

EXHIBIT 4

{81600.DOC}

Stacia Lay

From: Stacia Lay
Sent: Wednesday, August 18, 2010 2:42 PM
To: 'Heather Morado'
Subject: RE: Soaring Helmet v. Nanal, conference re discovery
Heather,

Thanks for your email.

I had just a few clarifications or corrections.

Re (2), Request for Production No. 8 is not one that Nanal did not respond to pending entry of the protective order. Other than that correction, (2) is accurate.

Re (3), I will obtain the best image of the motorcycle jacket, which may be in a form other than a photograph (i.e., by way of example only, catalog, digital image, etc.).

Re (6), I believe the Interrogatories should be 5, 12 and 14, not 13. Other than that correction, (6) is accurate.

Regarding the deposition dates, I have communicated with Mr. Bootesaz but do not have specific dates yet. He did mention that he would need accommodation for the Jewish holiday, which I assume would not be a problem. And regarding an approximate timetable for supplementation of Nanal's responses, I will forward that information to you as soon as possible.

In addition, I thought I'd confirm our conversation today with regard to Soaring Helmet's discovery responses. Specifically, Soaring Helmet agreed as follows:

- (a) Interrogatory No. 2, to provide supplemental information, namely, contact information for Jim Squire.
- (b) Interrogatory Nos. 7, 8, 9, 10, 11, 12, 13, 14, 16, 17, 20 and 21, to provide supplemental responses that do not refer to other interrogatory responses.
- (c) Interrogatory Nos. 19 and 20 and Requests for Production Nos. 17, 20, 24 and 27, to provide supplemental responses/documents pertaining to damages, which you said you expected from your client today.
- (d) Interrogatory No. 2 and related Requests for Production (Nos. 1, 6, 9, 10, 14, 26, and 28), to provide a supplemental response to the interrogatory correcting the reference to the December 2009 email, which you stated was in fact a telephone conversation.
- (e) Amended Initial Disclosures, to follow-up with your client regarding the documents specified therein for production.

Please also let me know approximately when you expect to supplement these responses. I will also be in touch soon to begin discussing possible dates for the depositions of individuals identified by Soaring Helmet in response to Nanal's discovery requests.

1/5/2011

Regards,
Stacia

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From: Heather Morado [<mailto:hmorado@invictalaw.com>]
Sent: Wednesday, August 18, 2010 1:27 PM
To: Stacia Lay
Subject: RE: Soaring Helmet v. Nanal, conference re discovery

Stacia,

I wanted to confirm that pursuant to our telephone conversation today, Nanal will produce the following:

- 1) Requests for production numbers 1, 2, 9, 13, 14, 18, 19, 23, 24, 26, 27, and 28 - Nanal will either produce responsive documents or state that there are no responsive documents.
- 2) Requests for production numbers 6, 7, 8, 11, and 15 - Nanal will produce responsive documents pursuant to the protective order.
- 3) Request for production number 3 - Nanal will produce a photograph of the motorcycle jacket. Soaring Helmet reserves the right to ask for a sample of the jacket but is not requesting one at this time.
- 4) Requests for production numbers 16 and 17 - Nanal will not be producing these documents.
- 5) Interrogatory number 3 - Nanal will supplement its response with regard to motorcycle jackets.
- 6) Interrogatories numbers 5, 12, and 13 - Nanal will supplement its responses, pursuant to the protective order.
- 7) Interrogatories numbers 8, 9, 10, and 11 - Nanal will supplement its responses with regard to internet search engines other than Google.

Also, please let me know the approximate date by which we should expect to receive supplemental responses / production. In addition, please advise as to when Mr. Bootesaz will be available for a deposition.

Best,

Heather M. Morado | Invicta Law Group, PLLC
Counsel for creative companies

1/5/2011

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From: Stacia Lay [mailto:SL@hllaw.com]
Sent: Thursday, August 12, 2010 4:08 PM
To: Heather Morado
Subject: RE: Soaring Helmet v. Nanal, conference re discovery

Heather,

My schedule is pretty open next week except for Monday, when I will be out of the office. Would Wednesday, 10 a.m. work for you? If not, Tuesday late morning or afternoon, or anytime Wednesday or Thursday also would work for me.

Thanks,
Stacia

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From: Heather Morado [mailto:hmorado@invictalaw.com]
Sent: Thursday, August 12, 2010 3:32 PM

1/5/2011

To: Stacia Lay
Subject: Soaring Helmet v. Nanal, conference re discovery

Stacia,
I've received your letter regarding the status of discovery in this matter - and I am available for a telephone conference next week, please let me know when would work best for you.

Heather M. Morado | Invicta Law Group, PLLC
Counsel for creative companies

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