

EXHIBIT 6

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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 ANSWERS TO
DEFENDANT'S FIRST SET OF
REQUESTS FOR ADMISSION

TO: Ms. Katherine Hendricks
Ms. Stacia N. Lay
HENDRICKS & LEWIS, PLLC
Attorneys for Defendant

In accordance with the provisions of Fed. R. Civ. P. 26 and 36, Plaintiff hereby
offers the following Answers to Defendant Nanal, Inc.'s First Set of Requests for
Admission:

1 **ANSWERS TO DEFENDANT'S FIRST SET OF REQUESTS FOR ADMISSION**

2 **REQUEST FOR ADMISSION NO. 1:** Admit that Plaintiff's registration for the
3 VEGA mark, Registration No. 2,087,637, is limited to "motorcycle helmets."

4 **ANSWER: ADMIT.**

5
6 **REQUEST FOR ADMISSION NO. 2:** Admit that Plaintiff has not obtained a
7 registration for the VEGA mark for use in connection with the sale of motorcycle jackets.

8 **ANSWER:** Plaintiff has obtained a federal registration for VEGA TECHNICAL
9 GEAR for "motorcycle helmets and protective clothing," therefore Plaintiff does not admit
10 nor deny.

11 **REQUEST FOR ADMISSION NO. 3:** Admit that Plaintiff has not used the
12 VEGA mark in connection with the sale of motorcycle jackets.

13 **ANSWER: DENY.**

14 **REQUEST FOR ADMISSION NO. 4:** Admit that Plaintiff does not have the
15 exclusive right to use the word "helmet" in connection with the marketing, advertising or
16 sale of motorcycle helmets.

17 **ANSWER: ADMIT.**

18 **REQUEST FOR ADMISSION NO. 5:** Admit that you are not aware of any
19 instances of alleged confusion resulting from Defendant's activities of which you
20 complain other than those instances alleged in your response to Defendant's Interrogatory
21 No. 2 in this Action.

22 **ANSWER: DENY.**

23 **REQUEST FOR ADMISSION NO. 6:** Admit that you are not aware of any
instances of Defendant's alleged interference with your business expectancy, other than

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DATED this 17th day of September 2010.

INVICTA LAW GROUP, PLLC

By *Heather Morado*
Stacie Foster, WSBA No. 23397
Heather Morado, WSBA No. 35135
Steve W. Edmiston, WSBA No. 17136
Attorneys for Plaintiff

1 **ATTORNEY'S FED. R. CIV. P. CERTIFICATION**

2 The undersigned attorney certifies pursuant to Fed. R. Civ. P. 26(g) that he or she
3 has read each answer to these requests, and that to the best of his or her knowledge,
4 information, and belief formed after a reasonable inquiry, each is (1) consistent with the
5 Civil Rules and warranted by existing law or a good faith argument for the extension,
6 modification, or reversal of existing law; (2) not interposed for any improper purpose,
7 such as to harass or to cause unnecessary delay or needless increase in the costs of
8 litigation; and (3) not unreasonable or unduly burdensome or expensive, given the needs
9 of the case, the discovery already had in the case, the amount in controversy, and the
10 importance of the issues at stake in the litigation.
11

12 DATED September 17, 2010.

13 INVICTA LAW GROUP, PLLC

14 By: Heather Morado
15 Stacie Foster, WSBA No. 23397
16 Heather M. Morado, WSBA No. 35135
17 Steven W. Edmiston, WSBA No. 17136
18 Attorneys for Plaintiff
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1 **CERTIFICATE OF SERVICE**

2 The undersigned declares under penalty of perjury, under the laws of the United
3 States of America, that the following is true and correct:

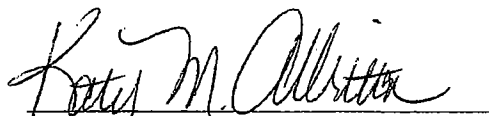
4 On this day, September 17, 2010, I caused to be sent via e-mail and First Class
5 Mail the following documents:
6

- 7 1. Plaintiff's Answers to Defendant's First Set of Requests for Admission.

8 To the following listed counsel of record:

9 Ms. Katherine Hendricks
10 Ms. Stacia N. Lay
11 HENDRICKS & LEWIS, PLLC
12 901 Fifth Avenue, Suite 4100
13 Seattle, WA 98164
14 kh@hllaw.com; sl@hllaw.com

15 Dated this 17th day of September, 2010, at Seattle, Washington.

16 
17 Katy M. Albritton
18 Legal Assistant