

Exhibit I

50	<p>1 A. You say it's a screenshot. It looks 2 familiar. What is the proof that this is a screenshot 3 of our Web site? 4 Q. Is this what your Web site looks like? 5 A. This one? 6 Q. Yes. 7 A. Yes. 8 Q. Do you notice in sort of the middle of the 9 left hand, there is a tool bar with the word "Vega" 10 entered into it? Do you see that? 11 A. Yes. 12 Q. Do you see underneath that in the drop-down 13 menu the word "Vega boots" and "Vega helmets"? 14 A. Uh-huh. 15 Q. Is it true that when you enter "Vega" on the 16 LeatherUp.com Web site, the words "Vega boots" and 17 "Vega helmet" appear? 18 A. No, it is not true. 19 Q. It's not true? 20 A. No. 21 MS. FOSTER: Can we go off the record for a 22 minute. 23 (Discussion off the record.) 24 BY MS. FOSTER: 25 Q. Mr. Bootesaz, when did Nanal stop using</p>	52	<p>1 A. I believe you discontinue the campaign. 2 That's how it is. 3 Q. So you believe that Nanal instructed Google 4 that they didn't want to use the word anymore; is that 5 correct? 6 A. Yes. 7 Q. Mr. Bootesaz, did Nanal Inc. use the term 8 "Vega" in connection with the -- Mr. Bootesaz? 9 A. Yes, I'm with you, ma'am. In connection 10 with? 11 Q. Did LeatherUp.com use the trademark "Vega" in 12 connection with the Xelement extreme black and gray 13 Tri-Tex fabric jacket? 14 A. No. 15 MS. FOSTER: Would you please mark this as 16 Exhibit 3. 17 (Plaintiff's Exhibit 3 was marked for 18 identification by the Reporter.) 19 BY MS. FOSTER: 20 Q. Mr. Bootesaz, I'm showing you what's been 21 marked as Exhibit 3. It was attached to our complaint 22 in this matter, and it was sent to you as part of the 23 cease and desist letter. I'll represent to you that 24 this was a printout from your Web site. 25 If you look down at the bottom, you see the</p>
51	<p>1 "Vega" as a Google AdWord? 2 MR. MOKHTARZADEH: Objection. Misstates the 3 client's prior testimony. 4 Would you read back the last question again, 5 please. 6 (Record read as follows: 7 "Question: Mr. Bootesaz, when did Nanal stop 8 using 'Vega' as a Google AdWord?") 9 THE WITNESS: The answer is in the 10 interrogatories. You have to read that. I don't 11 recall what I answered. 12 BY MS. FOSTER: 13 Q. Mr. Bootesaz, in your response to our 14 interrogatory as to when Nanal used Google AdWord key 15 "Vega," you responded that it was purchased on or about 16 September 2008 and discontinued in April 2009. Does 17 that sound right? 18 A. I believe so. 19 Q. Were you the person responsible for the 20 decision to stop using the Google AdWord "Vega"? 21 A. I don't recall whose decision it was, but 22 once we received the cease and desist letter, we 23 stopped. 24 Q. Did you tell Google you didn't want to use 25 the word anymore?</p>	53	<p>1 URL number, http://www.leatherup.com/men's 2 motorcycle jacket/extreme Vega, and the date is 12-21- 3 2009, indicating that this printout was printed on 12- 4 21-2009. 5 Do you recall seeing this printout attached 6 to the cease and desist letter that was sent to you? 7 A. No. 8 Q. Do you recall seeing this printout attached 9 to the complaint that was filed in this matter? 10 A. Yes. 11 Q. Did you see the cease and desist letter that 12 was sent to Nanal? 13 A. Yes. 14 Q. But you don't recall this printout? 15 A. It wasn't there. 16 Q. But you recall seeing it as part of the 17 complaint? 18 A. Yes. 19 Q. Do you see that the heading for the jacket is 20 "Xelement Extreme Vega Black and Gray Tri-Tex"? 21 A. Yes. 22 Q. Did Nanal use my client's trademark "Vega" in 23 connection with the sale of this jacket? 24 A. No. 25 Q. Why does the Web site indicate the term</p>

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>