

Exhibit C

1 No. 4 to the extent it seeks an admission that Nanal "used" "the Mark." Subject to and without
2 waiving its objections, Nanal responds as follows:

3 Nanal did not "use" Plaintiff's alleged trademark VEGA, Registration No. 2,087,637.

4 Nanal selected the keyword terms "vega helmets" using the automated Google AdWords
5 keyword tool that suggests keywords based on user input. Nanal input the generic term "helmet"
6 into the Google AdWords keyword suggestion tool and it suggested "vega helmet." Nanal first
7 purchased the keyword terms on or about September 1, 2008, and the use was discontinued on or
8 about April 3, 2010. Albert Bootesaz, President of Nanal, was primarily responsible for
9 selecting the keyword terms through use of Google's Adwords keyword suggestion tool. No
10 trademark searches were necessary and none were conducted.

11 **INTERROGATORY NO. 5.** Identify your sales and profits, in dollar and unit terms,
12 by month, year, or any other applicable period of time for which data is available to you, for all
13 products marketed and sold by you, including but not limited to motorcycle jackets.

14 **RESPONSE TO INTERROGATORY NO. 5:**

15 In addition to the General Objections, Nanal objects to Interrogatory No. 5 on the
16 grounds that it is overbroad, unduly burdensome and is not reasonably calculated to lead to the
17 discovery of admissible evidence in that it is not limited as to time or to the specific goods
18 allegedly relevant to Plaintiff's claims in this action. Nanal further objects to Interrogatory No. 5
19 on the ground that it seeks information of a confidential, trade secret or proprietary nature.
20 Subject to and without waiving its objections, Nanal will provide a response to Interrogatory No.
21 5 limited to motorcycle helmets and motorcycle jackets and limited to one year prior to any
22 purchase and/or use of the keyword term "vega" by Nanal upon entry of a confidentiality order
23 by the Court.

24 **INTERROGATORY NO. 6.** Identify the channels of trade in which you market and
25 sell products, including but not limited to motorcycle jackets.

26 **RESPONSE TO INTERROGATORY NO. 6:**

27 In addition to the General Objections, Nanal objects to Interrogatory No. 6 on the
28 grounds that it is overbroad and is not reasonably calculated to lead to the discovery of

1 **RESPONSE TO INTERROGATORY NO.11:**

2 In addition to the General Objections, Nanal objects to Interrogatory No. 11 on the
3 ground that it is overbroad to the extent the term “the Keywords” is intended to include the term
4 “helmets,” a generic term to which Plaintiff has no exclusive rights. Subject to and without
5 waiving its objections, Nanal responds as follows:

6 Total number of times the leatherup.com advertisement was reviewed by users is 40209,
7 which resulted in 2457 clicks.

8 **INTERROGATORY NO. 12.** Identify your sales and profits, in dollar and unit terms,
9 by month, year, or any other applicable period of time for which data is available to you, for all
10 products sold by you through the Website.

11 **RESPONSE TO INTERROGATORY NO. 12:**

12 In addition to the General Objections, Nanal objects to Interrogatory No. 12 on the
13 grounds that it is overbroad, unduly burdensome and is not reasonably calculated to lead to the
14 discovery of admissible evidence in that it is not limited as to time or to the specific goods
15 allegedly relevant to Plaintiff’s claims in this action. Interrogatory No. 12 is also repetitive, in
16 whole or substantial part, of Interrogatory No. 5. Nanal further objects to Interrogatory No. 12
17 on the ground that it seeks information of a confidential, trade secret or proprietary nature.
18 Subject to and without waiving its objections, Nanal will provide a response to Interrogatory No.
19 12 limited to motorcycle helmets and motorcycle jackets and limited to one year prior to any
20 purchase and/or use of the keyword term “vega” by Nanal upon entry of a confidentiality order
21 by the Court.

22 **INTERROGATORY NO. 13.** Identify all media (e.g., internet, newspapers,
23 magazines, trade journals, radio and/or television stations, etc.) where you have advertised your
24 goods and/or services.

25 **RESPONSE TO INTERROGATORY NO. 13:**

26 In addition to the General Objections, Nanal objects to Interrogatory No. 13 on the
27 grounds that it is overbroad and is not reasonably calculated to lead to the discovery of
28 admissible evidence in that it is not limited as to time or the specific goods allegedly relevant to