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September 12, 1984

Algy Tamoshunas, Esquire
North American Philips Corporation
580 White Plains Road
Tarrytown, New York 10591



Re: Magnavox v. Activision

Dear Algy:

We have received a Memorandum in Opposition to our Motion to Compel Further Interrogatory Responses from Activision. A copy is enclosed. We have also received a letter from the Howard, Rice firm essentially providing us with most of the information we sought by the motion, except for that requested in interrogatory 9 as to defendant's expert witness. A copy of that letter is also enclosed.

Assuming further review of the letter confirms our initial impression and it supplies us with the information we need, we will drop the motion to compel except as to interrogatory 9.

Very truly yours,

NEUMAN, WILLIAMS, ANDERSON & OLSON

By James T. Williams
James T. Williams

JTW:de
Enclosures

cc: T. A. Briody, Esq. - w/o encls.
L. Etlinger, Esq. - w/encls. ✓
T. W. Anderson, Esq. - w/o encls.

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SEP 11 1984

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**ADMITTED IN NEW YORK STATE

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77 West Washington Street
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Re: Magnavox v. Activision

Dear Jim:

Pursuant to our various telephone conversations and Magnavox' motion to compel further responses to interrogatories, Activision, by this letter, further updates certain of its responses.

Interrogatory No. 2: Activision's Notice of Prior Art, filed on September 7, 1984 pursuant to 35 U.S.C. §282, fully and completely answers this interrogatory.

Interrogatory No. 3: Activision contends that at the relevant time described in this interrogatory, the art to which the subject matter in the '507 patent pertains is the display of analog, digital or computer generated symbols. The level of ordinary skill in that art is at least a bachelor's degree in a science, with course work in mathematics, computers, and/or circuit design; and at least two years of work experience in the art. In lieu of such a degree, a person having at least three years of experience in computer programming and some circuit design experience would also have the requisite level of ordinary skill in the art. Similarly, an advanced academic degree and correspondingly less practical experience in the art could also meet the level of ordinary skill in the art.

Interrogatory No. 7(xii): As you know, on September 5, 1984, Marty Glick hand-delivered to you the financial data Magnavox sought by this interrogatory.