

Exhibit A

1 7. Nanal further expressly reserves the right to amend and/or supplement its
2 statement of the issues of law in light of the Court's decision on Nanal's pending motion for
3 summary judgment on the claims in Plaintiff's Second Amended Complaint.

4 **VI. NANAL'S WITNESSES.**

5 Pursuant to CR 16(i)(5), following are the names and addresses, if known, and a general
6 description of the expected testimony of each witnesses that may be called by Nanal, excluding
7 rebuttal witnesses:

8 1. Albert Bootesaz, president, Nanal, Inc., c/o Hendricks & Lewis PLLC, 901 Fifth
9 Avenue, Suite 4100, Seattle, Washington 98164. Will testify. Mr. Bootesaz is expected to
10 testify about all aspects of the case. In specific but no way limiting example, Mr. Bootesaz is
11 expected to testify about Nanal's business and specifically its website, LeatherUp.com; Nanal's
12 use of the Google AdWords program specifically as it relates to the use of keywords; Nanal's
13 sale of Xelement-branded motorcycle jackets; and all other aspects of the case.

14 2. Aaron Golshen, c/o Hendricks & Lewis PLLC, 901 Fifth Avenue, Suite 4100,
15 Seattle, Washington 98164. Possible witness only. Mr. Golshen is expected to testify about
16 Nanal's electronic marketing, including with any relevant internet search engine, namely,
17 Google's search engine, and Nanal's use of Google's AdWords program.

18 3. Jim Squire of Holiday Powersports, 4501 Page Avenue, Michigan Center,
19 Michigan 49254. Possible witness only. Mr. Squire is expected to testify about the reason(s) for
20 Holiday Powersports' decision not to carry Plaintiff's motorcycle helmets.

21 4. Lou Xu, President, Soaring Helmet Corporation, c/o Invicta Law Group, PLLC,
22 1000 Second Avenue, Suite 3310, Seattle, Washington 98104. Possible witness only. Mr. Xu is
23 expected to testify about all aspects of the case including but not limited to Soaring Helmet's
24 business, operations and marketing.

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