

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE PAPST LICENSING GMBH & CO.
KG LITIGATION

This Document Relates To:

Casio, No. 06-cv-1751

Misc. Action No. 07-493 (RMC)
MDL Docket No. 1880

PAPST'S PROPOSED DISCOVERY PLAN

The Court ordered the parties to file a joint proposed discovery plan by May 8, 2008. At about 7:45 p.m. eastern time, Casio sent Papst a revised draft of a plan. Casio's revised draft made substantial and significant changes to an earlier draft plan Papst sent to Casio earlier in the day. Counsel for Papst told Casio that they needed more time to consider and address the issue with Casio, that all of Papst's secretarial staff had left, and requested Casio to file that evening a request for a one day extension of time to allow the parties further time to meet and confer and try to further minimize the issues. Casio's counsel refused and said it would file the plan that evening. Unfortunately, Casio's proposed plan did not include Papst's positions that were provided to Casio earlier in the day. See Exhibit A attached. The Papst sections of the proposed plan that were deleted by Casio are reproduced below *in italics* as follows:

I. REQUESTED CLARIFICATION OF THE APRIL 24 ORDER

A. Papst's Position

The Court stated in its First Order Regarding Casio/Papst Discovery dated April 24, 2008, in paragraph 4,

Despite the fact the Court has stricken Papst's first discovery requests to Casio, Papst and Casio are entitled to receive reasonable discovery and both parties are obligated to provide reasonable discovery. Accordingly, Papst and Casio shall meet and confer no later than May 1, 2008, to determine specifically the reasonable discovery to be requested and to which the opposing party shall respond.

The Court also stated in paragraph 6,

Each party is limited to a maximum of twenty-five interrogatories, twenty-five requests for production, and twenty-five requests for admission, including discrete subparts.

It is Papst's understanding from this Order that the Court wanted Papst and Casio to meet and confer to somehow define with specificity the discovery that Casio needs to produce to Papst in this case. It is also Papst's understanding that the Court allowed Papst to generate a revised set of requests for production and interrogatories, each to be consistent with the Court's April 24 Order.

With this in mind, and consistent with the Court's Order the parties met and conferred on April 28, 2008 concerning discovery. Casio provided Papst with a list of categories of documents it proposed that it should produce, and merely said to Papst that it would produce some documents in the various categories. Papst believes it is appropriate that in order to memorialize the parties' agreement, it should be in the form of document requests and interrogatories, and that to do so would be consistent with what the Court ordered. To that end, Papst sent a revised set of document requests and interrogatories to Casio and each of the other defendants, and asked counsel for both Casio and the other defendants to provide them any proposed limitations on these requests which they felt were necessary to be consistent with the Court's April 24, 2008 Order. On May 7th Casio did provide Papst some pointed comments on certain production requests, including Papst's instructions section of its requests.

Papst then sent Casio's counsel and the other defendants a revised set of requests which

had been redrafted so that they would be consistent with Casio's comments. Attached hereto and marked as Exhibit B is Papst's revised set of requests which Papst would like not only Casio to respond to, but all of the other defendants. Papst has again requested that Casio and the other defendants provide comments and proposed limitations to these requests, if they believe they are inconsistent with the Court's Order.

Casio has taken the position that Papst does not have the right to serve additional interrogatories and document requests. However, it appears that in the April 24, 2008 Order the Court allowed Papst to serve additional discovery requests. In any event, Papst and Casio must come up with some list of documents and other information which Casio has to provide to Papst in connection with this case.

The fact that Papst's proposed document requests and interrogatories are consistent with the document requests and interrogatories that Papst has asked the other defendants in this case to respond to is significant because this would allow discovery in these MDL proceedings to proceed in a coordinated fashion.

Papst respectfully requests that the Court order Casio to respond to these new discovery requests in a reasonable period of time so that discovery may proceed against all defendants in a uniform fashion.

II. DISCOVERY RESPONSES

A. The Papst Position

Papst produced over 22,700 pages of documents during the Casio v. Papst lawsuit. On Friday, May 8, 2008, intends to produce over 50,000 pages of additional documents to counsel for all defendants. On May 7, 2008, Papst also served interrogatory answers on all defendants which totaled over 100 pages. A copy of those interrogatory responses are attached hereto as Exhibit C.

Papst's interrogatory responses, Exhibit C, respond to and are coextensive with many of Defendant Casio's interrogatories. By this Friday, Papst will provide the few remaining additional updated responses to Casio's interrogatories, consistent with the Court's April 24, 2008 Order.

Prior to the stay that was entered in the Casio v. Papst lawsuit, Casio produced no confidential technical documents to Papst, based on its position that a protective order was not entered in the case, and it would not produce the documents prior to that time. Yesterday, May 7, 2008, Casio produced additional technical documents to Papst. Casio apparently has limited its production of documents to Papst, which will be discussed in a further section of this paper.

Papst also had a meeting with counsel for all defendants, including Casio's counsel, on May 7, 2008, to discuss the form of the production of documents. Unfortunately, no further agreement was reached by the parties concerning this issue.

Papst is in the process of preparing further documents for production in this case, and will produce them when they are processed. These documents are in response, inter alia, to the document requests served by all of the defendants in this action.

III. THE PENDING MOTIONS

A. Papst's Position

Papst sees the following dispute over the meaning of paragraphs 2 through 5 of the Court's April 24 Order (docket #77). In paragraph 5 the Court states that,

Casio shall complete its current production of documents to Papst no later than May 6, 2008. Such production shall include information regarding sales of the six model cameras that Papst alleges infringe the patents-in-suit.

In paragraphs 2 and 3 the Court holds in abeyance Casio's request for sanctions related to Papst's first discovery requests and related to Casio's First Set of Interrogatories. Considering

the Court's Order in paragraph 6 requiring Casio to produce documents by May 6, 2008, Papst understands that the motion for sanctions referred to in paragraphs 2 and 3 only concerned the issue of whether monetary sanctions would apply. Casio has taken the position and has limited its document production until the Court has ruled on the sanction motion. By limiting its document production, Casio has delayed potentially indefinitely its discovery in this case. The parties request clarification on this issue.

This marks the end of the Papst positions that were deleted by Casio in its proposed discovery plan.

PAPST'S COMMENTS ON CASIO'S PROPOSED DISCOVERY PLAN

The proposed plan filed by Casio has commentary about Papst that is misleading and in some cases moot. For example, the plan has Footnote 3 inserted by Casio, that concerns the instructions to Papst's discovery requests. In a telephone conference on May 7, 2008, Papst's counsel told Casio's counsel that it was sending Casio a revised set of discovery requests that Papst believed dealt with Casio's pointed comments concerning the instructions. Papst's discovery requests (Exhibit B, Parts 1 and 2) were served on Casio's counsel on May 8, 2008. The proposed plan that Casio has provided the Court comments on the wrong set of discovery requests.

Casio complains in its footnote 3 on pages 5 and 6 of its unauthorized discovery plan that Papst still has not sufficiently narrowed its discovery requests. However, Casio's complaint is directed to the wrong set of requests not even at-issue between the parties. The following are two specific examples that refute Casio's arguments. First, Casio asserts that Papst "still demands documents from all Casio-related companies all over the world (definition number 1)".

Yet the latest draft Papst sent to Casio was drafted by Papst to eliminate this issue. Specifically Instruction 1 in Papst latest draft states,

“As use of herein, “Camera Manufacturer,” “Defendant,” “You” or “Your” means Casio Inc., Casio Computer Co., Ltd., Fujifilm Corporation, Fujifilm U.S.A., Inc., Matsushita Electric Industrial Co., Ltd., Victor Company of Japan, Ltd., Olympus Corp., Olympus Imaging America, Inc., Samsung Techwin Col, Samsung Opto-Electronics America, Inc., Panasonic Corporation of North America, JVC Company of America, Ricoh Company, Ltd., Ricoh Americas Corporation, Ricoh Corporation, Hewlett-Packard any other Product manufacturer or seller subsequently added to this MDL., all of their predecessor(s) and successor(s) in interest, and any person employed by or for any or all of these entities, and all of their attorneys, accountants, and consultants.”

To Papst’s understanding, this instruction is limited to the parties in suit. This instruction is similar in language to the language contained in similar instructions in all of Defendants’ discovery requests.

Second, also in footnote 3 on page 5 and 6 of Casio’s proposed plan, Casio refers to “(instructions 21-30)”. Yet Papst’s latest draft of its document request only has 15 instructions (see pages 1 through 7 of Exhibit B). Thus, in footnote 3, Casio does not address the right document. Papst’s last proposal for written discovery requests is Exhibit B. Papst’s latest discovery requests were modified to try to eliminate the problems raised by Casio. Thus, Casio’s comments in Footnote 3 are moot.

COMMENTS ON CASIO PRODUCTION OF DOCUMENTS

Papst provides the following comments of Casio’s document production to put in perspective the need for an appropriate discovery plan. Casio has produced about 100,000 pages of documents. A vast majority of these Casio documents are written in Japanese. Casio’s final document production likely could be significantly more than this since Casio still has not produced documents it alleges are covered by third party confidentiality agreements.

The following is one example of the problem with Casio's document production. Casio produced 27 versions of what appears to be a Japanese language specification, each of which is over 35 pages in length. These specifications appear to concern one of the most important features of Papst patents at issue here, i.e., how the Casio Cameras communicate with personal computers connected to Casio cameras. There are 49 Casio products asserted to be infringed by Papst. It is unclear which of the twenty-five plus versions of this specification, if any, apply to which of the 49 Casio products. Casio's document production is like a picture puzzle written in Japanese that would be the size of a room. This illustrates the monumental task Papst has in solving the puzzle of Casio's documents.

Papst's interrogatories (Exhibit B) were carefully drafted to help Papst unravel and simplify this puzzle and get the information it needs. For example, Papst Interrogatories 2 and 4 ask specific questions concerning what are called "identifiers." These are part of the computer code in each of Casio's products that would describe whether each product uses the important feature of Papst's patent discussed above. In these interrogatories, Papst asked Casio and the other defendants, *inter alia*, to identify all specific "identifiers" used in each of their products, and to point to documents that confirm this fact. Casio has complained it does not want to answer these specific questions, and that it prefers to proceed informally. If Casio wants to proceed on a cooperative basis, Papst agrees. However, if Casio does not cooperate as it asserts it will, Papst will request the Court's assistance in compelling Casio to provide the necessary information.

PAPST PROPOSAL ON HOW TO PROCEED WITH DISCOVERY

Thus, Papst's proposed plan is simple. Casio's counsel has repeatedly claimed that Papst has all the documents Papst "needs", and that Casio would like to discuss informally any

problems Papst has with Casio's discovery production. Casio's counsel has asserted that this would be the most economical process to proceed with discovery. Papst agrees with Casio's proposal, but expects Casio cooperate.

Papst has a deposition scheduled for May 14 and 15, 2008 of an individual Casio has identified in its Rule 26 initial disclosures as a person with knowledge about the technical issues in this case. Papst will depose this individual on the technical issues that are the subject matter of this case. Subsequent to the deposition Papst will meet with Casio's counsel to address specific issues and any deficiencies in Casio's document production. If this occurs, and Papst has further questions it needs answered, it will address those with the Court if they cannot be resolved amicably.

Dated: May 9, 2008

Respectfully submitted,

/s/ Joseph E. Cwik

James P. White
Jerold B. Schnayer
Joseph E. Cwik
WELSH & KATZ, LTD.
120 South Riverside Plaza, 22nd Floor
Chicago, IL 60606
(312) 655-1500

Robert F. Muse (Bar No. 166868)
Jacob A. Stein (Bar No. 052233)
Joshua A. Levy (Bar No. 475108)
Stein, Mitchell & Mezines, LLP
1100 Connecticut Ave., NW,
Suite 1100
Washington, D.C. 20036
(202) 737-7777
Counsel for Papst Licensing GmbH & Co. KG

EXHIBIT A

Schnayer, Jerold

From: Scott Stimpson [stimpsonlaw@gmail.com]
Sent: Thursday, May 08, 2008 6:47 PM
To: Schnayer, Jerold
Cc: jkfee@morganlewis.com; White, James; Cwik, Joseph
Subject: Re: Papst Camera Patent MDL
Attachments: jointdiscoveryPAPST.doc

Jerry:

Here is the revision. We are filing this tonight, and you just told me that you would wait.

We will wait for your comments, and then file tonight.

Scott

On Thu, May 8, 2008 at 7:44 PM, Schnayer, Jerold <jbschnayer@welshkatz.com> wrote:

Dear Scott,

I have no secretarial help. I cannot provide you with a written response tonight since you have not sent me a proposed draft by now. I am leaving my office. We can reconvene tomorrow morning.

You have my consent to file a non contentious request for a one day extension to file the report.

Thank you,

Jerold Schnayer

Welsh & Katz, Ltd.

120 South Riverside Plaza 22nd Floor

Chicago, IL 60606

312-655-1500

<http://www.welshkatz.com>

5/9/2008

EXHIBIT A

CONFIDENTIALITY NOTICE

This e-mail or the documents accompanying this e-mail contain information which may be confidential or privileged and exempt from disclosure under applicable law. The information is intended to be for the use of the individual or entity named on this transmission. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this information is without authorization and is prohibited. If you have received this e-mail in error, please notify us immediately so that we can take action to correct the problem.

From: Sliwinski, Cynthia
Sent: Thursday, May 08, 2008 5:15 PM
To: stimpsonlaw@gmail.com; jkfee@morganlewis.com
Cc: Schnayer, Jerold
Subject: FW: Papst Camera Patent MDL

Attached are the exhibits.

From: Sliwinski, Cynthia
Sent: Thursday, May 08, 2008 4:55 PM
To: stimpsonlaw@gmail.com; jkfee@morganlewis.com
Cc: Schnayer, Jerold
Subject: Papst Camera Patent MDL

Jerry Schnayer asked me to send you the attached draft for your review and consideration.

--

Scott D. Stimpson
The Law Office of Scott D. Stimpson
Suite 1102
445 Hamilton Avenue
White Plains, NY 10601
email: stimpsonlaw@gmail.com

5/9/2008

EXHIBIT A

phone: 203-258-8412

Disclaimer: This email is intended only for the personal use of the recipient(s) named above. This message may be an attorney-client communication and as such privileged and confidential. If you are not an intended recipient, you may not review, copy, or distribute this message. If you have received this communication in error, please notify me immediately by email and delete the original message.

5/9/2008

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE PAPST LICENSING GMBH & CO.
KG LITIGATION

This Document Relates To:

Casio, No. 06-cv-1751

Misc. Action No. 07-493 (RMC)
MDL Docket No. 1880

JOINT PROPOSED DISCOVERY PLAN

Papst Licensing GmbH & Co. KG ("Papst"), with Casio Inc. and Casio Computer Co., Ltd. (collectively "Casio"), hereby provide this joint proposed discovery plan pursuant to the Order of the Court, dated April 24, 2008 (docket #77).

The parties met and conferred, pursuant to paragraph 4 of the Court's April 24 Order, and were able to agree on few issues. There are, accordingly, issues raised herein for which we jointly request the Court's assistance.

I. REQUESTED CLARIFICATION OF THE APRIL 24 ORDER

A. Papst's Position

The Court stated in its First Order Regarding Casio/Papst Discovery dated April 24, 2008, in paragraph 4,

EXHIBIT A

Despite the fact the Court has stricken Papst's first discovery requests to Casio, Papst and Casio are entitled to receive reasonable discovery and both parties are obligated to provide reasonable discovery. Accordingly, Papst and Casio shall meet and confer no later than May 1, 2008, to determine specifically the reasonable discovery to be requested and to which the opposing party shall respond.

The Court also stated in paragraph 6,

Each party is limited to a maximum of twenty-five interrogatories, twenty-five requests for production, and twenty-five requests for admission, including discrete subparts.

It is Papst's understanding from this Order that the Court wanted Papst and Casio to meet and confer to somehow define with specificity the discovery that Casio needs to produce to Papst in this case. It is also Papst's understanding that the Court allowed Papst to generate a revised set of requests for production and interrogatories, each to be consistent with the Court's April 24 Order.

With this in mind, and consistent with the Court's Order the parties met and conferred on April 28, 2008 concerning discovery. Casio provided Papst with a list of categories of documents it proposed that it should produce, and merely said to Papst that it would produce some documents in the various categories. Papst believes it is appropriate that in order to memorialize the parties' agreement, it should be in the form of document requests and interrogatories, and that to do so would be

EXHIBIT A

consistent with what the Court ordered. To that end, Papst sent a revised set of document requests and interrogatories to Casio and each of the other defendants, and asked counsel for both Casio and the other defendants to provide them any proposed limitations on these requests which they felt were necessary to be consistent with the Court's April 24, 2008 Order. On May 7th Casio did provide Papst some pointed comments on certain production requests, including Papst's instructions section of its requests.

Papst then sent Casio's counsel and the other defendants a revised set of requests which had been redrafted so that they would be consistent with Casio's comments. Attached hereto and marked as Exhibit A is Papst's revised set of requests which Papst would like not only Casio to respond to, but all of the other defendants. Papst has again requested that Casio and the other defendants provide comments and proposed limitations to these requests, if they believe they are inconsistent with the Court's Order.

Casio has taken the position that Papst does not have the right to serve additional interrogatories and document requests. However, it appears that in the April 24, 2008 Order the Court allowed Papst to serve additional discovery requests. In any event, Papst and Casio must come

EXHIBIT A

up with some list of documents and other information which Casio has to provide to Papst in connection with this case.

The fact that Papst's proposed document requests and interrogatories are consistent with the document requests and interrogatories that Papst has asked the other defendants in this case to respond to is significant because this would allow discovery in these MDL proceedings to proceed in a coordinated fashion.

Papst respectfully requests that the Court order Casio to respond to these new discovery requests in a reasonable period of time so that discovery may proceed against all defendants in a uniform fashion.

B. Casio's Position¹

Paragraph 6(b) of the Court's April 24 Order (docket #77) stated that each party is limited to twenty-five interrogatories, twenty-five document requests, and twenty-five requests for admission. Casio and Papst disagree as to whether this means that Papst may now serve additional discovery requests on Casio.

On April 8, 2008, in response to thorough briefing and a hearing that

¹ Clarification of Papst Statement: Casio never provided comments to the Papst discovery requests so that Papst could serve anything on Casio, as Papst implies. Papst is referring to the draft of this report sent to it on the morning of May 7, which contained the basic text of what is now footnote 3, *infra*.

EXHIBIT A

addressed the issue, this Court expressly held that “no further written discovery requests shall be allowed between Casio and Papst.” Docket #36, ¶4. This effectively reconfirmed the May 14, 2007 Order of Judge Kessler that there would be no further written discovery requests between Casio and Papst after July 1, 2007 – a deadline that passed long ago. As the April 24 Order does not vacate either the Court’s April 8, 2008 Order, or the earlier Order of Judge Kessler, Casio does not believe the Court intended to again open up written discovery for Casio and Papst.² Indeed, if Papst and Casio were to serve discovery requests all over again, it would have been inconsistent for the Court to order them to meet and confer now for the purpose of determining the specific scope of further discovery. April 24 Order, ¶4 (docket #77).

Casio has already been forced to deal with 148 document requests from Papst, many very detailed interrogatories served on both Casio Japan and Casio America, and 130 requests for admission. Dealing with the Papst discovery requests was a painful and expensive experience. The Court found the Papst discovery requests “outrageously over the top” and “stunning” in their over breadth, served in “bad faith,” and struck them in their entirety. *Id.* ¶2; May 6 Order, fn 2 (docket #82). If the Court

² See Exhibit D at 27 (to counsel for Papst: “you’re dangerously close to being so grossly overbroad and you’re too late to change it now and now what are you going to do? How can I enforce it? I mean, you’ve let yourself get to the end of a limb”) (emphasis added).

EXHIBIT A

now combines that ruling with an order effectively allowing Papst to simply start the written discovery process anew, the only party that will have been punished as a result of Papst's discovery abuse is Casio because it would have to bear the additional burden and costs associated with responding to additional written discovery served ten months after the deadline.

Casio does not understand the Court to have intended to reverse itself on this issue, and Casio again urges the Court to deny Papst's request to reopen this Pandora's Box and the substantial expense associated with it.

Casio has produced over 100,000 pages of documents, including tens of thousands of pages directly on the technology at issue. After Papst has reviewed those documents in detail, if it believes there are additional documents needed and has good reason for this belief, Casio will supplement its production. The approach Papst wants to take – serving another overbroad set of requests for documents before it even bothers to review the documents it already has – will only add additional layers of expense and burden for both Casio and the Court. Papst has what it needs, and if its counsel would simply review the Casio production documents that should become clear.

Papst claims that Casio should respond to the discovery requests

EXHIBIT A

that are attached as Exhibit A. Those requests were only served on counsel for Casio at 3:00 p.m. on the same afternoon this submission was due (and Papst's first inserts and comments to this submission itself came three hours later, at 6:00 p.m.). Counsel for Casio was not given sufficient time to comment on these new requests, except to state that Papst should not be allowed any additional written discovery. Indeed, counsel for Casio has spent the last several days focusing on a different "narrowed" set of Papst requests that counsel for Papst served on Casio and presented as its proposed compromise on the Casio document production. See Exhibit C and fn 3, *infra*.

II. DISCOVERY RESPONSES**A. The Papst Position**

Papst produced over 22,700 pages of documents during the Casio v. Papst lawsuit. On Friday, May 8, 2008, intends to produce over 50,000 pages of additional documents to counsel for all defendants. On May 7, 2008, Papst also served interrogatory answers on all defendants which totaled over 100 pages. A copy of those interrogatory responses are attached hereto as Exhibit B.

Papst's interrogatory responses, Exhibit B, respond to and are coextensive with many of Defendant Casio's interrogatories. By this Friday, Papst will provide the few remaining additional updated responses

EXHIBIT A

to Casio's interrogatories, consistent with the Court's April 24, 2008 Order.

Prior to the stay that was entered in the Casio v. Papst lawsuit, Casio produced no confidential technical documents to Papst, based on its position that a protective order was not entered in the case, and it would not produce the documents prior to that time. Yesterday, May 7, 2008, Casio produced additional technical documents to Papst. Casio apparently has limited its production of documents to Papst, which will be discussed in a further section of this paper.

Papst also had a meeting with counsel for all defendants, including Casio's counsel, on May 7, 2008, to discuss the form of the production of documents. Unfortunately, no further agreement was reached by the parties concerning this issue.

Papst is in the process of preparing further documents for production in this case, and will produce them when they are processed. These documents are in response, *inter alia*, to the document requests served by all of the defendants in this action.

B. Casio's Position

Papst document Production: Casio has not received any documents from Papst since the stay was lifted. While Papst now states that some documents will be produced this week, they concede that this

EXHIBIT A

will not be all the Papst documents, and there is no deadline for them to complete the production. Accordingly, Casio requests an order that Papst produce all its documents within ten days.

Papst Responses to Interrogatories: Papst has agreed to provide, this week, full responses to Casio's outstanding interrogatories, as ordered in paragraphs 6(k) – 6(o) of the April 24 Order.

Casio's Production: Pursuant to paragraph 5 of the Court's Order, Casio produced additional documents on May 6. Approximately 69,000 additional documents, or about an additional 23 boxes worth, were produced that day.

With regard to the scope of the Casio production, the parties agreed that Casio would produce a number of additional documents, including things like service manuals and documents sufficient for an understanding of the specific relevant technology. Casio's plan was to include in this joint submission a specific list of what the parties would jointly agree to be the scope of any future Casio production.

But after working with Papst to reach agreements per the Court's Order, Papst rendered the agreements entirely meaningless by serving new document requests. Exhibit C. Casio had provided concessions on what it was willing to produce, in order to reach a final, amicable

EXHIBIT A

resolution, only to find out two days later that Papst was still demanding an outrageous scope of production.³

³ Papst claimed that the new requests (Exhibit C) were "narrowed" per the Court orders and instructions. Despite the numbering on the actual requests, they were not even close to the 25 request limit ordered by the court, as was clear from the vast array of documents demanded in the "instructions" to the requests (instructions 21-30). While purporting to limit some of the requests to certain features of the cameras, they nevertheless continued to demand documents from every Casio-related company all over the world (definition number 1) that had any mention of any of these features, including every technical document virtually ever written or created anywhere in the world (see, e.g., instructions 21 and 25), every document on the development history of every such feature (*id.*); every marketing plan, advertisement, brochure, bulletin, and market study, all over the world, making any reference to any of the features (instruction 23); every document from every "patent related" federal or state lawsuit, administrative proceeding, ITC proceeding, Patent Office proceeding, and "international cases and proceedings filed in any tribunal" anywhere in the world, that involves the cameras (request 12, instruction 13); every document related to prosecution of every patent and application all over the world that even partially mentions any of the features (request 17); etc. According to the requests, the documents identified in these "instructions" (obviously in large part simply copied from Papst's first set of requests) were only "examples" of what must be produced. Papst even expanded its requests in some respects, insisting that, for every responsive document that has ever been destroyed by any Casio related company worldwide in the last 23 years (instructions 1 and 17), Casio must identify the person who destroyed it, the date it was destroyed, the reasons for and circumstances surrounding the destruction (instruction 7). Papst also demanded that Casio produce every document relating to every review or analysis of any competitor product with these features (instruction 21), every document showing every tweak to any related software that has been made over the past 23 years (*id.*), every communication between every Casio employee from every country of the world with manufacturers or suppliers of integrated circuitry (*id.*), etc. At the April 22 telephonic hearing, the Court expressly warned Papst about using discovery "as a weapon" and told counsel for Papst: "don't do it again" (Exhibit D at 5). The message did not sink in.

Counsel for Casio has been grappling with this outrageous set of document requests – Papst's proposal for "compromise" and formally served on Casio pursuant to Federal Rule 26(g) – for the last several days. Only after counsel for Papst learned that Casio would show these requests to the Court did Papst serve another set, allegedly further narrowed. Counsel for Casio has not had the

EXHIBIT A

III. THE PENDING MOTIONS

A. Papst's Position

Papst sees the following dispute over the meaning of paragraphs 2 through 5 of the Court's April 24 Order (docket #77). In paragraph 5 the Court states that,

Casio shall complete its current production of documents to Papst no later than May 6, 2008. Such production shall include information regarding sales of the six model cameras that Papst alleges infringe the patents-in-suit.

In paragraphs 2 and 3 the Court holds in abeyance Casio's request for sanctions related to Papst's first discovery requests and related to Casio's First Set of Interrogatories. Considering the Court's Order in paragraph 6 requiring Casio to produce documents by May 6, 2008, Papst understands that the motion for sanctions referred to in paragraphs 2 and 3 only concerned the issue of whether monetary sanctions would apply. Casio has taken the position and has limited its document production until the Court has ruled on the sanction motion. By limiting its document production, Casio has delayed potentially indefinitely its discovery in this case. The parties request clarification on this issue.

B. Casio's Position

opportunity to focus on the new set, as they were not served until 3:00 p.m. on the day of this submission.

EXHIBIT A

In paragraphs 2 and 3 of the Court's April 24 Order (docket #77), the Court held the sanctions issues from the pending Casio motions in abeyance. The parties agree that resolution of the issues in these pending motions will significantly impact on the discovery between Casio and Papst, and so both parties respectfully request early resolution of these outstanding issues.

Resolution of Casio's motion for sanctions related to Papst's responses to Casio's interrogatories (docket #37) will dictate whether Casio and Papst need to address discovery related only to topics that may, as a result of the motion, no longer be in issue between Casio and Papst. That is, Casio has requested in that motion sanctions that, if ordered by the Court, would narrow the scope of needed discovery. Resolution of the sanctions portions of the Motion to strike (docket #38) may be relevant to the question of whether Papst may serve additional discovery requests, as one of the requested sanctions was that Papst's "bad faith" should preclude them from serving more requests. Accordingly, both parties respectfully request early resolution of these pending issues.⁴

⁴ The sanctions requests in the Motion to Strike are also important because Casio incurred very substantial expenses in dealing with those requests, the Motion to Strike, and the two Papst motions to compel (which were denied in their entirety). Casio requested reimbursement of its fees and costs associated with these tasks that were all necessitated only by the Papst overbroad

EXHIBIT A

Dated: May ____, 2008

Respectfully submitted,

Robert F. Muse (Bar No. 166868)
Jacob A. Stein (Bar No. 052233)
Joshua A. Levy (Bar No. 475108)

Stein, Mitchell & Mezines, LLP
1100 Connecticut Ave., NW,
Suite 1100
Washington, D.C. 20036
(202) 737-7777

James P. White
Jerold B. Schnayer
Walter J. Kawula
WELSH & KATZ, LTD.
120 South Riverside Plaza, 22nd Floor
Chicago, IL 60606
(312) 655-1500

approach to its discovery requests. The Court has already held that the Papst discovery requests were "outrageously over the top," "hugely overbroad," and "absolutely stunning" in their over-breadth (Exhibit D, tr. at 4, 17, 33), warned Papst about "playing those games" and "using discovery as a weapon...." (*id.* at 4-5), and has also held that they were "propounded in bad faith" (May 6 Order, fn 2, docket #82). Casio therefore respectfully suggests that the expenses Casio incurred with regard to these requests must be borne by Papst. See Fed. R. Civ. P. 26(g) ("If a certification violates this rule without substantial justification, the court . . . must impose an appropriate sanction" and the sanction may include "reasonable expenses, including attorney's fees"); Fed. R. Civ. P. 37(a)(5)(B) ("If the motion [to compel] is denied, the court . . . must, after giving an opportunity to be heard, require the movant, the attorney filing the motion, or both to pay the party or deponent who opposed the motion its reasonable expenses incurred in opposing the motion, including attorney's fees."); see also Exhibit B (page 45: "It is so overwritten, so overbroad. It is so incredibly expensive and burdensome. . . "; and page 8: "I will be really rough with somebody that I think is only playing delay and expense games.").

EXHIBIT A

**Counsel for Papst Licensing GmbH &
Co. KG**

J. Kevin Fee, Esq. (D.C. Bar No.
494016)
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, NW
Washington, D.C. 20004
Tel.: (202) 739-3000
Fax: (202) 739-3001

Scott D. Stimpson
The Law Office of Scott D. Stimpson
Suite 1102
445 Hamilton Avenue
White Plains, N.Y. 10601
Tel: 203-258-8412

**Attorneys for Plaintiff and Counter-
Defendant
Casio Inc. and Counter-Defendant
Casio Computer Co., Ltd.**

EXHIBIT B - PART 1

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE PAPST LICENSING GMBH & CO.
KG LITIGATION

Misc. Action No. 07-493 (RMC)

This Document Relates To:
ALL CASES

MDL Docket No. 1880

**PAPST LICENSING GMBH & CO. KG'S
THIRD REVISED FIRST SET OF REQUESTS FOR THE PRODUCTION OF
DOCUMENTS AND THINGS TO THE DEFENDANTS**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Papst Licensing GmbH & Co. KG ("Papst") requests that each of the Defendants or Camera Manufacturers (defined below) produce the following documents and things for inspection and copying in accordance with the Definitions and Instructions set forth herein. If the manner of production is not otherwise agreed upon, production shall be at the offices at Welsh & Katz, Ltd., 120 South Riverside, 22nd Floor, Chicago, Illinois 60606, within thirty (30) days after service hereof, or as the parties may otherwise agree.

DEFINITIONS AND INSTRUCTIONS

1. As used herein, "Camera Manufacturer, " "Defendant," "You" or "Your" means Casio Inc., Casio Computer Co., Ltd., Fujifilm Corporation, Fujifilm U.S.A., Inc., Matsushita Electric Industrial Co., Ltd., Victor Company of Japan, Ltd., Olympus Corp., Olympus Imaging America, Inc., Samsung Techwin Co., Samsung Opto-Electronics America, Inc., Panasonic Corporation of North America, JVC Company of America, Ricoh Company, Ltd., Ricoh Americas Corporation, Ricoh Corporation, Hewlett-Packard

EXHIBIT B - PART 1

any other Product manufacturer or seller subsequently added to this MDL, all of their predecessor(s) and successor(s) in interest, and any person employed by or for any or all of these entities, and all of their attorneys, accountants, and consultants.

2. As used herein, the term “document” shall have the full meaning ascribed to it under Rule 34 of the Federal Rules of Civil Procedure. Defendants shall search for and the produce any responsive documents written in English, in whole or in part, regardless of whether a Defendant also produces the same or similar document written in a foreign language.

3. If any of the information requested to be produced is available in machine-readable form (such as punch cards, paper or magnetic tapes, drums, disks, or core storage), state the form in which it is available and describe the type of computer or other machinery required to access the information. If the information requested is only available in machine-readable form, indicate whether you possess any existing program which will print the records in some form, and identify the person(s) who is/are familiar with the program. If no program exists, state whether you could develop one or whether an existing program could be modified to print records in a readable form.

4. The terms “concerning,” “relating to,” or “related to” in regard to a particular subject shall mean, without limitation, assessing, analyzing, constituting, containing, comprising, describing, discussing, embodying, reflecting, evidencing, identifying, mentioning, memorializing, stating, referring directly or indirectly to or in any way relevant to such subject.

5. In the event any information, document, or thing responsive to these requests is not provided by reason of a claim of privilege or work product, or for any other reason,

EXHIBIT B - PART 1

then the following shall be provided with respect to such information, document, or thing: (a) a brief description of the subject matter of the information, document, or thing; (b) the identity of the author or creator of the information, document, or thing; (c) the source of the information, document, or thing; (d) all recipients of the information, document, or thing (including, but not limited to those receiving copies and blind copies); (e) the date the information, document, or thing (or any copy or draft thereof which is not identical to the original) was created; and (f) the basis upon which the information, document, or thing is being withheld. With respect to any information that is redacted, the redacting party must in addition to the requirements above identify all pages by Bates Number where any redaction has occurred.

6. As used herein, “and” or “or” shall be construed conjunctively or disjunctively, or both conjunctively and disjunctively, so as to acquire the broadest meaning possible.

7. As used herein, “person” shall include, but is not limited to, any natural person, business, partnership, corporation, or other entity, and any employee, agent, attorney, or representative of any of the foregoing.

8. As used herein, the term “Product” shall mean all Digital Cameras made or sold by each Defendant. As to the Olympus parties and the Hewlett-Packard parties, the term “Product” shall also include all products made or sold by each Defendant (whether or not a Digital Camera) that acquire external light images and/or sound, and then process the external light images or sound into digital electrical signals representative of the external light images and/or sound, and then transfer those digital electrical signals to an

EXHIBIT B - PART 1

electronic memory, and then transfer those digital electrical signals to a personal computer, and wherein the Product also communicates with a personal computer.

9. As used herein, “Patents-in-Suit” refers to United States Patent No. 6,895,449 (“the ‘449 patent”) and United States Patent No. 6,470,399 (“the ‘399 patent”).

10. As used herein, “Specific Features” means those Product features concerning (1) how the Products electronically connect to and interact with various types of computers, (2) what standards and/or command sets are used by the Products to communicate with computers, (3) how digital information (including digital information representative of pictures and sounds) is transmitted back and forth between the Products and a computer to which they are connected, (4) the file systems used to store digital information in Products (including digital information representative of pictures and sounds), and (5) how the master boot record (MBR) and any boot sector(s) are generated by each Product during formatting of a memory chip and/or in response to an inquiry from a host computer.

11. Where appropriate, the singular form of a word should be interpreted in the plural and *vice versa*, and the masculine form of a word shall be interpreted to also include the feminine and *vice versa*, to obtain the broadest possible meaning.

12. These document requests are continuing in nature. If after making its initial response hereto (and up until the time of any hearing or trial), each of the Defendants or their attorneys, agents, or representatives obtain or become aware of any further information or documents responsive to these requests that was unavailable at the time of the initial response hereto, each of the Camera Manufacturers are requested to produce such information and documents.

EXHIBIT B - PART 1

13. Unless indicated otherwise, these requests apply to all documents and materials from 1985 to the present date.

14. The methods and format of each of the Camera Manufacturers' production shall be as follows:

15. Format of Production

(a) With respect to all responsive paper documents, each Defendant shall serve concurrently with its responses to these requests its estimated costs to produce to Papst all responsive hard copy documents in single-page Tagged Image File Format ("TIFF") with an accompanying Summation load file. To the extent available, the load file shall contain for each document the beginning Bates number, the ending Bates number, a description of the source for the document. Each page of a produced document shall have a legible, unique page identifier ("Bates Number") and confidentiality legend (where applicable) on the face of the image at a location that does not obliterate, conceal, or interfere with any information from the source documents. No other legend or stamp will be placed on the document image other than the Bates Number, confidentiality legend (where applicable), and redactions.

Should any Defendant convert any or all paper documents into any electronic format (such as TIFF or .pdf) at its own cost at any time, each such Defendant shall inform Papst of that fact, describe the electronic format that the documents exist in, and inform Papst of the estimated costs to obtain copies of these electronic files all within five days of any conversion.

In addition, hard copies shall be produced as they were kept in the ordinary course of business. This shall include stapling of documents, segregating individual file folder

EXHIBIT B - PART 1

and ordering groups of file folders and documents as they were kept in the ordinary course of business. The parties shall also provide for each group of documents to the extent known (1) the name of the person(s) and/or group(s) whose file each group of documents came from, and (2) an identification of the custodian(s) of each group of documents, all as the documents were kept in the ordinary course of business. Hard copies and things shall be maintained at a document depository in the United States and shall be reasonably accessible to all parties upon reasonable notice.

(b) The parties shall produce all responsive electronic documents as they are kept in the usual course of business, or as otherwise agreed between the parties. Should any Defendant convert any or all electronic documents into any other electronic format (such as TIFF or .pdf) at their own cost at any time, each such Defendant shall inform Papst of that fact, describe the electronic format that the documents exist in, and inform Papst of the estimated costs to obtain copies of these electronic files all within five days of any conversion.

Each Defendant shall serve concurrently with its responses to these requests its estimated costs to produce to Papst all responsive electronic documents in single-page Tagged Image File Format ("TIFF") with an accompanying Summation load file. To the extent available, the load file shall contain for each document the beginning Bates number, the ending Bates number, a description of the source from which the document came, a description of the computer from which the document came, the associated file name, and the associated directory path for the document. Documents that present imaging or formatting problems shall be promptly identified and the Parties shall meet and confer to attempt to resolve the problems. Each page of a produced document shall

EXHIBIT B - PART 1

have a legible, unique page identifier (“Bates Number”) and confidentiality legend (where applicable) on the face of the image at a location that does not obliterate, conceal, or interfere with any information from the source documents. No other legend or stamp will be placed on the document image other than the Bates Number, confidentiality legend (where applicable), and redactions. Each party will bear the burden and cost of any OCR post-processing. Papst is willing to mutually agree that during the first round of exchanging documents the parties need not exchange metadata, except as referenced above. If any party should later desire to obtain additional metadata, the parties will attempt to work it out amicably. An extracted text file of electronic documents shall be made part of the load file associated with each electronic document.

REQUESTS FOR DOCUMENTS AND THINGS

1. All documents relating to the development history of each Specific Feature¹ in each and every Product² of the Defendants.
2. Documents sufficient to show the monthly sales (in revenues and in units) for each Product in each country from January 1, 1999 to present.
3. Two functional samples of each and every Product used, manufactured, sold, offered for sale or imported into the United States since October 22, 2002.
4. All advertising, marketing and promotional documents in the United States that address and/or discuss, in whole or in part, the Specific Features in any and all Products of the Defendants since January 1, 1999.

¹ The term “Specific Feature” is defined in the Definitions and Instructions section above.

² The term “Product” is defined in the Definitions and Instructions section above.

EXHIBIT B - PART 1

5. Documents sufficient to show the overall construction and/or operation of each and every Product of the Defendant that has been used, manufactured, sold, offered for sale, or imported into the United States since October 22, 2002, including but not limited to, all user manuals, service manuals, overall product specifications, overall software requirements, and overall source code.

6. All documents primarily concerning the subject matter, construction and/or operation of one or more of the Specific Features in each and every Product of the Defendants that has been used, manufactured, sold, offered for sale, or imported into the United States since October 22, 2002.

7. All documents relating to the Defendants' alleged invalidity and/or unenforceability of the Patents-In-Suit.

8. All documents relating to the Defendants' alleged non-infringement of the Patents-In-Suit.

9. All documents relating to the interpretation, scope and meaning of the claims in the Patents-In-Suit.

10. Documents sufficient to show the identification of those entities and/or individuals who are the most knowledgeable concerning the research, development, and design of one or more of the Specific Features for each and every Product of the Defendants.

11. All documents relating to the Patents-In-Suit, Papst, LT Tasler, Michael Tasler and/or Labortechnik Tasler GmbH, including but not limited to, all documents relating to any and all work done by and/or products of Michael Tasler and/or Labortechnik Tasler GmbH.

EXHIBIT B - PART 1

12. All transcripts, discovery responses and expert reports in the United States wherein a Defendant or its expert witness has described and/or discussed, in whole or in part, how its Products operate with respect to any or all of the Specific Features.

13. All documents and things identified in, the identification of which is requested in, responsive to, or reviewed in formulating a response to Papst Licensing's First Joint Set of Interrogatories to the Defendants.

14. All documents relating to the level of ordinary skill in the art pertaining to the Patents-In-Suit.

15. All documents relating to any secondary considerations of non-obviousness or obviousness, including but not limited to, the following: (1) the commercial success of the Products attributable to the claimed inventions, rather than something else, such as innovative marketing, (2) the claimed inventions satisfied a long felt need, (3) the attempt and failure of others to make the claimed inventions, (4) skepticism of the claimed inventions by experts, (5) praise by others of the claimed inventions, (6) teaching away of the claimed inventions by others, (8) copying of the claimed inventions by others, (9) experts or persons of ordinary skill in the field of the inventions expressing surprise at the making of the claimed inventions, (10) the inventor proceeded contrary to accepted wisdom, and (11) the claimed inventions achieved unexpected results.

16. All document retention policies in place from the time each Defendant first started its research and development of the Specific Features up until today's date.

EXHIBIT B - PART 1

17. All patents, patent applications and file histories of any of the Defendant's U.S. patents or patent applications that address, in whole or in part, the Specific Features of the Defendants' Products.

18. Documents and things sufficient to show the details of the operation of each Product that has been used, manufactured, sold, offered for sale, or imported into the United States since October 22, 2002 with respect to how sound waves and/or light images are converted to representative analog signals, and how those electrical signals are converted to representative digital signals.

Dated: May 8, 2008

/s/ Jerold B. Schnayer

James P. White

Jerold B. Schnayer

Joseph E. Cwik

WELSH & KATZ, LTD.

120 South Riverside Plaza • 22nd Floor

Chicago, Illinois 60606

(312) 655-1500

Robert F. Muse

Joshua A. Levy

Kerry C. Dent

STEIN MITCHELL & MEZINES, LLP

1100 Connecticut Ave, NW

Washington, D.C. 20036

(202) 737-7777

**Attorneys for Defendant/Counter-
Plaintiff Papst Licensing GmbH & Co.
KG**

EXHIBIT B - PART 1

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing PAPST LICENSING GMBH & CO. KG'S THIRD REVISED FIRST JOINT SET OF REQUESTS FOR THE PRODUCTION OF DOCUMENTS AND THINGS TO THE CAMERA MANUFACTURERS was served on this the 8th day of May, 2008 upon the attorneys for the Camera Manufacturers as follows:

For The Casio Parties (via e-mail in both Microsoft Word and .pdf format):

Laura Krawczyk
Morgan Lewis & Bockius
101 Park Avenue
New York, NY 10178-0060
Phone: (212) 309-6000
Fax: (212) 309-6001
lkrawczyk@morganlewis.com

J. Kevin Fee
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Avenue, NW
Washington, D.C. 20004
jkfee@morganlewis.com

Scott D. Stimpson
The Law Office of Scott Stimpson
Suite 1102
445 Hamilton Avenue
White Plains, NY 10601
stimpsonlaw@gmail.com

For The Samsung Parties (via e-mail in both Microsoft Word and .pdf format):

Patrick J. Kelleher
Drinker Biddle Gardner Carton
191 North Wacker Drive
Suite 3700
Chicago, IL 60606-1698
Phone: (312) 569-1375
Fax: (312) 569-3375
Patrick.kelleher@abr.com

For The Fujifilm Parties (via e-mail in both Microsoft Word and .pdf format):

Steven J. Routh
Sten A. Jensen
John R. Inge
Robert Wolinsky

EXHIBIT B - PART 1

Hogan & Hartson, LLP
555 Thirteenth Street, N.W.
Washington, DC 20004
Phone: (202) 637-5600
Fax: (202) 637-5910
sjrouth@hhlaw.com
sajensen@hhlaw.com
JRInge@HHLAW.com
RBWolinsky@HHLAW.com

For the Olympus Parties (via e-mail in both Microsoft Word and .pdf format):

Richard de Bodo
Rachel M. Cappoccia
Hogan & Hartson, LLP
1999 Avenue of the Stars
Suite 1400
Los Angeles, CA 90067
Phone: (310) 785-4694
Fax: (310) 785-4601
rdebodo@hhlaw.com
rmcappoccia@hhlaw.com

For The Matsushita and Victory Company of Japan Parties (via e-mail in both Microsoft Word and .pdf format):

Richard de Bodo
Rachel M. Capoccia
Hogan & Hartson, LLP
1999 Avenue of the Stars
Suite 1400
Los Angeles, CA 90067
Phone: (310) 785-4694
Fax: (310) 785-4601
rdebodo@hhlaw.com
rmcapoccia@hhlaw.com

Adam K. Levin, Esq.
Hogan & Hartson LLP
555 13th Street, NW
Washington, DC 20004
aklevin@hhlaw.com

EXHIBIT B - PART 1

For the Ricoh Parties:

Paul Devinsky
McDermott Will & Emery LLP
600 13th Street, NW
Washington, DC 20005-3096
(202) 756-8369
Fax: (202) 756-8087
pdevinsky@mwe.com

For Hewlett-Packard Parties:

Heather N. Mewes
Fenwick & West, LLP
555 California St., 12th Floor
San Francisco, CA 94104
(415) 875-2300
hmewes@fenwick.com

/s/ Jerold B. Schnayer

Attorney for Papst Licensing GmbH & Co.
KG

EXHIBIT B - PART 2

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE PAPST LICENSING GMBH & CO.
KG LITIGATION

Misc. Action No. 07-493 (RMC)

This Document Relates To:
ALL CASES

MDL Docket No. 1880

**PAPST LICENSING GMBH & CO. KG'S
SECOND REVISED FIRST JOINT SET OF INTERROGATORIES TO DEFENDANTS**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Papst Licensing GmbH & Co. KG ("Papst"), through counsel, requests each of the Defendants to separately respond to each of the Interrogatories below.

DEFINITIONS

1. "Defendant," "Camera Manufacturer," "You" and/or "Your" shall mean the Defendant party or parties responding to the present interrogatories, each of their predecessor corporations, successor corporations, and each of their present employees, consultants, accountants, and attorneys.

2. "Document" and "Thing" shall have the full meaning ascribed to them under Rule 34 of the Federal Rules of Civil Procedure.

3. A request for a Document shall be deemed to include a request for a Thing. A request for a Thing shall be deemed to include a request for a Document.

4. "Or" is inclusive referring to any one or more of the disjoined words or phrases listed.

5. The terms "concerning," "relating to," or "related to" in regard to a

EXHIBIT B - PART 2

particular subject shall mean, without limitation, assessing, analyzing, constituting, containing, comprising, describing, discussing, embodying, reflecting, evidencing, identifying, mentioning, memorializing, stating, referring directly or indirectly to or in any way relevant to such subject.

6. "Communication," "communicate" or "communicating" means every manner or means of disclosure, transfer or exchange, and every disclosure, transfer or exchange of information whether orally or by Document or whether face-to-face, by telephone, mail, telex, facsimile, personal delivery or otherwise.

7. The terms "identify" or "identity" or "identification" when used in connection with an individual means: state the individual's full name; his or her employer; and his or her position, title, or job description. To the extent an individual is a former employee of Defendant, please provide a last known home address and his or her last known employer if known.

8. The terms "identify" or "identity" or "identification" when used in connection with a company, corporation, association, partnership, joint venture, or any legal entity other than a natural person means: state its full name and state the address of its principal place of business.

9. The terms "identify" or "identity" or "identification" when used in connection with an oral statement or discussion means: state the name of the speaker; the date of the statement; the place at which the statement was made; the person or persons to whom the statement was addressed, if practicable, and otherwise a general description of the persons to whom the statement was addressed; the subject matter of the statement; and if the statement was memorialized in writing or mechanical or other recording, state the date and

EXHIBIT B - PART 2

present location of said recording, and provide the production number(s) thereof.

10. The terms “identify” or “identity” or “identification” when used in connection with a written Document or statement means: provide the corresponding Bates number for the Document; or, if no Bates Number is available, other information sufficient for Papst to specifically identify the document. In lieu of such identification, You may attach a copy of the written Document or statement, and refer thereto in Your answer.

11. As used herein, the term “Product” shall mean all Digital Cameras made or sold by each Defendant. As to the Olympus parties and the Hewlett-Packard parties, the term “Product” shall also include all products made or sold by each Defendant (whether or not a Digital Camera) that acquire external light images and/or sound, and then process the external light images or sound into digital electrical signals representative of the external light images and/or sound, and then transfer those digital electrical signals to an electronic memory, and then transfer those digital electrical signals to a personal computer, and wherein the Product also communicates with a personal computer.

12. As used herein, “Specific Features” means those Product features concerning (1) how the Products electronically connect to and interact with various types of computers, (2) what standards and/or command sets are used by the Products to communicate with computers, (3) how digital information (including digital information representative of pictures and sounds) is transmitted back and forth between the Products and a computer to which they are connected, (4) the file systems used to store digital information in Products (including digital information representative of pictures and sounds), and (5) how the master boot record (MBR) and any boot sector(s) are generated by each Product during formatting of a memory chip and/or in response to an inquiry

EXHIBIT B - PART 2

from a host computer.

13. "Patents-in-Suit" refers to United States Patent No. 6,895,449 ("the '449 patent") and United States Patent No. 6,470,399 ("the '399 patent").

14. "USB Specification" means Universal Serial Bus Specification, Revision 2.0. The USB Specification is available from the USB Implementers Forum at <http://www.usb.org/developers>.

15. "SCSI Block Command" includes any and all commands identified as SCSI Block Commands, including the commands identified in SCSI Block Commands-2 (SBC-2) (T10/1417-D) and/ or SCSI Block Commands - 3 (SBC-3) (T10/1799-D). The SCSI specifications are available through the InterNational Committee for Information Technology Standards ("incits"), Technical Committee T10, at <http://www.t10.org>, and/or through ANSI, 11 West 42nd Street, 13th Floor, New York, NY 10036, Sales Dept: (212) 642-4900.

16. "PTP Command" includes any and all commands identified in PIMA 15740:2000, Picture Transfer Protocol (PTP) for Digital Still Photography Devices, and/or ISO 15740:2005, Picture Transfer Protocol (PTP) for Digital Still Photography Devices. The specifications are available through the International Imaging Industry Association ("I3A") at <http://www.i3a.org> and/or the International Organization for Standardization at <http://www.iso.org>.

INSTRUCTIONS

1. Where knowledge or information in Your possession is requested, the request extends to knowledge or information in the possession of Your agents, representatives, and attorneys. Whenever an answer to these interrogatories contains

EXHIBIT B - PART 2

information that is not based upon Your personal knowledge, state the source and the nature of such information.

2. Answer all of the interrogatories completely. If You contend that the answer to any interrogatory is privileged in whole or in part, state all facts supporting such privilege, and identify each person having knowledge of the factual basis on which the privilege is asserted. Answer should be made of all knowledge and information which is not privileged.

3. If You have no knowledge or information responsive to a particular interrogatory, please state such.

4. These interrogatories shall be deemed continuing and the Defendant shall supplement and seasonably amend its responses as required under the Federal Rules.

5. If an objection is made to any interrogatory, answer should be made of all knowledge and information to which the objection does not relate.

6. If You find the meaning of any term in these interrogatories unclear, You shall assume a reasonable meaning, state what the assumed meaning is, and respond to the interrogatory according to the assumed meaning.

7. The phrase “the basis for Your interpretation of each claim element” shall mean: identify all Documents that support Your interpretation of the claim; point out the specific portions of the identified Documents, and provide a full explanation of how the specific portions of the identified Documents relate to the stated claim interpretation.

8. The phrase “identify all evidence that supports Your allegations” shall mean at least the following: identify each person with factual information that allegedly supports Your allegations, including a full description of the information known to each person, identify all Documents that allegedly support Your allegations, and provide a full

EXHIBIT B - PART 2

explanation how each Document supports and/or relates your allegations.

9. The phrase “identify each claim of the patents in suit which You contend is invalid, and for each such claim, state in full detail all facts and reasons known to You that support the basis for Your contentions” shall mean at least the following: identify the specific statutory provision(s) relied upon for invalidity; describe all Documents and other evidence that you contend renders and/or is relevant to the issue of whether any claim is invalid; provide a full explanation of the basis for your contention why each Document and other evidence supports such contentions; provide a claim chart in full detail comparing each and every element of the allegedly invalid claims to the location of said claim elements in any and all asserted prior art; identify all portions of the specification or prosecution history of the Patents-In-Suit relied upon for any invalidity claim; provide full details of Your interpretation of each and every element of each claim that You allege is found or obvious in view of the prior art; provide full details of the basis for Your interpretation of each claim element as stated in response to this interrogatory; and identify all evidence that relates to Your allegations in response to this interrogatory.

10. In describing the development history of each Specific Feature, your answer should include, but not be limited to,: a description of any major design changes from product to product as they concern each Specific Feature; an identification of persons that were primarily responsible for each major design change as they concern each Specific Feature; an identification of those persons most knowledgeable about the major changes in the development history of the Specific Features; and an identification of representative documents which describe each major design change and the reasons for

EXHIBIT B - PART 2

each major design change.

PAPST'S INTERROGATORIES

INTERROGATORY NO. 1: Identify each of Your Products that have been used, manufactured, sold, offered for sale or imported into the United States since October 22, 2002, providing separately for each Product the model name, model number, any development name or model number used by You and/or by any other entity during the design, testing, or manufacturing of those Products, and the earliest and latest date that you are aware of for each importation into the United States and each sale in the United States of those Products, and identify the two most knowledgeable persons involved in each of the areas of the research, development and design with the respect to each of the Specific Features of those Products. See instruction 8.

INTERROGATORY NO. 2: Separately and for each of Your Products identified in response to Interrogatory No. 1, state all USB descriptor information used in connection with the Products, including the Device Descriptor (USB Specification 9.6.1), Configuration Descriptor (USB Specification 9.6.3), Interface Descriptor (USB Specification 9.6.5), Endpoint Descriptor (USB Specification 9.6.6) and String Descriptor (USB Specification 9.6.7), and separately for each Product identify Documents that provide the descriptor information, and identify with specificity the portions of the Documents that describe the descriptor information. For Products having more than one Interface Descriptor, Endpoint Descriptor, and/or String Descriptor, the response shall state all Interface Descriptors, Endpoint Descriptors, and/or String Descriptors.

EXHIBIT B - PART 2

INTERROGATORY NO. 3: Separately and for each of Your Products identified in response to Interrogatory No. 1, provide an identification of each SCSI Block Command and each PTP Command (collectively “Support Commands”) supported by each Product, identify all Documents that indicate each Support Command, identify the specific portions of the identified Documents that indicate each Support Command, and explain how each Document indicates each Support Command.

INTERROGATORY NO. 4: Separately for each of Your Products identified in response to Interrogatory No. 1, state in full detail all the facts and reasons known to You that support your contention that any of Your Products do not infringe, either literally or under the doctrine of equivalents, or by inducement, contributory infringement, or otherwise, each of the patents-in-suit, including but not limited to an identification of each element of each claim that You allege Your Products assertedly does not meet, Your interpretation of each element of each claim that You allege Your Products will not meet, in full detail, the basis for Your interpretation of each claim element as stated in response to this interrogatory, and identify all evidence that supports Your allegations in response to this interrogatory. See instructions Nos. 7 and 8.

INTERROGATORY NO. 5: Identify each claim of the patents in suit which You contend is invalid, and for each such claim, state in full detail all facts and reasons known to You that support the basis for Your contentions, and identify the person(s) most knowledgeable of Your invalidity contentions. See instruction No. 9.

EXHIBIT B - PART 2

INTERROGATORY NO. 6: Separately with respect to each of the Patents-In-Suit and to the extent that You will contest Papst's contentions as to indirect infringement, describe in full detail all events concerning Your awareness of the Patents-In-Suit prior to the date You became a party to these MDL proceedings, identify all Documents that concern such awareness and a full explanation of how each Document concerns such awareness, identify all of Your employees and/or agents having such awareness, and describe in full detail the specific awareness of each such employee and/or agent.

INTERROGATORY NO. 7: Identify the date, and substance of any and all studies, analyses, or legal advice of any kind, both oral and/or written, that You received at any time, including but not limited to after the filing of the Complaint, that relates to whether the Patents-In-Suit are infringed by Your Products, or are invalid, or are unenforceable, provide a full details of the circumstances under which You obtained such studies, analyses, or legal advice, including the identity of any oral, written or electronic communications or Documents concerning each such studies, analyses, or legal advice; identify all persons who gave, received, and/or heard such advice, and provide a full description of the advice given, received and/or heard by each person.

INTERROGATORY NO. 8: Identify each person that You have consulted or expect to call to testify as an expert witness at trial, or in support of any motion for summary judgment that you anticipate that you may and/or will file in these proceedings, and for each expert identified, state in full detail the qualifications of each expert, the

EXHIBIT B - PART 2

subject matter on which that expert is expected to testify and the substance of the facts and opinions to which that expert is expected to testify, including but not limited to a full explanation of the grounds for each opinion.

INTERROGATORY NO. 9: Describe the major changes in the development history of each of the Specific Features. See, instruction No. 10.

INTERROGATORY NO. 10: State the art area and level of ordinary skill in the art pertaining to the Patents-in-Suit and state in detail all bases for each such contention.

INTERROGATORY NO. 11: Describe in general the development history, sales, testing, construction and/or operation of the Specific Features for each device that You are relying on as prior art; describe in general the documents the relate to the development history, sales, testing, construction and/or operation of the Specific Features for each prior art device, and identify the person most knowledgeable concerning each prior art device.

EXHIBIT B - PART 2

Dated: May 8, 2008

/s/ Jerold B. Schnayer

James P. White

Jerold B. Schnayer

Joseph E. Cwik

WELSH & KATZ, LTD.

120 South Riverside Plaza • 22nd Floor

Chicago, Illinois 60606

(312) 655-1500

Robert F. Muse

Joshua A. Levy

Kerry C. Dent

STEIN MITCHELL & MEZINES, LLP

1100 Connecticut Ave, NW

Washington, D.C. 20036

(202) 737-7777

**Attorneys for Papst Licensing GmbH &
Co. KG**

EXHIBIT B - PART 2

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing PAPST LICENSING GMBH & CO. KG'S SECOND REVISED FIRST JOINT SET OF INTERROGATORIES TO CAMERA MANUFACTURERS was caused to be served on this the 8th day of May, 2008 upon the attorneys for the Camera Manufacturers via e-mail in .pdf and Microsoft Word format as follows:

For The Casio Parties :

Laura Krawczyk
Morgan Lewis & Bockius
101 Park Avenue
New York, NY 10178-0060
Phone: (212) 309-6000
Fax: (212) 309-6001
lkrawczyk@morganlewis.com

J. Kevin Fee
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Avenue, NW
Washington, D.C. 20004
jkfee@morganlewis.com

Scott D. Stimpson
The Law Office of Scott Stimpson
Suite 1102
445 Hamilton Avenue
White Plains, NY 10601
stimpsonlaw@gmail.com

For The Samsung Parties:

Patrick J. Kelleher
Drinker Biddle Gardner Carton
191 North Wacker Drive
Suite 3700
Chicago, IL 60606-1698
Phone: (312) 569-1375
Fax: (312) 569-3375
Patrick.kelleher@abr.com

For The Fujifilm Parties :

Steven J. Routh
Sten A. Jensen
John R. Inge
Robert Wolinsky
Hogan & Hartson, LLP
555 Thirteenth Street, N.W.

EXHIBIT B - PART 2

Washington, DC 20004
Phone: (202) 637-5600
Fax: (202) 637-5910
sjrouth@hhlaw.com
sajensen@hhlaw.com
JRInge@HHLAW.com
RBWolinsky@HHLAW.com

For the Olympus Parties :

Richard de Bodo
Rachel M. Cappoccia
Hogan & Hartson, LLP
1999 Avenue of the Stars
Suite 1400
Los Angeles, CA 90067
Phone: (310) 785-4694
Fax: (310) 785-4601
rdebodo@hhlaw.com
rmcapoccia@hhlaw.com

For The Matsushita and Victory Company of Japan Parties :

Richard de Bodo
Rachel M. Capoccia
Hogan & Hartson, LLP
1999 Avenue of the Stars
Suite 1400
Los Angeles, CA 90067
Phone: (310) 785-4694
Fax: (310) 785-4601
rdebodo@hhlaw.com
rmcapoccia@hhlaw.com

For the Ricoh Parties:

Paul Devinsky
MCDERMOTT, WILL & EMERY
600 13th Street, NW
Washington, DC 20005-3096
(202) 756-8369
Fax: (202) 756-8087
Email: pdevinsky@mwe.com

EXHIBIT B - PART 2

For Hewlett-Packard Parties

Heather N. Mewes
Fenwick & West, LLP
555 California St., 12th Floor
San Francisco, CA 94104
(415) 875-2300
hmewes@fenwick.com

/s/ Jerold B. Schnayer

Attorney for Papst Licensing GmbH & Co. KG

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE PAPST LICENSING GMBH & CO. KG
LITIGATION

This Document Relates To:
ALL CASES

Misc. Action No. 07-493 (RMC)

MDL Docket No. 1870

***** CONTAINS HIGHLY CONFIDENTIAL – OUTSIDE COUNCIL ONLY
INFORMATION UNDER THE PROTECTIVE ORDER *****

**MATERIAL
REDACTED**

**PAPST'S OBJECTIONS AND ANSWERS TO CAMERA MANUFACTURERS' FIRST
SET OF INTERROGATORIES (NOS. 1-10)**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Defendant Papst Licensing GmbH & Co. KG ("Papst"), objects to and answers the Camera Manufacturers' (the "Defendants' ") First Set of Interrogatories as follows:

GENERAL OBJECTIONS

1. Papst objects to Defendants' Interrogatories to the extent that they call for information protected by any applicable privilege or doctrine, including without limitation the attorney-client privilege, the work product doctrine and/or information pertaining to Papst counsel's mental impressions and/or trial preparation materials, any jointly shared privilege, and other protections afforded by Rule 26(b)(4)(B). Papst hereby asserts all such applicable privileges. Papst further objects to identifying such documents created after the commencement of the earliest Casio lawsuit.

2. Papst objects to Defendants' Interrogatories to the extent that they call for information disclosing confidential or proprietary information, and/or trade secrets of Papst, or information restricted from dissemination because of confidentiality commitments with other

EXHIBIT C

entities or pursuant to court order, statute, or regulation. Without waiving its objections, Papst will produce such information that is reasonably responsive and non-privileged upon the entry of a protective order governing such confidential information, and only after the relevant third-parties are notified of the potential disclosure and provided an opportunity to object to the potential disclosure.

3. Papst objects to Defendants' Interrogatories to the extent that they call for the disclosure of any information that is not reasonably related to the subject matter of this action, that is not relevant to the claims or defenses asserted in this action, that is not reasonably calculated to lead to the discovery of admissible evidence, and/or to the extent that the interrogatories seek to impose discovery obligations beyond those imposed by or permitted under the Federal Rules of Civil Procedure.

4. Papst objects to Defendants' Interrogatories as unduly and unnecessarily burdensome to the extent the requests seek information already in Defendants' possession, custody, or control.

5. Papst objects to Defendants' Interrogatories to the extent the requests, instructions, and/or definitions are unreasonably broad, vague and ambiguous, and/or unduly burdensome.

6. Papst has not completed its investigation of the facts relating to this action. Accordingly, with respect to all of the Interrogatories, Papst reserves the right to amend and/or supplement its responses, if necessary, with additional information based upon further investigation and discovery, and to rely upon such information in the course of this action and at trial.

7. In those instances where the responses to Defendants' interrogatories can be

derived from the business records of Papst or from an examination, audit or inspection of such business records, and the burden of deriving or ascertaining the answer is substantially the same for Defendants and Papst, Papst will specify the records from which an answer may be ascertained and afford Defendants' counsel a reasonable opportunity to audit, inspect and copy such records or provide categorized copies of such records in accordance with Federal Rule of Civil Procedure 33(d), in accordance with the Court's protective order.

8. Papst objects to any and all interrogatories to the extent that they are repetitive, overlapping or duplicative. Moreover, Papst may attempt to designate for production relevant documents in response to Defendants' interrogatories. However, by so designating documents, Papst does not represent that the identified documents are the only relevant documents, nor does Papst represent that the identified documents are necessarily the most relevant documents. In addition, the designation of documents is not necessarily exhaustive and other relevant documents may or may not exist. However, Papst will make a good faith effort to identify relevant documents and/or categories of documents as provided in Rules 33 and 34, Fed.R.Civ.P.

9. Papst objects to Defendants' interrogatories to the extent that they request Papst to provide the names of persons with knowledge of certain facts and a summary of each person's knowledge. If known, Papst will identify those persons, or documents from which the identity of those persons may be ascertained, believed to be generally most knowledgeable regarding the requested subjects.

GENERAL OBJECTIONS TO INSTRUCTIONS AND DEFINITIONS

1. Papst objects to Defendants' Instructions and Definitions to the extent they seek to impose obligations beyond those set forth in Rules 26 and 33 of the Federal Rules of Civil Procedure and any applicable local rules. Papst will respond to Defendants' Interrogatories in the

EXHIBIT C

manner required by the Federal Rules of Civil Procedure and applicable local rules.

2. Papst objects to Definition B as overly broad, unduly burdensome, and as calling for irrelevant information not reasonably calculated to lead to the discovery of admissible evidence. Papst further objects to Defendants' Definition B on the ground that the phrase "patent applications that (i) relate to or claim priority to or from any of the applications that led to the Patent-In-Suit or (ii) relate to or claim in whole or in part any of the subject matter disclosed or claimed in the Patents-In-Suit" in the context of this definition is vague and ambiguous.

3. ~~Papst objects to Defendants' Definition C as overly broad, unduly burdensome, and as calling for irrelevant information not reasonably calculated to lead to the discovery of admissible evidence. Papst further objects to Defendants' Definition C on the ground that the phrase "patents, other than the Patents-In-Suit, associated with or granted by the United States or any other jurisdiction that (i) relate to or claim priority to or from any of the applications that led to the Patent-In-Suit or (ii) relate to or claim in whole or in part any of the subject matter disclosed or claimed in the Patents-In-Suit" in the context of this instruction is vague and ambiguous.~~

4. Papst objects to Defendants' Definition E as overly broad, unduly burdensome, and as calling for irrelevant information not reasonably calculated to lead to the discovery of admissible evidence.

5. Papst objects to Defendants' Definition F as overly broad, unduly burdensome, and as calling for irrelevant information not reasonably calculated to lead to the discovery of admissible evidence.

6. Papst objects to Defendants' Definition G as overly broad, unduly burdensome, and as calling for irrelevant information not reasonably calculated to lead to the discovery of admissible evidence.

EXHIBIT C

7. Papst objects to Defendants' Definition H as overly broad, unduly burdensome, and as calling for irrelevant information not reasonably calculated to lead to the discovery of admissible evidence.

8. Papst objects to Defendants' Definition I as overly broad, unduly burdensome, and as calling for irrelevant information not reasonably calculated to lead to the discovery of admissible evidence in the context of Defendants' interrogatories.

9. Papst objects to Defendants' Instruction F to the extent it seeks to impose obligations beyond those set forth in the Federal Rules of Civil Procedure and any applicable local rules. Papst will respond to Defendants' Interrogatories in the manner required by the Federal Rules of Civil Procedure and applicable local rules.

SPECIFIC OBJECTIONS AND ANSWERS TO INTERROGATORIES

INTERROGATORY NO. 1:

State in full the basis for your contention that each Camera Manufacturer has infringed the Patents-in-Suit, including without limitation, an identification of each claim you contend has been infringed by each Camera Manufacturer (the "asserted claims"), an identification of the products you contend infringe each asserted claim, a claim chart describing where each element of each asserted claim is found in each accused product, and an identification of each document or thing that refers or relates to such alleged infringement.

ANSWER:

Papst objects that Interrogatory No. 1 is premature to the extent that this interrogatory seeks information and responses inconsistent with the dates set in the Second Practice and Procedure Order, Docket No. 36 (April 8, 2008) ("Order"). In the Order, at Paragraph 17, the Court orders that: "Papst shall file its asserted claims and infringement contentions no later than May 28, 2008." Papst reserves the right to present its asserted claims and infringement contentions

EXHIBIT C

at the time specified by the Order. Also, Papst reserves the right to amend or supplement the present response as the parties comply with the disclosure, briefing, and hearing schedule concerning claim construction as set forth in the Order. Papst further reserves the right to amend or supplement the present response after such time as the Court provides any rulings concerning the scope of the claims of the patents-in-suit.

Papst also objects that this interrogatory is premature in that Papst served Papst Licensing GmbH & Co. KG's First Joint Set Of Interrogatories To Defendants on the Camera Manufacturers on April 9, 2008. These interrogatories seek, among other things, information concerning USB descriptors and information regarding which SCSI Block Commands and which PTP Commands are supported by each device. Such information is relevant to the present responses. Papst does not expect responses from Camera Manufacturers, however, until after service of this interrogatory response. Also, at the time of this response, the Camera Manufacturers have not provided design documentation, nor any detailed product specifications, nor software code, for their digital cameras (Papst received a letter indicating that it would receive tens of thousands of documents on the day that these responses are due, but Papst has not had an opportunity to review those documents yet). Nevertheless, and without waiving any of the objections stated herein, Papst provides its responses below based on currently available information. Papst reserves the right to amend or supplement this response after it receives and evaluates any additional information as may become known as discovery progresses in this case.

Concerning the request to identify "the products you contend infringe each asserted claim," Papst objects that, at the time of service of this response, Papst has not had an opportunity to receive discovery from the Camera Manufacturers concerning the individual models each Camera Manufacturer has made and/or sold, or the geographical locations of such manufacturing and sales.

EXHIBIT C

Nevertheless, and without waiving the above objections, and subject to further discovery in this case, according to Papst's best understanding at this time, devices which are believed to be configurable to operate as USB Mass Storage mode ("Mass Storage Class Digital Cameras," or "MSC Digital Cameras") and digital cameras configured to operate in PTP mode ("PTP Digital Cameras") include at least the following:

Camera Brand	Device Model
Casio	EXILIM EX-V7
	EXILIM EX-Z110
	EXILIM EX-Z60
	EXILIM EX-Z1050
	EXILIM EX-Z75
	EXILIM EX-S600
	EXILIM EX-Z700
	EXILIM EX-Z1000
	EXILIM Pro EX-P700
	EXILIM EX-Z600
	EXILIM EX-S500
	EXILIM EX-S770
Fujifilm	FINE PIX F10
	FINE PIX F650
	FINEPIX S9100
	FINE PIX A700
	FINE PIX S5600
	FINE PIX E900
	FINE PIX V10
HP	PHOTOSMART R827
	PHOTOSMART R817

EXHIBIT C

Camera Brand	Device Model
	PHOTOSMART M425
	PHOTOSMART M527
	PHOTOSMART E427
	PHOTOSMART R927
	PHOTOSMART R725
	PHOTOSMART M627
JVC	GZ-MG67E
	GZ-MG505E
	GZ-MG20E
Olympus	STYLUS 760
	STYLUS 730
	EVOLT E-410
	FE-250
	SP-510UZ
	Stylus 1000
	FE-190
	E-500
	STYLUS 710
	FE 120
	SP-500UZ
	mju Digital 600
	Stylus 720 SW
Panasonic	DMC-LZ5 EG
	DMC-LX1
	DMC-L1K
	PV-GS320
	HDC-SD1

EXHIBIT C

Camera Brand	Device Model
	VDR-D230
	DMC-FX07
	DMC-FX01
	DMC-FX8 EG
	DMC-TZ1 EG
	DMC-FZ7 EG
	DMC-LZ3
Samsung	Digimax L55W

Subject to the above objections and subject to further discovery in this case, according to Papst's best understanding at this time, devices which are believed to be configurable to operate at least as MSC Digital Cameras include:

Camera Brand	Model
JVC	GZ-MG155U
Olympus	FE110
	Camedia C 4000
	Camedia C 370
	FE-170
Samsung	SGH-D900i
	SGH-D820
	Digimax V700
	Digimax I5
	Digimax A55W
	Digimax A40
	NV10
	Digimax S800

EXHIBIT C

Camera Brand	Model
	Digimax L85
	PRO815

Subject to the above objections and subject to further discovery in this case, according to Papst's best understanding at this time, devices which are believed to be configurable to operate at least as PTP Digital Cameras include:

Camera Brand	Model
Fujifilm	FINEPIX A800
	FINEPIX F40FD
	FINEPIX Z5FD
	FINEPIX S700
	FINEPIX S5 PRO
	FINE PIX F31FD
	FINE PIX S6000FD
	FINE PIX F20

Subject to the above objections and subject to further discovery in this case, according to Papst's best understanding at this time, devices identified in the following table are likely to be found to be configurable as a MSC Digital Camera, as a PTP Digital Camera, or both, after additional discovery or investigation:

Camera Brand	Model
Casio	EXILIM EX-Z80
	EXILIM EX-Z1200
	EXILIM EX-Z120
	EXILIM EX-Z50

EXHIBIT C

Camera Brand	Model
	EXILIM EX-S100
	QV-R62
	EXILIM EX-P505
	EXILIM EX-Z750
	EXILIM EX-Z57
	EXILIM EX-Z55
	EXILIM EX-Z500
	EXILIM EX-Z200
	EXILIM EX-Z850
	EXILIM EX-Z1080
	EXILIM EX-V8
	EXILIM EX-Z100
	EXILIM EX-Z9
	QV-R4
	QV-R52
	QV-5700
	QV-R3
	EXILIM EX-S10
	QV-R61
	GV-20
	EXILIM EX-S2
	EXILIM EX-M2
	EXILIM EX-Z3
	EXILIM EX-S3
	EXILIM EX-Z40
	EXILIM EX-Z4/EX-Z4U
	EXILIM EX-S20U

EXHIBIT C

Camera Brand	Model
	EXILIM EX-M20U
	EXILIM EX-P600
	QV-R40
	Exilim EX-Z30
	QV-R51
	EXILIM EX-Z70
Fujifilm	FINEPIX E 550
	FINEPIX J10
	FinePix F30 ZOOM
	FinePix A600 ZOOM
	FinePix F470 ZOOM
	FinePix A500 ZOOM
	FinePix A400 ZOOM
	FinePix F460
	FinePix A345 ZOOM
	FinePix S9500/S9000
	FinePix Z1
	FinePix A350 ZOOM
	FinePix Z3
	FinePix F100fd
	FinePix S3100
	FinePix F11 ZOOM
	FinePix A610
	FinePix A900
	FinePix A920
	FinePix F480
	FinePix F50fd

EXHIBIT C

Camera Brand	Model
	FinePix S5800
	FinePix Z10fd
	FinePix J50
	FinePix S1000fd
	FinePix S8100fd
	FinePix Z20fd
	FinePix F455 ZOOM
	FinePix A820
	FinePix S8000fd
	FinePix S602Z PRO
	FinePix S5500 ZOOM / S5100
	FinePix S5700
	FinePix F401 ZOOM
	FinePix A202/A200
	FinePix A203
	FinePix A204/FinePix 2650
	FinePix A303
	FinePix S304/FinePix 3800
	FinePix M603
	FinePix F410 ZOOM
	FinePix F700
	FinePix A310 ZOOM
	FinePix A210 ZOOM
	FinePix F450 ZOOM
	FinePix F810 ZOOM
	FinePix E510 ZOOM
	FinePix F402

EXHIBIT C

Camera Brand	Model
	FinePix E500 ZOOM
	FinePix A205 ZOOM / A205S
	FinePix F440 ZOOM
	FinePix S3 PRO
	FinePix S20 PRO
	FinePix A330
	FinePix A120
	FinePix S3000 Z
	FinePix S7000 Z
	FinePix A340
	FinePix S5000 Z
	FINEPIX S100fs
HP	PHOTOSMART R717
	PHOTOSMART M517
	PHOTOSMART M23
	PHOTOSMART M525
	PHOTOSMART R507
	PHOTOSMART R607/R607V/R607XI
	PHOTOSMART M22
	PHOTOSMART R837
	PHOTOSMART R818
	PHOTOSMART M415
	PHOTOSMART R967
	PHOTOSMART E327/E327V
	PHOTOSMART R727
	PHOTOSMART M417

EXHIBIT C

Camera Brand	Model
	PHOTOSMART M407/M407V/M407XI
	PHOTOSMART E317/E317V/E317XI
	PHOTOSMART 620
	PHOTOSMART M307
	PHOTOSMART E217
	PHOTOSMART 320
	PHOTOSMART 720
	PHOTOSMART 850
	PHOTOSMART 733
	PHOTOSMART 735
	PHOTOSMART 935
	PHOTOSMART 435
	PHOTOSMART 635
	PHOTOSMART 945
	PHOTOSMART R707
	PHOTOSMART 120
	PHOTOSMART R937
JVC	GZ-HD5
	XA-F57P
	XA-F107A
	GC-A50
	GC-A55
	GC-A70
	XA-C210
Olympus	LS-10
	WS-110

EXHIBIT C

Camera Brand	Model
	SP-570UZ
	STYLUS 1200
	μ Mini S/Stylus Verve Mini S
	μ Mini Digital/Stylus Verve Digital
	C-765 UZ
	C-770 UZ
	C-160/D-395
	C-360 Zoom/D-575 Zoom
	C-60 ZOOM
	C-725 UZ
	C-70 Zoom/C-7000 ZOOM
	E-300 / EVOLT E-300
	C-470 Zoom/D-590 Zoom
	μ 500/Stylus 500
	C-170/D-425
	C-460 Zoom/D-580 Zoom
	C-7070 WideZoom
	C-740 UZ
	C-480 ZOOM/D-545 ZOOM
	C-500 Zoom/D-595 Zoom
	C55/C-5500 SPORT ZOOM
	μ 400/Stylus 400
	IR-300
	C-120/D-380
	C-220 Zoom/D-520 Zoom
	C-300 Zoom/D-550 Zoom

EXHIBIT C

Camera Brand	Model
	C-720 UZ
	C-5050 ZOOM
	C-50 ZOOM
	C-450 Zoom
	μ 300/Stylus 300
	C-310 Zoom/D-540 Zoom
	C-150/D-390
	C-350 Zoom/D-560 Zoom
	C-750 UZ
	E-1
	C-5000 ZOOM
	C-5060 ZOOM
	μ 410/Stylus 410
	C-730 UZ
	μ 1010/Stylus 1010
	μ 780/Stylus 780
	E-510
	FE-210
	μ 790 SW/Stylus 790 SW
	μ 820/Stylus 820
	μ 830/Stylus 830
	FE-270
	FE-280
	SP-550 UZ
	E-3
	FE-290
	μ 1020/Stylus 1020

EXHIBIT C

Camera Brand	Model
	μ 1030 SW/Stylus 1030 SW
	μ 840/Stylus 840
	μ 850 SW/Stylus 850 SW
	FE-340
	FE-350
	E-420
	C-8080 WideZoom
	FE-5500/D-630 Zoom
	FE-300
	μ 700/Stylus 700
	IR-500
	SP-560 UZ
	FE-240
	C-180/D-435
	FE-100
	SP-310
	SP-700
	μ 800/Stylus 800
	μ 810/Stylus 810
	E-330 / Evolt E-330
	FE-180
	FE-230
	μ 770/Stylus 770
	SP-350
	FE-200
	FE-115
	μ 750/Stylus 750

EXHIBIT C

Camera Brand	Model
	μ 740/Stylus 740
	SP-320
	FE-140
	FE-130
	DS-20
	FE-310
Panasonic	EB-VS3 / VS3
	DMC-FX100
	Lumix DMC-TZ3
	Lumix DMC-FZ50
	Lumix DMC-FX12
	Lumix DMC-FX30
	Lumix DMC-FZ8
	Lumix DMC-LS75
	Lumix DMC-LZ6
	Lumix DMC-LZ7
	Lumix DMC-LX2
	Lumix DMC-FX10
	Lumix DMC-TZ5
	Lumix DMC-FX55
	Lumix DMC-L10K
	Lumix DMC-FS20
	Lumix DMC-FS3
	Lumix DMC-FS5
	Lumix DMC-FX35
	Lumix DMC-LZ10
	Lumix DMC-TZ4

EXHIBIT C

Camera Brand	Model
	Lumix DMC-FX50
	Lumix DMC-FX33
	Lumix DMC-LZ8
	Lumix DMC-LC43
	Lumix DMC-FX3
	Lumix DMC-FZ18
	Lumix DMC-FZ1
	Lumix DMC-LC33
	Lumix DMC-FX5
	Lumix DMC-FZ10
	Lumix DMC-LC50
	Lumix DMC-LC70
	Lumix DMC-LC1
	Lumix DMC-FX7
	Lumix DMC-LZ2
	Lumix DMC-FZ30
	Lumix DMC-F1
	Lumix DMC-LS2
	Lumix DMC-FZ20
	Lumix DMC-FX9
	Lumix DMC-LZ1
	Lumix DMC-FZ5
	Lumix DMC-FZ4
	Lumix DMC-FZ15
	Lumix DMC-LC80
	Lumix DMC-FZ3
	DMC-LS80

EXHIBIT C

Camera Brand	Model
	HDC-SD9
	VDR-D50
	SDR-H18
	EXLIM CARD EX-F1
Ricoh	Caplio GR
	GR Digital
	Caplio RR120
	Caplio R5
	Caplio GX100
	Caplio R7
	Caplio GR Digital II
	Caplio R8
	Caplio RR630
Samsung	SC-HMX10C
	L73
	Digimax S600
	Digimax D53
	GX-10
	Digimax S700
	Digimax S1000
	L700
	NV7 OPS
	NV3
	Digimax A503
	GX-1L
	Digimax S500
	GX-1S

EXHIBIT C

Camera Brand	Model
	L74 wide
	L100
	Digimax L60
	S85
	i8
	S860
	NV40
	NV4
	NV30
	Digimax V6
	Digimax i85
	Digimax i6 PMP
	NV11
	L830
	L730
	Digimax L77
	S850
	S630
	S1050
	S730
	NV15
	Digimax 240
	Digimax A6
	Digimax 301
	Digimax 202
	Digimax (Cyber) 530
	Digimax U-CA 3

EXHIBIT C

Camera Brand	Model
	Digimax 420
	Digimax 401
	Digimax V4
	Digimax 430
	Digimax 201
	Digimax 340
	Digimax 410
	Digimax 350SE
	Digimax 230
	NV24 HD
	Digimax 360
	Digimax A5
	Digimax V800
	Digimax U-CA 5
	Digimax A50
	Digimax A402
	Digimax A7
	Digimax A4
	Digimax 370
	Digimax U-CA 505
	Digimax L50
	Digimax A400
	Digimax U-CA 4
	Digimax 250
	Digimax V50
	Digimax V5
	Digimax U-CA 401

EXHIBIT C

Camera Brand	Model
	Digimax V70
	NV20

Papst reserves the right to amend, add to, or otherwise revise the above lists of devices as its investigation proceeds and as discovery in this case proceeds.

Papst objects to the extent that Interrogatory No.1 could be read to call for a claim chart for each and every potentially infringing device. Such a requirement would be unduly burdensome, as each set of claim charts would be several pages long, and there are hundreds of digital cameras at issue in this case. Also, as set forth above, Papst has served discovery requests on the Camera Manufacturers, the responses to which are expected to be highly relevant to the preparation of claim charts, but are not available at the time of service of this response. Nevertheless, and without waiving any of the objections stated herein, in the present response, Papst provides claim charts for two representative devices: 1) digital cameras which are configurable to operate as MSC Digital Cameras; and 2) digital cameras which are configurable to operate in PTP mode.

The claim charts below provide the infringement analysis with respect to the MSC Digital Cameras identified above:

'399 Patent Claims	MSC Digital Cameras
1. An interface device for communication between a host device, which comprises drivers for input/output devices customary in a host device and a multi-purpose interface, and a data transmit/receive device, the data transmit/receive	Generally, a preamble is not limiting. This claim covers an interface device as defined in the body of the claim below, and does not expressly require or exclude a host device or a data/transmit receive

EXHIBIT C

'399 Patent Claims	MSC Digital Cameras
device being arranged for providing analog data, comprising:	device. See the Claim Preamble section below for additional information.
a processor;	The interface portion of MSC Digital Cameras typically has a processor, such as a microprocessor or microcontroller.
a memory;	The interface portion of MSC Digital Cameras typically includes memory. Also, a socket is typically provided for adding a memory card.
a first connecting device for interfacing the host device with the interface device via the multi-purpose interface of the host device; and	The MSC Digital Cameras include a first connecting device comprising a Universal Serial Bus (USB) circuit for interfacing the interface device with a multipurpose USB interface on a host PC.
a second connecting device for interfacing the interface device with the data transmit/receive device, the second connecting device including a sampling circuit for sampling the analog data provided by the data transmit/receive device and an analog-to-digital converter for converting data sampled by the sampling circuit into digital data,	The MSC Digital Cameras include a second connecting device comprising a sampling circuit and an analog to digital converter. This circuitry interfaces analog data typically provided by a data transmit receive device (typically including a CCD image sensor) with the interface device.

EXHIBIT C

'399 Patent Claims	MSC Digital Cameras
	For example some MSC Digital Cameras use a Correlated Double Sampler (CDS).
wherein the interface device is configured by the processor and the memory to include a first command interpreter and a second command interpreter,	The interface device of MSC Digital Cameras is configured to include first and second command interpreters as set forth more fully below.
wherein the first command interpreter is configured in such a way that the command interpreter, when receiving an inquiry from the host device as to a type of a device attached to the multi-purpose interface of the host device, sends a signal, regardless of the type of the data transmit/receive device attached to the second connecting device of the interface device, to the host device which signals to the host device that it is an input/output device customary in a host device,	The first command interpreter may comprise, for example, a USB command interpreter. When a MSC Digital Camera is plugged in to a USB port on a host PC, the camera may receive a "Get_Descriptor" USB command. The "Get_Descriptor" USB command is an inquiry from the host PC. The first command interpreter of the MSC Digital Camera interprets the "Get_Descriptor" USB command and returns the requested descriptor(s). MSC Digital Cameras are believed, for example, to send a signal to the Host PC, regardless of the image sensor, microphone, or other data

EXHIBIT C

'399 Patent Claims	MSC Digital Cameras
	transmit/receive device which may be attached to the interface device, that the MSC Digital Camera is a mass storage class device, such as a disk drive, which is an I/O device customary in a host PC. See "First Command Interpreter" and "Signals to the Host Device and Customary in a Host Device" sections below for additional information.
whereupon the host device communicates with the interface device by means of the driver for the input/output device customary in a host device, and	Upon receiving the information signaling the host computer that the MSC Digital Camera is a mass storage device, the host PC automatically communicates with the interface device of the MSC Digital Camera by means of one or more software drivers for disk drives customary in the host PC. The interface device is configured to respond to communications from one or more of these drivers. For example, when the host PC is configured with the Windows XP operating system, the host PC is believed to communicate

EXHIBIT C

'399 Patent Claims	MSC Digital Cameras
	with the interface device by means of disk.sys, PartMgr.sys and usbstor.sys. Digital camera-specific drivers are not necessary. The host PC also uses the disk.sys and PartMgr.sys drivers to communicate with hard disk drives, which are input/output devices customary in the host PC. The host PC also uses usbstor.sys to communicate with hard disk drives attached to the USB port.
wherein the second command interpreter is configured to interpret a data request command from the host device to the type of input/output device signaled by the first command interpreter as a data transfer command for initiating a transfer of the digital data to the host device.	As set forth above, the first command interpreter signals to the host PC that the MSC Digital Camera is a mass storage device, such as a disk drive. The second command interpreter is configured to interpret data request commands for such disk drives. For example, the second command interpreter may be configured to interpret SCSI Block Commands (SBC) and/or ATAPI commands. This second command interpreter, for example, is believed to interpret the READ(10)

EXHIBIT C

'399 Patent Claims	MSC Digital Cameras
	command (Operation code 28h). MSC Digital Cameras are believed to interpret this data request command and provide the requested sectors of information, including data representing images acquired by, for example, a CCD sensor and digitized by the second connecting device.
2. An interface device according to claim 1, wherein the drivers for input/output drivers customary in a host device comprise a hard disk driver, and the signal indicates to the host device that the host device is communicating with a hard disk.	Windows XP drivers disk.sys and PartMgr.sys are the same drivers that would be used to communicate with a hard disk. The Interface Descriptor signals sent by the MSC Digital Camera indicating a SCSI command set indicate to the host PC that the MSC Digital Camera is a hard disk.
3. An interface device according to claim 1, wherein the memory means comprises a buffer to buffer data to be transferred between the data transmit/receive device and the host device.	MSC Digital Cameras include internal memory and structure for receiving a memory card. The internal memory and/or memory card comprise a buffer to buffer data acquired by the transmit/receive

EXHIBIT C

'399 Patent Claims	MSC Digital Cameras
	device until it is transferred to the host PC. The MSC Digital Cameras may also comprise a memory buffer used during processing of images acquired by the image sensor.
5. An interface device according to claim 1, wherein the processor is a digital signal processor.	MSC Digital Cameras may further comprise a digital signal processor.
7. An interface device according to claim 2, which further comprises a root directory and virtual files which are present on the signaled hard disk drive and which can be accessed from the host device.	The MSC Digital Cameras are believed to comply with, for example, the Design Rule for Camera File System (DCF). The DCF requires a root directory, and for files of images to be placed in certain locations in the directory tree. The files can be accessed from the host device.
11. An interface device for communication between a host device, which comprises a multi-purpose interface and a specific driver for this interface, and a data transmit/receive device, the data transmit/receive device being arranged for providing analog data, comprising:	Generally, a preamble is not limiting. This claim covers an interface device, and does not expressly require or exclude a host device or a data/transmit receive device. See the Claim Preambles section below for additional information.
a processor;	The interface portion of MSC Digital

EXHIBIT C

'399 Patent Claims	MSC Digital Cameras
	Cameras typically has a processor, such as a microprocessor or microcontroller.
a memory;	The interface portion of a MSC Digital Camera typically includes memory. Also, a socket is typically provided for adding a memory card.
a first connecting device for interfacing the host device with the interface device via the multi-purpose interface of the host device; and	The MSC Digital Cameras include a first connecting device comprising a Universal Serial Bus (USB) circuit for interfacing the interface device with a multipurpose USB interface on a host PC.
a second connecting device for interfacing the interface device with the data transmit/receive device, the second connecting device including a sampling circuit for sampling the analog data provided by the data transmit/receive device and an analog-to-digital converter for converting data sampled by the sampling circuit into digital data,	The MSC Digital Cameras include a second connecting device comprising a sampling circuit and an analog to digital converter. This circuitry interfaces analog data typically provided by a data transmit receive device (typically including a CCD image sensor) with the interface device. For example some MSC Digital Cameras use a Correlated Double Sampler (CDS).
where the interface device is configured using the	The interface device of MSC Digital

EXHIBIT C

399 Patent Claims	MSC Digital Cameras
processor and the memory to include a first command interpreter and a second command interpreter,	Cameras is configured to include first and second command interpreters as set forth more fully below.
wherein the first command interpreter is configured in such a way that the interface device, when receiving an inquiry from the host device as to the type of a device attached at the multi-purpose interface of the host device, sends a signal, regardless of the type of the data transmit/receive device attached to the second connecting device of the interface device, to the host device which signals to the host device that it is an input/output device customary in a host device,	The first command interpreter may comprise, for example, a USB command interpreter. When a MSC Digital Camera is plugged in to a USB port on a host PC, the camera may receive a "Get_Descriptor" USB command. The "Get_Descriptor" USB command is a type of inquiry from the host PC. The first command interpreter of the MSC Digital Camera interprets the "Get_Descriptor" USB command and returns the requested descriptor(s). MSC Digital Cameras are believed, for example, to send a signal to the Host PC, regardless of the image sensor, microphone, or other data transmit/receive device which may be attached to the interface device, that the MSC Digital Camera is a mass storage class device, such as a disk drive, which is

EXHIBIT C

'399 Patent Claims	MSC Digital Cameras
	an I/O device customary in a host PC. See "First Command Interpreter" and "Signals to the Host Device and Customary in a Host Device" sections below for additional information.
whereupon the host device communicates with the interface device by means of the specific driver for the multi-purpose interface, and	Upon receiving the information signaling the host computer that the MSC Digital Camera is a mass storage device, the host PC automatically communicates with the interface device of the MSC Digital Camera by means of one or more software drivers specifically adapted for the multipurpose USB interface. For example, when the host PC is configured with the Windows XP operating system, the host PC is believed to communicate with the interface device by means of usbd.sys, which is a specific driver for the multipurpose USB interface. Digital camera-specific drivers are not necessary.
wherein the second command interpreter is	As set forth above, the first command

EXHIBIT C

'399 Patent Claims	MSC Digital Cameras
configured to interpret a data request command from the host device to the type of input/output device signaled by the first command interpreter as a data transfer command for initiating a transfer of the digital data to the host device.	interpreter signals to the host PC that the MSC Digital Camera is a mass storage device, such as a disk drive. The second command interpreter is configured to interpret data request commands for such disk drives. For example, the second command interpreter may be configured to interpret SCSI Block Commands (SBC) and/or ATAPI commands. This second command interpreter, for example, is believed to interpret the READ(10) command (Operation code 28h). MSC Digital Cameras are believed to interpret this data request command and provide the requested sectors of information, including data representing images acquired by, for example, a CCD sensor and digitized by the second connecting device.
14. A method of communication between a host device, which comprises drivers for input/output devices customary in a host device and a	This claim covers a method of communicating between a host device interface device and a data

EXHIBIT C

'399 Patent Claims	MSC Digital Cameras
multi-purpose interface, and a data transmit/receive device, the data transmit/receive device being arranged for providing analog data, via an interface device, comprising:	transmit/receive device via an interface device. See the Claim Preambles section below for additional information concerning the host device and the data/transmit receive device
interfacing of the host device with a first connecting device of the interface device via the multi-purpose interface of the host device;	User manuals for the various MSC Digital Cameras instruct users, including users of cameras destined for the U.S., to interface a first connecting device of the MSC Digital Camera with a multipurpose interface of a host PC by connecting the MSC Digital Camera to the USB port on the host PC.
interfacing of the data transmit/receive device with a second connecting device of the interface device, the second connecting device including a sampling circuit for sampling the analog data provided by the data/transmit/receive device and an analog-to-digital converter for converting data sampled by the sampling circuit into digital data;	The MSC Digital Cameras include a second connecting device comprising a sampling circuit and an analog to digital converter. This circuitry interfaces analog data typically provided by a data transmit receive device (typically including a CCD image sensor) with the interface device.
inquiring by the host device at the interface device	When a MSC Digital Camera is plugged

EXHIBIT C

'399 Patent Claims	MSC Digital Cameras
as to the type of device to which the multi-purpose interface of the host device is attached;	in to a USB port on a host PC, the host PC may inquire the interface device as to the type of device it is by sending a "Get_Descriptor" USB command.
regardless of the type of the data transmit/receive data attached to the second connecting device of the interface device, responding to the inquiry from the host device by the interface device in such a way that it is an input/output device customary in a host device, whereupon the host device communicates with the interface device by means of the usual driver for the input/output device, and	A MSC Digital Camera responds to the "Get_Descriptor" inquiry in such a way that it is an input/output device customary in a host device. MSC Digital Cameras are believed, for example, to send a signal to the Host PC, regardless of the image sensor, microphone, or other data transmit/receive device which may be attached to the interface device, that the MSC Digital Camera is a mass storage class device, such as a disk drive, which is an I/O device customary in a host PC. See "First Command Interpreter" and "Signals to the Host Device and Customary in a Host Device" sections below for additional information. Upon receiving the information signaling the host computer that the MSC Digital Camera is

EXHIBIT C

'399 Patent Claims	MSC Digital Cameras
	a mass storage device, the host PC automatically communicates with the interface device of the MSC Digital Camera by means of one or more of the usual software drivers for disk drives customary in the host PC. For example, when the host PC is configured with the Windows XP operating system, the host PC is believed to communicate with the interface device by means of disk.sys, PartMgr.sys and usbstor.sys. Digital camera-specific drivers are not necessary. The host PC also uses the disk.sys and PartMgr.sys drivers to communicate with hard disk drives, which are input/output devices customary in the host PC. The host PC also uses usbstor.sys to communicate with hard disk drives attached to the USB port.
interpreting a data request command from the host device to the type of input/output device customary in the host device as a data transfer command for	A MSC Digital Camera is believed to interpret SCSI Block Commands (SBC) and/or ATAPI commands. For example,

EXHIBIT C

'399 Patent Claims	MSC Digital Cameras
initiating a transfer of the digital data to the host device.	the MSC Digital Camera is believed to interpret the READ(10) command (Operation code 28h). MSC Digital Cameras are believed to interpret this data request command and provide the requested sectors of information, including data representing images acquired by, for example, a CCD sensor and digitized by the second connecting device.
15. A method according to claim 14, wherein the drivers for input/output devices customary in a host device comprise a driver for a storage device and in particular for a hard disk drive.	Windows XP drivers disk.sys and PartMgr.sys are the same drivers that would be used to communicate with a storage device comprising a hard disk.

'499 Patent Claims	MSC Digital Cameras
1. An interface device for communication between a host device, which comprises drivers for input/output devices customary in a host device and a multi-purpose interface, and a data transmit/receive device comprising the following features:	Generally, a preamble is not limiting. This claim covers an interface device, and does not expressly require or exclude a host device or a data/transmit receive device. See the Claim Preambles section below for additional information.

EXHIBIT C

499 Patent Claims	MSC Digital Cameras
a processor;	The interface portion of MSC Digital Cameras typically has a processor, such as a microprocessor or microcontroller.
a memory;	The interface portion of a MSC Digital Camera typically includes memory. Also, a socket is typically provided for adding a memory card.
a first connecting device for interfacing the host device with the interface device via the multi-purpose interface of the host device; and	The MSC Digital Cameras include a first connecting device comprising a Universal Serial Bus (USB) circuit for interfacing the interface device with a multipurpose USB interface on a host PC.
a second connecting device for interfacing the interface device with the data transmit/receive device,	The MSC Digital Cameras include a second connecting device comprising a sampling circuit and an analog to digital converter. This circuitry interfaces analog data typically provided by a data transmit receive device (typically including a CCD image sensor) with the interface device.
wherein the interface device is configured by the processor and the memory in such a way	The interface device is believed to be configured by the processor and a program

EXHIBIT C

'499 Patent Claims	MSC Digital Cameras
that the interface device, when receiving an inquiry from the host device as to the type of a device attached to the multi-purpose interface of the host device, sends a signal, regardless of the type of the data transmit/receive device attached to the second connecting device of the interface device, to the host device which signals to the host device that it is a storage device customary in a host device,	stored in the memory, for example, in such a way that when the MSC Digital Camera receives a "Get_Descriptor" USB command, the MSC Digital Camera sends the requested descriptor(s). The "Get_Descriptor" USB command is a type of inquiry from the host PC. MSC Digital Cameras are believed, for example, to send a signal to the Host PC, regardless of the image sensor, microphone, or other data transmit/receive device which may be attached to the interface device, that the MSC Digital Camera is a mass storage class device, such as a disk drive, which is a storage device customary in a host PC.
whereupon the host device communicates with the interface device by means of the driver for the storage device customary in a host device, and	Upon receiving the information signaling the host computer that the MSC Digital Camera is a mass storage device, the host PC automatically communicates with the interface device of the MSC Digital Camera by means of one or more software drivers for disk drives customary in the host PC. The interface device is configured to respond to communications

EXHIBIT C

'499 Patent Claims	MSC Digital Cameras
	from one or more of these drivers, as set forth below. For example, when the host PC is configured with the Windows XP operating system, the host PC is believed to communicate with the interface device by means of disk.sys, PartMgr.sys and usbstor.sys. Digital camera-specific drivers are not necessary. The host PC also uses the disk.sys and PartMgr.sys drivers to communicate with hard disk drives, which are input/output devices customary in the host PC. The host PC also uses usbstor.sys to communicate with hard disk drives attached to the USB port.
wherein the interface device is arranged for simulating a virtual file system to the host, the virtual file system including a directory structure.	The interface portion of the MSC Digital Camera is believed to simulate a virtual file system, including, for example, simulating a master boot record, a boot sector and a sequence of sectors comprising at least one file allocation table, at least one directory, and files, as would be found on a disk drive having rotating media.

EXHIBIT C

'499 Patent Claims	MSC Digital Cameras
2. An interface device in accordance with claim 1, in which the directory structure has a configuration file for setting and controlling functions of the interface device or an executable or a batch file for conducting a routine stored in the memory or a data file used for transferring data from the data transmit/receive device to the host device or a help file for giving help on handling the interface device.	MSC Digital Cameras may include configuration files and files used for transferring data from the data transmit/receive device to the host device.
6. An interface device in accordance with claim 1 wherein, in response to a request from the host to read a boot sequence, the processor is arranged to send a virtual boot sequence to the host.	In response to a request from the host PC to read the first sector on the simulated disk drive (a typical location for a master boot record), the processor of the MSC Digital Camera is arranged to send a virtual boot sequence to the host. For example, in response to the request for the first sector, the MSC Digital Cameras is believed to provide 512 bytes of data which contain the information typically found in a master boot record (MBR), including information for at least one partition.

EXHIBIT C

'499 Patent Claims	MSC Digital Cameras
7. An interface device in accordance with claim 6 wherein the virtual boot sequence includes a starting position and a length of a file allocation table, an indication of a type of the storage device or a number of sectors of the storage device.	The MSC Digital Cameras are believed to provide a boot sequence including a master boot record and a boot sector, which typically include a starting location and a length of a File Allocation Table.
8. An interface device in accordance with claim 7 wherein, in response to a request from the host to display a directory of the storage device, a processor is arranged for transferring the file allocation table and the directory structure to the host.	The MSC Digital Camera is configured such that, in response to a request from the host PC to display a directory of the MSC Digital Camera (which appears to the host PC to be a storage device), the processor is arranged for transferring the file allocation table and the directory structure to the host PC.
9. An interface device in accordance with claim 1 wherein the file allocation table and the directory structure is transferred to the host in response to a request from the host to read data from or store data to the storage device.	The MSC Digital Camera is configured such that, in response to a request from the host PC to read data from or store data to the MSC Digital Camera (which appears to the host PC to be a storage device), the processor is arranged for transferring the file allocation table and the directory structure to the host PC.
12. An interface device in accordance with	In FAT file systems believed to be used in the

EXHIBIT C

499 Patent Claims	MSC Digital Cameras
claim 1 wherein the file allocation table includes information on numbers of blocks occupied by the data file wherein the interface device is arranged for receiving block numbers or a block number range from the host when the host wants to read the data file, and wherein the interface device is arranged to start a data transfer to the host, when the block numbers or the block number range is received from the host.	MSC Digital Cameras, the number of the first cluster of a file is in the directory. READ(10) command supports reading a single logical block address comprising a single 512 byte sector, or a starting logical block address plus a transfer length comprising a range of blocks of data.
13. An interface device in accordance with claim 12 wherein the processor is arranged for formatting the data acquired by the second connecting device into blocks having a predetermined size, the predetermined size being suited for the storage device.	It is believed that the processor is arranged for formatting the data acquired by the second connecting device into 512 byte blocks, which is a size being suited for a storage device.
15. An interface device in accordance with claim 1 wherein the storage device is a hard disk.	The Interface Descriptor sent by the MSC Digital Camera indicating a SCSI command set is the same as an Interface Descriptor as would be sent by a hard disk. Thus, the Interface Descriptor signals the host PC that

EXHIBIT C

'499 Patent Claims	MSC Digital Cameras
	the storage device is a hard disk.
16. An interface device in accordance with claim 1 wherein the memory has a data buffer for permitting independence in terms of time of the data transmit/receive device attachable to the second connecting device from the host device attachable to the first connecting device.	Images are typically stored in a data buffer, permitting time independence from when a photograph is captured and when it is transferred to the host PC.
17. An interface device for communication between a host device, which comprises a multi-purpose interface and a specific driver for this interface, and a data transmit/receive device comprising the following features:	Generally, a preamble is not limiting. This claim covers an interface device, and does not expressly require or exclude a host device or a data/transmit receive device. See the Claim Preambles section below for additional information.
a processor;	The interface portion of MSC Digital Cameras typically has a processor, such as a microprocessor or microcontroller.
a memory;	The interface portion of a MSC Digital Camera typically includes memory. Also, a socket is typically provided for adding a memory card.

EXHIBIT C

'499 Patent Claims	MSC Digital Cameras
a first connecting device for interfacing the host device with the interface device via the multi-purpose interface of the host device; and	The MSC Digital Cameras include a Universal Serial Bus (USB) circuit. A USB interface present on a host PC is a multipurpose interface.
a second connecting device for interfacing the interface device with the data transmit/receive device,	The MSC Digital Cameras include a second connecting device comprising a sampling circuit and an analog to digital converter. This circuitry interfaces analog data typically provided by a data transmit receive device (typically including a CCD image sensor) with the interface device. For example some MSC Digital Cameras use a Correlated Double Sampler (CDS).
where the interface device is configured using the processor and the memory in such a way that the interface device, when receiving an inquiry from the host device as to the type of a device attached at the multi-purpose interface of the host device, sends a signal, regardless of the type of the data transmit/receive device attached to the second connecting device of	The interface device is believed to be configured by the processor and a program stored in the memory, for example, in such a way that when the MSC Digital Camera receives a "Get_Descriptor" USB command, the MSC Digital Camera sends the requested descriptor(s). MSC Digital Cameras are believed, for example, to send a signal to the

EXHIBIT C

'499 Patent Claims	MSC Digital Cameras
the interface device, to the host device which signals to the host device that it is a storage device customary in a host device,	Host PC, regardless of the image sensor, microphone, or other data transmit/receive device which may be attached, that the MSC Digital Camera is a mass storage class device, such as a disk drive, which is a storage device customary in a host PC.
whereupon the host device communicates with the interface device by means of the specific driver for the multi-purpose interface, and	Upon receiving the information signaling the host computer that the MSC Digital Camera is a mass storage device, the host PC automatically communicates with the interface device of the MSC Digital Camera by means of one or more software drivers for disk drives customary in the host PC. The interface device is configured to respond to communications from one or more of these drivers, as set forth below. For example, when the host PC is configured with the Windows XP operating system, the host PC is believed to communicate with the interface device by means of usbd.sys. Digital camera-specific drivers are not necessary. The host PC also uses the usbd.sys driver to communicate with

EXHIBIT C

'499 Patent Claims	MSC Digital Cameras
	hard disk drives connected to the USB interface, and hard disk drives are input/output devices customary in the host PC.
wherein the interface device is arranged for simulating a virtual file system to the host, the virtual file system including a file allocation table and a directory structure.	The interface portion of the MSC Digital Camera is believed to simulate a virtual file system, including, for example, simulating a master boot record, a boot sector and a sequence of sectors comprising at least one file allocation table, at least one directory, and files, as would be found on a disk drive having rotating media.
18. A method of communication between a host device, which comprises drivers for input/output devices customary in a host device and a multi-purpose interface, and a data transmit/receive device via an interface device comprising the following steps:	Generally, a preamble is not limiting. This claim covers a method of communicating between a host device interface device and a data transmit/receive device via an interface device. See the Claim Preambles section below for additional information concerning the host device and the data/transmit receive device
interfacing of the host device with a first connecting device of the interface device via	User manuals for the various MSC Digital Cameras instruct users, including users of

EXHIBIT C

'499 Patent Claims	MSC Digital Cameras
the multi-purpose interface of the host device;	cameras destined for the U.S., to interface the a first connecting device of the MSC Digital Camera with a multipurpose interface of a host PC by connecting the MSC Digital Camera to the USB port on the host PC.
interfacing of the data transmit/receive device with a second connecting device of the interface device;	The MSC Digital Cameras include a second connecting device comprising a sampling circuit and an analog to digital converter. This circuitry interfaces analog data typically provided by a data transmit receive device (typically including a CCD image sensor) with the interface device.
inquiring by the host device at the interface device as to the type of device to which the multi-purpose interface of the host device is attached;	When a MSC Digital Camera is plugged in to a USB port on a host PC, the host PC may inquire the interface device as to the type of device it is by sending a "Get_Descriptor" USB command.
regardless of the type of the data transmit/receive device attached to the second connecting device of the interface device, responding to the inquiry from the host device	A MSC Digital Camera responds to the "Get_Descriptor" inquiry in such a way that it is an input/output device customary in a host device. MSC Digital Cameras are believed,

EXHIBIT C

'499 Patent Claims	MSC Digital Cameras
by the interface device in such a way that it is a storage device customary in a host device, whereupon the host device communicates with the interface device by means of the usual driver for the storage device, and	for example, to send a signal to the Host PC, regardless of the image sensor, microphone, or other data transmit/receive device which may be attached to the interface device, that the MSC Digital Camera is a mass storage class device, such as a disk drive, which is an storage device customary in a host PC. See "First Command Interpreter" and "Signals to the Host Device and Customary in a Host Device" sections below for additional information. Upon receiving the information signaling the host computer that the MSC Digital Camera is a mass storage device, the host PC automatically communicates with the interface device of the MSC Digital Camera by means of one or more of the usual software drivers for disk drives customary in the host PC. For example, when the host PC is configured with the Windows XP operating system, the host PC is believed to communicate with the interface device by means of disk.sys, PartMgr.sys and

EXHIBIT C

'499 Patent Claims	MSC Digital Cameras
	usbstor.sys. Digital camera-specific drivers are not necessary. The host PC also uses the disk.sys and PartMgr.sys drivers to communicate with hard disk drives, which are storage devices customary in the host PC. The host PC also uses usbstor.sys to communicate with hard disk drives attached to the USB port.
wherein the interface device is arranged for simulating a virtual file system to the host, the virtual file system including a file allocation table and a directory structure.	The interface portion of the MSC Digital Camera is believed to simulate a virtual file system, including, for example, simulating a master boot record, a boot sector and a sequence of sectors comprising at least one file allocation table, at least one directory, and files, as would be found on a disk drive having rotating media.

The claim chart below provides the infringement analysis with respect to the PTP Digital Cameras identified above:

'399 Patent Claims	PTP Digital Cameras
1. An interface device for communication between a host device, which comprises	Generally, a preamble is not limiting. This claim covers an interface device as defined in the body

EXHIBIT C

'399 Patent Claims	PTP Digital Cameras
drivers for input/output devices customary in a host device and a multi-purpose interface, and a data transmit/receive device, the data transmit/receive device being arranged for providing analog data, comprising:	of the claim below, and does not expressly require or exclude a host device or a data/transmit receive device. See the Claim Preamble section below for additional information.
a processor;	The interface portion of PTP Digital Cameras typically has a processor, such as a microprocessor or microcontroller.
a memory;	The interface portion of PTP Digital Cameras typically includes memory. Also, a socket is typically provided for adding a memory card.
a first connecting device for interfacing the host device with the interface device via the multi-purpose interface of the host device; and	The PTP Digital Cameras include first connecting device comprising a Universal Serial Bus (USB) circuit for interfacing the interface device with a multipurpose USB interface on a host PC.
a second connecting device for interfacing the interface device with the data transmit/receive device, the second	The PTP Digital Cameras include a second connecting device comprising a sampling circuit and an analog to digital converter. This circuitry

EXHIBIT C

'399 Patent Claims	PTP Digital Cameras
connecting device including a sampling circuit for sampling the analog data provided by the data transmit/receive device and an analog-to-digital converter for converting data sampled by the sampling circuit into digital data,	interfaces analog data typically provided by a data transmit receive device (typically including a CCD image sensor) with the interface device. For example some PTP Digital Cameras use a Correlated Double Sampler (CDS).
wherein the interface device is configured by the processor and the memory to include a first command interpreter and a second command interpreter,	The interface device of PTP Digital Cameras is configured to include first and second command interpreters as set forth more fully below.
wherein the first command interpreter is configured in such a way that the command interpreter, when receiving an inquiry from the host device as to a type of a device attached to the multi-purpose interface of the host device, sends a signal, regardless of the type of the data transmit/receive device attached to the second connecting device of the interface device, to the host device which signals to the host device that it is an input/output	The first command interpreter may comprise, for example, a USB command interpreter. When a PTP Digital Camera is plugged in to a USB port on a host PC, the camera may receive a "Get_Descriptor" USB command. The "Get_Descriptor" USB command is a type of inquiry from the host PC. The first command interpreter of the PTP Digital Camera interprets the "Get_Descriptor" command and returns the requested descriptor(s). PTP Digital Cameras are believed, for example, to send a signal to the Host

EXHIBIT C

'399 Patent Claims	PTP Digital Cameras
device customary in a host device,	PC, regardless of the image sensor, microphone, or other data transmit/receive device which may be attached to the interface device, that the PTP Digital Camera is an imaging device, such as a scanner, which is believed to be an I/O device customary in a host PC. See "First Command Interpreter" and "Signals to the Host Device and Customary in a Host Device" sections below for additional information.
whereupon the host device communicates with the interface device by means of the driver for the input/output device customary in a host device, and	Upon receiving the information signaling the host computer that the PTP Digital Camera is an imaging device, the host PC automatically communicates with the interface device of the PTP Digital Camera by means of one or more software drivers for imaging devices customary in the host PC. For example, when the host PC is configured with the Windows XP operating system, the host PC is believed to communicate with the interface device by means of at least usbscan.sys. The host PC also uses usbscan.sys drivers to communicate with scanners which are

EXHIBIT C

'399 Patent Claims	PTP Digital Cameras
	customary on the host PC.
wherein the second command interpreter is configured to interpret a data request command from the host device to the type of input/output device signaled by the first command interpreter as a data transfer command for initiating a transfer of the digital data to the host device.	The second command interpreter may be configured to interpret, for example, interpret certain operation codes specified in PIMA 15740 (the PTP specification). For example, PTP Digital Cameras are believed to interpret and respond to the operation code for the GetObject command (PIMA 15740, 10.4.9). PTP Digital Cameras are believed to interpret this data request command and provide the requested object, including data representing images acquired by, for example, a CCD sensor and digitized by the second connecting device.
3. An interface device according to claim 1, wherein the memory means comprises a buffer to buffer data to be transferred between the data transmit/receive device and the host device.	PTP Digital Cameras include internal memory and structure for receiving a memory card. The internal memory and/or memory card comprise a buffer to buffer data acquired by the transmit/receive device until it is transferred to the host PC. The PTP Digital Cameras may also comprise a memory buffer used during processing of images acquired by the image

EXHIBIT C

'399 Patent Claims	PTP Digital Cameras
	sensor.
5. An interface device according to claim 1, wherein the processor is a digital signal processor.	PTP Digital Cameras may further comprise a digital signal processor.
11. An interface device for communication between a host device, which comprises a multi-purpose interface and a specific driver for this interface, and a data transmit/receive device, the data transmit/receive device being arranged for providing analog data, comprising:	Generally, a preamble is not limiting. This claim covers an interface device, and does not expressly require or exclude a host device or a data/transmit receive device. See the Claim Preambles section below for additional information.
a processor;	The interface portion of a PTP Digital Camera typically has a processor, such as a microprocessor.
a memory;	The interface portion of a PTP Digital Camera typically includes memory. Also, a socket is typically provided for adding a memory card.
a first connecting device for interfacing the host device with the interface device via the multi-purpose interface of the host	The PTP Digital Cameras include first connecting device comprising a Universal Serial Bus (USB) circuit for interfacing the interface

EXHIBIT C

'399 Patent Claims	PTP Digital Cameras
device; and	device with a multipurpose USB interface on a host PC.
a second connecting device for interfacing the interface device with the data transmit/receive device, the second connecting device including a sampling circuit for sampling the analog data provided by the data transmit/receive device and an analog-to-digital converter for converting data sampled by the sampling circuit into digital data,	The PTP Digital Cameras include a second connecting device comprising a sampling circuit and an analog to digital converter. This circuitry interfaces analog data typically provided by a data transmit receive device (typically including a CCD image sensor) with the interface device. For example some PTP Digital Cameras use a Correlated Double Sampler (CDS).
where the interface device is configured using the processor and the memory to include a first command interpreter and a second command interpreter,	The interface device of PTP Digital Cameras is configured to include first and second command interpreters as set forth more fully below.
wherein the first command interpreter is configured in such a way that the interface device, when receiving an inquiry from the host device as to the type of a device attached at the multi-purpose interface of the host device, sends a signal, regardless	The first command interpreter may comprise, for example, a USB command interpreter. When a PTP Digital Camera is plugged in to a USB port on a host PC, the camera may receive a "Get_Descriptor" USB command. The "Get_Descriptor" USB command is a type of

EXHIBIT C

‘399 Patent Claims	PTP Digital Cameras
of the type of the data transmit/receive device attached to the second connecting device of the interface device, to the host device which signals to the host device that it is an input/output device customary in a host device,	inquiry from the host PC. The first command interpreter of the PTP Digital Camera interprets the "Get_Descriptor" command and returns the requested descriptor(s). PTP Digital Cameras are believed, for example, to send a signal to the Host PC, regardless of the image sensor, microphone, or other data transmit/receive device which may be attached to the interface device, that the PTP Digital Camera is an imaging device, such as a scanner, which is believed to be an I/O device customary in a host PC. See "First Command Interpreter" and "Signals to the Host Device and Customary in a Host Device" sections below for additional information.
whereupon the host device communicates with the interface device by means of the specific driver for the multi-purpose interface, and	Upon receiving the information signaling the host computer that the PTP Digital Camera is a mass storage device, the host PC automatically communicates with the interface device of the PTP Digital Camera by means of one or more software drivers specifically adapted for the multipurpose USB interface. For example, when

EXHIBIT C

'399 Patent Claims	PTP Digital Cameras
	the host PC is configured with the Windows XP operating system, the host PC is believed to communicate with the interface device by means of usbd.sys, which is a specific driver for the multipurpose USB interface.
wherein the second command interpreter is configured to interpret a data request command from the host device to the type of input/output device signaled by the first command interpreter as a data transfer command for initiating a transfer of the digital data to the host device.	The second command interpreter may be configured to interpret, for example, interpret certain operation codes specified in PIMA 15740 (the PTP specification). For example, PTP Digital Cameras are believed to interpret and respond to the operation code for the GetObject command (PIMA 15740, 10.4.9). PTP Digital Cameras are believed to interpret this data request command and provide the requested object, including data representing images acquired by, for example, a CCD sensor and digitized by the second connecting device.
14. A method of communication between a host device, which comprises drivers for input/output devices customary in a host device and a multi-purpose interface, and a	This claim covers a method of communicating between a host device interface device and a data transmit/receive device via an interface device. See the Claim Preambles section below for

EXHIBIT C

'399 Patent Claims	PTP Digital Cameras
data transmit/receive device, the data transmit/receive device being arranged for providing analog data, via an interface device, comprising:	additional information concerning the host device and the data/transmit receive device
interfacing of the host device with a first connecting device of the interface device via the multi-purpose interface of the host device;	User manuals for the various PTP Digital Cameras instruct users, including users of cameras destined for the U.S., to interface a first connecting device of the PTP Digital Camera with a multipurpose interface of a host PC by connecting the PTP Digital Camera to the USB port on the host PC.
interfacing of the data transmit/receive device with a second connecting device of the interface device, the second connecting device including a sampling circuit for sampling the analog data provided by the data/transmit/receive device and an analog-to-digital converter for converting data sampled by the sampling circuit into digital data;	The PTP Digital Cameras include a second connecting device comprising a sampling circuit and an analog to digital converter. This circuitry interfaces analog data typically provided by a data transmit receive device (typically including a CCD image sensor) with the interface device.
inquiring by the host device at the interface	When a PTP Digital Camera is plugged in to a

EXHIBIT C

'399 Patent Claims	PTP Digital Cameras
device as to the type of device to which the multi-purpose interface of the host device is attached;	USB port on a host PC, the host PC may inquire the interface device as to the type of device it is by sending a "Get_Descriptor" USB command.
regardless of the type of the data transmit/receive data attached to the second connecting device of the interface device, responding to the inquiry from the host device by the interface device in such a way that it is an input/output device customary in a host device, whereupon the host device communicates with the interface device by means of the usual driver for the input/output device, and	PTP Digital Cameras are believed, for example, to send a signal to the Host PC, regardless of the image sensor, microphone, or other data transmit/receive device which may be attached to the interface device, that the PTP Digital Camera is an imaging class device, such as a scanner, which is believed to be an I/O device customary in a host PC. See "First Command Interpreter" and "Signals to the Host Device and Customary in a Host Device" sections below for additional information. Upon receiving the information signaling the host computer that the PTP Digital Camera is imaging class device, the host PC automatically communicates with the interface device of the PTP Digital Camera by means of one or more software drivers for imaging devices customary in the host PC. The interface device is configured to respond to communications from

EXHIBIT C

'399 Patent Claims	PTP Digital Cameras
	one or more of these drivers, as set forth below. For example, when the host PC is configured with the Windows XP operating system, the host PC is believed to communicate with the interface device by means of usbscan.sys. The host PC also uses the usbscan.sys driver to communicate with scanners, which are input/output devices customary in the host PC.
interpreting a data request command from the host device to the type of input/output device customary in the host device as a data transfer command for initiating a transfer of the digital data to the host device.	The second command interpreter may be configured to interpret, for example, interpret certain operation codes specified in PIMA 15740 (the PTP specification). For example, PTP Digital Cameras are believed to interpret and respond to the operation code for the GetObject command (PIMA 15740, 10.4.9). PTP Digital Cameras are believed to interpret this data request command and provide the requested object, including data representing images acquired by, for example, a CCD sensor and digitized by the second connecting device.

EXHIBIT C

Papst reserves the right to amend or to supplement the identification of devices in this response to provide additional designations of devices as being MSC Digital Cameras, PTP Digital Cameras, or both, as discovery progresses in this case and additional information becomes available.

1. Claim Preambles

In construing patent claims, structure recited in the preamble of a claim is generally not considered a limitation of the claim. One generally should look to the body of the claims, which define the structure of the interface device. In one example, claim 1 of the '399 patent recites the following preamble:

An interface device for communication between a host device, which comprises drivers for input/output devices customary in a host device and a multi-purpose interface, and a data transmit/receive device, the data transmit/receive device being arranged for providing analog data, comprising:

In this claim, the preamble states that the claim is for an "interface device." Other independent apparatus claims of the '399 patent and the '449 patent similarly recite an "interface device." The "interface device" (which is defined later in the body of each claim) is for communicating between a "host device" and a "data transmit/receive device." The claims neither expressly require, nor prohibit, a permanently attached data transmit/receive device. Also, the apparatus claims neither expressly require, nor prohibit, a host device. Instead, the inquiry should be directed to whether the interface portion of a digital camera meets the limitations in the claims for the interface device.

To provide context for the remaining portions of a claim, the term "host device" may be understood to include Personal Computers ("PCs") and other host devices as described in the patent written description. Such host devices typically have or are connectable to input/output devices and have software drivers to operate those input/output devices.

The phrase "an input/output device customary in a host device" may be understood, for example, by referring to the '399 patent, for example, at column 4, lines 23-39, column 4, line 60

EXHIBIT C

to column 5, line 32, column 8, lines 43-67, and column 12, lines 23-40. Input/output devices customary in a host device include, for example, hard disk drives (e.g. column 8, lines 1-11), floppy disk drives, CD –ROM drives, or tape drives (e.g., column 4, lines 23-39) or printers (e.g., column 9, lines 38-48). Similar disclosures may be referred to for an understanding of the phrase “a storage device customary in a host device,” as that phrase is used in the claims of the ‘449 patent.

To provide context for the remaining portions of a claim, the term data transmit/receive devices may be understood to cover an entire spectrum of sensors. The written description of the ‘399 patent, for example, gives as an example an image-acquisition system, which is a diagnostic radiology system. In this regard, the term “data transmit/receive device” reads on a CCD image sensor typically found in a digital camera. Also, the term “data transmit/receive device” would read on a microphone.

Additionally, the term data transmit/receive device is recited differently in the two patents-in-suit. For example, in claim 1 of the ‘399 patent, the data transmit/receive device is recited as “being arranged for providing analog data.” (CCD image sensors provide analog data). However, in claim 1 of the 449 patent, there is no recitation that the data transmit receive device be arranged to provide analog data. If there is any interpretation of the term data transmit/receive device, that term in the ‘449 patent therefore should, for example, be construed more broadly than the data transmit/receive devices of the ‘399 patent.

2. First Connecting Device

An example of a "first connecting device" that is described in the ‘399 patent and the ‘449 patent includes an interface circuit. The Digital Cameras in suit all include a first connecting

EXHIBIT C

device because they include a Universal Serial Bus (USB) circuit. The USB interface circuit is for interfacing the interface device with a multipurpose USB interface on a host PC.

3. Second Connecting Device

The claim language “second connecting device” as recited in claim 1 of the ‘399 patent covers circuitry in a digital camera-in-suit that serves as the interface between the CCD image sensor (part of the data transmit/receive device) and the processor (part of the interface device):

a second connecting device for interfacing the interface device with the data transmit/receive device, the second connecting device including a sampling circuit for sampling the analog data provided by the data transmit/receive device and an analog-to-digital converter for converting data sampled by the sampling circuit into digital data,

Digital cameras-in-suit typically include a sample-and-hold circuit and an analog to digital converter as part of the circuitry that interfaces the data transmit/receive device to the processor of the interface device. The word “interfacing” does not require, nor does it prohibit, a permanent interface with a permanently attached data transmit/receive device.

In another example, independent claims 1 and 17 of the ‘449 patent recite a “second connecting device for interfacing the interface device with the data transmit/receive device,” which is broader than the language in the ‘399 patent, because it does not recite the sampling circuit or the analog-to-digital converter. Independent claim 18 of the ‘449 patent recites the step of interfacing a data transmit/receive device with a broadly recited second connecting device, which does not require any particular sampling circuit or analog-to-digital converter.

4. First Command Interpreter

The independent claims of the ‘399 patent recite that the interface device be configured by the processor and the memory to include a first command interpreter and a second command interpreter.

EXHIBIT C

In the claims of the '399 patent, the first command interpreter interprets USB commands, including those USB commands relating to the device enumeration process. The '449 patent is not limited to a "first command interpreter" because, for example, claim 1 of the '449 patent recites that the interface device is configured to provide certain signals in response to a received inquiry from a host PC. The host PC is believed to send several "Get_Descriptor" USB commands to the devices-in-suit. The digital cameras are believed to send responses to the "Get_Descriptor" command which may depend on whether the device is configured as a MSC Digital Camera or a PTP Digital Camera. Such responses are described in further detail below.

5. "Signals" to the Host Device and "Customary" in a Host Device

Claim 1 of the '399 patent recites, in part, that the "the first command interpreter" (which is part of the interface device) sends a signal to the host device "which signals to the host device that it is an input/output device customary in a host device." Claim 1 of the '449 patent recites, in part, that the "interface device" (not necessarily limited to a "command interpreter") sends a signal to the host device "which signals to the host device that it is a storage device customary in a host device."

The phrase "an input/output device customary in a host device" may be understood, for example, by referring to the '399 patent, for example, at column 4, lines 23-39, column 4, line 60 to column 5, line 32, column 8, lines 43-67, and column 12, lines 23-40. Input/output devices customary in a host device include, for example, hard disk drives (e.g. column 8, lines 1-11), floppy disk drives, CD-ROM drives, or tape drives (e.g., column 4, lines 23-39) or printers (e.g., column 9, lines 38-48). Similar disclosures may be referred to for an understanding of the phrase "a storage device customary in a host device," as that phrase is used in the claims of the '449 patent.

EXHIBIT C

The "signals" may be found in the responses to the "Get_Descriptor" USB commands. For example, a Casio Exilim Z75 Digital Camera is believed to respond to a "Get_Descriptor" USB command from a host PC by returning the requested descriptor(s). For example, the Casio Exilim Z75 Digital Camera, when in USB Mass Storage mode, is believed to return an Interface Descriptor which identifies the Casio Exilim Z75 Digital Camera as having a bInterfaceClass = 0x08, a bInterfaceSubClass = 0x05, and a bInterfaceProtocol = 0x50. An Interface Descriptor having the above information does not identify the attached device as a camera having an image sensor. Instead, the Interface Descriptor information given above is believed to signal to the host PC that the Casio Exilim Z75 device is an ATAPI removable rewriteable media device compatible with a SFF-8070i command set. It is further believed that a host PC receiving the above Interface Descriptor information would recognize the Exilim Z75 digital camera as an ATAPI disk drive. The host PC automatically loads standard software drivers, such as usbstor.sys, disk.sys and PartMgr.sys, and the host PC communicates with the interface device of the camera by means of such drivers. The host PC also uses the disk.sys and PartMgr.sys drivers to communicate with hard disk drives.

In another example, a Panasonic DMC-LX1 Digital Camera, when in USB Mass Storage mode, is believed to return an Interface Descriptor which identifies the Panasonic DMC-LX1 Digital Camera as having a bInterfaceClass = 0x08, a bInterfaceSubClass = 0x06, and a bInterfaceProtocol = 0x50. An Interface Descriptor having the above information does not identify the attached device as a camera having an image sensor. Instead, the Interface Descriptor information given above is believed to signal to the host PC that the Panasonic DMC-LX1 Digital Camera is a disk drive compatible with a SCSI command set. It is further believed that a host PC receiving the above Interface Descriptor information would recognize the DMC-LX1 Digital

EXHIBIT C

Camera as a SCSI disk drive. The host PC automatically loads standard software drivers, such as usbstor.sys, disk.sys and PartMgr.sys, and the host PC communicates with the interface device of the camera by means of such drivers. The host PC also uses the disk.sys and PartMgr.sys drivers to communicate with hard disk drives.

In another example, an Olympus E-500 Digital Camera, when in USB Mass Storage mode, is believed to return an Interface Descriptor which identifies the Olympus E-500 Digital Camera as having a bInterfaceClass = 0x08, a bInterfaceSubClass = 0x06, and a bInterfaceProtocol = 0x50. An Interface Descriptor having the above information does not identify the attached device as a camera having an image sensor. Instead, the Interface Descriptor information given above is believed to signal to the host PC that the Olympus E-500 Digital Camera is a disk compatible with a SCSI command set. It is further believed that a host PC receiving the above Interface Descriptor information would recognize the Olympus E-500 Digital Camera as a SCSI disk drive. The host PC automatically loads standard software drivers, such as usbstor.sys, disk.sys and PartMgr.sys, and the host PC communicates with the interface device of the camera by means of such drivers. The host PC also uses the disk.sys and PartMgr.sys drivers to communicate with hard disk drives.

In another example, in PTP mode, a PTP Digital Camera is believed to respond to a "Get_Descriptor" USB command from a host PC by returning the requested descriptor(s). For example, the PTP Digital Camera is believed to return an Interface Descriptor which identifies the PTP Digital Camera as having a bInterfaceClass = 0x06. An Interface Descriptor having bInterfaceClass = 0x06 is believed to signal to the host PC that the PTP Digital Camera is an I/O imaging device such as a scanner. The host PC, in response to this Interface Descriptor, loads and communicates with the interface device of the camera by means of Microsoft standard software

drivers, such as usbscan.sys. The host PC believed to use the usbscan.sys driver to communicate with imaging devices such as scanners.

6. Host Device Communicates with the Interface Device

Claim 1 of the '399 patent, for example, recites communication from the host device to the interface device to be by way of a driver for an input/output device customary in a host device:

whereupon the host device communicates with the interface device by means of the driver for the input/output device customary in a host device, and

The body of claim 1 of the '449 patent, for example, also recites communication between the host device and the interface device, but by way of a driver for a storage device:

whereupon the host device communicates with the interface device by means of the driver for the storage device customary in a host device, and

Host devices, such as a PC are believed to communicate with the interface device of a Digital Camera-in-suit as recited above. For example, a PC operating Windows XP is believed to communicate with a Casio Exilim Z75 digital camera in USB Mass Storage Mode by means of Microsoft standard software drivers, such as usbstor.sys, disk.sys and PartMgr.sys (disk.sys and PartMgr.sys drivers are also used to communicate with I/O storage devices, such as hard disk drives, and usbstor.sys is used to communicate with hard disk drives attached to a USB port). In another example, a PC operating Windows XP is believed to communicate with a Casio Exilim Z75 digital camera in PTP Mode by means of Microsoft standard software drivers, such as usbscan.sys (the usbscan.sys driver is also used to communicate with imaging devices, such as scanners).

Claim 11 of the '399 patent and claim 17 of the '449 patent, for example, recite communication from the host device to the interface device to be by way of a driver for an input/output device customary in a host device:

EXHIBIT C

whereupon the host device communicates with the interface device by means of the specific driver for multipurpose interface, and

Host devices, such as a PC are believed to communicate with the interface device of a Casio digital camera as recited above. For example, a PC operating Windows XP is believed to communicate with a MSC Digital Camera by means of a specific software drivers for the multipurpose USB interface, such as usbstor.sys. In another example, a PC operating Windows XP is believed to communicate with a PTP Digital Camera by means of a specific software driver for the multipurpose USB bus, such as usbscan.sys.

7. Second Command Interpreter

The “second command interpreter” of claim 1 of the ‘399 patent is a command interpreter that interprets a data request command:

wherein the second command interpreter is configured to interpret a data request command from the host device to the type of input/output device signaled by the first command interpreter as a data transfer command for initiating a transfer of the digital data to the host device.

The set of USB commands that are interpreted by the first command interpreter, e.g., the “Get_Descriptor” commands and commands like those, do not have a data request command for retrieving, for example, digital data corresponding to images acquired by a Digital Camera-in-suit. Instead, data request commands are specified in different command sets. For example, the SCSI Block Command (“SBC”) set includes READ commands. In another example, the ATAPI command set includes many of the SBC commands. MSC Digital Cameras are believed to interpret and respond to the SBC READ command. In USB Mass Storage mode, the Casio Exilim Z75 Digital Camera is believed to respond to, for example, a SCSI READ(10) command by transferring one or more requested sectors as specified by the READ(10) command. It is further believed that the Casio Exilim Z75 Digital Camera will transfer to a host computer digital data

EXHIBIT C

representing images acquired by a CCD image sensor and associated components in response to the READ(10) command. The READ(10) command is, for example, a standard data request command that a host PC may send to a hard disk drive.

Also, the PIMA 15470:2000 specification specifies commands such as “GetObject” (PIMA Commands). PTP Digital Cameras are believed to interpret this data request command and provide the requested “object,” including data representing images acquired by the CCD sensor and digitized by the second connecting device.

The interpretation of the SBC, ATAPI, and/or PIMA commands is believed to occur in a command interpreter other than the command interpreter that interprets the USB device enumeration commands.

8. Virtual File System

The Digital Cameras in suit are believed to represent to a host PC a file system which simulates the existence of addressable sectors, even though flash memory cards do not have any physical “sectors.” This is an example of virtualization of the file system. The term “file system” generally implies the use of rotating media, which is not present in the Digital Cameras-in-suit.

9. Virtual Boot Sequence

The Digital Cameras in suit are believed to send a virtual boot sequence to the host PC in response to a request from the host PC. For example the written descriptions of the patents-in-suit explain that when the host device receives the response that indicates that a drive is present, it then sends a request to the interface device to read the boot sequence. The written description also explains that on actual hard disks, the boot sequence normally resides on the first sectors of the disk. It is believed that, upon identifying the MSC Digital Camera as a disk drive, the host PC

EXHIBIT C

sends a read request to the MSC Digital Camera to read the first sector of the disk drive (which is a virtual disk drive).

In response to the request to read the first sector of the hard disk, the MSC Digital Camera is believed to send a 512 byte sector of information to the host PC. This 512 byte sector appears to contain the information of a master boot record (MBR), including partition information, which indicates the location of, for example, a boot sector. The MBR and the boot sector of the MSC Digital Camera, like the example given in the written description, are believed to include the drive type, the starting position and the length of the file allocation table (FAT), the number of sectors, etc

Documents and things that relate to infringement as pointed out above include, but are not limited to, the patents-in-suit and their respective file histories, the devices made by the Camera Manufacturers that are configurable to operate as a MSC Digital Camera and/or as a PTP Digital Camera, including the devices specifically identified in this response, Universal Serial Bus Specification, Revision 2.0, Universal Serial Bus Common Class Specification, Revision 1.0, Universal Serial Bus Mass Storage Class Specification Overview, Revision 1.2, Universal Serial Bus Mass Storage Class Bulk-Only Transport, Revision 1.0, USB Still Image Capture Device Definition, Revision 1.0, SCSI Block Commands-2 (SBC-2) (T10/1417-D) and/ or SCSI Block Commands - 3 (SBC-3) (T10/1799-D), PIMA 15740:2000, Picture Transfer Protocol (PTP) for Digital Still Photography Devices, and/or ISO 15740:2005, Picture Transfer Protocol (PTP) for Digital Still Photography Devices.

Additional documents that may relate or refer to the infringement of the patents in suit by products manufactured and/or sold by the parties in suit include documents which may be found in the following ranges: PAP0000377-PAP0000509, PAP0018972-PAP0019046,

EXHIBIT C

PAP0000920-PAP0001021, PAP 0019082-PAP0019155, PAP0000042-PAP0000106,
PAP0019239-PAP0019285, PAP0010286-PAP0019313, PAP0001918-PAP0002010,
PAP0021190-PAP0021244, PAP0001622-PAP0001688, PAP0021128-PAP0021182,
PAP0000107-PAP0000184, PAP0019314-PAP0019367.

INTERROGATORY NO. 2:

For each asserted claim of the Patents-in-Suit, if you assert infringement under the doctrine of equivalents, state in full the basis for your contention that each accused product performs substantially the same function in substantially the same way to obtain the same result as the subject matter claimed in the patent, describe the range of equivalents to which you contend the claimed invention is entitled, and state in full the basis for your contention that the claimed invention is entitled to such range of equivalents.

ANSWER:

Papst objects that Interrogatory No. 2 is premature to the extent that this interrogatory seeks information and responses inconsistent with the dates set in the Second Practice and Procedure Order, Docket No. 36 (April 8, 2008) ("Order"). In the Order, at Paragraph 17, the Court orders that: "Papst shall file its asserted claims and infringement contentions no later than May 28, 2008." Papst reserves the right to present its asserted claims and infringement contentions at the time specified by the Order. Also, Papst reserves the right to amend or supplement the present response as the parties comply with the disclosure, briefing, and hearing schedule concerning claim construction as set forth in the Order. Papst further reserves the right to amend or supplement the present response after such time as the Court provides any rulings concerning the scope of the claims of the patents-in-suit.

Papst also objects that this interrogatory is premature in that Papst served Papst Licensing GmbH & Co. KG's First Joint Set Of Interrogatories To Defendants on the Camera Manufacturers on April 9, 2008. These interrogatories seek, among other things, information concerning USB descriptors and information regarding which SCSI Block Commands and which PTP Commands

EXHIBIT C

are supported by each device. Such information is relevant to the present responses. Papst does not expect responses from Camera Manufacturers, however, until after service of this interrogatory response. Also, at the time of this response, the Camera Manufacturers have not provided design documentation, nor any detailed product specifications, nor software code, for their digital cameras (Papst received a letter indicating that it would receive tens of thousands of documents on the day that these responses are due, but Papst has not had an opportunity to review those documents yet). Nevertheless, and without waiving any of the objections stated herein, Papst provides its responses below based on currently available information. Papst reserves the right to amend or supplement this response after it receives and evaluates any additional information as may become known as discovery progresses in this case.

Based on information currently known to Papst, Papst contends that the asserted claims are literally infringed. However, at this point, the Camera Manufacturers have not provided their claim interpretation contentions or Markman briefs. Papst reserves the right to supplement or otherwise amend this response as discovery in this case progresses, and as the claim construction process in this case progresses.

INTERROGATORY NO. 3

If you contend that the Camera Manufacturers have infringed the Patents-in-Suit indirectly, state in full the basis for that contention by, without limitation, describing each act performed by each Camera Manufacturer which you contend induced or contributed to infringement, the direct infringement allegedly induced or contributed to by each such act, including the identity of the person committing the direct infringement, and how each such act of inducement or contribution resulted in such direct infringement.

ANSWER:

Papst objects that Interrogatory No. 3 is premature to the extent that this interrogatory seeks information and responses inconsistent with the dates set in the Second Practice and Procedure Order, Docket No. 36 (April 8, 2008) ("Order"). In the Order, at Paragraph 17, the

EXHIBIT C

Court orders that: "Papst shall file its asserted claims and infringement contentions no later than May 28, 2008." Papst reserves the right to present its asserted claims and infringement contentions at the time specified by the Order. Also, Papst reserves the right to amend or supplement the present response as the parties comply with the disclosure, briefing, and hearing schedule concerning claim construction as set forth in the Order. Papst further reserves the right to amend or supplement the present response after such time as the Court provides any rulings concerning the scope of the claims of the patents-in-suit.

Papst also objects that this interrogatory is premature in that Papst served Papst Licensing GmbH & Co. KG's First Joint Set Of Interrogatories To Defendants on the Camera Manufacturers on April 9, 2008. These interrogatories seek, among other things, information concerning USB descriptors and information regarding which SCSI Block Commands and which PTP Commands are supported by each device. Such information is relevant to the present responses. Papst does not expect responses from Camera Manufacturers, however, until after service of this interrogatory response. Also, at the time of this response, the Camera Manufacturers have not provided design documentation, nor any detailed product specifications, nor software code, for their digital cameras (Papst received a letter indicating that it would receive tens of thousands of documents on the day that these responses are due, but Papst has not had an opportunity to review those documents yet). Nevertheless, and without waiving any of the objections stated herein, Papst provides its responses below based on currently available information. Papst reserves the right to amend or supplement this response after it receives and evaluates any additional information as may become known as discovery progresses in this case.

Papst objects to the extent that Interrogatory No.3 could be read to call for a claim chart for each and every potentially infringing device. Such a requirement would be unduly burdensome, as each set of claim charts would be several pages long, and there are hundreds of digital cameras at issue in this case. Also, as set forth above, Papst has served discovery requests on the Camera Manufacturers, the responses to which are expected to be highly relevant to the preparation of claim charts, but are not available at the time of service of this response. Nevertheless, and without

EXHIBIT C

waiving any of the objections stated herein, in the present response, Papst provides claim charts for two representative devices: 1) digital cameras configured to operate in USB Mass Storage mode ("Mass Storage Class Digital Cameras," or "MSC Digital Cameras"); and 2) digital cameras configured to operate in PTP mode ("PTP Digital Cameras"). Papst believes that discovery to be provided by the Camera Manufacturers will confirm that most, if not all, of the digital cameras-in-suit may be configured to operate as MSC Digital Cameras and as PTP Digital Cameras.

Papst incorporates the response to Interrogatory No. 1, above, by reference as if fully restated herein. Papst asserts that the apparatus claims are directly infringed by the Digital Cameras-in-suit. However, at this point, the Camera Manufacturers have not provided their claim interpretation contentions or Markman briefs. Papst reserves the right to supplement or otherwise amend this response as discovery in this case progresses, and as the claim construction process in this case progresses.

Additionally, a reasonable opportunity for discovery is likely to yield evidence relating to whether the Camera Manufacturers had or have the requisite intent to induce the infringement of method claims 14 and 15 of the '399 patent, and method claim 18 of the '449 patent. The Digital Cameras-in-suit, on their own, do not perform the step of: "interfacing of the host device with a first connecting device of the interface device via the multi-purpose interface of the host device;" as recited in claim 14 of the '399 patent and claim 18 of the '449 patent. Also, the Digital Cameras-in-suit, on their own, do not perform the step of: "inquiring by the host device at the interface device as to the type of device to which the multi-purpose interface of the host device is attached;" as recited in claim 14 of the '399 patent and claim 18 of the '449 patent. However, the owners manuals and other documentation provided by the Camera Manufacturers instruct the end users of the Digital Cameras-in-suit to connect the cameras to host PCs in such a way that the steps

EXHIBIT C

identified above will be performed. Based on this evidence, the Camera Manufacturers intended to cause in the U.S. the actual steps that constitute direct infringement.

In addition, Papst gave notice to each of the Camera Manufacturers that the Digital Cameras-in-suit, when used in as directed in the user manuals provided with those devices, infringe the patents-in-suit. The notice provided by Papst is relevant to each Camera Manufacturer's state of mind. However, the Camera Manufacturers have not, to date, provided discovery regarding their state of mind regarding their actions vis-à-vis the patents-in-suit.

INTERROGATORY NO. 4

State what Papst contends to be the proper construction of each claim of the Patents-in-Suit and state in full the basis for each such contention by, without limitation, stating the substance of the proposed construction, identifying any special or uncommon meanings of words or phrases in the claim, and identifying all intrinsic and extrinsic evidence you contend supports your proposed construction.

ANSWER:

Papst objects that Interrogatory No. 4 is premature to the extent that this interrogatory seeks information and responses inconsistent with the dates set in the Second Practice and Procedure Order, Docket No. 36 (April 8, 2008) ("Order"). In the Order, at Paragraph 17, the Court orders that: "Papst shall file its asserted claims and infringement contentions no later than May 28, 2008." At Paragraph 20, the Court orders that: "Papst shall file its Markman hearing brief no later than July 9, 2008," and "Papst may reply no later than July 30, 2008." Papst reserves the right to present its asserted claims, infringement contentions, and proposed claim construction at the times specified by the Order. Also, Papst reserves the right to amend or supplement the present response as the parties comply with the disclosure, briefing, and hearing schedule concerning claim construction as set forth in the Order. Papst further reserves the right to amend or

EXHIBIT C

supplement the present response after such time as the Court provides any rulings concerning the scope of the claims of the patents-in-suit. Nevertheless, and without waiving any of the objections stated herein, Papst provides its response based on currently available information.

The response to Interrogatory No. 1, above, is incorporated herein by reference. The remarks concerning the interpretation of claim terms stated in that response are adopted herein.

INTERROGATORY NO. 5

Identify the specific dates of conception and actual reduction to practice for each claim of the Patents-in-Suit (both within the United States and outside of the United States if earlier) and state in full the basis for each such contention, including an identification of each person witnessing and/or participating in the acts of conception and reduction to practice, an identification of any other corroborating evidence, and a statement as to where the alleged acts of conception and reduction to practice occurred.

ANSWER:

Papst objects to this interrogatory as overly broad, unduly burdensome, and as calling for irrelevant information not reasonably calculated to lead to the discovery of admissible evidence.

Papst further objects to this interrogatory to the extent that it calls for a legal conclusion.

Subject to the general objections and the specific objections above which are incorporated herein, and without waiving any of the above objections, Papst answers as follows. On January 2nd

**MATERIAL
REDACTED**

**MATERIAL
REDACTED**

Papst will be providing documents and things that corroborate Mr. Tasler's work to develop his interface device, and will identify those documents that concern the subject matter of this interrogatory.

Papst plans to later amend and/or supplement its responses, if necessary, with additional information based upon further investigation and discovery, and to rely upon such information in the course of this action and at trial.

INTERROGATORY NO. 6

Describe all transfers of ownership, interest or assignment of each of the Patents-in-Suit by identifying the date of the transfer, the consideration for the transfer, the persons or entities involved, and all documents reflecting or relating to the transfer.

ANSWER:

Subject to the general objections above which are incorporated herein and without waiving any of the above objections, Papst answers as follows. On June 15, 2001, Michael Tasler, in consideration of one dollar "and other good and valuable consideration" assigned to Labortechnik Tasler GmbH, the entire right, title and interest in all U.S. patent applications and the corresponding Patents issued for the invention described as "Flexible Interface" at that time. The specific patent applications thereby assigned include Application No. 09/331,002 which issued as U.S. Patent No. 6,470,399, and Application 10/219,105 which issued as U.S. Patent No. 6,895,449. This assignment document was recorded at the United States Patent Office on July 23, 2001 and has a corresponding reel/frame number of 012023/0515.

EXHIBIT C

On February 28, 2006, LTT Labortechnik Tasler GmbH entered into a contract with Papst Licensing GmbH & Co. KG whereby LTT Labortechnik Tasler GmbH agreed to assign its rights to U.S. Patent No. 6,470,399 and U.S. Patent No. 6,895,449, among other patents and patent applications, in exchange for certain compensation. The details of the compensation are found in the contract that Mr. Tasler signed on February 28, 2006 which Papst will designate under Rule 33(d) after the document is produced. Papst further states that a previous draft of this contract was previously produced to Casio at PAP0013103-PAP0013115.

On March 8, 2006, LTT Labortechnik Tasler GmbH sold, assigned and transferred to Papst Licensing GmbH & Co. KG its entire right, title and interest in and to: United States Patent No. 6,470,399 B1, United States Patent No. 6,895,449 B2, and United States Patent Application No. 11/078,778. This assignment document was recorded at the United States Patent Office on March 15, 2006.

INTERROGATORY NO. 7

For each Patent-in-Suit, describe in detail where, when, how, and by whom the subject matter described in each of its claims was publicly used, publicly disclosed, offered for sale, or sold prior to the filing date of the Patent-in-Suit, along with the factual basis for such dates and all facts and circumstances relating thereto, including, but not limited to, by or to whom such subject matter was first used, first disclosed, first offered for sale, or first sold, and identify each such person involved in such acts (and state each person's role) and identify each document or thing which refers or relates to such acts.

ANSWER:

Papst objects on the ground that the phrase "the subject matter described in each of its claims" and "filing date of the Patent-in-Suit" is vague and ambiguous in the context of this interrogatory. Papst objects to this interrogatory as overly broad, unduly burdensome, and as calling for irrelevant information not reasonably calculated to lead to the discovery of admissible evidence. Papst further objects to the extent that this interrogatory calls for a legal conclusion. Subject to the general and specific objections above which are incorporated herein, and without waiving any of the above objections, Papst answers as follows. Papst is unaware of any public use,

public disclosure, offer for sale or sale of a Tasler product covered by the Patents-In-Suit before the earliest priority filing date of the Patents-In-Suit of March 4, 1997. From January, 1996 to

**MATERIAL
REDACTED**

incorporated by reference herein

If further information become available that is responsive to this interrogatory, Papst plans to amend and/or supplement its responses, if necessary, with additional information based upon further investigation and discovery, and to rely upon such information in the course of this action and at trial.

INTERROGATORY NO. 8

State in detail Papst's contentions, and the factual basis for such contentions, as to any "objective evidence" or "secondary considerations" of any alleged non-obviousness of any of the claims of each Patent-in-Suit in accordance with, for example, *Graham v. John Deer Co.*, 383 U.S. 1, 17 (1966), identify each person with knowledge of such prior art or facts, and identify each document or thing which refers or relates to such prior art or such facts.

ANSWER:

Papst objects that this interrogatory is premature in that Defendants have not fully responded to the discovery requests that Papst has served on Defendants. For example, at the time of this response, Defendants have not provided any evidence of their research and development documents which will likely demonstrate a long felt need for the solution addressed by the invention and the failure of others to solve the need addressed by the invention. Papst further objects on the ground that the phrases "identify each person with knowledge of such prior art" and "identify each document or thing which refers or relates to such prior art" is vague and ambiguous in the context of this interrogatory. Papst reserves the right to amend or supplement the present responses after it receives and evaluates any further substantive responses from Defendants.

EXHIBIT C

Subject to the general and specific objections above which are incorporated herein and without waiving any of the above objections, Papst responds as follows. On January 2nd or 3rd,

**MATERIAL
REDACTED**

Further, Casio and other defendants to these proceedings have identified a significant amount of prior art, such as digital cameras allegedly made by Kodak and Casio, that incorporated methods of connecting digital cameras and other interface devices to personal computers. These prior art devices did not operate in accordance with the invention, but typically required, for example, the loading of a specific software driver on the PC. Camera manufacturers continued to sell cameras having a similar design until approximately early 2000 when it is believed that they switched their camera designs so that from then on, they are covered by the patents in suit. It is believed that when they adopted the new designs covered by the claimed invention, the cameras experienced exceptional commercial success. Based, for example, on this set of facts, it is also believed likely that documents from the defendants will show the following secondary indices of nonobviousness, such as, (1) long felt need for the invention's commercial success of the claimed invention, (2) the attempt and failure of others to make the claimed inventions, (3) skepticism of the claimed inventions by experts, (4) praise by others of the claimed inventions, (5) teaching away of the

EXHIBIT C

claimed inventions by others, (6) copying of the claimed inventions by others, (7) experts or persons of ordinary skill in the field of the inventions expressing surprise at the making of the claimed inventions, (8) the inventor proceeded contrary to accepted wisdom, and (9) the claimed inventions achieved unexpected results..

For example, Papst contends that documents produced thus far (and documents to be later

**MATERIAL
REDACTED**

INTERROGATORY NO. 9

State in detail each argument, claim, or contention that has ever been asserted by any entity that any claim of the Patents-in-Suit is invalid, unenforceable, or not infringed, identify the party making such argument, claim or contention, identify all prior art asserted in each such argument, claim, or contention, identify each person having knowledge of facts relating to each argument, claim, or contention, and identify each document or thing which relates to such facts.

ANSWER:

Papst objects to this interrogatory as overly broad, unduly burdensome, and as calling for irrelevant information not reasonably calculated to lead to the discovery of admissible evidence. Papst further objects to this interrogatory to the extent that it calls for information protected by any applicable privilege or doctrine, including without limitation the attorney-client privilege, the work product doctrine and/or information pertaining to Papst counsel's mental impressions and/or trial preparation materials, any jointly shared privilege, and other protections afforded by Rule 26(b)(4)(B). Subject to all the general and specific objections above which are incorporated herein

EXHIBIT C

and without waiving any of the above objections, non-privileged documents that identify the arguments, claims and contentions by specific third-parties that certain claims of the Patents-In-Suit are invalid, unenforceable, or not infringed have been provided to one of the Camera Manufacturers in this action, Casio, and further documents will be produced in response to defendants' production requests. Pursuant to Rule 33(d), Papst previously identified such documents to Casio. See, Ex. A attached. Papst further states that it soon will be producing additional such documents responsive to this interrogatory, and also will identify those documents under Rule 33(d). Papst asserts that all such documents are protected in accordance with Rule 802 of the Federal Rules of Evidence. Papst further states that Casio's original and supplemental answers to interrogatories served on Papst in United States District Court for the District of Columbia, Docket No. 06-cv-1751, have further identified its arguments, claims and contentions that the claims of the Patents-in-Suit are invalid, unenforceable and/or not infringed. Papst assumes that Casio has already shared its original and supplemental answers to interrogatories with all of the Camera Manufacturers by this time given the Court's orders requiring cooperation between the Defendants. If not, Papst will produce Casio's interrogatory answers to the Camera Manufacturers upon written request. Papst incorporates by reference herein its answers to Interrogatory Nos. 1, 3 and 4 above.

INTERROGATORY NO. 10

Separately for each asserted claim, state the date on which Papst first became aware that each Camera Manufacturer was allegedly infringing each such claim and the circumstances surrounding Papst's acquisition of such knowledge, identify each person who became aware that each Camera Manufacturer was allegedly or might be infringing the Patents-in-Suit, identify each document or thing which refers or relates to such facts, and explain all of the reasons for any delay between the date on which Papst first became aware of the alleged infringement and the date Papst filed suit against each Camera Manufacturer.

EXHIBIT C

ANSWER:

Papst objects to this interrogatory as overly broad, unduly burdensome, and as calling for irrelevant information not reasonably calculated to lead to the discovery of admissible evidence. Papst further objects to this interrogatory to the extent that it calls for information protected by any applicable privilege or doctrine, including without limitation the attorney-client privilege, the work product doctrine and/or information pertaining to Papst counsel's mental impressions and/or trial preparation materials, any jointly shared privilege, and other protections afforded by Rule 26(b)(4)(B). Papst further objects on the basis that the phrases "the date on which Papst first became aware" and "each person who became aware that each Camera Manufacturer was allegedly or might be infringing the Patents-In-Suit" are vague and ambiguous in the context of this interrogatory. Papst further objects to this interrogatory on the grounds that the requested information concerns the doctrine of laches which is irrelevant in this case because Papst did not learn of the patents-in-suit until some unknown time in 2004 at the earliest and because Papst was not assigned the rights to enforce the Patents-In-Suit until 2006. *See, e.g., A.C. Aukerman Co. v. R.L. Chaides Constr. Co.*, 960 F.2d 1020, 1032 (Fed. Cir. 1992) (en banc)(A presumption of laches only arises "upon proof that the patentee delayed filing suit for more than six years after actual or constructive knowledge of the defendant's alleged infringing activity.").

Subject to all the general and specific objections above which are incorporated herein and without waiving any of the above objections, Papst does not know when it specifically first became aware that each Camera Manufacturer was allegedly infringing each claim, but it would have been sometime between 2004 and the time each Camera Manufacturer was provided with its written notice of infringement by Papst's attorneys, Welsh & Katz, Ltd. Papst's attorneys provided Casio Inc., the Hewlett-Packard Company, the Olympus Corporation, and the Samsung Corporation with written notice of infringement of its products on March 14, 2006. Papst's

EXHIBIT C

attorneys provided Fuji Photo Film USA, Inc. with written notice of infringement of its products on March 31, 2006. Papst's attorneys provided Panasonic Corporation of North America and Matsushita Electric Ind. Co., Ltd. with written notice of infringement of its products on April 26, 2006. Papst's attorneys provided Ricoh Company Ltd. with written notice of infringement of its products on April 28, 2006.

AS TO OBJECTIONS:

Dated: May 7, 2008

/s/ Jerold B. Schnayer
James P. White
Jerold B. Schnayer
Joseph E. Cwik
WELSH & KATZ, LTD.
120 South Riverside Plaza • 22nd Floor
Chicago, Illinois 60606
(312) 655-1500

Robert F. Muse
Joshua A. Levy
Kerry C. Dent
STEIN MITCHELL & MEZINES, LLP
1100 Connecticut Ave, NW
Washington, D.C. 20036
(202) 737-7777
Attorneys for Papst Licensing GmbH & Co. KG

EXHIBIT C

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing PAPST'S OBJECTIONS AND ANSWERS TO CAMERA MANUFACTURERS' FIRST SET OF INTERROGATORIES (NOS. 1-10) was caused to be served on this the 7th day of May, 2008 upon the attorneys for the Camera Manufacturers via e-mail in .pdf format as follows:

For The Casio Parties:

Laura Krawczyk
Morgan Lewis & Bockius
101 Park Avenue
New York, NY 10178-0060
Phone: (212) 309-6000
Fax: (212) 309-6001
lkrawczyk@morganlewis.com

J. Kevin Fee
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Avenue, NW
Washington, D.C. 20004
jkfee@morganlewis.com

Scott D. Stimpson
The Law Office of Scott Stimpson
Suite 1102
445 Hamilton Avenue
White Plains, NY 10601
stimpsonlaw@gmail.com

For The Samsung Parties:

Patrick J. Kelleher
Drinker Biddle Gardner Carton
191 North Wacker Drive
Suite 3700
Chicago, IL 60606-1698
Phone: (312) 569-1375
Fax: (312) 569-3375
Patrick.kelleher@dbr.com

EXHIBIT C

For The Fujifilm Parties:

Steven J. Routh
Sten A. Jensen
John R. Inge
Robert Wolinsky
Hogan & Hartson, LLP
555 Thirteenth Street, N.W.
Washington, DC 20004
Phone: (202) 637-5600
Fax: (202) 637-5910
sjrouth@hhlaw.com
sajensen@hhlaw.com
JRInge@HHLAW.com
RBWolinsky@HHLAW.com

For the Olympus Parties:

Richard de Bodo
Rachel M. Cappoccia
Hogan & Hartson, LLP
1999 Avenue of the Stars
Suite 1400
Los Angeles, CA 90067
Phone: (310) 785-4694
Fax: (310) 785-4601
rdebodo@hhlaw.com
rmcapoccia@hhlaw.com

For The Matsushita and Victory Company of Japan Parties:

Richard de Bodo
Rachel M. Capoccia
Hogan & Hartson, LLP
1999 Avenue of the Stars
Suite 1400
Los Angeles, CA 90067
Phone: (310) 785-4694
Fax: (310) 785-4601
rdebodo@hhlaw.com
rmcapoccia@hhlaw.com

EXHIBIT C

For the Ricoh Parties:

Paul Devinsky
MCDERMOTT, WILL & EMERY
600 13th Street, NW
Washington, DC 20005-3096
(202) 756-8369
Fax: (202) 756-8087
Email: pdevinsky@mwe.com

For Hewlett-Packard:

Heather N. Mewes
Fenwick & West, LLP
555 California St., 12th Floor
San Francisco, CA 94104
(415) 875-2300
hmewes@fenwick.com

/s/ Jerold B. Schnayer
Attorney for Papst Licensing GmbH & Co. KG

EXHIBIT C

EXHIBIT A

A. SIDNEY BATT
RICHARD L. WOOD*
JEROLD B. SCHNAYER
JOSEPH R. MARCUS
GERALD S. SCHUR
GERALD T. SHEKLETON
JAMES A. SCHEER
DANIEL R. CHERRY
ROBERT B. BREISBLATT
JAMES P. WHITE
R. MARK HALLIGAN
HARTWELL P. MORSE, III
EDWARD P. GAMSON, Ph.D.
KATHLEEN A. RHEINTGEN
THOMAS W. TOLPIN*
RICHARD W. McLAREN, JR.
ELLIOTT C. BANKENDORF
ERIC D. COHEN
JOHN L. AMBROGI
JULIE A. KATZ
JON P. CHRISTENSEN
WALTER J. KAWULA, JR.
LEONARD FRIEDMAN
STEVEN E. FELDMAN
JEFFREY W. SALMON
LOUISE T. WALSH
PAUL M. VARGO, Ph.D.
JOSEPH E. CWIK

WELSH & KATZ, LTD.

Attorneys at Law

120 SOUTH RIVERSIDE PLAZA • 22ND FLOOR
CHICAGO, ILLINOIS 60606-3912

TELEPHONE (312) 655-1500
FACSIMILE (312) 655-1501

www.welshkatz.com

June 29, 2007

J. ARON CARNAHAN
ERIK B. FLOM, Ph.D.
JAMES B. RADEN

RICHARD J. GURAK
DANIEL M. GURFINKEL
MICHELE S. KATZ*
BRIAN J. SODIKOFF
BRETT M. TOLPIN
GEORGE S. PAVLIK
MICHAEL A. KROL, Ph.D.
SHERRY L. ROLLO
CRAIG M. KUCHII
STEPHEN P. BENSON
GREGORY J. SKONY

OF COUNSEL
LAURIE A. HAYNIE
JAMES J. MYRICK
THOMAS R. VIGIL
PHILIP D. SEGREST, JR.**
WALLACE L. OLIVER, Ph.D.
LAURA A. LABEOTS, Ph.D.

DONALD L. WELSH (1925-1998)

* ALSO ADMITTED IN DISTRICT OF COLUMBIA
** ALSO ADMITTED IN ALABAMA

VIA E-MAIL

Jeffrey Gold, Esq.
Morgan Lewis & Bockius, LLP
101 Park Avenue
New York, New York 10178

Re: Casio Inc. v. Papst Licensing, Case No. 1:06 CV 011751 (GK)

Dear Jeffrey:

In response to Casio Inc. Interrogatory No. 2, Papst hereby identifies the following documents pursuant to Rule 33(d):

Beginning Bates No. For Each Document	End Bates No. For Each Document
PAP0001093	PAP0001355
PAP0002914	PAP0002914
PAP0002915	PAP0002919
PAP0002920	PAP0002923
PAP0002924	PAP0002929
PAP0002930	PAP0002934
PAP0002935	PAP0002935
PAP0002936	PAP0002941
PAP0002942	PAP0002960
PAP0002961	PAP0003352
PAP0003353	PAP0003353
PAP0003354	PAP0003367
PAP0003368	PAP0003474
PAP0003475	PAP0003525

EXHIBIT C

EXHIBIT A

Jeffrey Gold

June 29, 2007

Page 2

PAP0003526	PAP0003667
PAP0003668	PAP0003669
PAP0003670	PAP0003670
PAP0003671	PAP0003676
PAP0003677	PAP0003723
PAP0003724	PAP0003724
PAP0003725	PAP0004091
PAP0004092	PAP0004094
PAP0004095	PAP0004098
PAP0004099	PAP0004102
PAP0004103	PAP0004105
PAP0004106	PAP0004108
PAP0004109	PAP0004110
PAP0004111	PAP0004113
PAP0004114	PAP0004114
PAP0004115	PAP0004117
PAP0004118	PAP0004120
PAP0004121	PAP0004124
PAP0004125	PAP0004127
PAP0004128	PAP0004129
PAP0004130	PAP0004131
PAP0004132	PAP0004134
PAP0004135	PAP0004136
PAP0004137	PAP0004142
PAP0005150	PAP0005159
PAP0005160	PAP0005198
PAP0005199	PAP0005209
PAP0005210	PAP0005235
PAP0005236	PAP0005242
PAP0005243	PAP0005263
PAP0005264	PAP0005275
PAP0005276	PAP0005288
PAP0005289	PAP0005296
PAP0005297	PAP0005427
PAP0005428	PAP0005529
PAP0005530	PAP0005537
PAP0005538	PAP0005560
PAP0005561	PAP0005594
PAP0005595	PAP0005621
PAP0005622	PAP0005633
PAP0005634	PAP0005641
PAP0005642	PAP0005665
PAP0005666	PAP0005690
PAP0005691	PAP0005706
PAP0005707	PAP0005718
PAP0005719	PAP0005730
PAP0005731	PAP0005744
PAP0005745	PAP0005758
PAP0005759	PAP0005772
PAP0005773	PAP0005780
PAP0005781	PAP0005804
PAP0005805	PAP0005827
PAP0005828	PAP0005836

EXHIBIT C

EXHIBIT A

Jeffrey Gold

June 29, 2007

Page 3 -

PAP0005837	PAP0005846
PAP0005847	PAP0005859
PAP0005860	PAP0005882
PAP0005883	PAP0005898
PAP0005899	PAP0005926
PAP0005927	PAP0005942
PAP0005943	PAP0005953
PAP0005954	PAP0005962
PAP0005963	PAP0005988
PAP0005989	PAP0005995
PAP0005996	PAP0006008
PAP0006009	PAP0006036
PAP0006037	PAP0006046
PAP0006047	PAP0006106
PAP0006107	PAP0006115
PAP0006116	PAP0006133
PAP0006134	PAP0006151
PAP0006152	PAP0006164
PAP0006165	PAP0006181
PAP0006182	PAP0006209
PAP0006210	PAP0006219
PAP0006220	PAP0006253
PAP0006254	PAP0006261
PAP0006262	PAP0006274
PAP0006275	PAP0006328
PAP0006329	PAP0006448
PAP0006449	PAP0006459
PAP0006460	PAP0006486
PAP0006487	PAP0006605
PAP0006606	PAP0006621
PAP0006622	PAP0006634
PAP0006635	PAP0006674
PAP0006675	PAP0006724
PAP0006725	PAP0006821
PAP0006822	PAP0006838
PAP0006839	PAP0006855
PAP0006856	PAP0006862
PAP0006863	PAP0006873
PAP0006874	PAP0006885
PAP0006886	PAP0006901
PAP0006902	PAP0006999
PAP0007000	PAP0007021
PAP0007032	PAP0007055
PAP0007066	PAP0007087
PAP0007863	PAP0008130
PAP0008131	PAP0008393
PAP0013821	PAP0013822
PAP0013823	PAP0013824
PAP0013825	PAP0013826
PAP0013827	PAP0013828
PAP0013829	PAP0013830
PAP0013831	PAP0013832
PAP0013833	PAP0013834

EXHIBIT C

EXHIBIT A

Jeffrey Gold

June 29, 2007

Page 4

PAP0013835	PAP0013838
PAP0013839	PAP0013843
PAP0013844	PAP0013847
PAP0013848	PAP0013850
PAP0013851	PAP0013855
PAP0013856	PAP0013873

In response to Casio Inc. Interrogatory No. 4, Papst hereby identifies the following documents pursuant to Rule 33(d):

Beginning Bates No. For Each Document	End Bates No. For Each Document
PAP0000001	PAP0000006
PAP0000007	PAP0000007
PAP0000008	PAP0000008
PAP0000009	PAP0000009
PAP0000010	PAP0000010
PAP0000011	PAP0000011
PAP0000012	PAP0000018
PAP0000019	PAP0000025
PAP0000026	PAP0000027
PAP0000028	PAP0000029
PAP0000030	PAP0000031
PAP0000032	PAP0000033
PAP0000034	PAP0000041
PAP0000042	PAP0000042
PAP0000043	PAP0000043
PAP0000044	PAP0000046
PAP0000047	PAP0000049
PAP0000050	PAP0000054
PAP0000055	PAP0000071
PAP0000072	PAP0000073
PAP0000074	PAP0000075
PAP0000076	PAP0000076
PAP0000077	PAP0000078
PAP0000079	PAP0000081
PAP0000082	PAP0000084
PAP0000085	PAP0000085
PAP0000086	PAP0000087
PAP0000088	PAP0000089
PAP0000090	PAP0000095
PAP0000096	PAP0000098
PAP0000099	PAP0000106
PAP0000107	PAP0000107
PAP0000108	PAP0000117
PAP0000118	PAP0000119
PAP0000120	PAP0000121
PAP0000122	PAP0000124

EXHIBIT C

EXHIBIT A

Jeffrey Gold

June 29, 2007

Page 5

PAP0000125	PAP0000126
PAP0000127	PAP0000127
PAP0000128	PAP0000129
PAP0000130	PAP0000131
PAP0000132	PAP0000132
PAP0000133	PAP0000137
PAP0000138	PAP0000142
PAP0000143	PAP0000155
PAP0000156	PAP0000157
PAP0000158	PAP0000158
PAP0000159	PAP0000160
PAP0000161	PAP0000172
PAP0000173	PAP0000174
PAP0000175	PAP0000175
PAP0000176	PAP0000176
PAP0000177	PAP0000184
PAP0000185	PAP0000189
PAP0000190	PAP0000190
PAP0000191	PAP0000192
PAP0000193	PAP0000197
PAP0000198	PAP0000199
PAP0000200	PAP0000201
PAP0000202	PAP0000203
PAP0000204	PAP0000205
PAP0000206	PAP0000207
PAP0000208	PAP0000216
PAP0000217	PAP0000218
PAP0000219	PAP0000222
PAP0000223	PAP0000224
PAP0000225	PAP0000226
PAP0000227	PAP0000231
PAP0000232	PAP0000232
PAP0000233	PAP0000234
PAP0000235	PAP0000236
PAP0000237	PAP0000238
PAP0000239	PAP0000241
PAP0000242	PAP0000246
PAP0000247	PAP0000252
PAP0000253	PAP0000253
PAP0000254	PAP0000255
PAP0000256	PAP0000257
PAP0000258	PAP0000259
PAP0000260	PAP0000265
PAP0000266	PAP0000269
PAP0000270	PAP0000270
PAP0000271	PAP0000276
PAP0000277	PAP0000278
PAP0000279	PAP0000279
PAP0000280	PAP0000287
PAP0000288	PAP0000288
PAP0000289	PAP0000291
PAP0000292	PAP0000292
PAP0000293	PAP0000294

EXHIBIT C

EXHIBIT A

Jeffrey Gold

June 29, 2007

Page 6

PAP0000295	PAP0000300
PAP0000301	PAP0000302
PAP0000303	PAP0000304
PAP0000305	PAP0000305
PAP0000306	PAP0000307
PAP0000308	PAP0000309
PAP0000310	PAP0000311
PAP0000312	PAP0000313
PAP0000314	PAP0000318
PAP0000319	PAP0000325
PAP0000326	PAP0000330
PAP0000331	PAP0000335
PAP0000336	PAP0000337
PAP0000338	PAP0000339
PAP0000340	PAP0000344
PAP0000345	PAP0000349
PAP0000350	PAP0000354
PAP0000355	PAP0000360
PAP0000361	PAP0000365
PAP0000366	PAP0000366
PAP0000367	PAP0000368
PAP0000369	PAP0000376
PAP0000377	PAP0000379
PAP0000380	PAP0000382
PAP0000383	PAP0000386
PAP0000387	PAP0000400
PAP0000401	PAP0000410
PAP0000411	PAP0000412
PAP0000413	PAP0000416
PAP0000417	PAP0000419
PAP0000420	PAP0000425
PAP0000426	PAP0000427
PAP0000428	PAP0000429
PAP0000430	PAP0000430
PAP0000431	PAP0000436
PAP0000437	PAP0000440
PAP0000441	PAP0000443
PAP0000444	PAP0000446
PAP0000447	PAP0000449
PAP0000450	PAP0000452
PAP0000453	PAP0000456
PAP0000457	PAP0000458
PAP0000459	PAP0000459
PAP0000460	PAP0000465
PAP0000466	PAP0000466
PAP0000467	PAP0000468
PAP0000469	PAP0000471
PAP0000472	PAP0000473
PAP0000474	PAP0000474
PAP0000475	PAP0000476
PAP0000477	PAP0000477
PAP0000478	PAP0000479
PAP0000480	PAP0000485

EXHIBIT C

EXHIBIT A

Jeffrey Gold

June 29, 2007

Page 7

PAP0000486	PAP0000491
PAP0000492	PAP0000493
PAP0000494	PAP0000495
PAP0000496	PAP0000498
PAP0000499	PAP0000500
PAP0000501	PAP0000501
PAP0000502	PAP0000509
PAP0000510	PAP0000511
PAP0000512	PAP0000512
PAP0000513	PAP0000515
PAP0000516	PAP0000518
PAP0000519	PAP0000526
PAP0000527	PAP0000527
PAP0000528	PAP0000531
PAP0000532	PAP0000532
PAP0000533	PAP0000537
PAP0000538	PAP0000541
PAP0000542	PAP0000543
PAP0000544	PAP0000546
PAP0000547	PAP0000563
PAP0000564	PAP0000565
PAP0000566	PAP0000567
PAP0000568	PAP0000586
PAP0000587	PAP0000591
PAP0000592	PAP0000593
PAP0000594	PAP0000596
PAP0000597	PAP0000597
PAP0000598	PAP0000599
PAP0000600	PAP0000605
PAP0000606	PAP0000607
PAP0000608	PAP0000608
PAP0000609	PAP0000610
PAP0000611	PAP0000612
PAP0000613	PAP0000614
PAP0000615	PAP0000615
PAP0000616	PAP0000618
PAP0000619	PAP0000624
PAP0000625	PAP0000626
PAP0000627	PAP0000627
PAP0000628	PAP0000629
PAP0000630	PAP0000639
PAP0000640	PAP0000647
PAP0000648	PAP0000649
PAP0000650	PAP0000651
PAP0000652	PAP0000664
PAP0000665	PAP0000665
PAP0000666	PAP0000668
PAP0000669	PAP0000669
PAP0000670	PAP0000670
PAP0000671	PAP0000672
PAP0000673	PAP0000676
PAP0000677	PAP0000677
PAP0000678	PAP0000678

EXHIBIT C

EXHIBIT A

Jeffrey Gold

June 29, 2007

Page 8

PAP0000679	PAP0000680
PAP0000681	PAP0000681
PAP0000682	PAP0000682
PAP0000683	PAP0000684
PAP0000685	PAP0000693
PAP0000694	PAP0000695
PAP0000696	PAP0000698
PAP0000699	PAP0000702
PAP0000703	PAP0000704
PAP0000705	PAP0000706
PAP0000707	PAP0000709
PAP0000710	PAP0000717
PAP0000718	PAP0000719
PAP0000720	PAP0000721
PAP0000722	PAP0000724
PAP0000725	PAP0000727
PAP0000728	PAP0000728
PAP0000729	PAP0000733
PAP0000734	PAP0000738
PAP0000739	PAP0000744
PAP0000745	PAP0000745
PAP0000746	PAP0000751
PAP0000752	PAP0000753
PAP0000754	PAP0000755
PAP0000756	PAP0000761
PAP0000762	PAP0000762
PAP0000763	PAP0000764
PAP0000765	PAP0000770
PAP0000771	PAP0000776
PAP0000777	PAP0000778
PAP0000779	PAP0000779
PAP0000780	PAP0000780
PAP0000781	PAP0000781
PAP0000782	PAP0000787
PAP0000788	PAP0000789
PAP0000790	PAP0000790
PAP0000791	PAP0000792
PAP0000793	PAP0000800
PAP0000801	PAP0000803
PAP0000804	PAP0000806
PAP0000807	PAP0000808
PAP0000809	PAP0000811
PAP0000812	PAP0000814
PAP0000815	PAP0000816
PAP0000817	PAP0000818
PAP0000819	PAP0000821
PAP0000822	PAP0000822
PAP0000823	PAP0000824
PAP0000825	PAP0000830
PAP0000831	PAP0000835
PAP0000836	PAP0000850
PAP0000851	PAP0000852
PAP0000853	PAP0000854

EXHIBIT C

EXHIBIT A

Jeffrey Gold

June 29, 2007

Page 9

PAP0000855	PAP0000856
PAP0000857	PAP0000857
PAP0000858	PAP0000858
PAP0000859	PAP0000860
PAP0000861	PAP0000866
PAP0000867	PAP0000868
PAP0000869	PAP0000871
PAP0000872	PAP0000877
PAP0000878	PAP0000883
PAP0000884	PAP0000885
PAP0000886	PAP0000886
PAP0000887	PAP0000888
PAP0000889	PAP0000894
PAP0000895	PAP0000910
PAP0000911	PAP0000919
PAP0000920	PAP0000922
PAP0000923	PAP0000923
PAP0000924	PAP0000925
PAP0000926	PAP0000928
PAP0000929	PAP0000929
PAP0000930	PAP0000930
PAP0000931	PAP0000933
PAP0000934	PAP0000942
PAP0000943	PAP0000944
PAP0000945	PAP0000952
PAP0000953	PAP0000961
PAP0000962	PAP0000962
PAP0000963	PAP0000964
PAP0000965	PAP0000966
PAP0000967	PAP0000969
PAP0000970	PAP0000987
PAP0000988	PAP0000989
PAP0000990	PAP0000992
PAP0000993	PAP0000998
PAP0000999	PAP0000999
PAP0001000	PAP0001001
PAP0001002	PAP0001003
PAP0001004	PAP0001009
PAP0001010	PAP0001011
PAP0001012	PAP0001012
PAP0001013	PAP0001021
PAP0001022	PAP0001023
PAP0001024	PAP0001026
PAP0001027	PAP0001029
PAP0001030	PAP0001031
PAP0001032	PAP0001033
PAP0001034	PAP0001035
PAP0001036	PAP0001037
PAP0001038	PAP0001039
PAP0001040	PAP0001040
PAP0001041	PAP0001042
PAP0001043	PAP0001043
PAP0001044	PAP0001045

EXHIBIT C

EXHIBIT A

Jeffrey Gold

June 29, 2007

Page 10

PAP0001046	PAP0001048
PAP0001049	PAP0001053
PAP0001054	PAP0001055
PAP0001056	PAP0001057
PAP0001058	PAP0001062
PAP0001063	PAP0001064
PAP0001065	PAP0001066
PAP0001067	PAP0001072
PAP0001073	PAP0001083
PAP0001084	PAP0001092
PAP0001356	PAP0001358
PAP0001359	PAP0001361
PAP0001362	PAP0001365
PAP0001366	PAP0001366
PAP0001367	PAP0001369
PAP0001370	PAP0001371
PAP0001372	PAP0001374
PAP0001375	PAP0001381
PAP0001382	PAP0001383
PAP0001384	PAP0001385
PAP0001386	PAP0001388
PAP0001389	PAP0001390
PAP0001391	PAP0001392
PAP0001393	PAP0001395
PAP0001396	PAP0001401
PAP0001402	PAP0001406
PAP0001407	PAP0001408
PAP0001409	PAP0001409
PAP0001410	PAP0001410
PAP0001411	PAP0001418
PAP0001419	PAP0001429
PAP0001430	PAP0001431
PAP0001432	PAP0001433
PAP0001434	PAP0001444
PAP0001445	PAP0001446
PAP0001447	PAP0001447
PAP0001448	PAP0001458
PAP0001459	PAP0001459
PAP0001460	PAP0001460
PAP0001461	PAP0001461
PAP0001462	PAP0001464
PAP0001465	PAP0001466
PAP0001467	PAP0001468
PAP0001469	PAP0001471
PAP0001472	PAP0001476
PAP0001477	PAP0001478
PAP0001479	PAP0001480
PAP0001481	PAP0001482
PAP0001483	PAP0001484
PAP0001485	PAP0001486
PAP0001487	PAP0001492
PAP0001493	PAP0001494
PAP0001495	PAP0001497

EXHIBIT C

EXHIBIT A

Jeffrey Gold

June 29, 2007

Page 11

PAP0001498	PAP0001502
PAP0001503	PAP0001506
PAP0001507	PAP0001507
PAP0001508	PAP0001509
PAP0001510	PAP0001512
PAP0001513	PAP0001514
PAP0001515	PAP0001516
PAP0001517	PAP0001521
PAP0001522	PAP0001524
PAP0001525	PAP0001526
PAP0001527	PAP0001527
PAP0001528	PAP0001529
PAP0001530	PAP0001535
PAP0001536	PAP0001537
PAP0001538	PAP0001540
PAP0001541	PAP0001553
PAP0001554	PAP0001621
PAP0001622	PAP0001622
PAP0001623	PAP0001625
PAP0001626	PAP0001626
PAP0001627	PAP0001629
PAP0001630	PAP0001632
PAP0001633	PAP0001637
PAP0001638	PAP0001642
PAP0001643	PAP0001644
PAP0001645	PAP0001649
PAP0001650	PAP0001651
PAP0001652	PAP0001652
PAP0001653	PAP0001657
PAP0001658	PAP0001659
PAP0001660	PAP0001660
PAP0001661	PAP0001665
PAP0001666	PAP0001671
PAP0001672	PAP0001676
PAP0001677	PAP0001684
PAP0001685	PAP0001685
PAP0001686	PAP0001688
PAP0001689	PAP0001693
PAP0001694	PAP0001694
PAP0001695	PAP0001695
PAP0001696	PAP0001699
PAP0001700	PAP0001710
PAP0001711	PAP0001716
PAP0001717	PAP0001718
PAP0001719	PAP0001722
PAP0001723	PAP0001728
PAP0001729	PAP0001729
PAP0001730	PAP0001735
PAP0001736	PAP0001738
PAP0001739	PAP0001740
PAP0001741	PAP0001762
PAP0001763	PAP0001774
PAP0001775	PAP0001776

EXHIBIT C

EXHIBIT A

Jeffrey Gold

June 29, 2007

Page 12

PAP0001777	PAP0001778
PAP0001779	PAP0001788
PAP0001789	PAP0001800
PAP0001801	PAP0001803
PAP0001804	PAP0001808
PAP0001809	PAP0001809
PAP0001810	PAP0001810
PAP0001811	PAP0001814
PAP0001815	PAP0001818
PAP0001819	PAP0001819
PAP0001820	PAP0001820
PAP0001821	PAP0001824
PAP0001825	PAP0001825
PAP0001826	PAP0001826
PAP0001827	PAP0001840
PAP0001841	PAP0001842
PAP0001843	PAP0001843
PAP0001844	PAP0001848
PAP0001849	PAP0001849
PAP0001850	PAP0001851
PAP0001852	PAP0001853
PAP0001854	PAP0001855
PAP0001856	PAP0001857
PAP0001858	PAP0001864
PAP0001865	PAP0001866
PAP0001867	PAP0001868
PAP0001869	PAP0001877
PAP0001878	PAP0001879
PAP0001880	PAP0001881
PAP0001882	PAP0001883
PAP0001884	PAP0001885
PAP0001886	PAP0001893
PAP0001894	PAP0001895
PAP0001896	PAP0001897
PAP0001898	PAP0001904
PAP0001905	PAP0001905
PAP0001906	PAP0001907
PAP0001908	PAP0001917
PAP0001918	PAP0001918
PAP0001919	PAP0001921
PAP0001922	PAP0001925
PAP0001926	PAP0001928
PAP0001929	PAP0001929
PAP0001930	PAP0001933
PAP0001934	PAP0001939
PAP0001940	PAP0001941
PAP0001942	PAP0001942
PAP0001943	PAP0001944
PAP0001945	PAP0001946
PAP0001947	PAP0001948
PAP0001949	PAP0001950
PAP0001951	PAP0001959
PAP0001960	PAP0001961

EXHIBIT C

EXHIBIT A

Jeffrey Gold

June 29, 2007

Page 13

PAP0001962	PAP0001962
PAP0001963	PAP0001969
PAP0001970	PAP0001976
PAP0001977	PAP0001987
PAP0001988	PAP0001989
PAP0001990	PAP0001990
PAP0001991	PAP0002000
PAP0002001	PAP0002010
PAP0002014	PAP0002015
PAP0002016	PAP0002016
PAP0002017	PAP0002036
PAP0002037	PAP0002044
PAP0002045	PAP0002046
PAP0002047	PAP0002048
PAP0002049	PAP0002051
PAP0002052	PAP0002062
PAP0002063	PAP0002064
PAP0002065	PAP0002065
PAP0002066	PAP0002071
PAP0002072	PAP0002083
PAP0002084	PAP0002084
PAP0002085	PAP0002089
PAP0002090	PAP0002094
PAP0002095	PAP0002095
PAP0002096	PAP0002098
PAP0002099	PAP0002103
PAP0002104	PAP0002105
PAP0002106	PAP0002107
PAP0002108	PAP0002118
PAP0002119	PAP0002120
PAP0002121	PAP0002121
PAP0002122	PAP0002127
PAP0002128	PAP0002128
PAP0002129	PAP0002129
PAP0002130	PAP0002130
PAP0002131	PAP0002134
PAP0002135	PAP0002141
PAP0002142	PAP0002143
PAP0002144	PAP0002144
PAP0002145	PAP0002145
PAP0002146	PAP0002151
PAP0002152	PAP0002152
PAP0002153	PAP0002153
PAP0002154	PAP0002162
PAP0002163	PAP0002175
PAP0002176	PAP0002181
PAP0002182	PAP0002183
PAP0002184	PAP0002184
PAP0002185	PAP0002186
PAP0002187	PAP0002194
PAP0002195	PAP0002206
PAP0002207	PAP0002218
PAP0002219	PAP0002220

EXHIBIT C

EXHIBIT A

Jeffrey Gold

June 29, 2007

Page 14

PAP0002221	PAP0002221
PAP0002222	PAP0002223
PAP0002224	PAP0002224
PAP0002225	PAP0002237
PAP0002238	PAP0002239
PAP0002240	PAP0002240
PAP0002241	PAP0002249
PAP0002250	PAP0002260
PAP0002261	PAP0002263
PAP0002264	PAP0002264
PAP0002265	PAP0002273
PAP0002274	PAP0002275
PAP0002276	PAP0002279
PAP0002280	PAP0002281
PAP0002282	PAP0002293
PAP0002294	PAP0002294
PAP0002295	PAP0002296
PAP0002297	PAP0002297
PAP0002298	PAP0002302
PAP0002303	PAP0002304
PAP0002305	PAP0002314
PAP0002315	PAP0002315
PAP0002316	PAP0002318
PAP0002319	PAP0002321
PAP0002322	PAP0002322
PAP0002323	PAP0002324
PAP0002325	PAP0002326
PAP0002327	PAP0002334
PAP0002335	PAP0002337
PAP0002338	PAP0002338
PAP0002339	PAP0002339
PAP0002340	PAP0002342
PAP0002343	PAP0002345
PAP0002346	PAP0002348
PAP0002349	PAP0002353
PAP0002354	PAP0002354
PAP0002355	PAP0002356
PAP0002357	PAP0002357
PAP0002358	PAP0002365
PAP0002366	PAP0002368
PAP0002369	PAP0002369
PAP0002370	PAP0002370
PAP0002371	PAP0002372
PAP0002373	PAP0002378
PAP0018684	PAP0018690
PAP0018691	PAP0018694
PAP0018695	PAP0018700
PAP0018701	PAP0018701
PAP0018702	PAP0018703
PAP0018704	PAP0018705
PAP0018706	PAP0018736
PAP0018737	PAP0018745
PAP0018746	PAP0018749

EXHIBIT C

EXHIBIT A

Jeffrey Gold

June 29, 2007

Page 15

PAP0018752	PAP0018753
PAP0018754	PAP0018757
PAP0018758	PAP0018760
PAP0018761	PAP0018761
PAP0018762	PAP0018765
PAP0018766	PAP0018769
PAP0018774	PAP0018775
PAP0018776	PAP0018776
PAP0018777	PAP0018780
PAP0018781	PAP0018781
PAP0018782	PAP0018786
PAP0018787	PAP0018789
PAP0018790	PAP0018796
PAP0018797	PAP0018800
PAP0018801	PAP0018804
PAP0018805	PAP0018809
PAP0018810	PAP0018811
PAP0018812	PAP0018825
PAP0018826	PAP0018827
PAP0018828	PAP0018829
PAP0018830	PAP0018831
PAP0018832	PAP0018835
PAP0018836	PAP0018839
PAP0018842	PAP0018864
PAP0018865	PAP0018866
PAP0018867	PAP0018869
PAP0018870	PAP0018872
PAP0018873	PAP0018875
PAP0018876	PAP0018877
PAP0018878	PAP0018884
PAP0018885	PAP0018886
PAP0018887	PAP0018889
PAP0018890	PAP0018891
PAP0018892	PAP0018899
PAP0018900	PAP0018905
PAP0018906	PAP0018910
PAP0018911	PAP0018913
PAP0018914	PAP0018918
PAP0018919	PAP0018921
PAP0018922	PAP0018925
PAP0018926	PAP0018929
PAP0018930	PAP0018933
PAP0018934	PAP0018936
PAP0018937	PAP0018940
PAP0018941	PAP0018943
PAP0018944	PAP0018948
PAP0018949	PAP0018951
PAP0018952	PAP0018954
PAP0018955	PAP0018956
PAP0018957	PAP0018957
PAP0018958	PAP0018959
PAP0018960	PAP0018960
PAP0018961	PAP0018962

EXHIBIT C

EXHIBIT A

Jeffrey Gold

June 29, 2007

Page 16

PAP0018963	PAP0018964
PAP0018965	PAP0018965
PAP0018966	PAP0018970
PAP0018972	PAP0018973
PAP0018974	PAP0018977
PAP0018978	PAP0018980
PAP0018981	PAP0018982
PAP0018983	PAP0018984
PAP0018985	PAP0018988
PAP0018989	PAP0018990
PAP0018991	PAP0018993
PAP0018994	PAP0018998
PAP0018999	PAP0019001
PAP0019002	PAP0019013
PAP0019014	PAP0019019
PAP0019020	PAP0019023
PAP0019024	PAP0019025
PAP0019026	PAP0019026
PAP0019027	PAP0019031
PAP0019032	PAP0019033
PAP0019034	PAP0019035
PAP0019036	PAP0019037
PAP0019038	PAP0019039
PAP0019040	PAP0019041
PAP0019042	PAP0019043
PAP0019044	PAP0019046
PAP0019072	PAP0019074
PAP0019075	PAP0019077
PAP0019082	PAP0019083
PAP0019084	PAP0019088
PAP0019089	PAP0019090
PAP0019091	PAP0019092
PAP0019093	PAP0019095
PAP0019096	PAP0019097
PAP0019098	PAP0019099
PAP0019100	PAP0019101
PAP0019102	PAP0019103
PAP0019104	PAP0019105
PAP0019106	PAP0019109
PAP0019110	PAP0019116
PAP0019117	PAP0019124
PAP0019125	PAP0019129
PAP0019130	PAP0019131
PAP0019132	PAP0019145
PAP0019146	PAP0019147
PAP0019148	PAP0019148
PAP0019149	PAP0019155
PAP0019156	PAP0019158
PAP0019159	PAP0019162
PAP0019168	PAP0019171
PAP0019172	PAP0019200
PAP0019201	PAP0019208
PAP0019209	PAP0019210

EXHIBIT C

EXHIBIT A

Jeffrey Gold

June 29, 2007

Page 17

PAP0019211	PAP0019212
PAP0019213	PAP0019216
PAP0019217	PAP0019219
PAP0019220	PAP0019220
PAP0019221	PAP0019222
PAP0019223	PAP0019225
PAP0019226	PAP0019229
PAP0019230	PAP0019236
PAP0019237	PAP0019238
PAP0019239	PAP0019245
PAP0019246	PAP0019258
PAP0019259	PAP0019260
PAP0019261	PAP0019272
PAP0019273	PAP0019274
PAP0019275	PAP0019276
PAP0019277	PAP0019280
PAP0019281	PAP0019285
PAP0019286	PAP0019313
PAP0019314	PAP0019315
PAP0019316	PAP0019317
PAP0019318	PAP0019330
PAP0019331	PAP0019339
PAP0019340	PAP0019341
PAP0019342	PAP0019343
PAP0019344	PAP0019346
PAP0019347	PAP0019355
PAP0019356	PAP0019357
PAP0019358	PAP0019362
PAP0019363	PAP0019367
PAP0019368	PAP0019369
PAP0019370	PAP0019373
PAP0019374	PAP0019375
PAP0019376	PAP0019379
PAP0019380	PAP0019381
PAP0019382	PAP0019384
PAP0019385	PAP0019389
PAP0019390	PAP0019391
PAP0019392	PAP0019393
PAP0019394	PAP0019395
PAP0019396	PAP0019397
PAP0019398	PAP0019401
PAP0019402	PAP0019405
PAP0019419	PAP0019426
PAP0019427	PAP0019429
PAP0019430	PAP0019432
PAP0019433	PAP0019436
PAP0019439	PAP0019441
PAP0019442	PAP0019444
PAP0019445	PAP0019446
PAP0019447	PAP0019449
PAP0019450	PAP0019453
PAP0019454	PAP0019466
PAP0019467	PAP0019467

EXHIBIT C

EXHIBIT A

Jeffrey Gold

June 29, 2007

Page 18

PAP0019468	PAP0019469
PAP0019470	PAP0019476
PAP0019477	PAP0019477
PAP0019478	PAP0019480
PAP0019481	PAP0019482
PAP0019483	PAP0019487
PAP0019488	PAP0019493
PAP0019494	PAP0019502
PAP0019503	PAP0019508
PAP0019509	PAP0019511
PAP0019512	PAP0019515
PAP0019516	PAP0019519
PAP0019520	PAP0019521
PAP0019522	PAP0019522
PAP0019523	PAP0019524
PAP0019525	PAP0019527
PAP0019528	PAP0019531
PAP0019532	PAP0019534
PAP0019535	PAP0019539
PAP0019540	PAP0019541
PAP0019542	PAP0019542
PAP0019543	PAP0019548
PAP0019549	PAP0019562
PAP0019563	PAP0019569
PAP0019570	PAP0019573
PAP0019576	PAP0019577
PAP0019578	PAP0019578
PAP0019579	PAP0019584
PAP0019585	PAP0019587
PAP0019588	PAP0019591
PAP0019592	PAP0019595
PAP0020532	PAP0020534
PAP0020535	PAP0020537
PAP0020538	PAP0020539
PAP0020540	PAP0020542
PAP0020543	PAP0020544
PAP0020545	PAP0020546
PAP0020547	PAP0020556
PAP0020557	PAP0020566
PAP0020567	PAP0020570
PAP0020571	PAP0020575
PAP0020576	PAP0020586
PAP0020587	PAP0020589
PAP0020590	PAP0020591
PAP0020592	PAP0020592
PAP0020593	PAP0020595
PAP0020596	PAP0020599
PAP0020600	PAP0020602
PAP0020603	PAP0020606
PAP0020607	PAP0020608
PAP0020609	PAP0020615
PAP0020616	PAP0020621
PAP0020622	PAP0020624

EXHIBIT C

EXHIBIT A

Jeffrey Gold

June 29, 2007

Page 19

PAP0020625	PAP0020627
PAP0020628	PAP0020629
PAP0020630	PAP0020631
PAP0020632	PAP0020634
PAP0020635	PAP0020638
PAP0020641	PAP0020642
PAP0020643	PAP0020643
PAP0020644	PAP0020654
PAP0020655	PAP0020656
PAP0020657	PAP0020658
PAP0020659	PAP0020660
PAP0020661	PAP0020662
PAP0020663	PAP0020663
PAP0020664	PAP0020672
PAP0020673	PAP0020674
PAP0020675	PAP0020681
PAP0020682	PAP0020688
PAP0020689	PAP0020693
PAP0020694	PAP0020700
PAP0020701	PAP0020709
PAP0020710	PAP0020711
PAP0020712	PAP0020715
PAP0020716	PAP0020718
PAP0020719	PAP0020726
PAP0020727	PAP0020728
PAP0020729	PAP0020732
PAP0020735	PAP0020737
PAP0020738	PAP0020746
PAP0020747	PAP0020748
PAP0020749	PAP0020750
PAP0020751	PAP0020752
PAP0020753	PAP0020756
PAP0020762	PAP0020766
PAP0020767	PAP0020794
PAP0020795	PAP0020797
PAP0020798	PAP0020799
PAP0020800	PAP0020801
PAP0020803	PAP0020804
PAP0020805	PAP0020806
PAP0020807	PAP0020835
PAP0020836	PAP0020847
PAP0020848	PAP0020849
PAP0020850	PAP0020850
PAP0020851	PAP0020852
PAP0020853	PAP0020853
PAP0020854	PAP0020855
PAP0020856	PAP0020862
PAP0020863	PAP0020865
PAP0020866	PAP0020867
PAP0020868	PAP0020871
PAP0020872	PAP0020873
PAP0020874	PAP0020875
PAP0020876	PAP0020876

EXHIBIT C

EXHIBIT A

Jeffrey Gold

June 29, 2007

Page 20

PAP0020877	PAP0020881
PAP0020882	PAP0020882
PAP0020883	PAP0020884
PAP0020885	PAP0020886
PAP0020887	PAP0020888
PAP0020889	PAP0020890
PAP0020891	PAP0020891
PAP0020892	PAP0020893
PAP0020894	PAP0020894
PAP0020895	PAP0020899
PAP0020900	PAP0020907
PAP0020908	PAP0020916
PAP0020917	PAP0020921
PAP0020922	PAP0020926
PAP0020927	PAP0020927
PAP0020928	PAP0020932
PAP0020933	PAP0020933
PAP0020934	PAP0020935
PAP0020936	PAP0020937
PAP0020938	PAP0020938
PAP0020939	PAP0020940
PAP0020941	PAP0020942
PAP0020943	PAP0020944
PAP0020945	PAP0020946
PAP0020947	PAP0020949
PAP0020950	PAP0020951
PAP0020952	PAP0020958
PAP0020959	PAP0020974
PAP0020975	PAP0021002
PAP0021003	PAP0021003
PAP0021004	PAP0021006
PAP0021007	PAP0021011
PAP0021012	PAP0021012
PAP0021013	PAP0021014
PAP0021015	PAP0021016
PAP0021017	PAP0021018
PAP0021019	PAP0021031
PAP0021032	PAP0021032
PAP0021033	PAP0021034
PAP0021035	PAP0021047
PAP0021048	PAP0021050
PAP0021051	PAP0021052
PAP0021053	PAP0021053
PAP0021054	PAP0021055
PAP0021056	PAP0021057
PAP0021058	PAP0021058
PAP0021059	PAP0021064
PAP0021065	PAP0021068
PAP0021069	PAP0021073
PAP0021074	PAP0021075
PAP0021078	PAP0021080
PAP0021081	PAP0021081
PAP0021082	PAP0021083

EXHIBIT C

EXHIBIT A

Jeffrey Gold

June 29, 2007

Page 21

PAP0021084	PAP0021087
PAP0021088	PAP0021092
PAP0021093	PAP0021101
PAP0021102	PAP0021102
PAP0021103	PAP0021104
PAP0021105	PAP0021106
PAP0021107	PAP0021108
PAP0021109	PAP0021112
PAP0021113	PAP0021114
PAP0021115	PAP0021119
PAP0021128	PAP0021130
PAP0021131	PAP0021133
PAP0021134	PAP0021161
PAP0021162	PAP0021163
PAP0021164	PAP0021167
PAP0021168	PAP0021173
PAP0021174	PAP0021175
PAP0021176	PAP0021176
PAP0021177	PAP0021180
PAP0021190	PAP0021191
PAP0021192	PAP0021195
PAP0021196	PAP0021200
PAP0021201	PAP0021202
PAP0021203	PAP0021208
PAP0021209	PAP0021210
PAP0021211	PAP0021211
PAP0021212	PAP0021215
PAP0021216	PAP0021216
PAP0021217	PAP0021218
PAP0021219	PAP0021222
PAP0021223	PAP0021223
PAP0021224	PAP0021225
PAP0021226	PAP0021228
PAP0021229	PAP0021232
PAP0021233	PAP0021239
PAP0021240	PAP0021240
PAP0021241	PAP0021244
PAP0021246	PAP0021247
PAP0021248	PAP0021250
PAP0021251	PAP0021252
PAP0021254	PAP0021255
PAP0021256	PAP0021262
PAP0021263	PAP0021269
PAP0021270	PAP0021337
PAP0021338	PAP0021347
PAP0021348	PAP0021348
PAP0021349	PAP0021350
PAP0021351	PAP0021352
PAP0021353	PAP0021353
PAP0021354	PAP0021356
PAP0021357	PAP0021357
PAP0021358	PAP0021358
PAP0021359	PAP0021360

EXHIBIT C

EXHIBIT A

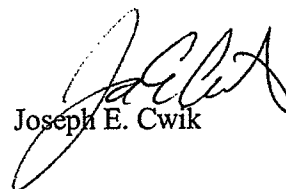
Jeffrey Gold

June 29, 2007

Page 22

PAP0021361 PAP0021362
PAP0021363 PAP0021368

By:



Joseph E. Cwik

JEC/pm

cc: Jerold B. Schnayer
Campbell Killefer