

1 PILLSBURY, MADISON & SUTRO
ROBERT P. TAYLOR
2 225 Bush Street
Mailing Address P. O. Box 7880
3 San Francisco, CA 94120
Telephone: (415) 983-1000
4

5 NEUMAN, WILLIAMS, ANDERSON & OLSON
THEODORE W. ANDERSON
JAMES T. WILLIAMS
6 77 West Washington Street
Chicago, IL 60602
7 Telephone: (312) 346-1200

8 Attorneys for Plaintiffs
The Magnavox Company and
9 Sanders Associates, Inc.

10 United States District Court for the
11 Northern District of California
12

13 _____)
14 THE MAGNAVOX COMPANY, a Corpora-)
tion, and SANDERS ASSOCIATES,)
15 INC., a Corporation,) No. C 82 5270 JPV
16 Plaintiffs,)
17 vs.) NOTICE TO TAKE
18 ACTIVISION, INC., a Corporation,) DEPOSITION
19 Defendant.)
20 _____)


21 TO: Aldo J. Test Harry B. Bremond
Thomas O. Herbert Michael A. Ladra
22 Edward S. Wright Wilson, Sonsini, Goodrich
Flehr, Hohbach, Test, & Rosati
23 Albritton & Herbert Two Palo Alto Square
Suite 3400 Palo Alto, CA 94304
24 Four Embarcadero Center
San Francisco, CA 94111
25

26 PLEASE TAKE NOTICE that commencing at 9:30 A.M. on
27 the 8th day of May, 1984, at the offices of Cunningham
28

1 Reporting Associates, Inc., 111 Gillett Street, Hartford,
2 Connecticut, plaintiffs in the above-identified action will
3 take the deposition of Coleco Industries, Inc., 999 Quaker Lane
4 South, West Hartford, Connecticut (hereinafter "deponent"),
5 pursuant to Rule 30(b)(6) F.R.Civ.P. A subpoena duces tecum is
6 to be served on the deponent. The matters on which examination
7 is requested in the subpoena under Rule 30(b)(6) are set forth
8 in Attachment A hereto. Deponent is requested to designate one
9 or more officers, directors, or managing agents, or other
10 persons who consent to testify on its behalf, as to the matters
11 set forth in Attachment A hereto and known or reasonably
12 available to deponent and is requested to make this designation
13 available to plaintiffs at least three days prior to the
14 commencement of the deposition. The documents and things
15 requested to be produced in the subpoena are set forth in
16 Attachment B hereto.

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

21 Dated: April 26, 1984.

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

77 West Washington Street
Chicago, Illinois 60602
(312) 346-1200

ATTACHMENT A

1
2
3 1. The electrical design, circuitry, and
4 operation of the Coleco Gemini television game console.

5 2. The electrical design, circuitry, and operation
6 of the internal circuitry of any and all custom integrated
7 circuits included in the Coleco Gemini television game
8 console including without limitation the custom integrated
9 circuit sometimes known as the television interface adapter or
10 video interface circuit.

11 3. The electrical design, circuitry, and
12 operation of the Coleco Colecovision television game console and
13 any and all adapters for use with such Colecovision television
14 game console to permit use therewith of television game
15 cartridges for the Atari VCS Model 2600 television game console.

16 4. The electrical design, circuit, and operation
17 of any and all custom integrated circuits included in the Coleco
18 Colecovision television game console and any and all adapters for
19 use with such Colecovision television game console to permit use
20 therewith of television game cartridges for the Atari VCS Model
21 2600 television game console.

22 5. The manner of use and operation of the
23 television game consoles, adapters and integrated circuits
24 referred to in paragraphs 1-4 hereof.

ATTACHMENT B

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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.

