

Exhibit F

14

1 Maybe you can point out to me what you're relying on,
 2 but the notice of deposition that I received doesn't
 3 show anything -- any basis for inquiry regarding my
 4 client's corporate structure.
 5 I previously made an objection. I believe
 6 this is outside the scope of this deposition notice.
 7 Based on that, I'm going to instruct him not to answer.
 8 MS. FOSTER: I will state for the record that
 9 the deposition notice requests "the existence,
 10 location, maintenance, storage, loss and/or destruction
 11 of all documents or Defendant's other corporate
 12 records." We have asked for these documents in the
 13 past. We have not been provided these documents.
 14 As a result, I requested these documents as
 15 part of this deposition. This has been an ongoing
 16 process. We've requested documents. Certainly these
 17 documents have been the subject of discovery. They
 18 have not been provided.
 19 We are asking some basic corporate questions
 20 here, we are protected by a confidentiality agreement,
 21 and if you instruct your client not to answer, we'll be
 22 forced to move the court to compel this information,
 23 and if I have to come down here again, I'll be forced
 24 to ask the court for sanctions.
 25 Now, I suggest we get this information on the

15

1 record. If you want to protect it pursuant to the
 2 protective order, if you want to have the information
 3 stricken from the record pursuant to the protective
 4 order, you can so move. But for right now I suggest we
 5 go ahead with the deposition and get the information on
 6 the record.
 7 MR. MOKHTARZADEH: Okay. Ms. Foster, I don't
 8 see, as I said, anything in the notice of deposition
 9 regarding the item you're requiring. The existence
 10 location, maintenance, storage, or loss of any
 11 documents or records is an area that you can ask about,
 12 but that's not --
 13 MS. FOSTER: Okay. Then let me change my
 14 question --
 15 MR. MOKHTARZADEH: Rephrase your question.
 16 That's fine.
 17 MS. FOSTER: -- and ask about corporate
 18 records. That's fine. I think we can solve our
 19 problems that way.
 20 MR. MOKHTARZADEH: That's fine.
 21 BY MS. FOSTER:
 22 Q. Mr. Bootesaz, does Nanal Inc. keep corporate
 23 records?
 24 A. Yes.
 25 Q. And what kind of corporate records?

16

1 A. I don't know.
 2 Q. Does it keep corporate meeting minutes?
 3 A. These are the questions that my accountant
 4 handle.
 5 Q. Does your accountant handle your corporate
 6 meetings?
 7 A. Yes.
 8 Q. Who is your accountant?
 9 A. Kasra, K-s-r-a [sic], and last name is
 10 Shahrokhshahi, S-h-a-a-h-k-o-r-i [sic], something like
 11 that.
 12 Q. You're not quite sure about the spelling; is
 13 that correct?
 14 MR. MOKHTARZADEH: Let me give it to you. S-
 15 h-a-h-r-o-k-h-s-h-a-h-i.
 16 MS. FOSTER: Thank you, both.
 17 Q. Is your accountant located in Los Angeles?
 18 A. Both. Los Angeles and Las Vegas.
 19 Q. The same accountant has offices in both
 20 cities?
 21 A. Yeah.
 22 Q. Does your accountant keep the corporate
 23 meeting minutes?
 24 A. I believe so.
 25 Q. Does your accountant attend the corporate

17

1 meetings?
 2 A. From time to time, yes.
 3 Q. Does your corporation have bylaws?
 4 A. I'm not sure.
 5 Q. Does Nanal Inc. have an operating agreement?
 6 MR. MOKHTARZADEH: Objection. Calls for a
 7 legal conclusion and legal analysis.
 8 My client is not a lawyer. I don't think he
 9 --
 10 THE WITNESS: You're wasting my valuable time
 11 sitting here.
 12 MR. MOKHTARZADEH: He may not fully
 13 understand what the meaning of the term "operating
 14 agreement" or "minute of the records" are. I caution
 15 the witness that if he doesn't know the answer to the
 16 question, he should not just volunteer an answer, and
 17 he should first understand the question before
 18 answering.
 19 BY MS. FOSTER:
 20 Q. If you don't understand a question, Mr.
 21 Bootesaz, just say, "I don't understand your question,"
 22 and I'll --
 23 A. I've been telling you I don't understand. You
 24 keep coming back asking the same question differently
 25 now. You asked me once; I told you I don't understand