

COPY

NEUMAN, WILLIAMS, ANDERSON & OLSON

77 WEST WASHINGTON STREET CHICAGO, ILLINOIS 60602



April 27, 1984

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

Dear Algy:

As we discussed on the telephone today, we have prepared and served Notices of Deposition of Atari and Coleco and a Response to Activision's Motion to Compel. Copies of each of the notices are enclosed herewith. The response was transmitted to San Francisco using our word processor; we will forward a copy to you when we receive one from our associate.

We presently intend to resume the Activision deposition next Wednesday, May 2. Further, we will be forwarding proposed supplemental interrogatory responses to you Monday or Tuesday of next week.

Very truly yours,

NEUMAN, WILLIAMS, ANDERSON & OLSON

T. Williams James

JTW:de Enclosures

- cc: T. A. Briody w/o encls.

  - L. Etlinger w/encls. T. W. Anderson w/o encls.

By

10		
1	PILLSBURY, MADISON & SUTRO ROBERT P. TAYLOR 225 Bush Street	
(13 ° S	Mailing Address P. O. Box 7880	
3	San Francisco, CA 94120 Telephone: (415) 983-1000	
4	NEUMAN, WILLIAMS, ANDERSON & OLSON	
5	THEODORE W. ANDERSON JAMES T. WILLIAMS	
6	77 West Washington Street Chicago, IL 60602	
7	Telephone: (312) 346-1200	
8	Attorneys for Plaintiffs	
9	The Magnavox Company and Sanders Associates, Inc.	
10		
ll	United States District Co	
12	Northern District of Ca	lifornia
13		
14	THE MAGNAVOX COMPANY, a Corpora-	)
15	tion, and SANDERS ASSOCIATES, INC., a Corporation,	) ) No. C 82 5270 JPV
16	Plaintiffs,	)
17	vs.	) <u>NOTICE TO TAKE</u>
18	ACTIVISION, INC., a Corporation,	) <u>DEPOSITION</u>
19	Defendant.	)
20		)
21		Harry B. Bremond
22	Edward S. Wright	Michael A. Ladra Wilson, Sonsini, Goodrich
23		& Rosati Two Palo Also Square
24	Four Embarcadero Center	Palo Alto, CA 94304
25	San Francisco, CA 94111	
26	PLEASE TAKE NOTICE that c	commencing at 9:30 A.M. on
27	the 15th day of May, 1984, at the off:	ices of Brobeck, Phleger &
28	5	
18. J. I.	NOTIC	CE TO TAKE DEPOSITION
125 BR		

1 Harrison, Two Palo Alto Square, Palo Alto, California, 2 plaintiffs in the above-identified action will take the 3 deposition of Atari, Inc., 1265 Borregas Avenue, Sunnyvale, 4 California (hereinafter "deponent"), pursuant to Rule 30(b)(6) 5 F.R.Civ.P. A subpoena duces tecum is to be served on the 6 deponent. The matters on which examination is requested in the 7 subpoena under Rule 30(b)(6) are set forth in Attachment A 8 hereto. Deponent is requested to designate one or more 9 officers, directors, or managing agents, or other persons who 10 consent to testify on its behalf, as to the matters set forth in 11 Attachment A hereto and known or reasonably available to 12 deponent and is requested to make this designation available to 13 plaintiffs at least three days prior to the commencement of the 14 deposition. The documents and things requested to be produced 15 in the subpoena are set forth in Attachment B hereto.

The deposition will be taken upon oral examination before a notary public, or before some other officer authorized by law to administer oaths. The oral examination will continue from day-to-day or by adjournment until completed.

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Dated:

April 26, 1984.

Theodore W. Anderson James T. Williams NEUMAN, WILLIAMS, ANDERSON & OLSON Attorneys for The Magnavox Company and Sanders Associates, Inc.

77 West Washington Street Chicago, Illinois 60602 (312) 346-1200

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## ATTACHMENT A

 The electrical design, circuitry, and operation of the Atari VCS Model 2600 television game console.

5 2. The electrical design, circuitry, and operation 6 of the internal circuitry of any and all custom integrated 7 circuits included in the Atari VCS Model 2600 television game 8 console including without limitation the custom integrated 9 circuit sometimes known as the television interface adapter or 10 video interface circuit.

11 3. The electrical design, circuitry, and 12 operation of the Atari Model 5200 television game console and 13 any and all adapters for use with such Model 5200 television 14 game console to permit use therewith of television game 15 cartridges for the Atari VCS Model 2600 television game console.

4. The electrical design, circuit, and operation of any and all custom integrated circuits included in the Atari Model 5200 television game console and any and all adapters for use with such Model 5200 television game console to permit use therewith of television game cartridges for the Atari VCS Model 2600 television game console.

5. The manner of use and operation of the television game consoles, adapters and integrated circuits referred to in paragraphs 1-4 hereof.

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NOTICE TO TAKE DEPOSITION

## ATTACHMENT B

2	
3	1. Schematic diagrams, circuit diagrams, and
4	block diagrams showing the internal electrical circuitry of
5	the television game consoles, adapters, and integrated
6	circuits referred to in paragraphs 1-4 of Attachment A.
7	2. Documents describing the internal electrical
8	circuitry and operation of the television game consoles,
9	adapters, and integrated circuits referred to in
10	paragraphs 1-4 of Attachment A.
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	-4- NOTICE TO TAKE DEPOSITION

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l	CERTIFICATE OF SERVICE
2	
3	I hereby certify that copies of Plaintiffs' Notice
4	To Take Deposition were forwarded, both Federal Express
5	courier service and United States Postal Service, First Class
6	mail, postage prepaid, in envelopes addressed to the
7	following:
8	
9	Thomas O. Herbert, Esq. Flehr, Hohbach, Test,
10	Albritton & Herbert Suite 3400
11	Four Embarcadero Center San Francisco, California 94111
12	and
13 14	Michael A. Ladra, Esq.
15	Wilson, Sonsini, Goodrich & Rosati Two Palo Alto Square Palo Alto, California 94304
16	on April 26, 1984.
17	
18	La State
19	James T. Williams
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