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

10 United States District Court For The
Northern District Of California

12 THE MAGNAVOX COMPANY, a)
corporation, and SANDERS)
13 ASSOCIATES, INC., a corporation,)
14 Plaintiffs,) No. C 82 5270 TEH
15 v.) PLAINTIFF'S RESPONSE
TO DEFENDANT'S FOURTH
16 ACTIVISION, INC., a corporation,) SET OF INTERROGATORIES
(NOS. 193-196)
17 Defendant.)

18
19 Plaintiffs herewith respond to defendant's interroga-
20 tories 193-196. Plaintiffs object to each of those interroga-
21 tories for at least the following reasons:

22 1. Plaintiffs object to interrogatories 193-196 to the
23 extent they are deemed to be continuing or require supplementation
24 beyond the requirements of Rule 26(e), F.R.Civ.P.

1 2. Plaintiffs object to the definitions of "Magnavox"
2 and "Sanders" included in the introduction to interrogatories
3 193-196 to the extent those definitions and the interrogatories
4 making use of them attempt to impose any obligation on plaintiffs
5 to supply information beyond that required by the Federal Rules of
6 Civil Procedure.

7 3. Plaintiffs object to interrogatories 193-196 as
8 having been served upon them less than thirty (30) days prior to
9 the May 31, 1984 discovery close date.

10 However, in order to advance the progress of this action
11 and without waiver of any of the within-stated objections,
12 plaintiffs further respond to defendant's interrogatories 193-196
13 in the following. The answers supplied are based on information
14 obtained from those employees of plaintiff Sanders believed to
15 have knowledge of the relevant facts.

16
17 INTERROGATORY NO. 193

18 Identify all employees and/or other personnel of Sanders
19 Associates who between January 1, 1964 and May 27, 1969 visited
20 the NASA facility now known as the NASA-Johnson Space Center at
21 Houston, Texas.

22 RESPONSE:

23 Plaintiffs object to interrogatories 193-196 as
24 requesting information which is neither relevant to the subject
25 matter of this action nor reasonably calculated to lead to the
26 discovery of admissible evidence. Without waiver of this

1 objection, plaintiffs further respond to interrogatory 193 by
2 stating that plaintiff Sanders has been unable to identify any
3 employee and/or other personnel of Sanders who, between January 1,
4 1964 and May 27, 1969, visited the NASA facility now known as the
5 NASA-Johnson Space Center at Houston, Texas who is also either an
6 inventor of U.S. Patent 3,728,480, 3,659,284 or Re. 28,507, an
7 attorney or agent who prepared or prosecuted any application for
8 those patents, or an individual substantively involved in the
9 preparation or prosecution of any application for those patents
10 who was associated with the inventor, the assignee, or with anyone
11 to whom there was an obligation to assign the application.

12

13 INTERROGATORY NO. 194

14 For each person identified in response to Interrogatory
15 No. 193, state whether that person saw the computerized flight
16 simulation system or any part(s) thereof (including but not
17 limited to the components sometimes referred to as the image plane
18 generator and the electronic scene generator) at the NASA
19 facility.

20 RESPONSE:

21 No response required in light of the response to
22 interrogatory 193.

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1 INTERROGATORY NO. 195

2 For each person identified in response to Interrogatory
3 194 as having seen the simulation system or any part(s) thereof,
4 state the following:

- 5 A. The date(s) the person saw the system or part(s)
6 thereof;
- 7 B. The portion(s) of the system or part(s) which the
8 person saw;
- 9 C. Whether the system or part(s) were seen in opera-
10 tion and, if so, what they were seen to do;
- 11 D. The person(s) at Sanders to whom the person seeing
12 the system or parts reported; and
- 13 E. Whom at Sanders the person told about seeing the
14 system, parts and/or operation thereof and what was
15 said.

16 RESPONSE:

17 No response required in light of the responses to
18 interrogatories 193 and 194.

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20 INTERROGATORY NO. 196

21 Identify all documents in the possession, custody or
22 control of Sanders which refer or relate in any way to the subject
23 matter of Interrogatories Nos. 193-195.

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RESPONSE:

No response required in light of the responses to
interrogatories 193-195.

July 16, 1984 Thomas M. Hefner
The Magnavox Company

Subscribed and sworn to before me
this 16th day of July, 1984,
in Knox County, Tennessee.

Barbara Griffin
Notary Public

My Commission Expires: June 23, 1986
July 19, 1984, 1984 James Sanders
Sanders Associates, Inc.

Subscribed and sworn to before me
this 19th day of July, 1984,
in Nashua, New Hampshire.

Anne Marie Coleman
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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