

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNIVERSITY OF ILLINOIS FOUNDATION,  
Plaintiff,

v.

BLONDER-TONGUE LABORATORIES, INC.,  
and  
ALLIED RADIO CORPORATION,  
Defendants.

CIVIL ACTION NO. 66 C 567

ANSWERS TO  
PLAINTIFF'S INTERROGATORIES

Now comes the Defendant, Blonder-Tongue Laboratories, Inc., by its Chairman of the Board, Isaac S. Blonder, and answers the interrogatories of Plaintiff as follows:

1. Has defendant, since October 5, 1965, manufactured for sale or sold any antennas intended for radio or television reception, characterized by having six or more straight (i.e., not folded) electrical dipole elements arranged in pairs to form a set of three or more substantially parallel straight dipoles of different lengths, the inner ends of the pair of elements forming the dipoles being connected by a pair of feeders which are electrically transposed between

connections each dipole element in a pair being connected to a different one of said pair of feeders?

ANSWER No.

2. If the answer to Interrogatory No. 1 is in the affirmative:

- (a) Identify all drawings or other documents illustrating or describing said antennas;
- (b) As to each drawing or document identified in sub-paragraph (a) above, state whether such drawing or document is in the custody or control of defendant and whether such drawing or document will be made available for inspection and copying; and
- (c) Identify each individual who played a part in designing and testing each such product and indicate what part he played in said designing or testing.

ANSWER No answer needed in view of the negative answer to Interrogatory No. 1.

3. If the answer to Interrogatory No. 1 is in the affirmative:

- (a) When did defendant first give consideration to

the possibility of manufacturing each such product?

- (b) Identify all documents relating to such initial consideration; and
- (c) Identify all documents, relating to all subsequent consideration given to the possibility of manufacturing such antennas, which have not already been identified in response to subparagraph (b) above.

ANSWER

No answer needed in view of the negative answer to Interrogatory No. 1.

4. If the answer to Interrogatory No. 1 is in the affirmative:

- (a) Identify all drawings or other documents illustrating or describing all experimental antennas actually made or otherwise considered which fall within the class of antennas defined in Interrogatory No. 1 regardless of whether said antennas were produced for commercial sale; and
- (b) Identify each individual who played a significant part in designing, building, testing, or otherwise considering the technical performance of each such antenna.

ANSWER No answer needed in view of the negative answer to Interrogatory No. 1.

5. Identify all drawings or other documents relating to, illustrating, or describing all prototype or experimental versions of the following commercial antennas if such commercial antennas were made by defendant:

- (a) Golden Dart All Channel UHF Antenna
- (b) Golden Arrow All Channel Indoor UHF Antenna.

ANSWER Engineering Notebooks A.E.S., Nos. 1, 2, 3 and 4; Drawings Nos. MD-1551 and MC-1658C.

6. Identify all documents in defendant's possession reflecting consideration of the patent in suit and indicate whether such documents will be made available for inspection and copying.

ANSWER Apart from a copy of the patent in suit, other documents are privileged.

7. (a) When and under what circumstances did defendant first learn of the development at the University of Illinois of log-periodic antennas corresponding to those described and claimed in the patent in suit?

(b) Identify all documents in the possession of defendant which relate or refer to, in whole or in part, the development of said antennas at the University of Illinois.

ANSWER

(a) When purported service of the present suit was made upon Defendant, Blonder-Tongue Laboratories, Inc.

(b) Apart from a copy of the patent in suit, Defendant is unaware of any other documents in its possession of the type requested in this paragraph.

/s/ Isaac S. Blonder  
Chairman of the Board

STATE OF NEW JERSEY }  
COUNTY OF ESSEX } ss

Being duly sworn before me this 8 day of August, 1966, Isaac S. Blonder deposes and says that he is the Chairman of the Board of Blonder-Tongue Laboratories, Inc., and that he has provided such answers on behalf of Blonder-Tongue Laboratories, Inc., and that such answers are true and accurate to the best of his information and belief.

/s/ Donald M. Schachat  
Notary Public

My Commission Expires:

**DONALD M. SCHACHAT**  
Notary Public of N.J.

My Commission Expires Aug. 27, 1967

RECEIPT of a copy of Defendant's Answers to  
Plaintiff's Interrogatories acknowledged this 11th day  
of August, 1966.

/s/ Jerome B. Klose  
Attorney for Plaintiff