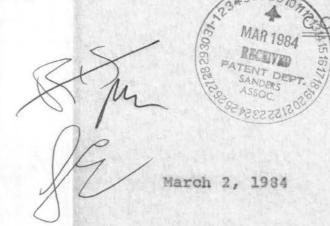
NEUMAN, WILLIAMS, ANDERSON & OLSON

77 WEST WASHINGTON STREET

CHICAGO, ILLINOIS 60602



Thomas A. Briody, Esquire Corporate Patent Counsel North American Philips Corporation 580 White Plains Road Tarrytown, New York 10591

Re: Magnavox v. Activision

Dear Tom:

We have served a notice for the deposition of Activision during the week of March 26. The deposition will primarily concern the operation and software of the accused Activision game cartridges. A copy of the notice is enclosed.

We have also written Tom Herbert informing him that we will be updating our interrogatory responses shortly to formally state the games being asserted. A copy of our letter to Tom is enclosed.

We have ordered a copy of Activision's 100 statement for its quarter ending December 31, 1983 and expect to receive it on Monday. We will forward it to you promptly.

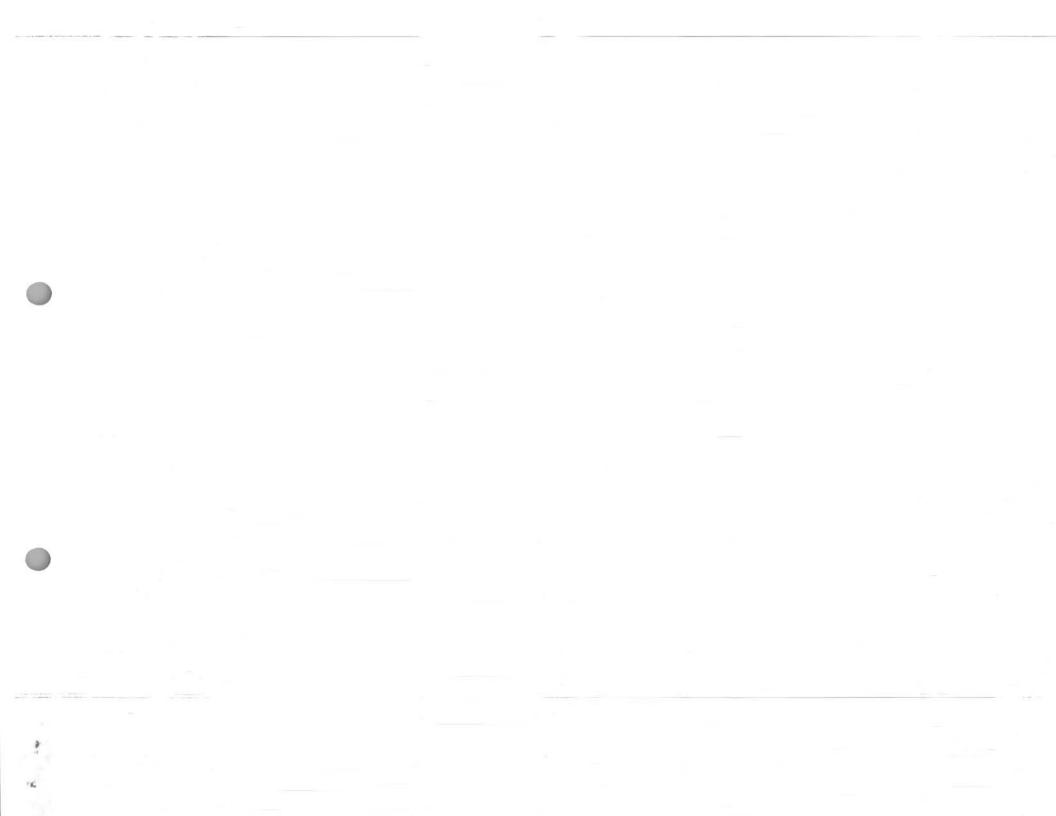
Very truly yours,

NEUMAN, WILLIAMS, ANDERSON & OLSON

By James T. Williams

JTW:de Enclosures

cc: Algy Tamoshunas - w/encls. Louis Etlinger - w/encls. Theodore W. Anderson - w/encls.



1 PLEASE TAKE NOTICE that commencing at 10:00 A.M. on 2 March 26, 1984 at the offices of Pillsbury, Madison & Sutro, 3 225 Bush Street, San Francisco, California 94120, plaintiffs 4 will take the desposition of defendant, Activision, Inc., 5 pursuant to Rule 30(b)(6), F.R.Civ.P., by such person or 6 persons as Activision, Inc. shall designate to testify on its 7 behalf. The schedule of matters on which examination is 8 requested is attached hereto as Schedule 1.

9 The desposition will proceed before a Notary Public 10 or other officer authorized to administer oaths and will 11 continue from day-to-day through March 28, 1984 or by 12 adjournment until completed. You are invited to attend and 13 cross-examine.

14 Dated: March 2, 1984 15 16 Anderson Theodore W. 17 James T. Williams NEUMAN, WILLIAMS, ANDERSON 18 & OLSON 77 West Washington Street 19 Chicago, Illinois 60602 20 Attorneys for Plaintiffs 21 Robert P. Taylor 22 PILLSBURY, MADISON & SUTRO 225 Bush Street San Francisco, California 94120 23 24 25 26 2-27 NOTICE TO TAKE DEPOSITION 28

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ı	COUEDINE 1
2	SCHEDULE 1
23	1. The manner in which each of the following
4	television game products of defendant is played:
	Tennis
5	Ice Hockey
6	Boxing
7	Fishing Derby
8	Dolphin
9	Keystone Kapers
10	Decathalon
11	Stampede
12	Grand Prix
13	Barnstorming
14	Sky Jinks
15	Enduro
16	Pressure Cooker
17	2. The facts and circumstances relating to the
18	design, development, and/or programming of each of the
19	television game products of defendant identified in paragraph
20	l hereof.
21	3. The function and operation of any program
22	included in each of the television game products of defendant
23	identified in paragraph 1 hereof.
24	4. The structure, circuitry, programming,
25	function, and operation of the television game consoles with
26	
27	3-
28	NOTICE TO TAKE DEPOSITION
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. . . .

l	which each of the television some products identified in
2	which each of the television game products identified in
23	paragraph 1 hereof may be used.
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l	CERTIFICATE OF SERVICE
2	It is hereby certified that the foregoing NOTICE
3	TO TAKE DEPOSITION was served upon:
4	
5	Also J. Test
6	Thomas O. Herbert Edward S. Wright
7	Flehr, Hohbach, Test, Albritton & Herbert
8	Suite 3400 Four Embardacero Center
9	San Francisco, California 94111
10	and
11	Harry B. Bremond Michael A. Ladra
12	Wilson, Sonsini, Goodrich & Rosati
13	Two Palo Alto Square Palo Alto, California 94304
14	by Federal Express Courier Service this 2nd day of March, 1984.
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17	James T. Williams
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