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

THE FINNEY COMPANY, a partnership, Plaintiff, v. JFD ELECTRONICS CORPORATION, a corporation, and THE UNIVERSITY OF ILLINOIS FOUNDATION, a non-profit corporation, Defendants.	CIVIL ACTION NOS. 65 C 220 and 65 C 671 (Cons.)

ADDITIONAL ANSWERS BY PLAINTIFF,
THE FINNEY COMPANY, TO ADDITIONAL INTERROGATORIES
UNDER RULE 33 FILED BY DEFENDANT,
THE UNIVERSITY OF ILLINOIS FOUNDATION

INTERROGATORY 24

24. If the answer to Interrogatory No. 23 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 subparagraph (a) above, state whether such drawing or document is in the custody or control of

plaintiff and whether such drawing or document will be made available for inspection and copying.

ANSWER (By John F. Pearne)

24 (a) Per agreement of counsel for the parties, drawings illustrating all of the antennas of the general character defined by Interrogatory 23 of the Foundation defendant, that plaintiffs have manufactured for sale or sold, are a group of special drawings to be furnished to both defendants and identified by plaintiffs' exhibit numbers and antenna model numbers and with suitable designations added to distinguish successive versions of various models changed since they were first manufactured. (Note: Copies of plaintiffs' control records kept in the regular course of business and showing all features of those antennas of present interest, including all dimensions of present interest, together with pictorial illustrations of the complete antennas have already been furnished to both defendants.)

(b) Yes

INTERROGATORY 25

25. If the answer to Interrogatory No. 23 is in the affirmative:

(a) When did plaintiff first give consideration to the possibility of manufacturing such a product?

(b) Identify all documents relating to such initial consideration;

(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) of this interrogatory.

ANSWER (By John F. Pearne)

25 (a) About or shortly prior to August, 1959.

(b) The documents plaintiffs have been able to locate and which relate to such initial consideration are a group of four longhand sheets of calculations, dimensional data, and sketches made in designing a 10-element, simple dipole, log periodic antenna for the frequency band of 54 to 216 megacycles, and another 10-element, simple dipole, log periodic antenna for the frequency band from 54 to 88 megacycles. These sheets are contained in a folder of other similar material identified as Folder No. 1 in the appended list of engineering files of Finney Manufacturing Company.

Additional documents relating to subsequent considerations of the type inquired about and that occurred prior to the first manufacture for sale of antennas of the type inquired about consist of numerous additional longhand sheets of calculations, dimensional data, sketches, and performance test data. Such sheets are included with other material in each of the folders carrying the following folder numbers and further identified in the appended list of engineering files of Finney Manufacturing Company:

Folder Nos. 1-13, inclusive, 15-18, inclusive, and 20

Because the particular documents referred to (at least in most cases) are not individually identifiable by any kind of descriptive title, they could be more specifically identified only by stating the substance of the content of each, which is not called for by the interrogatory and, as the law is understood by the undersigned, could not properly be called for in an interrogatory.

INTERROGATORY 26

26. If the answer to Interrogatory No. 23 is in the affirmative:

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. 23, regardless of whether or not said antennas were ever produced for commercial sale.

ANSWER (By John F. Pearne)

26. The drawings and other documents which plaintiffs have been able to locate and which illustrate or describe experimental antennas (within the intended meaning of Interrogatory 23 of the Foundation as agreed upon between counsel for the parties) which plaintiffs actually made or otherwise considered consist of a large number of diagrammatic drawings, rough sketches, dimensional data, performance test data, and performance graphs contained in folders carrying the following folder numbers and further identified in the appended list of engineering files of Finney Manufacturing Company:

Folder Nos. 1, 4, and 5-24, inclusive.

Because the particular documents referred to (at least in most cases) are not individually identifiable by any kind of descriptive title, they could be more specifically identified only by stating the substance of the content of each, which is

not called for by the interrogatory and, as the law is understood by the undersigned, could not properly be called for in an interrogatory.

INTERROGATORY 27

27. Identify all drawings or other documents relating to, illustrating, or describing all prototype or experimental versions of the following commercial antennas made by plaintiff:

VL-5
VL-7
VL-10
VL-15
VL-18

UVF-10
UVF-16
UVF-18
UVF-24

MARK X
MARK XII
MARK XVIII
MARK XXIV

FMSL-5
FMSL-8
FMSL-10
FMSL-12

ANSWER (By John F. Pearne)

27. The drawings or other documents to which this interrogatory refers are contained in the folders identified by the following folder numbers in the appended list of engineering files of Finney Manufacturing Company:

Folder numbers 2, 6-9, inclusive,
13, 14, and 19-24, inclusive.

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ENGINEERING FILES OF FINNEY MANUFACTURING COMPANY

Folder No. 1 entitled MULTIPLE DRIVE ENDFIRE ARRAYS

Collection of loose test data sheets for proposed Finney Company multiple drive endfire antennas and comparisons of their performance with the performance of competitive antennas manufactured by other concerns.

Folder No. 2 entitled JFD LPV TESTS

Collection of loose test data sheets and dimensioned line diagrams for LPV antennas of JFD Electronics Corporation and comparative tests of competitive antennas of The Finney Company.

Folder No. 3 entitled MULTIPLE DRIVE JFD, CM TACO

Collection of loose test data sheets and bound sets of test data sheets and dimensioned line diagrams for JFD, Channel Master, Jerrold Taco, and FINCO multiple drive endfire antennas.

Folder No. 4 entitled STR. ELEMENT M.D. ENDFIRE(SINGLE BOOM)

Collection of sets of test data sheets for proposed 3, 4, 5, 6, and 7 straight-element multiple drive endfire antennas with phase transposition between elements.

Folder No. 5 entitled MULTIPLE DRIVE ENDFIRE ARRAYS (BIRO)

Collection of loose test data sheets for proposed Finney Company multiple drive endfire antennas and comparisons of their performance with the performance of competitive antennas manufactured by other concerns. (Work done by Steven Biro and assistants under his direction, under the overall supervision of Lewis H. Finneburgh, Jr.)

Folder No. 6 entitled EXP 1053B (Dead)

Collection of loose test data sheets from which final element lengths and spacings of original FINCO Model VL-7 antenna (7 V-element driven array) were based, graph of db gain of final design, and photos of final design.

Folder No. 7 entitled EXP 1053C (Dead)

Collection of loose test data sheets from which final element lengths and spacings of original FINCO Model VL-10 antenna (10 V-element driven array) were based, graphs of db gain of final design and of JFD Model LPV-11, and photos of final model VL-10 design.

Folder No. 8 entitled EXP 1053D (Dead)

Collection of loose test data sheets from which final element lengths and spacings of original FINCO Model VL-15 (9 V-element driven array plus 6 anterior directors) were based, graphs of db gain of final design, photos of final design, and one data sheet of much later date comparing the final design with another antenna.

Folder No. 9 entitled EXP 1053E (Dead)

Collection of loose test data sheets from which final element lengths and spacings of original FINCO Model VL-18 (9 V-element driven array plus 9 anterior directors) were based, temporary schematic of the final design with miscellaneous structural design information noted, graphs of db gain of final design, and a number of test data sheets of much later dates comparing the final design with another antenna.

Folder No. 10 entitled EXP 1053-4 Ele. (Dead)

Collection of loose test data sheets from which element lengths and spacings of proposed FINCO 4 V-element driven array were based.

Folder No. 11 entitled EXP 1053-6 Ele. (Dead)

Collection of loose test data sheets from which element lengths and spacings of proposed FINCO 6 V-element driven array were based.

Folder No. 12 entitled EXP 1053-7 Ele. Dr. Plus 6 Par.

Collection of loose test data sheets from which element lengths and spacings of proposed FINCO 7 V-element driven array plus 6 anterior directors (parasitic elements) were based.

Folder No. 13 entitled EXP 1054

Collection of loose test data sheets from which final element lengths of original Allied Radio (FINCO) MARK X, XII, XVIII, and XXIV were based, sets of copies of EXP sheets setting forth specification details for that MARK series of antennas (including revisions of March, 1965), photos of that series of antennas before revisions of March, 1965.

Folder No. 14 entitled EXP 1097

Sets of copies of September, 1964, EXP sheets for original FINCO models UVF 16, 18, and 24 antennas, sets of February, 1965, EXP sheets for original FINCO models UVF 8 and 10 antennas, and collection of loose test data sheets for comparing the performance of the UVF series of antennas with the MARK series of antennas and with other antennas.

Folder No. 15 entitled 4 Ele. (Straight) Twin Boom

Sets of loose test data sheets for proposed FINCO multiple drive endfire arrays of 4 simple, straight dipole driven elements.

Folder No. 16 entitled 5 Ele. (Straight) Twin Boom

Sets of loose test data sheets for proposed FINCO multiple drive endfire arrays of 5 simple, straight dipole driven elements.

Folder No. 17 entitled 6 Ele. (Vee) Twin Boom

Collection of loose test data sheets for proposed FINCO multiple drive endfire arrays of 6 V-dipole driven elements.

Folder No. 18 entitled EXP 1079 (Containing separate folders identified below)

5 ELE. (VEE) TWIN BOOM (Folder No. 18A)

Collection of loose test data sheets for proposed FINCO multiple drive endfire arrays of 5 V-dipole driven elements.

9 ELE. (VEE) TWIN BOOM (Folder No. 18B)

Collection of loose test data sheets for proposed FINCO multiple drive endfire arrays of 9 V-dipole driven elements.

13 ELE. (VEE) TWIN BOOM (Folder No. 18C)

Collection of loose test data sheets for proposed FINCO multiple drive endfire arrays of 13 V-dipole driven elements.

Folder No. 19 entitled EXP 1105

Collection of loose test data sheets and sketches for FINCO models FMSL 5, 8, 10, and 12.

Folder No. 20 entitled EXP 1053A (VL-5)

Collection of loose test data sheets and sketches from which final element lengths and spacings of original FINCO model VL-5 were based.

Folder No. 21 entitled EXP 1053B (VL-7)

Collection of loose test data sheets and sketches from which final element lengths and spacings of FINCO model VL-5 revisions were based.

Folder No. 22 entitled EXP 1053C (VL-10)

Collection of loose test data sheets and sketches from which final element lengths and spacings of FINCO model VL-10 revisions were based.

Folder No. 23 entitled EXP 1053D (VL-15)

Collection of loose test data sheets and sketches from which final element lengths and spacings of FINCO model VL-15 revisions were based.

Folder No. 24 entitled EXP 1053E (VL-18)

Collection of loose test data sheets and sketches from which final element lengths and spacings of FINCO model VL-18 revisions were based.