

EX. D

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
TEXARKANA DIVISION

JOHN WARD, JR.

v.

CISCO SYSTEMS, INC.

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C.A. NO. 08-4022

JURY TRIAL DEMANDED

**DEFENDANT’S AMENDED ANSWERS
TO PLAINTIFF’S INTERROGATORIES**

TO: Plaintiff John Ward, Jr., by and through his attorney of record, Nicholas H. Patton, Patton, Tidwell & Schroeder, LLP, 4605 Texas Boulevard, P.O. Box 5398, Texarkana, Texas 75505-5398.

Defendant Cisco Systems, Inc. (“Defendant” or “Cisco”) hereby serves its Amended Answers to Plaintiff’s First Set of Interrogatories in compliance with the order of the court dated March 30, 2009. These answers supersede the answers previously provided. The objections previously made in response to the interrogatories are reasserted as if repeated verbatim. To the extent these objections have been overruled by the court, they are reasserted here for appellate purposes only.

Documents Concerning the Information Received: ARK0000246-252

Persons Involved in the Information Received: Rick Frenkel

Nature of Any Communication Involved:

Date: October 17, 2007

Time: 1:47 p.m.

All Persons Involved in the Communication: Rick Frenkel

2. Anonymous email to Patent Troll Tracker
Date and time received by Frenkel: October 18 at 5:30 a.m.
Documents Concerning the Information Received: ARK0001421
Persons Involved in the Information Received: Rick Frenkel, Anonymous author
Nature of Any Communication Involved: N/A
Date: N/A
Time: N/A
All Persons Involved in the Communication: N/A
Documents Concerning That Communication: N/A
3. Anonymous email to Patent Troll Tracker
Date and time received by Frenkel: October 17, 2007 at 6:37 AM
Document Concerning the Information Received: ARK.001420
Persons Involved in the Information Received: Rick Frenkel
Nature of Any Communication Involved: N/A
4. Conversation with either Mallan Yen or Marta Beckwith
Date and time received by Frenkel: October 18 in the morning.
Documents Concerning the Information Received: None
Persons Involved in the Information Received: Rick Frenkel and Mallun Yen or Marta Beckwith
Nature of Any Communication Involved: Oral communication regarding change of docket in ESN case.
Date: October 18
Time: AM
All Persons Involved in the Communication: Rick Frenkel and Mallun Yen or Marta Beckwith
5. Original Complaint ESN v Cisco, 5:07-CV-00156-DF-CMC in the United States District Court for the Eastern District of Texas—Texarkana Division stamped 10/16
Date and time received by Frenkel: October 18 at unknown time
Documents Concerning the Information Received: ARK.0000167-241
Persons Involved in the Information Received: Rick Frenkel
Nature of Any Communication Involved: None
Date: N/A
Time: N/A
6. Docket in ESN v Cisco, 5:07-CV-00156-DF-CMC in the United States District Court for the Eastern District of Texas—Texarkana Division showing complaint filed on 10/16