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11 Attorneys for Defendant  
Activision, Inc.

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& FALK

A Professional Corporation

12  
13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA

15  
16 THE MAGNAVOX COMPANY, a corpora- )  
tion, and SANDERS ASSOCIATES, )  
17 INC., a corporation )

18 Plaintiffs, )

19 vs. )

20 ACTIVISION, INC., a corporation, )

21 Defendant. )  
22

No. C 82 5270 JPV

NOTICE OF MOTION AND MOTION  
FOR ORDER COMPELLING FURTHER  
ANSWERS TO INTERROGATORIES  
BY PLAINTIFFS

Date: September 21, 1984  
Time: 1:30 p.m.

23 TO ALL PARTIES HEREIN AND TO THEIR ATTORNEYS OF RECORD:

24 PLEASE TAKE NOTICE that on September 21, 1984 at

25 1:30 p.m. or as soon thereafter as this matter may be heard

26 before United States Magistrate F. Steele Langford, Defendant

NOTICE OF MOTION AND MOTION FOR ORDER COMPELLING FURTHER ANSWERS  
TO INTERROGATORIES BY PLAINTIFFS

1 Activision, Inc. will seek an order from this Court to compel  
2 further answers to certain interrogatories from Plaintiffs The  
3 Magnavox Company and Sanders Associates, Inc. ("Magnavox") pursuant  
4 to Rule 37 of the Federal Rules of Civil Procedure, on the  
5 grounds that Magnavox' present responses to the interrogatories that  
6 are the subject of this motion are inadequate and prevent  
7 Activision from discovering the full basis of Magnavox' alleged  
8 claims against it.

9           This motion will be based on this Notice of Motion  
10 and Motion for Order Compelling Further Answers to Interrogatories  
11 by Plaintiffs; the Memorandum of Points and Authorities in  
12 Support of Defendant's Motion for Order Compelling Further  
13 Answers to Interrogatories, and appendices thereto; the Declaration  
14 of Marla J. Miller, with exhibits; all the papers and pleadings  
15 on file in this action; and on any oral or documentary evidence  
16 presented at the hearing.

HOWARD  
RICE  
NEMEROVSKI  
CANADY  
ROBERTSON  
& FALK  
A Professional Corporation

18 DATED: August 24, 1984

Respectfully submitted,  
  
MARTIN R. GLICK  
H. JOSEPH ESCHER III  
MARLA J. MILLER  
HOWARD, RICE, NEMEROVSKI, CANADY,  
ROBERTSON & FALK  
A Professional Corporation

23 By Marla J. Miller  
24 MARLA J. MILLER

25 Attorneys for Defendant  
26 ACTIVISION, INC.

NOTICE OF MOTION AND MOTION FOR ORDER COMPELLING FURTHER ANSWERS  
TO INTERROGATORIES BY PLAINTIFFS

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PROOF OF SERVICE BY MAIL

I declare that:

I am employed in the County of San Francisco, California  
I am over the age of eighteen (18) years and not a party to  
the within cause. My business address is Three Embarcadero  
Center, Seventh Floor, San Francisco, California 94111.

On August 24, 1984, I served the within

NOTICE OF MOTION AND MOTION FOR ORDER COMPELLING FURTHER ANSWERS TO  
INTERROGATORIES BY PLAINTIFFS; MEMORANDUM OF POINTS AND AUTHORITIES  
IN SUPPORT OF DEFENDANT'S MOTION FOR ORDER COMPELLING FURTHER  
ANSWERS TO INTERROGATORIES, with appendices thereto; DECLARATION  
OF MARLA J. MILLER IN SUPPORT OF DEFENDANT'S MOTION FOR ORDER  
COMPELLING FURTHER ANSWERS TO INTERROGATORIES AND CERTIFICATE  
OF COMPLIANCE WITH LOCAL RULE 230-4(a), with exhibits thereto;  
PROPOSED ORDER

by placing a true copy thereof enclosed in a sealed envelope,  
with postage thereon fully prepaid, by air mail, Federal Express  
addressed as follows:

Theodore W. Anderson, Esq.  
James T. Williams, Esq.  
Neuman, Williams, Anderson & Olson  
77 West Washington Street  
Chicago, Illinois 60602

I, Cheryl Leger, declare under penalty of perjury  
that the foregoing is true and correct.

Executed on August 24, 1984, at San Francisco,  
California.

  
\_\_\_\_\_  
CHERYL LEGER

HOWARD  
RICE  
NEMEROVSKI  
CANADY  
ROBERTSON  
& FALK  
A Professional Corporation

1 PROOF OF SERVICE BY HAND DELIVERY

2 I declare that:

3 I am employed in the County of San Francisco,  
4 California. I am over the age of eighteen (18) years and  
5 not a party to the within cause, my business address is:  
6 Three Embarcadero Center, 7th Floor, San Francisco, California  
7 94111.

8 On August 24, 1984, I served the within

9 NOTICE OF MOTION AND MOTION FOR ORDER COMPELLING FURTHER ANSWERS TO  
10 INTERROGATORIES BY PLAINTIFFS; MEMORANDUM OF POINTS AND AUTHORITIES  
11 IN SUPPORT OF DEFENDANT'S MOTION FOR ORDER COMPELLING FURTHER  
12 ANSWERS TO INTERROGATORIES, with appendices thereto; DECLARATION  
13 OF MARLA J. MILLER IN SUPPORT OF DEFENDANT'S MOTION FOR ORDER  
14 COMPELLING FURTHER ANSWERS TO INTERROGATORIES AND CERTIFICATE OF  
15 COMPLIANCE WITH LOCAL RULE 230-4(a), with exhibits thereto;  
16 PROPOSED ORDER

17 by personally delivering a copy to:

18 J. Thomas Rosch, Esq.  
19 Robert L. Ebe, Esq.  
20 McCutchen, Doyle, Brown & Enersen  
21 Three Embarcadero Center, 28th Floor  
22 San Francisco, CA 94111

23 I declare under penalty of perjury that the foregoing  
24 is true and correct.  
25  
26



DENNIS HALL