

NEUMAN, WILLIAMS, ANDERSON & OLSON

77 WEST WASHINGTON STREET

CHICAGO, ILLINOIS 60602



[Handwritten signatures]

March 2, 1984

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 10Q 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

[Signature]
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

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16 
17 Theodore W. Anderson
18 James T. Williams
19 NEUMAN, WILLIAMS, ANDERSON
20 & OLSON
21 77 West Washington Street
22 Chicago, Illinois 60602
23 Attorneys for Plaintiffs

21 Robert P. Taylor
22 PILLSBURY, MADISON & SUTRO
23 225 Bush Street
24 San Francisco, California 94120

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SCHEDULE 1

1. The manner in which each of the following television game products of defendant is played:

- Tennis
- Ice Hockey
- Boxing
- Fishing Derby
- Dolphin
- Keystone Kapers
- Decathalon
- Stampede
- Grand Prix
- Barnstorming
- Sky Jinks
- Enduro
- Pressure Cooker

2. The facts and circumstances relating to the design, development, and/or programming of each of the television game products of defendant identified in paragraph 1 hereof.

3. The function and operation of any program included in each of the television game products of defendant identified in paragraph 1 hereof.

4. The structure, circuitry, programming, function, and operation of the television game consoles with

1 which each of the television game products identified in
2 paragraph 1 hereof may be used.

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CERTIFICATE OF SERVICE

It is hereby certified that the foregoing NOTICE
TO TAKE DEPOSITION was served upon:

Also J. Test
Thomas O. Herbert
Edward S. Wright
Flehr, Hohbach, Test,
Albritton & Herbert
Suite 3400
Four Embarcadero Center
San Francisco, California 94111

and

Harry B. Bremond
Michael A. Ladra
Wilson, Sonsini, Goodrich
& Rosati
Two Palo Alto Square
Palo Alto, California 94304

by Federal Express Courier Service this 2nd day of March, 1984.

James T. Williams