

NEUMAN, WILLIAMS, ANDERSON & OLSON

77 WEST WASHINGTON STREET

CHICAGO, ILLINOIS 60602



COPY

April 27, 1984

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

Dear Algy:

As we discussed on the telephone today, we have prepared and served Notices of Deposition of Atari and Coleco and a Response to Activision's Motion to Compel. Copies of each of the notices are enclosed herewith. The response was transmitted to San Francisco using our word processor; we will forward a copy to you when we receive one from our associate.

We presently intend to resume the Activision deposition next Wednesday, May 2. Further, we will be forwarding proposed supplemental interrogatory responses to you Monday or Tuesday of next week.

Very truly yours,

NEUMAN, WILLIAMS, ANDERSON & OLSON

By

Jim Lee
James T. Williams

JTW:de
Enclosures

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

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9 JAMES T. WILLIAMS
10 77 West Washington Street
11 Chicago, IL 60602
12 Telephone: (312) 346-1200

13 Attorneys for Plaintiffs
14 The Magnavox Company and
15 Sanders Associates, Inc.

16 United States District Court for the
17 Northern District of California

18 THE MAGNAVOX COMPANY, a Corpora-)
19 tion, and SANDERS ASSOCIATES,)
20 INC., a Corporation,)

21 Plaintiffs,)

22 vs.)

23 ACTIVISION, INC., a Corporation,)

24 Defendant.)

No. C 82 5270 JPV

NOTICE TO TAKE

DEPOSITION

25 TO: Aldo J. Test
26 Thomas O. Herbert
27 Edward S. Wright
28 Flehr, Hohbach, Test,
Albritton & Herbert
Suite 3400
Four Embarcadero Center
San Francisco, CA 94111

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


PLEASE TAKE NOTICE that commencing at 9:30 A.M. on
the 15th day of May, 1984, at the offices of Brobeck, Phleger &

NOTICE TO TAKE DEPOSITION

1 Harrison, Two Palo Alto Square, Palo Alto, California,
2 plaintiffs in the above-identified action will take the
3 deposition of Atari, Inc., 1265 Borregas Avenue, Sunnyvale,
4 California (hereinafter "deponent"), pursuant to Rule 30(b)(6)
5 F.R.Civ.P. A subpoena duces tecum is to be served on the
6 deponent. The matters on which examination is requested in the
7 subpoena under Rule 30(b)(6) are set forth in Attachment A
8 hereto. Deponent is requested to designate one or more
9 officers, directors, or managing agents, or other persons who
10 consent to testify on its behalf, as to the matters set forth in
11 Attachment A hereto and known or reasonably available to
12 deponent and is requested to make this designation available to
13 plaintiffs at least three days prior to the commencement of the
14 deposition. The documents and things requested to be produced
15 in the subpoena are set forth in Attachment B hereto.

16 The deposition will be taken upon oral examination
17 before a notary public, or before some other officer authorized
18 by law to administer oaths. The oral examination will continue
19 from day-to-day or by adjournment until completed.

20 Dated: April 26, 1984.

21
22 
23 Theodore W. Anderson
James T. Williams
24 NEUMAN, WILLIAMS, ANDERSON & OLSON
Attorneys for The Magnavox Company
25 and Sanders Associates, Inc.

26 77 West Washington Street
Chicago, Illinois 60602
27 (312) 346-1200
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ATTACHMENT B

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1. Schematic diagrams, circuit diagrams, and block diagrams showing the internal electrical circuitry of the television game consoles, adapters, and integrated circuits referred to in paragraphs 1-4 of Attachment A.

2. Documents describing the internal electrical circuitry and operation of the television game consoles, adapters, and integrated circuits referred to in paragraphs 1-4 of Attachment A.

