

Exhibit 6

The Honorable James L. Robart

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ATIGEO LLC, a Washington limited liability
company; and MICHAEL SANDOVAL, an
individual,

Plaintiffs,

v.

OFFSHORE LIMITED D, a California
business organization, form unknown;
OFFSHORE LIMITED D, a California
partnership; DENNIS MONTGOMERY,
individually and as a partner of Offshore
Limited D; ISTVAN BURGYN, individually
and as a partner of Offshore Limited D;
DEMARATECH, LLC, a California limited
liability company; and DOES 1-10, inclusive,

Defendants.

Case No. 2:13-cv-01694-JLR

**ATIGEO LLC'S FIRST SET OF
INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS
DIRECTED TO OFFSHORE LIMITED D
AND ANSWERS AND RESPONSES
THERE TO**

TO: Defendant Offshore Limited D;

AND TO: Paul Edward Brain, counsel for Defendant.

Plaintiff Atigeo LLC ("Atigeo") submits the following written interrogatories and requests for production to Defendant Offshore Limited D. Pursuant to Federal Rules of Civil Procedure 26, 33, and 34, these discovery requests must be answered in writing and under oath, within thirty (30) days after the date of service hereof.

The inspection and photocopying of the requested DOCUMENTS shall be at the offices of Atigeo's attorneys of record, Stoel Rives LLP, 600 University Street, Suite 3600, Seattle,

ATIGEO LLC'S FIRST SET OF INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS DIRECTED
TO OFFSHORE LIMITED D ***AND ANSWERS AND RESPONSES***
THERE TO (Case No. 2:13-cv-01694-JLR) – Page 1

BRAIN LAW FIRM PLLC
1119 PACIFIC AVENUE, SUITE 1200
TACOMA, WASHINGTON 98402
TEL: 253-327-1019 / FAX: 253-327-1021

1 Washington 98101, or at such other place as mutually agreed upon by counsel. Inspection and
2 copying will be conducted by counsel for Atigeo or its agents from time to time until
3 completion.

4 **INSTRUCTIONS**

5 1. Whenever a reference to a business entity appears, the reference shall mean the
6 business entity, any predecessor or successor entity, any names under which the business
7 entity was previously known, and the business entity's affiliated companies, partnerships,
8 divisions, subdivisions, directors, officers, employees, agents, clients or other representatives
9 of affiliated third parties.

10 2. If the production of any requested document specified herein is objected to on
11 the grounds that it is burdensome and/or oppressive, please set forth the following
12 information:

- 13 a. The precise reason why the document requested poses a special burden to
14 Defendant in its production;
15 b. The approximate number of documents which meet the request; and
16 c. The location(s) of the documents which have been requested.

17 3. Privilege/Redaction Log: It is not Atigeo's intention to request production of
18 privileged matter. In the event that any document requested herein is objected to on the
19 grounds that it is privileged in whole or in part, please set forth the following information:

- 20 a. Describe in detail the nature and contents of the document;
21 b. The date each document bears;
22 c. The name, occupation, and capacity of the individual from whom the
23 privileged matter emanated;
24 d. All persons or entities to whom the document was addressed or dictated;
25 and
26 e. A clear and concise statement as to the grounds upon which a claim of
27 privilege is based.

28 4. The information sought in these discovery requests is intended to include any
and all witnesses and information known to you. As required by Federal Rules of Civil

1 Procedure 26 and 34, the documents to be produced in response to these requests specifically
2 embrace, in addition to documents within your possession, custody or control, documents
3 within the possession, custody or control of any of your agents, accountants, representatives or
4 attorneys. Such documents also embrace originals and identical copies (whether different
5 from the original because of notes made thereon or otherwise) of the documents described in
6 these requests.

7 5. If any requested document was, but is no longer, in your possession, custody, or
8 control, state what disposition was made of it, the reason for such disposition, and identify all
9 persons or entities you believe to have possession, custody, or control of the document or any
10 copies. If you do not know, or cannot recall, whether particular responsive documents exist,
11 or if such documents are missing, state the efforts made to ascertain their existence.

12 6. As required by Federal Rules of Civil Procedure 26(b) and 34(b), produce all
13 Documents and Electronically-Stored Information in their original files as they are kept in the
14 ordinary course of business or, alternatively, organized and labeled to specifically indicate the
15 Discovery Request(s) to which each such document is being produced. Identify all Documents
16 and Electronically-Stored Information by Bates number for each Discovery Request. If any
17 Document and Electronically-Stored Information produced has been removed from its original
18 location, indicate on each document produced, or in an index or other convenient manner, the
19 location where such document was found.

20 7. The following requests are continuing in nature and in the event you become
21 aware of or acquire additional information relating or referring thereto, such additional
22 information is to be promptly produced as permitted by Federal Rule of Civil Procedure 26.

23 DEFINITIONS

24 1. The terms “COMMUNICATION” and “COMMUNICATIONS” shall include
25 any letter, facsimile, memorandum, note, electronic mail, audio or video recording of a
26 conversation, or any other recording, in any medium, of any message, including drafts, whether
27 sent or not sent.

1 2. The terms “DOCUMENT” or “DOCUMENTS” encompass all forms of tangible
2 expression, including, without limitation, all written, recorded, printed, typed, transcribed,
3 filmed, digitized, or graphic matter and all other tangible things and media upon which any
4 handwriting, typing, printing, drawing, representation, electrostatic or other copy, sound or
5 video recording, magnetic or electrical impulse, visual reproduction or communication is
6 recorded, reproduced or represented, including, but not limited to, books, records,
7 correspondence, reports, memoranda, electronic mail (e-mail), contracts, tables, tabulations,
8 graphs, charts, diagrams, plans, schedules, appointment books, calendars, diaries, time sheets,
9 reports, studies, analyses, drafts, telegrams, teletype or telecopy messages, files, telephone logs
10 and messages, checks, microfilms, microfiche, pictures, photographs, printouts, electronic data
11 compilations, tapes, diskettes, drives, removable media, notes, minutes or transcripts of
12 proceedings. Documents shall include originals and all non-identical copies (whether different
13 from the original because of notes made in or attached to such copy, or otherwise), all other data
14 and metadata compilations from which information can be obtained (translated, if necessary into
15 useable form), and any preliminary versions, drafts, or other revisions of any of the foregoing.

16 3. “DOCUMENTS AND ELECTRONICALLY-STORED INFORMATION” shall
17 include the above meaning of the term DOCUMENTS and shall mean mean the original, all
18 copies, and all translations of any writing, drawings, graphs, sound recordings, images, and other
19 data, metadata or data compilations stored in any medium (paper or other tangible format, as
20 well as any electronic format) from which information can be obtained. “DOCUMENTS AND
21 ELECTRONICALLY-STORED INFORMATION” includes, for example (and not by way of
22 limitation) paper documents, photographs, microfilm, microfiche, email, computer tapes,
23 computer printouts, spreadsheets, calendars, appointment books, lists, tabulations, surveys, all
24 other records kept by electronic, photographic or mechanical means, and things similar to the
25 foregoing, however denominated. “ELECTRONICALLY-STORED INFORMATION”
26 includes without limitation email, voicemail, documents, spreadsheets, calendars, and any other
27 information existing in any electronic format (e.g., Word, Excel, Outlook, .pdf, HTML, .tif,
28 .jpeg, .wav).

1 4. The term “SUBJECT DOMAIN NAMES” shall mean any and all of the domain
2 names associated with Defendants’ accused wrongful acts, as alleged in the operative version of
3 the complaint in this case, including but not limited to the following domain names registered
4 through Network Solutions: atigeo.co, gratonresort.net, theuntoldstory.net, yellowstoneclub.net
5 and yellowstoneclubs.net.

6 5. The term “SUBJECT WEBSITES” shall mean any and all of the following
7 websites associated with Defendants’ accused wrongful acts, as alleged in the operative version
8 of the complaint, including but not limited to the following websites: www.atigeo.co,
9 www.gratonresort.net, www.theuntoldstory.net, www.yellowstoneclub.net and
10 www.yellowstoneclubs.net.

11 6. “PERSON” means any natural person, firm, association, partnership, limited
12 liability partnership, proprietorship, corporation, company, limited liability company, or any
13 other business or legal entity, and includes any and all of such person’s directors, officers,
14 employees, agents, attorneys, accountants, consultants, and/or other representatives.

15 7. “IDENTIFY.”

16 a. “IDENTIFY,” when used in the context of identifying a natural person,
17 means to state the person’s (i) full name, (ii) present or last known business
18 and residence addresses, (iii) present or last known business, residence, and
19 cellular telephone numbers, and (iv) present or last known employer, job
20 title or (if the job title is unknown to you) the nature or description of the
21 position occupied by the person.

22 b. “IDENTIFY,” when used in the context of identifying an entity, association,
23 partnership, or other organization rather than a natural person, means to
24 state (i) the organization’s full name, (ii) the address and telephone number
25 of its primary place of business; (iii) each address where the organization is
26 located where you have had contact with it that is or may be material to this
27 matter; (iv) each telephone number you have used to contact the
28 organization; (v) the state of the organization’s formation, and (vi) all
known natural persons who own, operate, and/or control the organization to
the best of your knowledge, information, and belief and, with respect to
each natural person with whom either of you has had contact, the person’s
(A) full name, (B) present or last known business and residence addresses,
(C) present or last known business, residence, and cellular telephone
numbers, and (D) present or last known employer, job title or (if the job title

1 is unknown to you) the nature or description of the position occupied by the
2 person.

3 c. "IDENTIFY," when used in the context of identifying a document, means to
4 provide sufficient information to permit unambiguous identification of the
5 document, including, without limitation, the document's (i) form (*i.e.*, letter,
6 memorandum, handwritten notes, typewritten notes, report, analysis, etc.),
7 (ii) title (if any), (iii) date, (iv) author, and (v) addressee or intended
8 recipient, if any, and (vi) current location.

9 d. "IDENTIFY," when used in the context of identifying a communication,
10 means to provide sufficient information to permit unambiguous
11 identification of the communication, including without limitation (i) the
12 date of the communication, (ii) the manner in which the communication
13 took place (*i.e.*, whether the communication took place through a meeting,
14 telephone conversation, letter, email, or other form of communication, the
15 form of which you are to specify), (iii) the location of the communication if
16 the communication was in the form of a telephone conversation or meeting,
17 (iv) all parties or persons present at the time of such communication or who
18 participated, overheard, or may have overheard the communication if it was
19 oral, or who have seen or may have seen the communication if it was in
20 writing, and (v) the subject matter and substance of the communication.

21 8. The term "including" is to be considered without limitation.

22 9. The terms "and" and "or" are to be considered conjunctively and disjunctively.

23 The singular form of a noun or pronoun includes the plural form and vice versa. The term "or"
24 is understood to include and encompass "and." "Any" is understood to include and encompass
25 "all." The word "all" also includes "each" and vice versa.

26 10. The term "REGARDING" any given subject shall mean, without limitation,
27 identifying, describing, discussing, assessing, stating, referring, constituting, containing,
28 concerning, embodying, and/or referring directly or indirectly to, in any way, the particular
subject matter.

11. Each of the terms "REFER TO," "RELATE TO," "RELATING TO," or
"REGARDING" means and includes any logical or factual connection with the matter identified
or discussed. These terms include all matters or things that in any way discuss, are connected to,
arise from, reflect, summarize, evaluate, comment on, and/or tend to prove or disprove the
subject or object of the particular discovery request in which any of these terms is used.

1 12. "YOU," "YOUR," or "DEFENDANT" means and includes Defendant Offshore
2 Limited D, and all agents, related entities, owners, affiliates, representatives, accountants,
3 attorneys, and any other person who, or entity that, is affiliated with, has acted, and/or is acting
4 for or on behalf of one or more of the following: Offshore Limited D.

5 13. "PLAINTIFFS" means and includes Atigeo LLC and/or Michael Sandoval and
6 all agents, related entities, owners, affiliates, representatives, accountants, attorneys, and any
7 other person who, or entity that, is affiliated with, has acted, and/or is acting for or on behalf of
8 Atigeo LLC and/or Michael Sandoval.

9 14. "DEFENDANTS" means and includes Offshore Limited D, Dennis Montgomery,
10 Istvan Burgyan, Demaratech LLC, and/or Does 1-25 and all agents, related entities, owners,
11 affiliates, representatives, accountants, attorneys, and any other person who, or entity that, is
12 affiliated with, has acted, and/or is acting for or on behalf of Offshore Limited D, Dennis
13 Montgomery, Istvan Burgyan, Demaratech LLC, and/or Does 1-25.

14 INTERROGATORIES

15 **INTERROGATORY NO. 1:** IDENTIFY and describe with particularity all devices, servers,
16 and methods (specifically hardware, software, and systems), including location, used to store the
17 documents referenced in Defendants' Initial Disclosures and the documents produced in
18 response to Atigeo's Requests for Production in the above-captioned case.

19 **ANSWER:** Offshore Limited D, a California business organization, form unknown, and
20 Offshore Limited D, a California partnership, (collectively "Offshore") has never existed
21 in any form. As such, the entity has no assets or documents of any kind.

22 REQUESTS FOR PRODUCTION

23 **RFP NO. 1:** Please produce all DOCUMENTS REGARDING the formation of Offshore
24 Limited D.

25 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
26 documents of any kind.

1 **RFP NO. 2:** Please produce all DOCUMENTS REGARDING the ownership of Offshore
2 Limited D.

3 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
4 documents of any kind.

5
6 **RFP NO. 3:** Please produce all minutes of meetings conducted by Offshore Limited D.

7 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
8 documents of any kind.

9
10 **RFP NO. 4:** Please produce all DOCUMENTS reflecting the employees of Offshore
11 Limited D.

12 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
13 documents of any kind.

14
15 **RFP NO. 5:** Please produce all DOCUMENTS reflecting the directors or officers of Offshore
16 Limited D.

17 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
18 documents of any kind.

19
20 **RFP NO. 6:** Please produce all DOCUMENTS reflecting the partners of Offshore Limited D.

21 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
22 documents of any kind.

23 **RFP NO. 7:** Please produce all operating agreements of Offshore Limited D.

24 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
25 documents of any kind.

1 **RFP NO. 8:** Please produce all partnership agreements REGARDING Offshore Limited D.

2 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
3 documents of any kind.

4
5 **RFP NO. 9:** Please produce all DOCUMENTS reflecting Offshore Limited D's place of
6 business.

7 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
8 documents of any kind.

9
10 **RFP NO. 10:** Please produce all DOCUMENTS reflecting any licenses held by Offshore
11 Limited D.

12 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
13 documents of any kind.

14
15 **RFP NO. 11:** Please produce all DOCUMENTS reflecting any permits held by Offshore
16 Limited D.

17 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
18 documents of any kind.

19
20 **RFP NO. 12:** Please produce all shareholder certificates REGARDING Offshore Limited D.

21 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
22 documents of any kind.

23
24 **RFP NO. 13:** Please produce all DOCUMENTS reflecting the domain names owned by
25 Offshore Limited D.

26 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
27 documents of any kind.

1 **RFP NO. 14:** Please produce all DOCUMENTS reflecting the websites formed by Offshore
2 Limited D.

3 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
4 documents of any kind.

5
6 **RFP NO. 15:** Please produce all DOCUMENTS REGARDING the formation of Demaratech,
7 LLC

8 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
9 documents of any kind.

10
11 **RFP NO. 16:** Please produce all DOCUMENTS REGARDING the ownership of Demaratech,
12 LLC.

13 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
14 documents of any kind.

15
16 **RFP NO. 17:** Please produce all minutes of meetings conducted by Demaratech, LLC.

17 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
18 documents of any kind.

19
20 **RFP NO. 18:** Please produce all DOCUMENTS reflecting the employees of Demaratech, LLC.

21 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
22 documents of any kind.

23
24 **RFP NO. 19:** Please produce all DOCUMENTS reflecting the directors or officers of
25 Demaratech, LLC.

26 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
27 documents of any kind.

1 **RFP NO. 20:** Please produce all operating agreements REGARDING Demaratech, LLC.

2 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
3 documents of any kind.

4
5 **RFP NO. 21:** Please produce all DOCUMENTS reflecting the members of Demaratech, LLC.

6 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
7 documents of any kind.

8
9 **RFP NO. 22:** Please produce all DOCUMENTS reflecting Demaratech, LLC's place of
10 business.

11 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
12 documents of any kind.

13
14 **RFP NO. 23:** Please produce all DOCUMENTS reflecting any licenses held by Demaratech,
15 LLC.

16 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
17 documents of any kind.

18
19 **RFP NO. 24:** Please produce all DOCUMENTS reflecting any permits held by Demaratech,
20 LLC.

21 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
22 documents of any kind.

23
24 **RFP NO. 25:** Please produce all DOCUMENTS reflecting the domain names owned by
25 Demaratech, LLC.

26 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
27 documents of any kind.

1 **RFP NO. 26:** Please produce all DOCUMENTS reflecting the websites formed by Demaratech,
2 LLC.

3 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
4 documents of any kind.

5
6 **RFP NO. 27:** Please produce all DOCUMENTS reflecting the domain names owned by you.

7 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
8 documents of any kind.

9
10 **RFP NO. 28:** Please produce all DOCUMENTS reflecting the websites owned by you.

11 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
12 documents of any kind.

13
14 **RFP NO. 29:** Please produce all DOCUMENTS REGARDING the formation of any entity
15 involved in any aspect of the SUBJECT DOMAIN NAMES.

16 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
17 documents of any kind.

18
19 **RFP NO. 30:** Please produce all DOCUMENTS REGARDING the formation of any entity
20 involved in any aspect of the SUBJECT WEBSITES.

21 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
22 documents of any kind.

23
24 **RFP NO. 31:** Please produce all COMMUNICATIONS between you and any person
25 REGARDING Offshore Limited D.

26 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
27 documents of any kind.

1 **RFP NO. 32:** Please produce all COMMUNICATIONS between any pseudonym used by any
2 of your owners, representatives, or employees (including Clark Kent, David Webb, Linda
3 Stevens, nCoder) and any person REGARDING Offshore Limited D.

4 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
5 documents of any kind.

6
7 **RFP NO. 33:** Please produce all COMMUNICATIONS between you and any person
8 REGARDING Demaratech, LLC.

9 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
10 documents of any kind.

11
12 **RFP NO. 34:** Please produce all COMMUNICATIONS between any pseudonym used by any
13 of your owners, representatives, or employees (including Clark Kent, David Webb, Linda
14 Stevens, nCoder) and any person REGARDING Demaratech, LLC.

15 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
16 documents of any kind.

17
18 **RFP NO. 35:** Please produce all DOCUMENTS REGARDING the registration or use of the
19 SUBJECT DOMAIN NAMES.

20 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
21 documents of any kind.

22
23 **RFP NO. 36:** Please produce all DOCUMENTS REGARDING the creation or use of the
24 SUBJECT WEBSITES.

25 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
26 documents of any kind.

1 **RFP NO. 37:** Please produce all COMMUNICATIONS between you and any person
2 REGARDING the SUBJECT DOMAIN NAMES.

3 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
4 documents of any kind.

5
6 **RFP NO. 38:** Please produce all COMMUNICATIONS between you and any person
7 REGARDING the SUBJECT WEBSITES.

8 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
9 documents of any kind.

10
11 **RFP NO. 39:** Please produce all COMMUNICATIONS between any pseudonym used by any
12 of your owners, representatives, or employees (including Clark Kent, David Webb, Linda
13 Stevens, nCoder) and any person REGARDING the SUBJECT DOMAIN NAMES.

14 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
15 documents of any kind.

16
17 **RFP NO. 40:** Please produce all COMMUNICATIONS between any pseudonym used by any
18 of your owners, representatives, or employees (including Clark Kent, David Webb, Linda
19 Stevens, nCoder) and any person REGARDING the SUBJECT WEBSITES.

20 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
21 documents of any kind.

22
23 **RFP NO. 41:** Please produce all COMMUNICATIONS between you and Network Solutions
24 REGARDING the SUBJECT DOMAIN NAMES.

25 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
26 documents of any kind.

1 **RFP NO. 42:** Please produce all COMMUNICATIONS between you and Network Solutions
2 REGARDING the SUBJECT WEBSITES.

3 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
4 documents of any kind.

5
6 **RFP NO. 43:** Please produce all COMMUNICATIONS between you and Network Solutions
7 regarding account number 27945118.

8 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
9 documents of any kind.

10
11 **RFP NO. 44:** Please produce all COMMUNICATIONS between you and any person
12 REGARDING Atigeo LLC.

13 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
14 documents of any kind.

15
16 **RFP NO. 45:** Please produce all COMMUNICATIONS between any pseudonym used by any
17 of your owners, representatives, or employees (including Clark Kent, David Webb, Linda
18 Stevens, nCoder) and any person REGARDING Atigeo LLC.

19 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
20 documents of any kind.

21
22 **RFP NO. 46:** Please produce all COMMUNICATIONS between you and any person
23 REGARDING Atigeo LLC's subsidiaries.

24 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
25 documents of any kind.

1 **RFP NO. 47:** Please produce all COMMUNICATIONS between any pseudonym used by any
2 of your owners, representatives, or employees (including Clark Kent, David Webb, Linda
3 Stevens, nCoder) and any person REGARDING Atigeo LLC's subsidiaries.

4 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
5 documents of any kind.

6
7 **RFP NO. 48:** Please produce all COMMUNICATIONS between you and Atigeo LLC,
8 including communications with any of Atigeo LLC's employees.

9 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
10 documents of any kind.

11
12 **RFP NO. 49:** Please produce all COMMUNICATIONS between any pseudonym used by any
13 of your owners, representatives, or employees (including Clark Kent, David Webb, Linda
14 Stevens, nCoder) and Atigeo LLC, including communications with any of Atigeo LLC's
15 employees.

16 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
17 documents of any kind.

18
19 **RFP NO. 50:** Please produce all COMMUNICATIONS between you and any person
20 REGARDING Michael Sandoval.

21 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
22 documents of any kind.

23
24 **RFP NO. 51:** Please produce all COMMUNICATIONS between any pseudonym used by any
25 of your owners, representatives, or employees (including Clark Kent, David Webb, Linda
26 Stevens, nCoder) and any person REGARDING Michael Sandoval.

27 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
28 documents of any kind.

1 **RFP NO. 52:** Please produce all COMMUNICATIONS between you and Michael Sandoval.

2 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
3 documents of any kind.

4
5 **RFP NO. 53:** Please produce all COMMUNICATIONS between any pseudonym used by any
6 of your owners, representatives, or employees (including Clark Kent, David Webb, Linda
7 Stevens, nCoder) and Michael Sandoval.

8 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
9 documents of any kind.

10
11 **RFP NO. 54:** Please produce all COMMUNICATIONS between you and Western Capital
12 Partners.

13 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
14 documents of any kind.

15
16 **RFP NO. 55:** Please produce all COMMUNICATIONS between any pseudonym used by any
17 of your owners, representatives, or employees (including Clark Kent, David Webb, Linda
18 Stevens, nCoder) and Western Capital Partners.

19 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
20 documents of any kind.

21
22 **RFP NO. 56:** Please produce all COMMUNICATIONS between you and Jeff Adams.

23 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
24 documents of any kind.

1 **RFP NO. 57:** Please produce all COMMUNICATIONS between any pseudonym used by any
2 of your owners, representatives, or employees (including Clark Kent, David Webb, Linda
3 Stevens, nCoder) and Jeff Adams.

4 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
5 documents of any kind.

6
7 **RFP NO. 58:** Please produce all COMMUNICATIONS between you and any lawyers
8 representing Western Capital Partners, including Robert Hatch and Joseph Novak.

9 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
10 documents of any kind.

11
12 **RFP NO. 59:** Please produce all COMMUNICATIONS between any pseudonym used by any
13 of your owners, representatives, or employees (including Clark Kent, David Webb, Linda
14 Stevens, nCoder) and any lawyers representing Western Capital Partners, including Robert
15 Hatch and Joseph Novak.

16 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
17 documents of any kind.

18
19 **RFP NO. 60:** Please produce all COMMUNICATIONS between you and Edra Blixseth.

20 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
21 documents of any kind.

22
23 **RFP NO. 61:** Please produce all COMMUNICATIONS between any pseudonym used by any
24 of your owners, representatives, or employees (including Clark Kent, David Webb, Linda
25 Stevens, nCoder) and any lawyers representing Edra Blixseth.

26 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
27 documents of any kind.

1 **RFP NO. 62:** Please produce all COMMUNICATIONS between you and Timothy Blixseth.

2 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
3 documents of any kind.

4
5 **RFP NO. 63:** Please produce all COMMUNICATIONS between any pseudonym used by any
6 of your owners, representatives, or employees (including Clark Kent, David Webb, Linda
7 Stevens, nCoder) and any lawyers representing Timothy Blixseth.

8 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
9 documents of any kind.

10
11 **RFP NO. 64:** Please produce all DOCUMENTS REGARDING the following statement made
12 on the SUBJECT WEBSITES: That Atigeo billed a client for “nonexistent development work.”

13 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
14 documents of any kind.

15
16 **RFP NO. 65:** Please produce all DOCUMENTS REGARDING the following statement made
17 on the SUBJECT WEBSITES: That “Edra Blixseth place[d] \$7mil into [Atigeo] accounts as
18 ‘pre-divorce’ money. Michael Sandoval agree[d] to escrow and ‘shelter’ the money for Edra
19 Blixseth.”

20 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
21 documents of any kind.

22
23 **RFP NO. 66:** Please produce all DOCUMENTS REGARDING the following statement made
24 on the SUBJECT WEBSITES: That Michael Sandoval took all of Edra Blixseth’s “sheltered”
25 money.

26 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
27 documents of any kind.

1 **RFP NO. 67:** Please produce all DOCUMENTS REGARDING the following statement made
2 on the SUBJECT WEBSITES: That Atigeo and Michael Sandoval own three lots on Lake
3 Washington, “purchased with Blixseth money without their consent or knowledge.”

4 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
5 documents of any kind.

6
7 **RFP NO. 68:** Please produce all DOCUMENTS REGARDING the following statement made
8 on the SUBJECT WEBSITES: That “Michael Sandoval, with the help of his controller, took the
9 [Blixseth] money to purchase the property on Lake Washington in 2006 without the knowledge
10 or consent of Edra Blixseth. Michael Sandoval admitted to the wrongdoing in March 2007 after
11 being confronted with the evidence by Edra Blixseth and her associates.”

12 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
13 documents of any kind.

14
15 **RFP NO. 69:** Please produce all DOCUMENTS REGARDING the following statement made
16 on the SUBJECT WEBSITES: That Atigeo and Michael Sandoval “still owe the Blixseth estate
17 \$8 [million].”

18 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
19 documents of any kind.

20
21 **RFP NO. 70:** Please produce all DOCUMENTS REGARDING the lawsuit known as *Edra*
22 *Blixseth v. xPatterns et al.*, King County Superior Court Case No. 08-2-18034-4.

23 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
24 documents of any kind.

1 **RFP NO. 71:** Please produce all DOCUMENTS supporting the statements made in the
2 document entitled “Declaration of Istvan Burgyan in Support of Motion for Summary
3 Judgment,” dated December 23, 2013 in the above-captioned case.

4 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
5 documents of any kind.

6
7 **RFP NO. 72:** Please produce all DOCUMENTS supporting the statements made in the
8 document entitled “Declaration of Dennis Montgomery In Support of Motion to Dismiss and
9 Special Motion to Strike,” filed in the above-captioned case on November 22, 2013.

10 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
11 documents of any kind.

12
13 **RFP NO. 73:** Please produce all insurance policies, which you contend may be relevant or
14 satisfy all or part of a possible judgment in the above-caption matter, or which reimburse you for
15 payments made in defense costs or to satisfy a possible judgment in the above-captioned matter.

16 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
17 documents of any kind.

18
19 **RFP NO. 74:** Please produce all correspondence regarding or relating to insurance policies,
20 which you contend may be relevant or satisfy all or part of a possible judgment in the above-
21 caption matter, or which reimburse you for payments made in defense costs or to satisfy a
22 possible judgment in the above-captioned matter.

23 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
24 documents of any kind.

1 **RFP NO. 75:** Please produce all DOCUMENTS identified in Defendants' Initial Disclosures in
2 the above-captioned case.

3 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
4 documents of any kind.

5
6 **RFP NO. 76:** Please produce all DOCUMENTS regarding the affirmative defenses referenced
7 in Defendants' Initial Disclosures in the above-captioned case.

8 **RESPONSE:** Offshore has never existed in any form. As such, the entity has no
9 documents of any kind.

VERIFICATION

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

_____, _____ for Defendant Offshore Limited D,
being first duly sworn, on oath deposes and says:

That I am _____; that I have read the foregoing
Interrogatories and Requests for Production of Documents and the answers and responses
thereto and have reviewed the documents produced, know the contents thereof, and believe the
answers to the Interrogatories and responses to the Requests to be true and the documents
produced complete.

Signature: _____
Name Printed: _____

SUBSCRIBED AND SWORN TO before me this ____ day of _____, 2014.

Signature: _____
Name Printed: _____

NOTARY PUBLIC in and for the State of
Washington, residing at _____
My appointment expires: _____

STATEMENT OF ATTORNEY

The undersigned hereby states that he is the attorney for the party answering the above
propounded Interrogatories and responding to the Interrogatories and Requests for Production of
Documents, and that all objections, if any, set forth in response to said Interrogatories and
Requests were made by the undersigned as required by CR 26(g).

DATED this 7th day of February, 2014.

BRAIN LAW FIRM PLLC

By: 

Paul E. Brain, WSBA #13438

Counsel for Defendants Offshore Limited D and
Demaratech LLC

CERTIFICATE OF SERVICE

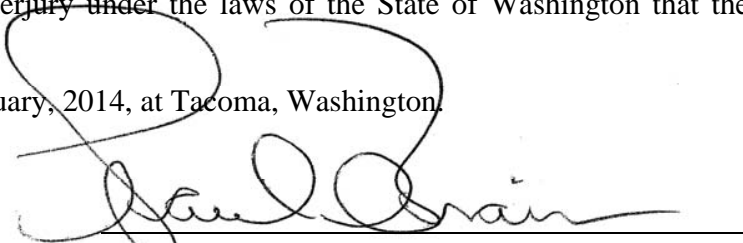
I hereby certify that I am a citizen of the United States of America and a resident of the State of Washington, am over the age of twenty-one years, am not a party to this action, and am competent to be a witness herein.

I hereby certify that I have this 7th day of February, 2014, served a true and correct copy of the foregoing document upon counsel of record, via email and U.S. First Class Mail postage prepaid, properly addressed as follows:

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I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 7th day of February, 2014, at Tacoma, Washington.



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