaintiff currently
15 produces the documents attached to this disclosure.

16 Categories of relevant documents include but are not limited to:

17 All documents held by Zango, Inc. regarding liability and damages. All documents held by
18 Mainstream regarding liability and damages. All documents regarding liability and damages held by
19 third-party clients of Mainstream who purchased Zango internet advertising leads from Mainstream.

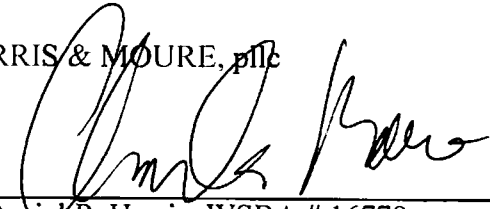
20 Plaintiff reserves the right to identify other documents and tangible items within the scope of
21 FRCP 26(a)(1)(B) as discovery and investigation continue.

22 C. Plaintiff suffered damages by, among other things, incurring \$588,184.37, plus interest and
23 attorneys' fees and costs for having to bring this lawsuit. Plaintiff reserves the right to amend and
24 include additional damages as discovery and investigation continue.
25
26

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

DATED this Tuesday, June 19, 2007.

HARRIS & MOURE, PLLC

By 

Daniel P. Harris, WSBA # 16778
Charles P. Moure, WSBA # 23701
Attorneys for Plaintiff Talon

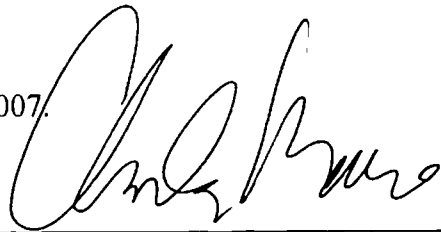
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that service of plaintiff's Initial Disclosures has been made this Tuesday, June 19, 2007, by sending a copy via the ECF electronic delivery service to:

Michael H. Ferring
Daniel D. DeLue
Ferring & DeLue LLP
600 Stewart Street, Suite 1115
Seattle, Washington 98101-1242
T. 206-508-3804
F. 206-508-3817

Signed at Seattle, Washington this Tuesday, June 19, 2007.



Charles Moure