

Exhibit A

2	<p>1 APPEARANCES</p> <p>2</p> <p>3</p> <p>4 FOR THE PLAINTIFF:</p> <p>5 BY: STACIE FOSTER, ESQ.</p> <p>6 INVICTA LAW GROUP PLLC</p> <p>7 1000 Second Avenue</p> <p>8 Suite 3310</p> <p>9 Seattle, Washington 98104</p> <p>10</p> <p>11</p> <p>12 FOR THE DEFENDANT:</p> <p>13 BY: SHAHROKH MOKHTARZADEH, ESQ.</p> <p>14 LAW OFFICES OF SHAHROKH MOKHTARZADEH</p> <p>15 815 Moraga Drive</p> <p>16 Los Angeles, California 90049</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	4
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1 DEPOSITION OF ALBERT BOOTESAZ

2 MONDAY, SEPTEMBER 20, 2010

3 LOS ANGELES, CALIFORNIA

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15 Deposition of ALBERT BOOTESAZ, taken on behalf of

16 Plaintiff, at 12:08 P.M., Monday, September 20,

17 2010, at 815 Moraga Drive, Los Angeles, California,

18 before Jeanine Curcione, C.S.R. No. 10223, RPR,

19 pursuant to notice.

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1 LOS ANGELES, CALIFORNIA;

2 MONDAY, SEPTEMBER 20, 2010

3 12:08 P.M.

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5 ALBERT BOOTESAZ, having been duly affirmed, was

6 examined and testified as follows:

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8 EXAMINATION

9 BY MS. FOSTER:

10 Q. Mr. Bootesaz, you've already been sworn, and

11 you're under oath, and so that oath will continue

12 throughout the rest of the deposition. I understand

13 that you're appearing here today as a witness in the

14 matter of Soaring Helmet v. Nanal; is that correct?

15 A. Correct.

16 Q. And you were listed as a witness on Nanal

17 Incorporated's initial disclosures; is that correct?

18 A. I don't know if I was a witness. I'm just

19 here. I don't know.

20 Am I a witness?

21 MR. MOKHTARZADEH: You don't know what was

22 contained in that initial disclosure.

23 THE WITNESS: I don't know, no.

24 BY MS. FOSTER:

25 Q. You are the president of Nanal, Inc.; is that

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<p>1 correct? 2 A. Correct. 3 Q. Are you also the president of Albert Adams, 4 Incorporated? 5 A. No. 6 Q. Do you have any relationship with Albert 7 Adams, Incorporated? 8 A. No. 9 Q. Are you familiar with the company Albert 10 Adams, Incorporated? 11 A. Yes. 12 Q. And how are you familiar with that company? 13 A. This was a company selling perfumes. 14 Q. And did you have any relationship with that 15 company? 16 A. I had an interest in the company. 17 Q. Is the company now defunct? 18 A. It's -- 19 Q. Is it gone? 20 A. Some years ago. 21 Q. And do you have any relationship with a 22 company Aral, A-r-a-l, Trading Company? 23 A. Yes. 24 Q. And what is your relationship? 25 A. I'm the president of Aral.</p>	<p>1 jackets. 2 Q. Were any of those leather jackets then sold 3 on LeatherUp.com? 4 A. Some. 5 Q. What brands of leather jackets? 6 A. USA Leather. 7 Q. USA Leather. 8 But that's an imported brand? 9 A. Yes. 10 Q. And where's it imported from? 11 A. China. 12 Q. China. Despite the name. 13 Were you involved with a company Ashford LLC? 14 A. Yes. 15 Q. Is that an existing company? 16 A. Yes. 17 Q. And where is it registered as an LLC? 18 A. State of California. 19 Q. And what is your role in Ashford LLC? 20 A. I'm a managing partner. 21 Q. What is the business of Ashford LLC? 22 A. Real estate holding. 23 Q. Does Ashford currently own real estate? 24 A. Yes. 25 Q. Does it own real estate in the state of</p>
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<p>1 Q. And does Aral still exist? 2 A. Yes. 3 Q. And what is its business? 4 A. Nothing. 5 Q. Why does it still exist? 6 A. That's a question that I asked my accountant, 7 and he hasn't given me any answer back. 8 It does not operate, I should say. 9 Q. Was that a corporation? 10 A. Yes. 11 Q. Was it formed in Nevada? 12 A. No. 13 Q. Was it formed in California? 14 A. Correct. 15 Q. And did it do business at one point? 16 A. Yes. 17 Q. And it's ceased doing business now? 18 A. Yes. 19 Q. Approximately when did it cease doing 20 business? 21 A. I believe sometime this year. 22 Q. 2010? 23 A. 2010. 24 Q. And what was the nature of its business? 25 A. It was purchasing and importing leather</p>	<p>1 California? 2 A. Yes. 3 Q. Does it own real estate in any other state? 4 MR. MOKHTARZADEH: At some point all this is 5 going to be irrelevant and not likely to -- 6 THE WITNESS: I need to check. 7 MR. MOKHTARZADEH: -- lead to admissible -- 8 MS. FOSTER: Okay. Let's move on. 9 Q. Are you related to the company Grand Saz 10 Global, Inc.? 11 A. Yes. 12 Q. And what's your relationship to Grand Saz 13 Global, Inc.? 14 A. I'm the president of the company. 15 Q. And what's the nature of the business? 16 A. Nothing. 17 Q. Again nothing? 18 Was it formerly a functioning business? 19 A. Correct. 20 Q. When did it cease functioning? 21 A. I believe 2008. 22 Q. When did it begin as a functioning business? 23 A. 2003, I believe. I need to check. I can't 24 recollect all this information. 25 Q. What was the nature of the business?</p>