

Exhibit H

1 keyword tool that suggests keywords based on user input. Nanal input the generic term "helmet"
2 into the Google AdWords keyword suggestion tool and it suggested "vega helmet." Albert
3 Bootesaz, President of Nanal, was primarily responsible for selecting the keyword terms through
4 use of Google's Adwords keyword suggestion tool. In further response, based on Nanal's
5 investigation to-date, Nanal did not use the word "vega" in connection with a motorcycle jacket
6 as alleged in Plaintiff's Second Amended Complaint and Exhibit E thereto.

7 **INTERROGATORY NO. 8.** State the date (month, day, and year) of your first
8 purchase of the Keywords, and identify each internet search engine from which the Keywords
9 were purchased.

10 **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 8:**

11 In addition to the General Objections, Nanal objects to Interrogatory No. 8 on the ground
12 that it is overbroad to the extent the term "the Keywords" is intended to include the term
13 "helmets," a generic term to which Plaintiff has no exclusive rights. Subject to and without
14 waiving its objections, Nanal responds as follows:

15 Pursuant to Google's AdWords service, Nanal purchased the keyword terms "vega
16 helmets" on or about September 1, 2008, and discontinued use on or about April 3, 2010. Nanal
17 did not purchase the keyword term "vega" from any other Internet search engine.

18 **INTERROGATORY NO. 9.** State why you selected the Keywords for use in
19 connection with the marketing of your goods and services, and identify the person who was
20 primarily responsible for the selection of the Keywords.

21 **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 9:**

22 In addition to the General Objections, Nanal objects to Interrogatory No. 9 on the ground
23 that it is overbroad to the extent the term "the Keywords" is intended to include the term
24 "helmets," a generic term to which Plaintiff has no exclusive rights. Subject to and without
25 waiving its objections, Nanal responds as follows:

26 Nanal selected the keyword terms "vega helmets" using the automated Google AdWords
27 keyword tool that suggests keywords based on user input. Nanal input the generic term "helmet"
28 into the Google AdWords keyword suggestion tool and it suggested "vega helmet." Albert