

NEUMAN, WILLIAMS, ANDERSON & OLSON

77 WEST WASHINGTON STREET

CHICAGO, ILLINOIS 60602



COPY

May 2, 1984

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

Re: Magnavox v. Activision

Dear Algy:

Enclosed are notices of depositions of Sanders and
Magnavox beginning May 14 in San Francisco.

Very truly yours,

NEUMAN, WILLIAMS, ANDERSON & OLSON

By

JTW/ae
James T. Williams

JTW:de
Enclosures

cc: T. A. Briody, Esq. - w/o encls.
L. Etlinger, Esq. - w/encls. ←
T. W. Anderson, Esq. - w/o encls.

FILE
ACTIVISION

1 FLEHR, HOHBACH, TEST,
ALBRITTON & HERBERT
2 ALDO J. TEST
THOMAS O. HERBERT
3 EDWARD S. WRIGHT
Suite 3400, Four Embarcadero Center
4 San Francisco, CA 94111-4187
Telephone: (415) 781-1989

5 WILSON, SONSINI, GOODRICH & ROSATI
6 HARRY B. BREMOND
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7 Two Palo Alto Square
Palo Alto, CA 94304
8 Telephone: (415) 493-9300

9 Attorneys for Defendant

10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA

13 THE MAGNAVOX COMPANY,)
a Corporation, and)
14 SANDERS ASSOCIATES, INC.,)
a Corporation,)
15)
Plaintiffs,)
16)
v.)
17)
ACTIVISION, INC.,)
18 a Corporation,)
19)
Defendant.)

Civil Action
C 82 5270 JPV

NOTICE OF DEPOSITION

20
21 TO: Plaintiffs and their counsel of record

22
23 PLEASE TAKE NOTICE that commencing at 9:30 a.m. on
24 May 14, 1984 at the offices of FLEHR, HOHBACH, TEST, ALBRITTON &
25 HERBERT, Suite 3400, Four Embarcadero Center, San Francisco,
26 California 94111, defendant will take the deposition of plaintiff
27 Sanders Associates, Inc. (hereinafter Sanders) pursuant to Rule
28 30(b)(6) of the Federal Rules of Civil Procedure by such person or

1 persons as Sanders shall designate to testify on its behalf. The
2 schedule of matters on which examination is requested is attached
3 hereto as Schedule 1.

4 Sanders is requested to bring to the deposition all
5 documents which relate to the matters set forth in Schedule 1.
6 These documents are included in the deposition and trial exhibits
7 previously requested by defendant, in Defendant's First Request
8 for Production of Documents served December 17, 1982, and/or in
9 Defendant's Second Request for Production of Documents served
10 March 16, 1983.

11 The deposition will proceed before a notary public or
12 other officer authorized to administer oaths and will continue
13 from day to day until completed. You are invited to attend and
14 cross-examine.

FLEHR, HOHBACH, TEST,
ALBRITTON & HERBERT

15
16
17 Date: May 1, 1984

By *Edward S. Wright*
Edward S. Wright
Attorneys for Defendant

*probable
5-2580 Germany*

SCHEDULE 1

1
2 ✓ 1. The facts and circumstances under which U.S. Patent
3 3,135,815 (Spiegel) and German Patent 1,119,152 came to the
4 attention of Sanders. *(computer)*

5 ✓ ~~2.~~ Any charges of infringement of U.S. Patent
6 3,135,815 and/or German Patent 1,119,152 against Sanders. *NONE*

7 ✓ 3. All studies made by Sanders with regard to validity
8 and/or infringement of U.S. Patent 3,135,815 and/or German Patent
9 1,119,152. *got file wrapper + looked at claims - no documents sent to Jim 5/16/84*

10 ✓ 4. The facts and circumstances under which Sanders
11 acquired an interest in U.S. Patent 3,135,815 and/or German Patent
12 1,119,152. *(computer)*

13 ✓ 5. Any attempts by Sanders to enforce or grant rights
14 to others under U.S. Patent 3,135,815 and/or German Patent
15 1,119,152. *NONE*

16 6. All licenses, sublicenses, immunities from suit, or
17 other rights granted or offered by Sanders under U.S. Patent
18 Re. 28,507 with regard to programmable television gaming consoles
19 including, but not limited, to those consoles manufactured by or
20 for Magnavox, Atari, Mattel and Coleco; and all attempts by
21 Sanders to otherwise enforce U.S. Patent Re. 28,507 with regard to
22 programmable television gaming consoles.

23 7. All licenses, sublicenses, immunities from suit, or
24 other rights granted or offered by Sanders under U.S. Patent
25 Re. 28,507 with regard to game cartridges for programmable
26 television gaming consoles including, but not limited to, game
27 cartridges made by or for Magnavox, Atari, Mattel, Coleco, Parker
28 Brothers and Imagic; and all attempts by Sanders to otherwise

None

has none

I don't know (LE)

I don't know (none)

hasn't Magnavox provided all these

what about early attempts we mag, RCA, etc

1 enforce U.S. Patent Re. 28,507 with regard to game cartridges for
2 programmable television gaming cartridges.

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