

Sanders Response to Activision Interrogatories

INTERROGATORY NO. 1

- 1 - Canada 934,056
- 2 - UK 1,268,821
- 3 - France 69,07714
- 4 - Holland 153,404
- 5 - Israel 31.836
- 6 - Australia 440.524
- 7 - Hong Kong 75/1976
- 8 - Sweden 7800417-3
- 9 - Sweden 7800418-1
- 10 - Sweden 7800419-9
- 11 - Canada 948,400
- 12 - Australia 440,977
- 13 - Belgium 739,124
- 14 - UK 1,268,822
- 15 - Germany 1,951,848
- 16 - Switzerland 512.865
- 17 - Italy 897,269
- 18 - Japan 765636
- 19 - Israel 38.735
- 20 - Hong Kong 483/1977
- 21 - U.S. 3,829,095
- 22 - U.S. 3,737,566
- 23 - Mexico 141,144
- 24 - U.S. 3,728,480
- 25 - Argentina 201.824
(1)

26-	Greece	45.937
27-	India	136.499
28-	Venezuela	30.146
29-	Venezuela	39.070
30-	Greece	67248
31-	U.S.	3,497,829
32-	U.S.	3,599,221
33-	Canada	895,028
34-	UK	1,255,224
35-	Australia	429,985
36-	France	69.07715
37-	Italy	961.012
38-	Belgium	730,002
39-	Holland	154.894
40-	Israel	31,826
41-	Germany	1913722
42-	Japan	768992
43-	Sweden	368.467
44-	Switzerland	512.864
45-	U.S.	3,659,284
46-	Canada	920,160
47-	Australia	442,967
48-	Belgium	751.008
49-	UK	1,318,051
50-	France	7019368
51-	Holland	152422
52-	Germany	2,017,312
53-	Israel	33.915

54-	Italy	893,433
55-	Japan	778,416
56-	Sweden	364,186
57-	Switzerland	529,491
58-	Mexico	140,468
59-	Argentina	208,872
60-	Greece	46,582
61-	Venezuela	30,171
62-	Hong Kong	484/1977
63-	Israel	41,011
64-	UK	1,319,410
65-	Japan	852,060
66-	Singapore	380/1975
67-	W. Malaysia	260/1975
68-	Hong Kong	76/1976
69-	U.S.	3,778,058
70-	U.S.	Re. 28,507
71-	Greece	51,156
72-	Canada	993,001
73-	Venezuela	33,789
74-	U.S.	3,659,285
75-	Canada	911,484
76-	Belgium	754,932
77-	Australia	441,126
78-	UK	1,328,223
79-	France	70,29,310
80-	Germany	2,030,959

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| 81- | Israel | 34.263 |
| 82- | Italy | 901,545 |
| 83- | Japan | 811,493 |
| 84- | Sweden | 377,889 |
| 85- | Switzerland | 534.989 |
| 86- | Mexico | 141091 |
| 87- | Singapore | 381/1975 |
| 88- | W. Malaysia | 261/1975 |
| 89- | Hong Kong | 77/1976 |
| 90- | Canada | 927,864 |
| 91- | Sweden | 7415697-7 |
| 92- | U.S. | Re. 28,598 |
| 93- | Canada | 999,888 |
| 94- | U.S. | 3,921,161 |
| 95- | Canada | 1010,464 |
| 96- | Australia | 478,656 |
| 97- | Belgium | 815.628 |
| 98- | UK | 1,472,480 |
| 99- | France | 74/18382 |
| 100- | Germany | 2426249 |
| 101- | Israel | 44575 |
| 102- | Italy | 1,019,625 |
| 103- | Sweden | 74 07044-2 |
| 104- | Switzerland | 600,718 |
| 105- | Hong Kong | 578/1977 |
| 106- | U.S. | 4,034,990 |
| 107- | Canada | 1,111,546 |

108-	UK	1,566,337
109-	Germany	271,4670
110-	Phillipines	13144
111-	Taiwan	11669
112-	Hong Kong	506/1980
113-	W. Malaysia	210/1981
114-	Singapore	354/1980
115-	U.S.	4,194,198
116-	U.S.	4,107,737
117-	U.S.	4,077,049
118-	Canada	1,111,545
119-	UK	1,595,852
120-	Germany	2800756
121-	UK	1,601,723
122-	U.S.	4,357,014
123-	U.S.	4,355,814
124-	U.S.	4,117,511
125-	U.S.	4,355,805
126-	U.K	2,033,703
127-	U.S.	4,342,454
128-	U.S.	4,359,223
129-	U.S.	4,346,407
130-	Korea	13,509

INTERROGATORY NO. 2

- A. (a) Sanders holds title to patents 1-121, 124 and 126-129
(b) Sanders owns patents 122, 123 and 125 jointly with Marvin Glass & Associates
- B. Sanders acquired its interest in the patents by assignment from the inventors thereof.
- C. Sanders interest in the patents were acquired by assignment from the inventors prior to the date of filing thereof. All of the inventors, except for Howard Morrison on patent 122, were employees of Sanders.

INTERROGATORY NO. 3

- (a) Under the cross-license with Atari between Atari and Magnavox, Sanders obtained a license to:
- (i) U.S. Serial No. 613,050 filed 9/15/75 and foreign equivalents,
 - (ii) U.S. Serial No. 626,664 filed 10/29/75 and foreign equivalents,
 - (iii) U.S. Serial No. 626,665 filed 10/29/75 and foreign equivalents,
 - (iv) Foreign equivalents to U.S. Patent No. 3,793,483 and
 - (v) application of Steven T. Mayer and Ronald E. Milner for "Method of Generating a

Plurality of Moving Objects on a Video
Display Screen" and foreign equivalents.

(b.) Under the Supplement to Nonexclusive
Sublicense Agreement for Home Video Game Devices between
Magnavox and Coleco, Sanders obtained a license to
" any and all patents, patent applications, existing
inventions and prospective patent applications therein in
the field of video games, both United States and
foreign, owned either directly or indirectly by
LICENSEE or its SUBSIDIARY as of the date of
this Supplement, and directed to games commercially
made, sold and delivered during the period ending
December 31, 1976" .

INTERROGATORY NO. 5
No.

INTERROGATORY NO. 22

INTERROGATORY NO. 23

- 1- Sanders Development Corporation
- 2- Sanders Investment Corporation
- 3- Sanders International Sales Corporation
- 4- S.A. Sales Corporation

INTERROGATORY NO. 23 CONTINUED

- 5 - High Point Realty Corporation
- 6 - Hi-Tension Realty Corporation
- 7 - California Computer Products, Inc.
- 8 - CalComp International, Inc.
- 9 - CalComp Pacific Inc.
- 10 - Input Controls, Inc.
- 11 - CalComp Financial, Inc.
- 12 - CalComp Europe, Ltd.
- 13 - Talos Systems, Inc.
- 14 - N.V. CalComp S.A.
- 15 - CalComp B.V.
- 16 - CalComp Limited.
- 17 - CalComp Europe Limited
- 18 - CalComp GmbH
- 19 - CalComp S.A.
- 20 - CalComp S.p.A.
- 21 - California Computer Products of Canada Limited.
- 22 - CalComp S.A. de C.V.
- 23 - CalComp A.B.
- 24 - CalComp Espana S.A.
- 25 - CalComp Domestic International Sales Corporation
- 26 - Network 180 Corporation
- 27 - Xytex Corporation
- 28 - Sanders Associates International, Inc.
- 29 - Sanders Limited (Bermuda)
- 30 - Sanders Data Systems Limited

INTERROGATORY NO. 39

B. unknown -

INTERROGATORY NO. 45

B. unknown -

INTERROGATORY NO. 79

1 -	Canada	Patent No.	920,160
2 -	Australia	" "	442,967
3 -	Belgium	" "	751,008
4 -	UK	" "	1,318,051
5 -	France	" "	7019368
6 -	Holland	" "	152,422
7 -	Germany	" "	2,017,312
8 -	Israel	" "	33,915
9 -	Italy	" "	893,433
10 -	Japan	" "	778,416
11 -	Sweden	" "	364,186
12 -	Switzerland	" "	529,491
13 -	Mexico	" "	140,468
14 -	Argentina	" "	208,892
15 -	Greece	" "	46,582
16 -	Venezuela	" "	30,171
17 -	Hong Kong	" "	484/1977

18 -	Israel	Patent	No.	41,011
19 -	UK	"	"	1,319,410
20 -	Japan	"	"	852,060
21 -	Singapore	"	"	380/1975
22 -	West Malaysia	"	"	260 of 1975
23 -	Hong Kong	"	"	76 of 1976
24 -	Greece	"	"	51,156
25 -	Canada	"	"	993,001
26 -	Venezuela	"	"	33,789

INTERROGATORY NO. 80

A - Richard Seligman, 8 Wheaton Drive, Nashua, New Hampshire 03063 (603-885-5186), Assistant Patent Counsel for Sanders Associates, Inc was responsible for each of the listed patents. Mr.

Seligman reports to Louis Etlinger, 15 Apache Road, Nashua, New Hampshire 03063 (603-885-2640), Director, Patents and Licensing for Sanders Associates, Inc. who at least saw most of the correspondence concerning the handling of these patents and in some cases participated in the decision making process re the handling of these applications. Technical assistance in the handling of these applications may have been provided by Ralph Baer, 134 Mayflower Drive, Manchester, New Hampshire 03104 (603-885-4112), Engineer for Sanders.

The following Patent firms also
(10)

actively participated in the handling of the listed patents as representatives of Sanders in the countries where patent applications were filed:

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63, Avenue de la Toison d'Or

Bruxelles 6, Belgium

United Kingdom

Baron and Warren

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Paris, France

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L. A. Groth and Company

A. B. Patentbyrå

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Edeficio Venezuela

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Donaldson & Burkinshaw

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1380 Buenos Aires

Argentina

B. Cited Prior Art. for patents 1-26 identified
in response to Interrogatory No. 79.

- 1 - U.S. Patent Nos. 2,455,992; 2,847,661
- 2 - A televised game of cricket
- 3 - None
- 4 -
- 5 - UK patent 633,424; US Patent 2,784,247
- 6 - UK patent 633,424; U.S. Patents 2,784,247 + 3,122,607;
French patent 1,358,474; US. Application 69.04775
- 7 - Publication "Funk und Ton", 1954, No. 4, pages 179-186
- 8 - None
- 9 - None
- 10 - Publication "OKI DENKI GIHO", vol. 34, no. 1, pp 80-82
- 11 - Swedish patent application 3520/69
- 12 - None
- 13 - None
- 14 - None
- 15 - None
- 16 - None
- 17 - None

18 - None

19 -

20 - None

21 - None

22 - None

23 - None

24 - None

25 - None

26 - None