

Exhibit M

54	<p>1 "Vega"?</p> <p>2 A. This is doctored. This is made up. This has</p> <p>3 nothing to do with our Web site.</p> <p>4 Q. You're saying this is not a true and correct</p> <p>5 copy of your Web site as it appeared on December 21,</p> <p>6 2009?</p> <p>7 A. Correct.</p> <p>8 Q. Can you provide me with a true and correct</p> <p>9 copy of your Web site as it appeared on December 21,</p> <p>10 2009?</p> <p>11 A. I have to talk to my technical people to see</p> <p>12 if such a thing is possible or not. I'll get back to</p> <p>13 you on that.</p> <p>14 Q. So you're saying that the Xelement Extreme</p> <p>15 Vega jacket was not sold on LeatherUp.com?</p> <p>16 A. What I am saying, this jacket is sold. This</p> <p>17 description is doctored.</p> <p>18 Q. Doctored by whom?</p> <p>19 A. The Chinese guy in Seattle.</p> <p>20 Q. Which Chinese guy in Seattle?</p> <p>21 A. Owner of Soaring Helmet.</p> <p>22 Q. You're saying that my client doctored your</p> <p>23 Web site?</p> <p>24 A. This page.</p> <p>25 Q. Did my client doctor your Web site on</p>	56	<p>1 the URL indicates the date 9-17-2010 indicating, that</p> <p>2 this is a printout from 9-17-2010, which was last week.</p> <p>3 Do you see that?</p> <p>4 A. Yes, I do.</p> <p>5 Q. Do you see the URL at the very bottom? It</p> <p>6 says http://www.leatherup.com/Xelement Men's Motorcycle</p> <p>7 Jacket/Xelement Extreme Vega?</p> <p>8 A. Yes, I do.</p> <p>9 Q. Do you still maintain that the word "Vega"</p> <p>10 does not appear on your Web site?</p> <p>11 A. Correct.</p> <p>12 Q. Why is the word "Vega" in the URL on the</p> <p>13 bottom of this page?</p> <p>14 A. Because the person who printed this</p> <p>15 manipulated and put the word. Eleven years old can do</p> <p>16 this thing. Eleven years old.</p> <p>17 Q. So you're saying the individual who printed</p> <p>18 this --</p> <p>19 A. They put the information that's --</p> <p>20 Q. -- put the word "Vega" into the URL?</p> <p>21 A. They manipulated the Web site, put the word</p> <p>22 "Vega" on a search engine so it comes up. You can put</p> <p>23 any word, it comes up.</p> <p>24 Q. Do you understand the significance of the URL</p> <p>25 at the bottom of the page?</p>
55	<p>1 December 21, 2009?</p> <p>2 A. I don't know what they have done. I'm not in</p> <p>3 Seattle.</p> <p>4 Q. But you're going to provide me with a true</p> <p>5 copy of your Web site as it appeared on December 21,</p> <p>6 2009?</p> <p>7 A. No. I'm going to contact my technical</p> <p>8 people, present them with this and ask them what is</p> <p>9 this. I already asked them when this came in. They</p> <p>10 searched. This description did not come up. This word</p> <p>11 did not come up.</p> <p>12 Q. Mr. Bootesaz, would you have been the person</p> <p>13 to make the decision about whether you use the term</p> <p>14 "Vega" in connection with the Xelement Extreme jacket?</p> <p>15 Would that have been your decision?</p> <p>16 A. To use the term?</p> <p>17 Q. Yes.</p> <p>18 A. Yes. But we did not use the term.</p> <p>19 MS. FOSTER: Would you please mark this as</p> <p>20 Exhibit 4.</p> <p>21 (Plaintiff's Exhibit 4 was marked for</p> <p>22 identification by the Reporter.)</p> <p>23 BY MS. FOSTER:</p> <p>24 Q. Mr. Bootesaz, I'm showing what's been marked</p> <p>25 as Exhibit 4. If you look at the very bottom, you see</p>	57	<p>1 A. I think I can.</p> <p>2 Q. If you look at the jacket on this page, is</p> <p>3 that manufactured by Vega?</p> <p>4 A. I don't know.</p> <p>5 Q. Do you know who manufactures that jacket?</p> <p>6 A. Xelement.</p> <p>7 Q. Is Xelement one of your companies?</p> <p>8 A. On what capacity am I talking here?</p> <p>9 Q. You're speaking as the representative of</p> <p>10 Nanal Inc.</p> <p>11 A. Ask the question as far as Nanal is</p> <p>12 concerned, I answer you.</p> <p>13 Q. Does Nanal Inc. own the company Xelement?</p> <p>14 A. No.</p> <p>15 Q. Does Alebert Bootesaz own the company</p> <p>16 Xelement?</p> <p>17 MR. MOKHTARZADEH: Objection --</p> <p>18 THE WITNESS: No.</p> <p>19 BY MS. FOSTER:</p> <p>20 Q. Does one of your other companies own the</p> <p>21 company Xelement?</p> <p>22 A. Am I here as an Xelement --</p> <p>23 MR. MOKHTARZADEH: Objection --</p> <p>24 THE WITNESS: You're trying to piss me off.</p> <p>25 Is that what you're trying to do? Are you trying to</p>