

EXHIBIT 15

{81600.DOC}

THE HONORABLE JAMES J. ROBERT

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

SOARING HELMET CORPORATION, a
Washington Corporation,

Plaintiff,

v.

NANAL, INC., a Nevada corporation, d/b/a
LEATHERUP.COM,

Defendant.

Cause No. C09-0789 JLR

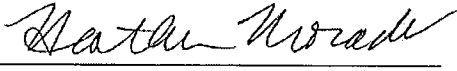
PLAINTIFF'S RESPONSE TO MOTION
TO STRIKE

1 **B) Defendant's Motion to Strike Exhibit N to the Morado Declaration Must**
2 **Be Denied.**

3 Defendant's motion to strike Exhibit N to the Morado Declaration should be
4 disregarded, as Soaring Helmet has already filed a praecipe correcting the Declaration to
5 include the correct Exhibit N. Morado Dec., ¶ 8, Exh. F. Soaring Helmet inadvertently
6 attached the wrong version of the spreadsheets attached as Exhibit N, which included
7 identical information, in a different format. The praecipe correcting Exhibit N, Bates Nos.
8 SHC 00020-00100, were produced to Defendant in discovery on August 27, 2010. *Id.*, Exh.
9 F. Defendant has not shown any prejudice as a result of the praecipe, because none exists.
10 Thus, Defendant's Motion to Strike Exhibit N is moot and should be denied.

11 DATED December 28, 2010.

12 INVICTA LAW GROUP, PLLC

13 By 
14 Stacie Foster, WSBA No. 23397
15 Heather M. Morado, WSBA No. 35135
16 Attorneys for Plaintiff

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21 had been told were within the knowledge of the identified witnesses. Thus, there is simply no violation of
22 Fed.R.Civ.P. 26(a) under the circumstances. Even if there were an arguable violation of Fed.R.Civ.P. 26(a),
23 Soaring Helmet's repeated identification of the witnesses and subject matter knowledge of the witnesses,
 coupled with Defendant's clear choice not to take depositions, makes such disclosure justified and harmless
 under the circumstances.