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RESPONSE DUE

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9 Attorneys for Plaintiffs
The Magnavox Company and
10 Sanders Associates, Inc.

11 United States District Court For The
12 Northern District Of California

13 THE MAGNAVOX COMPANY, a corporation,)
14 and SANDERS ASSOCIATES, INC.,)
a corporation,)
15 Plaintiffs,)
16 v.)
17 ACTIVISION, INC., a corporation,)
18 Defendant.)

No. C 82 5270 JPV

PLAINTIFFS' SUPPLEMENTAL
RESPONSE TO DEFENDANT'S
INTERROGATORIES

19
20 Plaintiffs herewith supplement their responses to
21 defendant's interrogatories 32-37, 39-41, 53, 65, 76-78, 84-87,
22 101-116, 126-134, 138, 139, 154, 159-162, and 169-174. This
23 supplementation is without waiver of any of the objections stated
24 in plaintiff's initial responses to those interrogatories in
25 "Plaintiffs' Response To Defendant's First Set of Interrogatories
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PLAINTIFFS' SUPPLEMENTAL
RESPONSE TO DEFENDANT'S
INTERROGATORIES

1 RESPONSE:

2 **Yes.**

3
4 INTERROGATORY NO. 116

5 If the answer to INTERROGATORY NO. 115 is other than an
6 unqualified negative, set forth in detail the reason(s) for such
7 belief.

8
9 RESPONSE:

10 During the prosecution of U.S. Patent 3,659,284,
11 Examiner Trafton had clearly indicated his knowledge of the
12 application which resulted in U.S. Patent 3,728,480; such
13 applications were cited to him during the examination of the
14 application leading to U.S. Patent 28.507. See plaintiffs
15 response to at least interrogatories 101-104 and 175.

16
17 INTERROGATORY NO. 126

18 For each combination of the games identified in response
19 to Interrogatory No. 38 of Defendant's First Set of
20 Interrogatories to Plaintiffs (namely, "Fishing Derby", "Boxing",
21 "Tennis" and "Ice Hockey") and the consoles identified in response
22 to Interrogatory No. 50 of DEFENDANT'S FIRST SET OF
23 INTERROGATORIES TO PLAINTIFFS (namely, the Atari VCS Model 2600,
24 the Sears Tele-Game Video Arcade, and the combination of the
25 Colecovision game console and the Expansion Module 1) which
26 plaintiffs contend constitutes an infringement of Claim 25 of the

1 United States Patent Re. 28,507, identify the elements which
2 plaintiffs contend correspond to the following elements of the
3 claim:

- 4 A. A hitting symbol;
5 B. Means for generating a hitting symbol;
6 C. A hit symbol;
7 D. Means for generating a hit symbol;
8 E. Coincidence between said hitting symbol and said
9 hit symbol;
10 F. Means for ascertaining coincidence between said
11 hitting symbol and said hit symbol;
12 G. A distinct motion imparted to said hit symbol upon
13 coincidence; and
14 H. Means for imparting a distinct motion to said hit
15 symbol upon coincidence.

16
17 RESPONSE:

18 Plaintiffs are at this time unable to supply all the
19 information requested in Interrogatory 126. Plaintiffs have not
20 completed their discovery as to the television game cartridges
21 manufactured, used, and/or sold by Activision, and the television
22 game consoles with which those cartridges are used, and are thus
23 unable to fully state what contentions they will make at trial as
24 to the subject matter of this interrogatory. Plaintiffs object to
25 this interrogatory as premature.

- 1 D. Tennis, Ice Hockey, Boxing and Fishing Derby: At
2 least the Activision television game cartridge, the
3 television interface adapter, and the
4 microprocessor.
- 5 E. Tennis: The coincidence between the human
6 controlled player symbol and the ball symbol by
7 which the player hits the ball.
8 Ice Hockey: The coincidence between the player
9 symbol and the puck symbol by which the player
10 intercepts the puck.
11 Boxing: The coincidence between the human
12 controlled boxer symbol and the game controlled
13 boxer symbol by which the human controlled boxer
14 hits the game controlled boxer.
15 Fishing Derby: The coincidence between the fishing
16 line symbol and the fish symbols by which the fish
17 are caught.
- 18 F. Tennis, Ice Hockey, Boxing and Fishing Derby: At
19 least the Activision television game cartridge, the
20 microprocessor, and perhaps the television
21 interface adapter.
- 22 G. Tennis: The motion of the ball symbol following
23 coincidence with the human controlled player
24 symbol.
25 Ice Hockey: The motion of the puck symbol
26 following coincidence with player symbol.

1 Boxing: The motion of the game controlled boxer
2 symbol following coincidence with the human
3 controlled boxer symbol.

4 Fishing Derby: The motion of the fish symbol
5 following coincidence with the fishing line symbol.

6 H. Tennis, Ice Hockey, Boxing and Fishing Derby: At
7 least the Activision game television cartridge and
8 the microprocesor.

9
10 INTERROGATORY NO. 127

11 For each combination of the games identified in response
12 to Interrogatory No. 38 of Defendant's First Set of
13 Interrogatories to Plaintiffs (namely, "Fishing Derby", "Boxing",
14 "Tennis" and "Ice Hockey") and the consoles identified in response
15 to Interrogatory No. 50 of Defendant's First Set Of
16 Interrogatories To Plaintiffs (namely, the Atari VCS Model 2600,
17 the Sears Tele-Game Video Arcade, and the combination of the
18 Colecovision game console and the Expansion Module 1) which
19 plaintiffs contend constitutes an infringement of Claim 26 of the
20 United States Patent Re. 28,507, identify the elements which
21 plaintiffs contend correspond to the following elements of the
22 claim:

- 23 A. A variation in the horizontal position of the
24 hitting symbol;
25 B. A variation in the vertical position of the hitting
26 symbol; and

1 C. Means for providing horizontal and vertical control
2 signals for varying the horizontal and vertical
3 positions of said hitting symbol.
4

5 RESPONSE:

6 Plaintiffs are at this time unable to supply all the
7 information requested in Interrogatory 127. Plaintiffs have not
8 completed their discovery as to the television game cartridges
9 manufactured, used, and/or sold by Activision, and the television
10 game consoles with which those cartridges are used, and are thus
11 unable to fully state what contentions they will make at trial as
12 to the subject matter of this interrogatory. Plaintiffs object to
13 this interrogatory as premature.

14 However, in order to advance the progress of this
15 action, plaintiffs further respond to interrogatory 127 as follows
16 while reserving the right to alter, amend, supplement or change
17 the response after discovery is completed and prior to trial.
18 Each response refers to the combination of the indicated
19 Activision television game cartridge and the Atari VCS Model 2600,
20 the Sears Tele-Game Video Arcade, the Colecovision game console
21 with the Coleco Expansion Module 1, or the Coleco Gemini
22 television game console.

23 A. Tennis: The player symbols under control of the
24 human player may be moved horizontally.

25 Ice Hockey: The player symbols may be moved
26 horizontally.
27

1 Boxing: The boxer symbol under human control may
2 be moved horizontally.

3 Fishing Derby: The end of the fishing line symbols
4 may be moved horizontally.

5 B. Tennis: The player symbols under control of the
6 human player may be moved vertically.

7 Ice Hockey: The player symbols may be moved
8 vertically.

9 Boxing: The boxer symbol under control of the
10 human player may be moved vertically.

11 Fishing Derby: The end of the fishing line symbol
12 may be moved vertically.

13 C. Tennis, Ice Hockey, Boxing and Fishing Derby: At
14 least the Activision game cartridge, the joystick,
15 the microprocessor, and the peripheral interface
16 adapter.

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18 INTERROGATORY NO. 128

19 For each combination of the games identified in response
20 to Interrogatory No. 38 of Defendant's First Set of
21 Interrogatories to Plaintiffs (namely, "Fishing Derby", "Boxing",
22 "Tennis" and "Ice Hockey") and the consoles identified in response
23 to Interrogatory No. 50 of Defendant's First Set Of
24 Interrogatories To Plaintiffs (namely, the Atari VCS Model 2600,
25 the Sears Tele-Game Video Arcade, and the combination of the
26 Colecovision game console and the Expansion Module 1) which

1 RESPONSE:

2 Plaintiffs are at this time unable to supply the
3 information requested in interrogatory 129. Plaintiffs have not
4 completed their discovery as to the television game cartridges
5 manufactured, used, and/or sold by Activision, and the television
6 game consoles with which those cartridges are used, and are thus
7 unable to respond to this interrogatory. Plaintiffs object to
8 this interrogatory as premature.
9

10 INTERROGATORY NO. 130

11 For each combination of the games identified in response
12 to Interrogatory No. 38 of Defendant's First Set of
13 Interrogatories to Plaintiffs (namely, "Fishing Derby", "Boxing",
14 "Tennis" and "Ice Hockey") and the consoles identified in response
15 to Interrogatory No. 50 of Defendant's First Set Of
16 Interrogatories To Plaintiffs (namely, the Atari VCS Model 2600,
17 the Sears Tele-Game Video Arcade, and the combination of the
18 Colecovision game console and the Expansion Module 1) which
19 plaintiffs contend constitutes an infringement of Claim 51 of the
20 United States Patent Re. 28,507, identify the elements which
21 plaintiffs contend correspond to the following elements of the
22 claim:

- 23 A. A hitting symbol;
24 B. Means for generating a hitting symbol;
25 C. A hit symbol;
26 D. Means for generating a hit symbol;

- 1 E. Coincidence between said hitting symbol and said
2 hit symbol;
- 3 F. Means for ascertaining coincidence between said
4 hitting symbol and said hit symbol;
- 5 G. A distinct motion imparted to said hit symbol upon
6 coincidence; and
- 7 H. Means for imparting a distinct motion to said hit
8 symbol upon coincidence.
- 9

10 RESPONSE:

11 Plaintiffs are at this time unable to supply all the
12 information requested in interrogatory 130. Plaintiffs have not
13 completed their discovery as to the television game cartridges
14 manufactured, used, and/or sold by Activision, and the television
15 game consoles with which those cartridges are used, and are thus
16 unable to fully state what contentions they will make at trial as
17 to the subject matter of this interrogatory. Plaintiffs object to
18 this interrogatory as premature.

19 However, in order to advance the progress of this
20 action, plaintiffs further respond to interrogatory 130 as follows
21 while reserving the right to alter, amend, supplement or change
22 the response after discovery is completed and prior to trial.
23 Each response refers to the combination of the indicated
24 Activision television game cartridge and the Atari VCS Model 2600,
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1 the Sears Tele-Game Video Arcade, the Colecovision game console
2 with the Coleco Expansion Module 1, or the Coleco Gemini
3 television game console.

4 A. Tennis: The player symbols under control of the
5 human players.

6 Ice Hockey: The player symbols.

7 Boxing: The boxer symbol under control of the
8 human player.

9 Fishing Derby: The end of the fishing line
10 symbols.

11 B. Tennis, Ice Hockey, Boxing and Fishing Derby: At
12 least the Activision television game cartridge, the
13 joystick, the microprocessor, the peripheral
14 interface adapter, and the television interface
15 adapter.

16 C. Tennis: The ball symbol.

17 Ice Hockey: The puck symbol.

18 Boxing: The boxer symbol under control of the
19 game.

20 Fishing Derby: The fish symbols.

21 D. Tennis, Ice Hockey, Boxing and Fishing Derby: At
22 least the Activision television game cartridge, the
23 television interface adapter, and the
24 microprocessor.

1 E. Tennis: The coincidence between the human
2 controlled player symbol and the ball symbol by
3 which the player hits the ball.

4 Ice Hockey: The coincidence between the player
5 symbol and the puck symbol by which the player
6 intercepts the puck.

7 Boxing: The coincidence between the human
8 controlled boxer symbol and the game controlled
9 boxer symbol by which the human controlled boxer
10 hits the game controlled boxer.

11 Fishing Derby: The coincidence between the fishing
12 line symbol and the fish symbols by which the fish
13 are caught.

14 F. Tennis, Ice Hockey, Boxing and Fishing Derby: At
15 least the Activision television game cartridge, the
16 microprocessor, and perhaps the television
17 interface adapter.

18 G. Tennis: The motion of the ball symbol following
19 coincidence with the human controlled player
20 symbol.

21 Ice Hockey: The motion of the puck symbol
22 following coincidence with player symbol.

23 Boxing: The motion of the game controlled boxer
24 symbol following coincidence with the human
25 controlled boxer symbol.

1 Fishing Derby: The motion of the fish symbol
2 following coincidence with the fishing line symbol.

3 H. Tennis, Ice Hockey, Boxing and Fishing Derby: At
4 least the Ativision game television cartridge and
5 the microprocesor.
6

7 INTERROGATORY NO. 131

8 For each combination of the games identified in response
9 to Interrogatory No. 38 of Defendant's First Set of
10 Interrogatories to Plaintiffs (namely, "Fishing Derby", "Boxing",
11 "Tennis" and "Ice Hockey") and the consoles identified in response
12 to Interrogatory No. 50 of Defendant's First Set Of
13 Interrogatories To Plaintiffs (namely, the Atari VCS Model 2600,
14 the Sears Tele-Game Video Arcade, and the combination of the
15 Colecovision game console and the Expansion Module 1) which
16 plaintiffs contend constitutes an infringement of Claim 52 of the
17 United States Patent Re. 28,507, identify the elements which
18 plaintiffs contend correspond to the following elements of the
19 claim:

- 20 A. A variation in the horizontal position of the
21 hitting symbol;
22 B. A variation in the vertical position of the hitting
23 symbol; and
24 C. Means for providing horizontal and vertical control
25 signals for varying the horizontal and vertical
26 positions of said hitting symbol.
27

1 B. Tennis: The player symbols under control of the
2 human player may be moved vertically.

3 Ice Hockey: The player symbols may be moved
4 vertically.

5 Boxing: The boxer symbol under control of the
6 human player may be moved vertically.

7 Fishing Derby: The end of the fishing line symbol
8 may be moved vertically.

9 C. Tennis, Ice Hockey, Boxing and Fishing Derby: At
10 least the Activision game cartridge, the joystick,
11 the microprocessor, and the peripheral interface
12 adapter.

13
14 INTERROGATORY NO. 132

15 For each combination of the games identified in response
16 to Interrogatory No. 38 of Defendant's First Set of
17 Interrogatories to Plaintiffs (namely, "Fishing Derby", "Boxing",
18 "Tennis" and "Ice Hockey") and the consoles identified in response
19 to Interrogatory No. 50 of Defendant's First Set Of
20 Interrogatories To Plaintiffs (namely, the Atari VCS Model 2600,
21 the Sears Tele-Game Video Arcade, and the combination of the
22 Colecovision game console and the Expansion Module 1) which
23 plaintiffs contend constitutes an infringement of Claim 60 of the
24 United States Patent Re. 28,507, identify the elements which
25 plaintiffs contend correspond to the following elements of the
26 claim:

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- A. A vertical synchronization signal;
- B. A horizontal synchronization signal;
- C. Means for generating vertical and horizontal synchronization signals;
- D. Means responsive to said synchronization signals for deflecting the beam of a cathode ray tube to generate a raster on the screen of the tube;
- E. A first symbol on said screen;
- F. A position for the first symbol which is directly controlled by a player;
- G. Means coupled to said synchronization signal generating means and said cathode ray tube for generating a first symbol on said screen at a position which is directly controlled by a player;
- H. A second symbol on the screen which is movable;
- I. Means coupled to a said synchronization signal generating means and said cathode ray tube for generating a second symbol on said screen which is movable;
- J. A first coincidence between said first symbol and said second symbol;
- K. Means couple to said first symbol generating means and said second symbol generating means for determining a first coincidence between said first symbol and said second symbol;

- 1 L. A distinct motion imparted to said second symbol in
2 response to said coincidence; and
3 M. Means coupled to said coincidence determining means
4 and said second symbol generating means for
5 imparting a distinct motion to said second symbol
6 in response to said coincidence.
7

8 RESPONSE:

9 Plaintiffs are at this time unable to supply all the
10 information requested in Interrogatory 132. Plaintiffs have not
11 completed their discovery as to the television game cartridges
12 manufactured, used, and/or sold by Activision, and the television
13 game consoles with which those cartridges are used, and are thus
14 unable to fully state what contentions they will make at trial as
15 to the subject matter of this interrogatory. Plaintiffs object to
16 this interrogatory as premature.

17 However, in order to advance the progress of this
18 action, plaintiffs further respond to Interrogatory 132 as follows
19 while reserving the right to alter, amend, supplement or change
20 the response after discovery is completed and prior to trial.
21 Each response refers to the combination of the indicated
22 Activision television game cartridge and the Atari VCS Model 2600,
23 the Sears Tele-Game Video Arcade, the Colecovision game console
24 with the Coleco Expansion Module 1, or the Coleco Gemini
25 television game console.
26

- 1 A. Tennis, Ice Hockey, Boxing and Fishing Derby: The
2 vertical synchronization signals at the outputs of
3 the television interface adapter and the television
4 game console.
- 5 B. Tennis, Ice Hockey, Boxing and Fishing Derby: The
6 horizontal synchronization signals at the outputs
7 of the television interface adapter and the
8 television game console.
- 9 C. Tennis, Ice Hockey, Boxing and Fishing Derby: The
10 Activision television game cartridge, the
11 microprocessor, and the television interface
12 adapter.
- 13 D. Tennis, Ice Hockey, Boxing and Fishing Derby: At
14 least the horizontal and vertical deflection
15 circuitry of the associated television receiver.
- 16 E. Tennis: The player symbols under control of the
17 human player.
18 Ice Hockey: The player symbols.
19 Boxing: The boxer symbol under control of the
20 human player.
21 Fishing Derby: The end of the fishing line
22 symbols.
- 23 F. Tennis, Ice Hockey, Boxing and Fishing Derby: The
24 position of the first symbol.

1 G. Tennis, Ice Hockey, Boxing and Fishing Derby: At
2 least the Activision television game cartridge, the
3 joystick, the peripheral interface adapter, the
4 television interface adapter, and the
5 microprocessor.

6 H. Tennis: The ball symbol.

7 Ice Hockey: The puck symbol.

8 Boxing: The boxer symbol under control of the
9 game.

10 Fishing Derby: The fish symbols.

11 I. Tennis, Ice Hockey, Boxing and Fishing Derby: At
12 least the Activision television game cartridge, the
13 television interface adapter, and the
14 microprocessor.

15 J. Tennis: The coincidence between the human
16 controlled player symbol and the ball symbol by
17 which the player hits the ball.

18 Ice Hockey: The coincidence between the player
19 symbol and the puck symbol by which the player
20 intercepts the puck.

21 Boxing: The coincidence between the human
22 controlled boxer symbol and the game controlled
23 boxer symbol by which the human controlled boxer
24 hits the game controlled boxer.

1 Fishing Derby: The coincidence between the fishing
2 line symbol and any of the fish symbols by which
3 the fish are caught.

4 K. Tennis, Ice Hockey, Boxing and Fishing Derby: At
5 least the Activision television game cartridge, the
6 microprocessor and perhaps the television interface
7 adapter.

8 L. Tennis: The motion of the ball symbol following
9 coincidence.

10 Ice Hockey: The motion of the puck symbol
11 following coincidence.

12 Boxing: The motion of the game controlled boxer
13 symbol following coincidence.

14 Fishing Derby: The motion of the fish symbol
15 following coincidence.

16 M. Tennis, Ice Hockey, Boxing and Fishing Derby: At
17 least the Activision television game cartridge and
18 the microprocessor.

19
20 INTERROGATORY NO. 133

21 For each combination of the games identified in response
22 to Interrogatory No. 38 of Defendant's First Set of
23 Interrogatories to Plaintiffs (namely, "Fishing Derby", "Boxing",
24 "Tennis" and "Ice Hockey") and the consoles identified in response
25 to Interrogatory No. 50 of Defendant's First Set Of
26 Interrogatories To Plaintiffs (namely, the Atari VCS Model 2600,

1 the Sears Tele-Game Video Arcade, and the combination of the
2 Colecovision game console and the Expansion Module 1) which
3 plaintiffs contend constitutes an infringement of Claim 61 of the
4 United States Patent Re. 28,507, identify the elements which
5 plaintiffs contend correspond to the following elements of the
6 claim:

- 7 A. A third symbol on the screen of the cathode ray
8 tube;
- 9 B. Player control of the position of the third symbol;
- 10 C. Means coupled to said synchronization signal
11 generating means and said cathode ray tube for
12 generating a third symbol on said screen at a
13 position which is controlled by a player;
- 14 D. A second coincidence between said third symbol and
15 said second symbol;
- 16 E. Means coupled to said third symbol generating means
17 and second symbol generating means for determining
18 a second coincidence between said third symbol and
19 said second symbol;
- 20 F. A first coincidence between said third symbol and
21 said second symbol;
- 22 G. A distinct motion imparted to said second symbol in
23 response to the second coincidence; and
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1 H. Means coupled to said second and third symbol
2 coincidence determining means and said second
3 symbol generating means for imparting a distinct
4 motion to said second symbol in response to said
5 second coincidence.
6

7 RESPONSE:

8 Plaintiffs are at this time unable to supply all the
9 information requested in Interrogatory 132. Plaintiffs have not
10 completed their discovery as to the television game cartridges
11 manufactured, used, and/or sold by Activision, and the television
12 game consoles with which those cartridges are used, and are thus
13 unable to fully state what contentions they will make at trial as
14 to the subject matter of this interrogatory. Plaintiffs object
15 this interrogatory as premature.

16 However, in order to advance the progress of this
17 action, plaintiffs further respond to Interrogatory 133 as follows
18 while reserving the right to alter, amend, supplement or change
19 the response after discovery is completed and prior to trial.
20 Each response refers to the combination of the indicated
21 Activision television game cartridge and the Atari VCS Model 2600,
22 the Sears Tele-Game Video Arcade, the Colecovision game console
23 with the Coleco Expansion Module 1, or the Coleco Gemini
24 television game console.

25 A. Tennis: The second player symbol under control of
26 a human player.
27

1 Ice Hockey: The second player symbol.

2 Fishing Derby: The end of the second fishing line
3 symbol.

4 B. Tennis: The position of the symbol is controlled
5 by the player.

6 Ice Hockey: The position of the symbol is
7 controlled by the player.

8 Fishing Derby: The position of the symbol is
9 controlled by the player.

10 C. Tennis, Ice Hockey, Boxing and Fishing Derby: At
11 least the Activision television game cartridge, the
12 joystick, the peripheral interface adapter, the
13 television interface adapter, and the
14 microprocesor.

15 D. Tennis: The coincidence between the second human
16 controlled player symbol and the ball symbol by
17 which the second player hits the ball.

18 Ice Hockey: The coincidence between the second
19 player symbol and the puck symbol by which the
20 player intercepts the puck.

21 Fishing Derby: The coincidence between the second
22 fishing line symbol and any of the fish symbols by
23 which the fish is caught.

- 1 E. Tennis, Ice Hockey, and Fishing Derby: At least
2 the Activision television game cartridge, the
3 microprocesor and perhaps the television interface
4 adapter.
- 5 F. The reference to a "first" coincidence between the
6 second and third symbols in the context of Claim 61
7 is not understood.
- 8 G. Tennis: The motion of the ball symbol following
9 the second coincidence.
10 Ice Hockey: The motion of the puck symbol
11 following the second coincidence.
12 Fishing Derby: The motion of the fish symbol
13 following the second coincidence.
- 14 H. Tennis, Ice Hockey and Fishing Derby: At least the
15 Activision television game cartridge and the
16 microprocessor.

17
18 INTERROGATORY NO. 134

19 For each combination of the games identified in response
20 to Interrogatory No. 38 of Defendant's First Set of
21 Interrogatories to Plaintiffs (namely, "Fishing Derby", "Boxing",
22 "Tennis" and "Ice Hockey") and the consoles identified in response
23 to Interrogatory No. 50 of Defendant's First Set Of
24 Interrogatories To Plaintiffs (namely, the Atari VCS Model 2600,
25 the Sears Tele-Game Video Arcade, and the combination of the
26 Colecovision game console and the Expansion Module 1) which

1 D. Tennis and Ice Hockey: At least the Activision
2 television game cartridge and the microprocess.
3

4 INTERROGATORY NO. 138

5 Identify all portions of the subject matter described in
6 U.S. Patent 3,728,480 which Magnavox and Sanders contend are not
7 prior art with regard to United States Patent Re. 28,507.
8

9 RESPONSE:

10 This interrogatory has been limited by defendant to the
11 portions of U.S. Patent 3,728,480 enumerated in this response.
12 Circuits as described at column 4, lines 16-21; column 6, lines
13 7-22 and 45-58; column 9, line 39 - column 10, line 15; column 12,
14 lines 23-26, 44-48, and 57-60; Claims 13-23; Claims 26-30, and
15 Claim 41 of U.S. Patent 3,728,480 were built and used with a color
16 television receiver by the inventor thereof prior to the
17 commencement of reasonable diligence toward reduction to practice
18 of the claimed subject matter of U.S. Patent Re. 28.507.
19

20 INTERROGATORY NO. 139

21 For each portion of the subject matter of U.S. Patent
22 3,728,480 identified in response to Interrogatory No. 138:

23 A. Set forth in detail the basis of the contention
24 that the portion of the subject matter is not prior art;
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(d) Identify all documents which refer or relate in any way to the consideration of the prior art and/or the determination that it was not material.

RESPONSE:

No response required.

May 8, 1984, 1984 Thomas M. Hoque
The Magnavox Company

Subscribed and sworn to before me this 8th day of May, 1984, in Knox County.

Barbara Gruchin
Notary Public

My Commission Expires: June 23, 1986
May 9, 1984, 1984 Gene S. Hoque
Sanders Associates, Inc.

Subscribed and sworn to before me this 9th day of May, 1984, in Nashua, New Hampshire.

Ann Marie Curran
Notary Public

My Commission Expires: March 3, 1987

The foregoing objections and contentions are asserted or stated on behalf of plaintiffs by:

Theodore W. Anderson
James T. Williams
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