

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ERICH SPECHT, et al.)	
)	NO 09 CV 2572
Plaintiffs,)	
)	Judge Leinenweber
v.)	
)	Magistrate Judge Cole
GOOGLE, INC., et al.)	
)	
Defendants.)	

**PLAINTIFFS ANSWER TO
FIRST SET OF INTERROGATORIES PROPOUNDED BY
DEFENDANT, GOOGLE, INC.**

Plaintiffs by and through Erich Specht, pursuant to Rule 33 of the Federal Rules of Civil Procedure, hereby responds to the interrogatories as follows:

Plaintiffs incorporate as if set forth fully herein, all general and specific objections previously raised to these interrogatories and do not, by providing these responses, waive any or all objections which have or could have been raised and reserve the right to raise any and all objections and privileges they are entitled to raise.

The following responses and previous objections are based upon Plaintiffs understanding of the Court's June 4, 2009 order and information now known. Plaintiffs have not yet completed discovery or preparation for trial and will supplement the responses and objections to the extent required by Rule 33.

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1

Identify the complete factual basis for Plaintiffs' allegation, in ¶52 of their First Amended

Investigation Continues.

INTERROGATORY NO.2.

Identify the complete factual basis for Plaintiffs' allegation, in ¶75 of their First Amended Complaint, that "Plaintiffs have expended considerable resources marketing, advertising and promoting goods under its Android Data mark," including all persons having relevant knowledge.

RESPONSE: See the answer to Interrogatory No. 1 and the documents produced.

In 2000, I hired a professional graphic designer, Prisca Tibbetts, to design the original brochure which was used as an exhibit on the trademark application. This brochure was professionally printed, and was distributed to clients and prospective clients during meetings and via direct mailings. Prisca's design services for that brochure cost \$730 and the printing of 1500 copies was done by Image Systems for \$1,394.00. In addition to the professional design and printing services, I also incurred fees for mailing labels, envelopes, and postage as each mailing was performed.

Additional brochures were designed in-house in 2002 and 2007, which were sent via direct mailings to potential clients or investors/purchasers.

Other professionally printed materials which contained the Android Data mark were several versions of letterhead and envelopes, initially professionally printed and later designed and printed in-house, requiring considerable expense in printers, ink cartridges, paper, postage, and the like.

From 1998-2005, I paid over \$90,000 for co-location space and business-class internet service which, in addition to being used to host client sites, was used to host my online marketing materials including offers for purchase and investment opportunities via several variations of the androiddata.com web site. In 2009, a new web domain was launched at android-data.com.

Between 2002 and 2004, online advertisements were purchased on bizbuysell.com and usbx.com seeking investment opportunities.

Persons with relevant knowledge: See the answers to Interrogatory No. 1.

Investigation Continues

INTERROGATORY NO.3

Identify each and every product or service that any of the Plaintiffs have offered for sale, sold, licensed or distributed in association with the ANDROID DATA trademark, at any time, and for each product or service, further identify each and every consummated sale, license or distribution

of such product or service, including:

- a) the method and date of the sale, license or distribution;
- b) the identity of the person who purchased, licensed or received the product or service;
- c) the amount of revenue received by any of the Plaintiffs in association with that sale, license or distribution; and
- d) all persons having relevant knowledge of those sales, licenses or distribution.

RESPONSE: The Android Data® mark has been used to promote products and services related to:

Android Data proprietary e-commerce software product which was licensed to clients

Web site design services

Web site hosting services

Custom database application development

Computer consulting services

Also, see the answers to the other Interrogatories, documents produced and the invoices provided.

Investigation Continues

INTERROGATORY NO.4

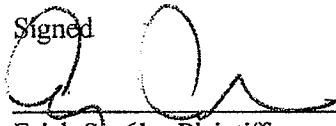
Identify each and every way in which Plaintiffs have marketed, advertised and/or promoted any goods or services offered for sale, sold, licensed or distributed in association with the ANDROID DATA trademark, including the dates and locations (such as by dissemination through newspapers, magazines, direct mailings, advertising circulars, periodicals, broadcast median, billboards and websites), of such marketing, advertising and/or promotion.

RESPONSE:

* Brochures:

>> One created in 2000, created by Prisca Tibbetts and printed by Image Systems. 1500 copies were produced, most of which were distributed by direct mail and/or presented directly to clients at meetings.

Signed



Erich Specht, Plaintiff

Dated: July 29, 2009

Martin J. Murphy
Attorney for Plaintiffs
2811 RFD
Long Grove, IL 60047
(312) 933-3200
martymvillageinvestments.com

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of this document on the following by personal service on July 31, 2009 at the address listed below:

To:

Herbert H. Finn, Esq.
Greenberg & Traurig, LLP
77 W Wacker Drive #3100
Chicago, IL 60601

Signed this 31st day of July, 2009

By: _____


Martin Murphy
Attorney for Plaintiffs
2811 RFD
Long Grove, IL 600473
(312) 933-3200
email: martym@villageinvestments.com

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

ERICH SPECHT, an individual, and doing business as ANDROID DATA CORPORATION and THE ANDROID'S DUNGEON INCORPORATED,)	
)	
Plaintiffs,)	Civil Action No. 09-cv-2572
)	
v.)	Judge Harry D. Leinenweber
)	
GOOGLE INC.,)	Magistrate Judge Jeffrey Cole
)	
Defendant.)	

**PLAINTIFFS' SUPPLEMENTAL ANSWERS TO FIRST SET
OF INTERROGATORIES PROPOUNDED BY GOOGLE, INC.**

Plaintiffs Erich Specht ("Specht"), Android Data Corporation ("ADC") and The Android's Dungeon Incorporated ("ADI") (collectively, "Plaintiffs"), by their attorneys, Novack and Macey LLP and Martin J. Murphy, hereby submit their Supplemental Answers to First Set of Interrogatories Propounded by Google, Inc. (the "Interrogatories"), in response to the August 2, 2009 letter sent by counsel for Google to counsel for Plaintiffs (the "Requested Supplement") as follows.

GENERAL OBJECTIONS

1. Plaintiffs object to the Interrogatories and the Requested Supplement to the extent that they purport to impose duties and/or obligations in excess of, or inconsistent with, those imposed by the Federal Rules of Civil Procedure or the local rules or standing order of this Court. In this regard, Plaintiffs object to, without limitation, Definition and Instruction A, Definition and Instruction C and Definition and Instruction D.
2. Plaintiffs object to the Interrogatories and the Requested Supplement to the extent they seek documents outside Plaintiffs' possession, custody or control.

the documents they have produced in discovery and all forthcoming production of documents by Plaintiffs to derive or ascertain the answer and state that identification of specific documents would be equally as burdensome for Plaintiffs as it would be for Google.

INTERROGATORY NO. 3:

Identify each and every product or service that any of the Plaintiffs have offered for sale, sold, licensed or distributed in association with the ANDROID DATA trademark, at any time, and for each product or service, further identify each and every consummated sale, license or distribution of such product or service, including:

- a) the method and date of the sale, license or distribution;
- b) the identity of the person who purchased, licensed or received the product or service;
- c) the amount of revenue received by any of the Plaintiffs in association with that sale, license or distribution; and
- d) all persons having relevant knowledge of those sales, licenses or distribution.

SUPPLEMENTAL ANSWER:

Plaintiffs object to this Interrogatory as overbroad and unduly burdensome, as it contemplates a response that identifies "each and every consummated sale, license or distribution of such product or service" related to the ANDROID DATA mark over greater than a ten year period, as well as identifying every person with knowledge of these facts. Plaintiffs object to this Interrogatory as seeking information outside their possession, custody or control. Subject to the foregoing General Objections and specific objections, Plaintiffs refer Google to the twenty page response previously provided to Interrogatory No. 1. Plaintiffs further state that additional detail concerning this Interrogatory may be determined by examining, auditing, compiling, abstracting, or summarizing Plaintiffs' business records, and the burden of deriving or ascertaining the answer will be substantially the same for Plaintiffs as it is for Google. Plaintiffs refer Google to the documents they have produced in discovery and all forthcoming production of documents by Plaintiffs to derive or ascertain the answer and state that identification of specific documents would be equally as burdensome for Plaintiffs as it would be for Google.

same for Plaintiffs as it is for Google. Plaintiffs refer Google to the documents they have produced in discovery and all forthcoming production of documents by Plaintiffs to derive or ascertain the answer and state that identification of specific documents would be equally as burdensome for Plaintiffs as it would be for Google.

ERICH SPECHT, ANDROID DATA
CORPORATION and THE ANDROID'S
DUNGEON INCORPORATED

By: P. Andrew Fleming
One of Their Attorneys

P. Andrew Fleming
John F. Shonkwiler
John B. Haarlow, Jr.
Andrew P. Shelby
NOVACK AND MACEY LLP
100 North Riverside Plaza
Chicago, IL 60606
(312) 419-6900
Doc. #310994

Martin Murphy
2811 RFD
Long Grove, IL 60047
(312) 933-3200

VERIFICATION OF ERICH SPECHT

I, Erich Specht, state that I have answered the foregoing Plaintiffs' Supplemental Answers to First Set of Interrogatories Propounded by Google, Inc. on behalf of myself individually and as the authorized agent of Android Data Corporation and The Android's Dungeon, Inc., and I declare under penalty of perjury that the foregoing is true and correct.



Erich Specht

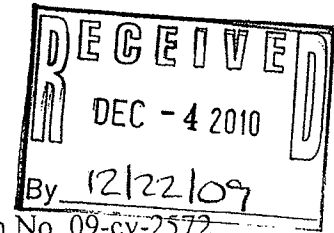
11/15/09

Date

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

ERICH SPECHT, an individual, and doing)
 business as ANDROID DATA CORPORATION)
 and THE ANDROID'S DUNGEON)
 INCORPORATED,)
)
 Plaintiffs,)
)
 v.)
)
 GOOGLE INC.,)
)
 Defendant.)



Civil Action No. 09-cv-2572
 Judge Harry D. Leinenweber
 Magistrate Judge Jeffrey Cole

**PLAINTIFFS' SECOND SUPPLEMENTAL ANSWERS TO FIRST
SET OF INTERROGATORIES PROPOUNDED BY GOOGLE, INC.**

Plaintiffs Erich Specht ("Specht"), an individual, and doing business as Android Data Corporation ("ADC"), and The Android's Dungeon Incorporated ("ADI") (collectively, "Plaintiffs"), by their attorneys, Novack and Macey LLP and Martin J. Murphy, hereby submit their Second Supplemental Answers to First Set of Interrogatories Propounded by Google, Inc. (the "Interrogatories"), as follows.

SECOND SUPPLEMENTAL ANSWERS

Each Second Supplemental Answer incorporates, and is subject to, the general and specific objections set forth in Plaintiffs' Objections to Google's First Set of Interrogatories dated July 23, 2009 and Plaintiffs' Answer to First Set of Interrogatories Propounded by Google, Inc. dated July 31, 2009 (together, the "Initial Answer") and set forth in Plaintiffs' Supplemental Answers to First Set of Interrogatories Propounded by Google, Inc. dated November 19, 2009 (the "Supplemental Answer"), which are not waived.

paper documents that have not yet been produced. Accordingly, Plaintiffs reserve their right to supplement this Response.

INTERROGATORY NO. 4:

Identify each and every way in which Plaintiffs have marketed, advertised and/or promoted any goods or services offered for sale, licensed or distributed in association with the ANDROID DATA trademark, including the dates and locations (such as by dissemination through newspapers, magazines, direct mailings, advertising circulars, periodicals, broadcast median [sic], billboards and websites), of such marketing advertising, and/or promotion.

SECOND SUPPLEMENTAL ANSWER:

Plaintiffs hereby incorporate the answer to this Interrogatory contained in the Initial Answer, the Supplemental Answer and the Second Supplemental Answer to Interrogatory No. 2.

Plaintiffs further state that document discovery in this case is ongoing, and Plaintiffs are continuing to review and produce electronic and paper documents. Plaintiffs expect that additional information responsive to this Interrogatory will be ascertainable from electronic and paper documents that have not yet been produced. Accordingly, Plaintiffs reserve their right to supplement this Response.

INTERROGATORY NO. 5:

Identify, by month and year, the total dollar amount of goods and/or services sold, licensed and/or distributed by each respective Plaintiff in association with the ANDROID DATA trademark.

SECOND SUPPLEMENTAL ANSWER:

Plaintiffs hereby incorporate the answer to this Interrogatory contained in the Initial Answer and the Supplemental Answer and also the Second Supplemental Answer to Interrogatory No. 3.

Answering further, Plaintiffs state that the total dollar amount of goods and/or services sold, licensed and/or distributed by each respective Plaintiff in association with the "ANDROID

responded to Plaintiffs' advertisements typically received electronic and/or hard copy promotional materials from Plaintiffs, which were generally accompanied by cover letters, including documents labeled 10397-10440, 12165-12311, PL 18195-18228 and Specht F 001-037. Other correspondence between Plaintiffs and prospects who responded to marketing materials are located among emails to be produced in this case as part of Plaintiffs' ongoing electronic document production.

Various online directory sites include ads related to Plaintiffs, but these ads were not placed by Plaintiffs. Documents relating thereto include documents labeled Specht E 81-84, E 87-88 and E 90-96.

Plaintiffs also made many proposals to potential clients. Some of these include the February 6, 2008 letter labeled Specht E 44, the May 27, 2009 email labeled Specht E 70 and the June 9, 2009 email labeled Specht E 71-73. Other correspondence and documents concerning business proposals can be found in emails to be produced in this case as part of Plaintiffs' ongoing electronic document production.

Plaintiffs further state that document discovery in this case is ongoing, and Plaintiffs are continuing to review and produce electronic and paper documents. Plaintiffs expect that additional information responsive to this Interrogatory will be ascertainable from electronic and paper documents that have not yet been produced. Accordingly, Plaintiffs reserve their right to supplement this Response.


INTERROGATORY NO. 3:

Identify each and every product or service that any of the Plaintiffs have offered for sale, sold, licensed or distributed in association with the ANDROID DATA trademark, at any time, and for each product or service, further identify each and every consummated sale, license or distribution of such product or service, including:

- a) the method and date of the sale, license or distribution;

VERIFICATION OF ERICH SPECHT

I, Erich Specht, state that I have answered the foregoing Plaintiffs' Second Supplemental Answers to First Set of Interrogatories Propounded by Google, Inc. on behalf of myself individually and as the authorized agent of Android Data Corporation and The Android's Dungeon, Inc., and I declare under penalty of perjury that the foregoing is true and correct.



Erich Specht

12/22/09

Date

EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

ERICH SPECHT, an individual, and doing)
business as ANDROID DATA CORPORATION)
and THE ANDROID'S DUNGEON)
INCORPORATED,)

Plaintiffs,)

v.)

GOOGLE INC.,)

Defendant.)

Civil Action No. 09-cv-2572

Judge Harry D. Leinenweber

Magistrate Judge Jeffrey Cole

**PLAINTIFFS' THIRD SUPPLEMENTAL ANSWERS TO FIRST
SET OF INTERROGATORIES PROPOUNDED BY GOOGLE, INC.**

Plaintiffs Erich Specht ("Specht"), an individual, and doing business as Android Data Corporation ("ADC"), and The Android's Dungeon Incorporated ("ADI") (collectively, "Plaintiffs"), by their attorneys, Novack and Macey LLP and Martin J. Murphy, hereby submit their Third Supplemental Answers to First Set of Interrogatories Propounded by Google, Inc. (the "Interrogatories"), as follows.

THIRD SUPPLEMENTAL ANSWERS

Each Third Supplemental Answer incorporates, and is subject to, the general and specific objections set forth in the following documents, which are not waived: (1) Plaintiffs' Objections to Google's First Set of Interrogatories dated July 23, 2009 and Plaintiffs' Answer to First Set of Interrogatories Propounded by Google, Inc. dated July 31, 2009 (together, the "Initial Answer"); (2) Plaintiffs' Supplemental Answers to First Set of Interrogatories Propounded by Google, Inc. dated November 19, 2009 (the "Supplemental Answer"); and (3) Plaintiffs' Second Supplemental Answers to First Set of Interrogatories Propounded by Google, Inc. dated December 29, 2009 (the "Second Supplemental Answer").

INTERROGATORY NO. 3:

Identify each and every product or service that any of the Plaintiffs have offered for sale, sold, licensed or distributed in association with the ANDROID DATA trademark, at any time, and for each product or service, further identify each and every consummated sale, license or distribution of such product or service, including:

- a) the method and date of the sale, license or distribution;
- b) the identity of the person who purchased, licensed or received the product or service;
- c) the amount of revenue received by any of the Plaintiffs in association with that sale, license or distribution; and
- d) all persons having relevant knowledge of those sales, licenses or distribution.

THIRD SUPPLEMENTAL ANSWER:

Plaintiffs hereby incorporate the answer to this Interrogatory contained in the Initial Answer, the Supplemental Answer and the Second Supplemental Answer.

Answering further, Plaintiffs state that they have offered for sale, sold, licensed or distributed the following products and services in association with the ANDROID DATA trademark:

- (1) A proprietary e-commerce software suite that was licensed to clients;
- (2) Web site design services;
- (3) Web site hosting services;
- (4) Web site registration services;
- (5) Custom programming services, including custom database and/or e-commerce application development;
- (6) Computer consulting services;
- (7) An application to be licensed to towing companies for managing inventory;
and
- (8) Real estate services.

Answering further, Plaintiffs state that the products and/or services Plaintiffs provided include:

Customer: Artistry In Printing

Product or service: License for proprietary e-commerce software suite and web site hosting services

Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced from</u>
8/31/2000	\$847.50	Android Data Corporation
9/15/2000	\$847.50	Android Data Corporation
11/1/2000	\$175.00	Android Data Corporation
12/1/2000	\$175.00	Android Data Corporation
1/1/2001	\$175.00	Android Data Corporation
2/2/2001	\$100.00	Android Data Corporation
3/1/2001	\$100.00	Android Data Corporation
4/1/2001	\$100.00	Android Data Corporation
5/1/2001	\$100.00	Android Data Corporation
7/1/2001	\$100.00	Android Data Corporation
8/1/2001	\$100.00	Android Data Corporation
9/1/2001	\$100.00	Android Data Corporation
10/1/2001	\$225.00	Android Data Corporation
11/1/2001	\$100.00	Android Data Corporation
12/3/2001	\$25.00	Android Data Corporation
1/1/2002	\$100.00	Android Data Corporation
2/1/2002	\$50.00	Android Data Corporation
3/1/2002	\$50.00	Android Data Corporation
4/1/2002	\$100.00	Android Data Corporation
5/1/2002	\$35.00	Android Data Corporation
6/1/2002	\$10.00	Android Data Corporation
7/1/2002	\$0.00	Android Data Corporation

Individuals with knowledge:

Jim Emily, Kevin Delaney and other unknown individuals who may have come in contact with the software, invoices, marketing or other materials.

Artistry In Printing
1424 Lee Street
Unit B
Des Plaines, IL 60018

Customer: Basil Street Gallery of London

Product or service: Web site registration services

Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced from</u>
2/2/2000	\$125.00	Android Data Corporation

Product or service: License for proprietary e-commerce software suite and web site hosting services

Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced from</u>
5/11/2000	\$2,579.78	Android Data Corporation

6/5/2000	\$1,744.23	Android Data Corporation
7/1/2000	\$1,041.38	Android Data Corporation
8/1/2000	\$1,297.79	Android Data Corporation
9/1/2000	\$918.32	Android Data Corporation
10/2/2000	\$2,959.12	Android Data Corporation
11/1/2000	\$2,000.00	Android Data Corporation
12/1/2000	\$2,000.00	Android Data Corporation
1/1/2001	\$1,850.00	Android Data Corporation
2/2/2001	\$2,306.00	Android Data Corporation
3/1/2001	\$2,374.94	Android Data Corporation
4/1/2001	\$2,000.00	Android Data Corporation
5/1/2001	\$2,000.00	Android Data Corporation
6/1/2001	\$2,000.00	Android Data Corporation
7/1/2001	\$2,000.00	Android Data Corporation
8/1/2001	\$3,485.43	Android Data Corporation
9/1/2001	\$1,900.00	Android Data Corporation
10/1/2001	\$2,000.00	Android Data Corporation
11/1/2001	\$2,000.00	Android Data Corporation
12/3/2001	\$3,014.66	Android Data Corporation
1/1/2002	\$2,063.00	Android Data Corporation
2/1/2002	\$2,000.00	Android Data Corporation
3/1/2002	\$2,100.00	Android Data Corporation
4/1/2002	\$2,000.00	Android Data Corporation
5/1/2002	\$2,000.00	Android Data Corporation
6/1/2002	\$2,000.00	Android Data Corporation
7/1/2002	\$2,000.00	Android Data Corporation
8/1/2002	\$2,000.00	Android Data Corporation
9/1/2002	\$3,650.00	Android Data Corporation
10/1/2002	\$2,720.89	Android Data Corporation
11/4/2002	\$2,000.00	Android Data Corporation
12/4/2002	\$2,000.00	Android Data Corporation

Individuals with knowledge:

Mark McSweeney, Chief Financial Officer, Erik Martinez, Director of Marketing, Maria Jong, Mike Stopka, President, and other unknown individuals who may have come in contact with the software, invoices, marketing or other materials.

Basil Street Gallery of London
1400 Morse Avenue
Elk Grove Village, IL 60007

Customer: Bonaparte Corporation

Product or service: Computer consulting services

Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced from</u>
1/19/1999	\$600.00	Android Data Corporation

Product or service: Web site design services
Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced from</u>
2/28/1999	\$647.74	Android Data Corporation

Product or service: Web site hosting services
Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced from</u>
4/1/1999	\$60.00	Android Data Corporation
5/26/1999	\$60.00	Android Data Corporation
5/27/1999	\$60.00	Android Data Corporation
7/1/1999	\$67.74	Android Data Corporation
8/4/1999	\$60.00	Android Data Corporation
9/1/1999	\$60.00	Android Data Corporation
10/1/1999	\$60.00	Android Data Corporation
11/1/1999	\$60.00	Android Data Corporation
12/1/1999	\$60.00	Android Data Corporation
1/3/2000	\$60.00	Android Data Corporation
2/1/2000	\$60.00	Android Data Corporation

Individuals with knowledge:

Michelle Johnson and other unknown individuals who may have come in contact with the software, invoices, marketing or other materials.

Bonaparte Corporation
1455 S. Michigan Avenue
Chicago, IL 60605

Customer: Daily Herald

Product or service: Computer consulting services
Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced from</u>
2/14/2002	\$562.50	Android Data Corporation

Individuals with knowledge:

Richard Battin
New Media 4th Floor
155 E. Algonquin Road
Arlington Heights, IL 60005

Customer: David Finn

Product or service: Computer consulting services

Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced from</u>
7/11/2003	\$200.00	The Android's Dungeon Incorporated

Individuals with knowledge:

David Finn

113 S. Arlington Heights Road

Arlington Heights, IL 60005

Customer: Design Toscano

Product or service: Custom programming services

Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced from</u>
11/12/1999	\$925.00	Android Data Corporation
11/18/1999	\$225.00	Android Data Corporation
12/1/1999	\$200.00	Android Data Corporation
1/8/2000	\$3,600.00	Android Data Corporation
4/9/2001	\$320.00	Android Data Corporation
4/25/2001	\$560.00	Android Data Corporation
6/20/2001	\$160.00	Android Data Corporation

Product or service: Web site registration services

Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced from</u>
7/19/1999	\$70.00	Android Data Corporation

Product or service: License for proprietary e-commerce software suite, web site hosting services and web site design services

Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced from:</u>
2/3/1999	\$1,850.00	Android Data Corporation
4/15/1999	\$1,850.00	Android Data Corporation
5/31/1999	\$1,903.21	Android Data Corporation
7/1/1999	\$2,067.60	Android Data Corporation
8/4/1999	\$2,509.34	Android Data Corporation
9/1/1999	\$1,900.42	Android Data Corporation
10/1/1999	\$3,817.10	Android Data Corporation
11/1/1999	\$2,910.27	Android Data Corporation
12/1/1999	\$8,329.22	Android Data Corporation

12/29/1999	\$9,738.36	Android Data Corporation
2/1/2000	\$9,452.87	Android Data Corporation
3/1/2000	\$6,481.38	Android Data Corporation
4/1/2000	\$7,482.78	Android Data Corporation
5/1/2000	\$9,751.21	Android Data Corporation
6/5/2000	\$3,838.73	Android Data Corporation
7/1/2000	\$9,296.30	Android Data Corporation
8/1/2000	\$9,500.10	Android Data Corporation
9/1/2000	\$10,527.46	Android Data Corporation
10/2/2000	\$12,782.20	Android Data Corporation
11/1/2000	\$6,730.44	Android Data Corporation
12/1/2000	\$12,147.81	Android Data Corporation
1/1/2001	\$14,356.40	Android Data Corporation
2/5/2001	\$15,212.78	Android Data Corporation
3/1/2001	\$11,913.53	Android Data Corporation
4/1/2001	\$15,029.47	Android Data Corporation
5/1/2001	\$20,581.61	Android Data Corporation
6/1/2001	\$14,000.00	Android Data Corporation
7/1/2001	\$14,000.00	Android Data Corporation
8/1/2001	\$14,035.00	Android Data Corporation
9/1/2001	\$13,750.00	Android Data Corporation
10/1/2001	\$14,000.00	Android Data Corporation
11/1/2001	\$14,460.00	Android Data Corporation
12/3/2001	\$15,504.44	Android Data Corporation
1/1/2002	\$14,063.00	Android Data Corporation
2/1/2002	\$14,000.00	Android Data Corporation
3/1/2002	\$14,256.60	Android Data Corporation
4/1/2002	\$15,043.52	Android Data Corporation
5/1/2002	\$14,000.00	Android Data Corporation
6/1/2002	\$16,000.00	Android Data Corporation
7/1/2002	\$14,000.00	Android Data Corporation
8/1/2002	\$14,160.00	Android Data Corporation
9/1/2002	\$14,000.00	Android Data Corporation
10/1/2002	\$14,000.00	Android Data Corporation
10/22/2002	\$10,500.00	Android Data Corporation

Individuals with knowledge:

Mark McSweeney, Chief Financial Officer, Erik Martinez, Director of Marketing, Maria Jong, Mike Stopka, President, and other unknown individuals who may have come in contact with the software, invoices, marketing or other materials.

Design Toscano

1400 Morse Avenue

Elk Grove Village, IL 60007

Customer: Edge Consulting

Product or service: Web site development services

Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced From</u>
7/6/1999	\$1,400.00	Android Data Corporation

Individuals with knowledge:

John DeAno, President, Dennis Ignacek, Sales Manager, and other unknown individuals who may have come in contact with the software, invoices, marketing or other materials.

Edge Consulting

1097 W Hawthorn Drive

Itasca, IL 60143

Customer: Eide & Eide CPA

Product or service: Complimentary web site hosting services

Method of sale: None, not invoiced

Date Services Provided

1/2000-2/2003

Product or service: Complimentary computer consulting services

Method of sale: None, not invoiced

Date Services Provided

Reference¹

9/3/2001	See email from Roger Eide to E. Specht re "FW: FrontPage 2000 (3.0) Extensions."
9/3/2001	See email from Roger Eide to E. Specht re "ISDN Line."
7/29/2002	See email from Roger Eide to E. Specht re "FW: [rogereide.com] Renewal Notification."
2/23/2003	See email from E. Specht to Roger Eide re "android data."
12/9/2009	See email from E. Specht to Tory Eide re "rogereide.com domain name about to expire."

Individuals with knowledge:

Roger Eide, Tory Eide and other unknown individuals who may have come in contact with the software, invoices, marketing or other materials.

Eide & Eide CPA

Greenleaf Center

3 S Greenleaf Street

Suite G

Gurnee, IL 60031

¹ To the extent that these documents have not yet been produced, they will be produced by Plaintiffs in due course.

Customer: Fat Dog Vintage Salvage

Product or service: Complimentary web site hosting services

Method of sale: None, not invoiced

Date Services Provided

Through 11/2002

Individuals with knowledge:

Bill Rodencal and other unknown individuals who may have come in contact with the software, invoices, marketing or other materials.

Fat Dog Vintage Salvage

21525 Belgren Rd.

Waukesha, WI 53186

Customer: HuTech Resources

Product or service: Computer consulting services

Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced From</u>
11/9/1998	\$1,200.00	Android Data Corporation
11/4/1999	\$80.00	Android Data Corporation

Product or service: Web site design services

Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced From</u>
3/10/1999	\$3,700.00	Android Data Corporation

Individuals with knowledge: Jordan May and other unknown individuals who may have come in contact with the software, invoices, marketing or other materials.

HuTech Resources, LLC

650 East Devon Avenue, Suite 165

Itasca, IL 60143

Customer: Hutech and The Physician's Coalition of America

Product or service: Custom e-commerce application development and web site hosting services

Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced from</u>
7/1/1999	\$333.38	Android Data Corporation
8/4/1999	\$195.00	Android Data Corporation
9/1/1999	\$195.00	Android Data Corporation
10/1/1999	\$195.00	Android Data Corporation
11/1/1999	\$195.00	Android Data Corporation

12/1/1999	\$195.00	Android Data Corporation
1/3/2000	\$195.00	Android Data Corporation
2/1/2000	\$195.00	Android Data Corporation
3/1/2000	\$195.00	Android Data Corporation

Individuals with knowledge:

Jordan May and other unknown individuals who may have come in contact with the software, invoices, marketing or other materials.

HuTech Resources, LLC

650 East Devon Avenue, Suite 165

Itasca, IL 60143

Customer: MagnaMedia Training Solutions

Product or service: Custom e-commerce application development and web site hosting services

Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced from</u>
4/22/1999	\$150.00	Android Data Corporation
7/1/1999	\$207.96	Android Data Corporation
8/4/1999	\$150.00	Android Data Corporation
9/1/1999	\$150.00	Android Data Corporation
10/1/1999	\$150.00	Android Data Corporation
11/1/1999	\$100.00	Android Data Corporation
12/1/1999	\$275.00	Android Data Corporation
1/3/2000	\$150.00	Android Data Corporation
2/1/2000	\$150.00	Android Data Corporation
3/1/2000	\$150.00	Android Data Corporation
4/1/2000	\$150.00	Android Data Corporation
5/1/2000	\$150.00	Android Data Corporation
6/5/2000	\$150.00	Android Data Corporation
7/1/2000	\$150.00	Android Data Corporation
8/1/2000	\$150.00	Android Data Corporation
9/1/2000	\$150.00	Android Data Corporation
10/2/2000	\$150.00	Android Data Corporation
11/1/2000	\$150.00	Android Data Corporation
12/1/2000	\$150.00	Android Data Corporation
1/1/2001	\$150.00	Android Data Corporation
2/2/2001	\$150.00	Android Data Corporation
3/1/2001	\$150.00	Android Data Corporation
4/1/2001	\$150.00	Android Data Corporation
5/1/2001	\$150.00	Android Data Corporation
6/1/2001	\$150.00	Android Data Corporation
7/1/2001	\$150.00	Android Data Corporation
8/1/2001	\$150.00	Android Data Corporation
9/1/2001	\$150.00	Android Data Corporation

10/1/2001	\$150.00	Android Data Corporation
11/1/2001	\$48.36	Android Data Corporation

Individuals with knowledge: John DeAno, President, Dennis Ignacek, Sales Manager, and other unknown individuals who may have come in contact with the software, invoices, marketing or other materials.

MagnaMedia Training Solutions
 1835A Rohlwing Road
 Arlington Heights, IL 60008

Customer: Motorola GPS Products

Product or service: Web site design services

Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced from</u>
11/9/1999	\$2,550.00	Android Data Corporation

Individuals with knowledge:

Jennie Wilson and other unknown individuals who may have come in contact with the software, invoices, marketing or other materials.

GPS Products - Integrated Electronic Systems Sctr.
 Motolola
 4000 Commercial Avenue
 Northbrook, IL 60062-1840

Customer: Wendy Murphy

Product or service: Complimentary web site hosting services, web site design services

Method of sale: None, not invoiced

<u>Date Services Provided</u>	<u>Reference</u>
6/2000-3/2005, 7/2009-present	WM 3-39, 55

Individuals with knowledge:

Wendy Murphy
 2811 RFD
 Long Grove, IL 60047

Customer: NCR Customer Education (billed to O/S Services)

Product or service: Web site hosting services

Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced from</u>
4/22/1999	\$100.00	Android Data Corporation

7/1/1999	\$207.96	Android Data Corporation
8/4/1999	\$150.00	Android Data Corporation
9/1/1999	\$150.00	Android Data Corporation
10/1/1999	\$150.00	Android Data Corporation
11/1/1999	\$150.00	Android Data Corporation
12/1/1999	\$150.00	Android Data Corporation
1/3/2000	\$150.00	Android Data Corporation
2/1/2000	\$150.00	Android Data Corporation
3/1/2000	\$150.00	Android Data Corporation
4/1/2000	\$150.00	Android Data Corporation
5/1/2000	\$150.00	Android Data Corporation
6/5/2000	\$150.00	Android Data Corporation
7/1/2000	\$150.00	Android Data Corporation
8/1/2000	\$150.00	Android Data Corporation
9/1/2000	\$150.00	Android Data Corporation
10/2/2000	\$150.00	Android Data Corporation
11/1/2000	\$150.00	Android Data Corporation
12/1/2000	\$150.00	Android Data Corporation
1/1/2001	\$150.00	Android Data Corporation
2/2/2001	\$150.00	Android Data Corporation
3/1/2001	\$150.00	Android Data Corporation
4/1/2001	\$250.00	Android Data Corporation
5/1/2001	\$150.00	Android Data Corporation
6/1/2001	\$150.00	Android Data Corporation
7/1/2001	\$150.00	Android Data Corporation
8/1/2001	\$150.00	Android Data Corporation
9/1/2001	\$150.00	Android Data Corporation
10/1/2001	\$150.00	Android Data Corporation
11/1/2001	\$150.00	Android Data Corporation
12/3/2001	\$150.00	Android Data Corporation
1/1/2002	\$150.00	Android Data Corporation
2/1/2002	\$150.00	Android Data Corporation

Individuals with knowledge:

John DeAno, President, Dennis Ignacek, Sales Manager, and other unknown individuals who may have come in contact with the software, invoices, marketing or other materials.

O/S Services

1835A Rohlwing Road

Arlington Heights, IL 60008

Customer: Northwest Repossession

Product or service: Custom database application development

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced from</u>
5/19/2009	\$1,000.00	The Android's Dungeon Incorporated

Individuals with knowledge:

Warren Crum and other unknown individuals who may have come in contact with the software, invoices, marketing or other materials.

Northwest Recovery / Northwest Repossession
4000 Industrial Avenue
Rolling Meadows, IL 60008

Customer: O/S Services

Product or service: Custom database application development, custom e-commerce application development

Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced from</u>
6/11/1999	\$2,000.00	Android Data Corporation

Product or service: Web site hosting services

Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced from</u>
4/22/1999	\$150.00	Android Data Corporation
7/1/1999	\$207.96	Android Data Corporation
8/4/1999	\$150.00	Android Data Corporation
9/1/1999	\$150.00	Android Data Corporation
10/1/1999	\$150.00	Android Data Corporation
11/1/1999	\$150.00	Android Data Corporation
12/1/1999	\$150.00	Android Data Corporation
1/3/2000	\$150.00	Android Data Corporation
2/1/2000	\$150.00	Android Data Corporation
3/1/2000	\$150.00	Android Data Corporation
4/1/2000	\$150.00	Android Data Corporation
5/1/2000	\$150.00	Android Data Corporation
6/5/2000	\$150.00	Android Data Corporation
7/1/2000	\$150.00	Android Data Corporation
8/1/2000	\$150.00	Android Data Corporation
9/1/2000	\$150.00	Android Data Corporation
10/2/2000	\$150.00	Android Data Corporation
11/1/2000	\$116.12	Android Data Corporation

Product or service: Custom database application development

Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced from</u>
12/28/2000	\$360.00	Android Data Corporation

Individuals with knowledge: John DeAno, President, Dennis Ignacek, Sales Manager, and other unknown individuals who may have come in contact with the software, invoices, marketing or other materials.

O/S Services
1835A Rohlwing Road
Arlington Heights, IL 60008

Customer: Picket Fence Realty

Product or service: Computer consulting services

Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced from</u>
7/25/2003	\$280.00	The Android's Dungeon Incorporated

Product or service: Complimentary computer consulting services

Method of sale: None, not invoiced

<u>Date Services Provided</u>	<u>Reference²</u>
7/14/2004	See email from E. Specht to Tom Zander re "PFRMP - 2 New Agents."
12/13/2004	See email from Tom Zander to E. Specht re "MP Historic Postcards."
1/11/2005	See email from E. Specht to Tom Zander re "website contract."
1/16/2005	See email from E. Specht to Tom Zander re "New M.P. Agent."
1/19/2005	See email from E. Specht to Andrew Sapp re "picket fence."
9/18/2006	See email from E. Specht to Megan Specht re "Search Engine Optimization."
1/31/2007	See email from E. Specht to Megan Specht re "Quick Question."
7/24/2007	See email from Megan Specht to E. Specht re "Question."
11/11/2009	See email from E. Specht to Paul Duchek re "info."
1/20/2010	See email from E. Specht to Megan Specht re "Question."
1/24/2010	See email from E. Specht to Megan Specht and Paul Duchek re "printer."
2/2/2010	See email from Megan Specht to E. Specht re "Computer."
2/2/2010	See email from Megan Specht to E. Specht re "D-Fence."

Product or service: Custom web application development, web site hosting services

Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced from</u>
7/7/1999	\$925.00	Android Data Corporation
8/16/1999	\$800.00	Android Data Corporation
9/1/1999	\$41.13	Android Data Corporation

² See Note 1.

10/1/1999	\$150.00	Android Data Corporation
11/1/1999	\$75.00	Android Data Corporation
12/1/1999	\$75.00	Android Data Corporation
1/3/2000	\$45.00	Android Data Corporation
2/1/2000	\$45.00	Android Data Corporation
3/1/2000	\$45.00	Android Data Corporation
4/1/2000	\$45.00	Android Data Corporation
5/1/2000	\$45.00	Android Data Corporation
6/5/2000	\$45.00	Android Data Corporation
7/1/2000	\$45.00	Android Data Corporation
8/1/2000	\$45.00	Android Data Corporation
8/1/2000	\$125.00	Android Data Corporation
9/1/2000	\$45.00	Android Data Corporation
10/2/2000	\$45.00	Android Data Corporation
11/1/2000	\$45.00	Android Data Corporation
12/1/2000	\$45.00	Android Data Corporation
1/1/2001	\$45.00	Android Data Corporation
2/2/2001	\$45.00	Android Data Corporation
3/1/2001	\$45.00	Android Data Corporation
4/1/2001	\$45.00	Android Data Corporation
5/1/2001	\$45.00	Android Data Corporation
6/1/2001	\$45.00	Android Data Corporation
7/1/2001	\$45.00	Android Data Corporation
8/1/2001	\$45.00	Android Data Corporation
9/1/2001	\$145.00	Android Data Corporation
10/1/2001	\$0.00	Android Data Corporation
11/1/2001	\$45.00	Android Data Corporation
12/3/2001	\$45.00	Android Data Corporation
1/1/2002	\$45.00	Android Data Corporation
7/22/2002	\$180.00	Android Data Corporation
1/3/2003	\$100.00	The Android's Dungeon Incorporated
2/1/2003	\$100.00	The Android's Dungeon Incorporated
3/5/2003	\$100.00	The Android's Dungeon Incorporated
3/7/2003	\$2,140.00	The Android's Dungeon Incorporated
4/2/2003	\$100.00	The Android's Dungeon Incorporated
5/1/2003	\$100.00	The Android's Dungeon Incorporated
5/1/2003	\$80.00	The Android's Dungeon Incorporated
6/1/2003	\$100.00	The Android's Dungeon Incorporated
7/1/2003	\$100.00	The Android's Dungeon Incorporated
8/1/2003	\$320.00	The Android's Dungeon Incorporated
9/15/2003	\$100.00	The Android's Dungeon Incorporated
10/6/2003	\$380.00	The Android's Dungeon Incorporated
12/1/2003	\$100.00	The Android's Dungeon Incorporated
1/19/2004	\$100.00	The Android's Dungeon Incorporated
3/14/2004	\$100.00	The Android's Dungeon Incorporated
5/9/2004	\$100.00	The Android's Dungeon Incorporated

7/12/2004	\$100.00	The Android's Dungeon Incorporated
8/19/2004	\$100.00	The Android's Dungeon Incorporated
9/2/2004	\$100.00	The Android's Dungeon Incorporated
10/14/2004	\$100.00	The Android's Dungeon Incorporated
11/9/2004	\$100.00	The Android's Dungeon Incorporated
2/27/2005	\$100.00	Erich Specht
2/27/2005	\$100.00	Erich Specht
2/27/2005	\$100.00	Erich Specht
5/19/2009	\$40.00	The Android's Dungeon Incorporated

Product or service: Real estate services

Method of sale: Paid by check

<u>Date Received</u>	<u>Amount</u>	<u>Received By</u>
7/22/2005	\$6,125.88	The Android's Dungeon Incorporated
8/03/2005	\$7,192.50	The Android's Dungeon Incorporated
9/20/2005	\$2,590.00	The Android's Dungeon Incorporated
10/03/2005	\$7,743.75	The Android's Dungeon Incorporated
11/22/2005	\$103.75	The Android's Dungeon Incorporated
12/22/2005	\$15,060.00	The Android's Dungeon Incorporated
3/06/2006	\$7,903.13	The Android's Dungeon Incorporated
3/24/2006	\$3,975.00	The Android's Dungeon Incorporated
5/26/2006	\$6,993.75	The Android's Dungeon Incorporated
6/05/2006	\$23,827.90	The Android's Dungeon Incorporated
6/20/2006	\$6,993.75	The Android's Dungeon Incorporated
6/23/2006	\$3,534.38	The Android's Dungeon Incorporated
7/12/2006	\$3,956.25	The Android's Dungeon Incorporated
7/31/2006	\$2,671.88	The Android's Dungeon Incorporated
9/14/2006	\$2,581.25	The Android's Dungeon Incorporated
10/06/2006	\$6,025.50	The Android's Dungeon Incorporated
11/2006	\$2,048.44	The Android's Dungeon Incorporated
12/2006	\$7,875.00	The Android's Dungeon Incorporated
7/20/2007	\$7,194.25	The Android's Dungeon Incorporated
12/04/2007	\$4,355.98	The Android's Dungeon Incorporated
5/05/2008	\$3,336.00	The Android's Dungeon Incorporated
6/09/2008	\$4,049.15	The Android's Dungeon Incorporated
7/02/2008	\$5,544.00	The Android's Dungeon Incorporated
7/03/2008	\$9,960.00	The Android's Dungeon Incorporated
9/26/2008	\$1,000.00	The Android's Dungeon Incorporated
10/02/2008	\$4,548.38	The Android's Dungeon Incorporated
10/20/2008	\$3,470.00	The Android's Dungeon Incorporated
11/07/2008	\$1,875.00	The Android's Dungeon Incorporated

1/12/2009	\$1,387.38	The Android's Dungeon Incorporated
3/2009	\$1,870.00	The Android's Dungeon Incorporated
4/7/2009	\$2,160.00	The Android's Dungeon Incorporated
5/22/2009	\$3,680.00	The Android's Dungeon Incorporated
6/2009	\$2,108.48	The Android's Dungeon Incorporated
6/26/2009	\$1,220.00	The Android's Dungeon Incorporated
9/2009	\$4,046.09	The Android's Dungeon Incorporated
9/4/2009	\$2,160.00	The Android's Dungeon Incorporated
9/14/2009	\$2,610.00	The Android's Dungeon Incorporated
11/20/2009	\$2,040.00	The Android's Dungeon Incorporated
11/30/2009	\$2,771.50	The Android's Dungeon Incorporated
12/2009	\$2,675.00	The Android's Dungeon Incorporated

Individuals with knowledge:

Paul Duchek, Sue Duchek, Megan Specht, Tom Zander and other unknown individuals who may have come in contact with the software, invoices, marketing or other materials.

Picket Fence Realty
113 S. Arlington Heights Road
Arlington Heights, IL 60005

Customer: Jonathan Sazonoff

Product or service: Complimentary web site hosting services

Method of sale: None, not invoiced

<u>Date Services Provided</u>	<u>Reference</u> ³
7/2001-1/2005	See 1/21/2002 email from J. Sazonoff to E. Specht re "saztv update"; 1/20/2005 email from J. Sazonoff to E. Specht re "saztv January 2005 update"; 1/17/2005 email from E. Specht to J. Sazonoff re "site."

Individuals with knowledge:

Jonathan Sazonoff and other unknown individuals who may have come in contact with the software, invoices, marketing or other materials.

Saz Productions, Inc.
PO Box 5222
Chicago, IL 60680-5222

Customer: SS Syntec / DA Syntec

Product or service: Custom e-commerce application development

Method of sale: Invoiced, paid by check

³ See Note 1.

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced from</u>
9/25/1999	\$6,937.50	Android Data Corporation
1/13/2000	\$125.00	Android Data Corporation
4/1/2000	\$2,312.50	Android Data Corporation
5/3/2000	\$160.00	Android Data Corporation
10/2/2000	\$160.00	Android Data Corporation
2/28/2001	\$60.00	Android Data Corporation

Product or service: Web site hosting services

Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced from</u>
7/1/2000	\$175.00	Android Data Corporation
8/1/2000	\$200.00	Android Data Corporation
9/1/2000	\$200.00	Android Data Corporation
10/2/2000	\$200.00	Android Data Corporation
11/1/2000	\$200.00	Android Data Corporation
12/1/2000	\$200.00	Android Data Corporation
1/1/2001	\$200.00	Android Data Corporation
2/2/2001	\$200.00	Android Data Corporation
3/1/2001	\$200.00	Android Data Corporation
4/1/2001	\$354.84	Android Data Corporation
4/1/2001	\$45.16	Android Data Corporation

Individuals with knowledge:

Steve Salzman and other unknown individuals who may have come in contact with the software, invoices, marketing or other materials.

SS Syntec / DA Syntec

4426 N. Winchester

Suite 1N

Chicago, IL 60640

Customer: Summit Recruiting

Product or service: Computer consulting services

Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced From</u>
4/5/1999	\$416.25	Android Data Corporation
4/21/1999	\$341.25	Android Data Corporation
7/8/1999	\$677.50	Android Data Corporation
7/23/1999	\$558.75	Android Data Corporation
8/3/1999	\$333.75	Android Data Corporation
8/24/1999	\$307.50	Android Data Corporation
9/20/1999	\$67.50	Android Data Corporation
10/25/1999	\$300.00	Android Data Corporation

1/3/2000	\$165.00	Android Data Corporation
1/3/2000	\$476.25	Android Data Corporation
2/18/2000	\$180.00	Android Data Corporation
4/1/2000	\$45.00	Android Data Corporation
4/19/2000	\$22.50	Android Data Corporation
5/26/2000	\$60.00	Android Data Corporation
6/8/2000	\$15.00	Android Data Corporation
9/20/2000	\$105.00	Android Data Corporation
10/31/2000	\$45.00	Android Data Corporation
11/1/2000	\$210.00	Android Data Corporation
2/1/2001	\$15.00	Android Data Corporation
7/30/2001	\$60.00	The Android's Dungeon Incorporated

Product or service: Web site design services

Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced from</u>
8/4/1999	\$1,400.00	Android Data Corporation

Product or service: Web site hosting services

Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced from</u>
9/1/1999	\$130.65	Android Data Corporation
10/1/1999	\$150.00	Android Data Corporation
11/1/1999	\$150.00	Android Data Corporation
12/1/1999	\$150.00	Android Data Corporation
1/3/2000	\$150.00	Android Data Corporation
2/1/2000	\$150.00	Android Data Corporation
3/1/2000	\$150.00	Android Data Corporation
4/1/2000	\$150.00	Android Data Corporation
5/1/2000	\$150.00	Android Data Corporation
6/5/2000	\$150.00	Android Data Corporation
7/1/2000	\$150.00	Android Data Corporation
8/1/2000	\$150.00	Android Data Corporation
9/1/2000	\$150.00	Android Data Corporation
10/2/2000	\$150.00	Android Data Corporation
11/1/2000	\$150.00	Android Data Corporation
12/1/2000	\$150.00	Android Data Corporation
1/1/2001	\$150.00	Android Data Corporation
2/2/2001	\$150.00	Android Data Corporation
3/1/2001	\$150.00	Android Data Corporation
4/1/2001	\$150.00	Android Data Corporation
5/1/2001	\$150.00	Android Data Corporation
6/1/2001	\$150.00	Android Data Corporation
7/1/2001	\$150.00	Android Data Corporation

8/1/2001	\$150.00	Android Data Corporation
9/1/2001	\$150.00	Android Data Corporation
10/1/2001	\$150.00	Android Data Corporation
1/1/2002	\$150.00	Android Data Corporation
2/1/2002	\$150.00	Android Data Corporation

Product or service: Custom database application development
Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced from</u>
9/28/2001	\$3,000.00	The Android's Dungeon Incorporated ⁴

Individuals with knowledge:

John DeAno, President, Dennis Ignacek, Sales Manager, and other unknown individuals who may have come in contact with the software, invoices, marketing or other materials.
Summit Recruiting
1835A Rohlwing Road
Arlington Heights, IL 60008

Customer: UniSource Energy

Product or service: Custom database application development
Method of sale: Invoiced, paid by check

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced From</u>
2/7/1998	\$1,880.00	Erich Specht
4/6/1998	\$1,040.00	Erich Specht
11/9/1998	\$2,500.00	Erich Specht
1/16/1999	\$1,470.00	Android Data Corporation
7/8/1999	\$420.00	Android Data Corporation
9/27/1999	\$80.00	Android Data Corporation

Individuals with knowledge:

Ken Gansmann
UniSource Energy
245 W. Roosevelt Road
Building 15, Suite 123
West Chicago, IL 60185

Customer: Village Investments

Product or service: Complimentary web site hosting services
Method of sale: None, not invoiced

⁴ The actual value of the services provided relating to this project was \$10,545. The total amount paid on this invoice was \$1,000.

Date Services Provided

3/2001-2/2005

Individuals with knowledge:

Martin J. Murphy
 2811 RFD
 Long Grove, IL 60047

Answering further, in addition to the above products and/or services provided, Plaintiffs state that their offers of products and/or services included:

<u>Date of Offer</u>	<u>Offeree</u>	<u>Product Offered</u>	<u>Reference</u> ⁵
2000	Various brochure recipients	All computer related products and services	PL-E 0004716
7/18/2000	Greg Panjian	All computer related products and services	Specht D 77
2002	Various brochure recipients	All computer related products and services	PL-E 0004716
8/24/2002-6/10/2003	Various ad respondents	Asset sale	Letters marked 10397-10440, 12231-34, 18195-228, Specht F 1-32.
8/10/2002-12/3/2003	Various online ad respondents	Asset sale	Emails marked 12165-12311, 12235-57, 12262-83, 12285-12303, 12305-06, 12311.
9/3/2002	Chuck Rothstein	Asset sale	Email marked 12230.
10/21/2002	Rochae Holly	All computer related products and services	Pl. 16948
11/25/2002	Gil Chavez and Keith Searls	Custom web application design services	Specht D 213-20
12/30/2002	Various email contacts	Asset sale	Specht E 19, 12165
2007	Various brochure recipients	All computer related products and services	PL-E 00099548
2/6/2008	Jordan May, HuTech Resources	Android Content Manager	Specht E 44
5/27/2009	Dennis Ignacek	Android Data Software	Specht E 70
6/9/2009	Sue and Paul Duchek	License for proprietary e-commerce software suite, web site design services	Specht E 71-73

⁵ See Note 1.

10/3/2009	Mike Stopka, Design Toscano	License for proprietary e-commerce software suite	Email sent by Erich Specht October 3, 2009.
11/10/2009	Henry Blaufeld, Surgimesh	Web site design services	Email sent by Erich Specht November 10, 2009.

Plaintiffs further state that document discovery in this case is ongoing, and Plaintiffs are continuing to review and produce electronic documents. Plaintiffs expect that additional information responsive to this Interrogatory will be ascertainable from electronic documents that have not yet been produced. Accordingly, Plaintiffs reserve their right to supplement this Response.

INTERROGATORY NO. 5:

Identify, by month and year, the total dollar amount of goods and/or services sold, licensed and/or distributed by each respective Plaintiff in association with the ANDROID DATA trademark.

THIRD SUPPLEMENTAL ANSWER:

Plaintiffs hereby incorporate the answer to this Interrogatory contained in the Initial Answer, the Supplemental Answer and the Second Supplemental Answer and also the Third Supplemental Answer to Interrogatory No. 3.

Erich Specht

<u>Date</u>	<u>Amount Invoiced</u>
2/2005	\$ 300.00
2/1998	\$ 1,880.00
4/1998	\$ 1,040.00
11/1998	\$ 3,700.00

Android Data Corporation

<u>Date</u>	<u>Amount Invoiced</u>
1/1999	\$ 2,070.00
2/1999	\$ 2,497.74
3/1999	\$ 3,700.00
4/1999	\$ 3,067.50
5/1999	\$ 2,023.21

6/1999	\$	2,000.00
7/1999	\$	7,143.85
8/1999	\$	6,055.59
9/1999	\$	9,862.20
10/1999	\$	5,122.10
11/1999	\$	7,570.27
12/1999	\$	19,322.58
1/2000	\$	5,266.25
2/2000	\$	10,657.87
3/2000	\$	7,321.38
4/2000	\$	10,507.78
5/2000	\$	13,195.99
6/2000	\$	6,242.96
7/2000	\$	11,157.68
8/2000	\$	12,615.39
9/2000	\$	13,243.28
10/2000	\$	16,791.32
11/2000	\$	9,926.56
12/2000	\$	15,377.81
1/2001	\$	17,076.40
2/2001	\$	18,388.78
3/2001	\$	15,083.47
4/2001	\$	19,004.47
5/2001	\$	23,176.61
6/2001	\$	16,655.00
7/2001	\$	16,595.00
8/2001	\$	18,115.43
9/2001	\$	16,345.00
10/2001	\$	16,675.00
11/2001	\$	16,803.36
12/2001	\$	18,739.10
1/2002	\$	16,571.00
2/2002	\$	16,912.50
3/2002	\$	16,406.60
4/2002	\$	17,143.52
5/2002	\$	16,035.00
6/2002	\$	18,010.00

7/2002	\$	16,180.00
8/2002	\$	16,160.00
9/2002	\$	17,650.00
10/2002	\$	27,220.89
11/2002	\$	2,000.00
12/2002	\$	2,000.00

The Android's Dungeon Incorporated

<u>Date</u>		<u>Amount Invoiced</u>
7/2001	\$	60.00
9/2001	\$	1,000.00 ⁶
1/2003	\$	100.00
2/2003	\$	100.00
3/2003	\$	2,240.00
4/2003	\$	100.00
5/2003	\$	180.00
6/2003	\$	100.00
7/2003	\$	580.00
8/2003	\$	320.00
9/2003	\$	100.00
10/2003	\$	380.00
12/2003	\$	100.00
1/2004	\$	100.00
3/2004	\$	100.00
5/2004	\$	100.00
7/2004	\$	100.00
8/2004	\$	100.00
9/2004	\$	100.00
10/2004	\$	100.00
11/2004	\$	100.00
7/2005	\$	6,125.88
8/2005	\$	7,192.50
9/2005	\$	2,590.00
10/2005	\$	7,743.75

6

See Note 4.

11/2005	\$	103.75
12/2005	\$	15,060.00
3/2006	\$	11,878.13
5/2006	\$	6,993.75
6/2006	\$	34,356.03
7/2006	\$	6,628.13
9/2006	\$	2,581.25
10/2006	\$	6,025.50
11/2006	\$	2,048.44
12/2006	\$	7,875.00
7/2007	\$	7,194.25
12/2007	\$	4,355.98
5/2008	\$	3,336.00
6/2008	\$	4,049.15
7/2008	\$	15,504.00
9/2008	\$	1,000.00
10/2008	\$	8,018.38
11/2008	\$	1,875.00
1/2009	\$	1,387.38
3/2009	\$	1,870.00
4/2009	\$	2,160.00
5/2009	\$	4,720.00
6/2009	\$	3,328.48
9/2009	\$	8,816.09
11/2009	\$	4,811.50
12/2009	\$	2,675.00

Plaintiffs further state that document discovery in this case is ongoing, and Plaintiffs are continuing to review and produce electronic documents. Plaintiffs expect that additional information responsive to this Interrogatory will be ascertainable from electronic documents that have not yet been produced. Accordingly, Plaintiffs reserve their right to supplement this Response.

INTERROGATORY NO. 9:

Identify, by year, all customers for, vendors of and/or suppliers for any product or service offered, sold, licensed or distributed by each Plaintiff in association with the ANDROID DATA trademark.

THIRD SUPPLEMENTAL ANSWER:

Plaintiffs hereby incorporate the answer to this Interrogatory contained in the Initial Answer, the Supplemental Answer and the Second Supplemental Answer.

With respect to customers for any product or service offered, sold, licensed or distributed by each Plaintiff in association with the ANDROID DATA trademark, Plaintiffs refer to the Third Supplemental Answer to Interrogatory No. 3.

With respect to “vendors of” any product or service offered, sold, licensed or distributed by each Plaintiff in association with the ANDROID DATA trademark, Plaintiffs interpret “vendors of Plaintiffs’ products and/or services” to mean individuals and/or entities that sold Plaintiffs’ products and/or services other than Plaintiffs and state that there are no such individuals and/or entities.

With respect to suppliers for any product or service offered, sold, licensed or distributed by each Plaintiff in association with the ANDROID DATA trademark, Plaintiffs state that their suppliers include:

Supplier	Year(s)
3C Consulting Corp.	1999
Actionscript.org	2006-2008
Altec Data	2002
Amazon.com	1999-2002, 2008-2009
Ameritech	1999-2002
Artistry In Printing	2000-2002
AT&T	1999-2002
AT&T Business Services	2003-2005
Barnes & Noble	2000
Best Buy	1999-2002, 2009
Blue Cross Blue Shield	1999-2004

Borders Books & Music	1999
Brad Thomas	2000
Brandt Financial Concepts	1999-2004
Celtic Life Insurance Co.	1999-2002
Chicat Software	2009
ComEd	1999-2002
Comcast	2003
Comp U Time	2000
Comp USA	2000
Computer Discount Warehouse	1999-2001
Crown Books	2000
Cyber Exchange	1999
Deluxe Business Forms & Supplies	1999-2001
Desaware Software	2001
Dwight & MH Jackson Inc.	1999
EnterAct, LLC	1999-2000
FedEx	2000-2003
Fileburst	2007-2008
Flashkit.com	2008
Fort Dearborn Life Insurance Co.	2002
Fortiss	2001
Genuity	2000-2002
GoDaddy.com	2007-2008
GTE Internetworking	1999-2000
Hinckley Springs	2001-2002
Image Systems	2000
Interland	2005-2007
International Computer Concepts	2001
iStockPhoto.com	2007-2010
Kirupa.com	2008
KOI Computers	1999-2000
Mabry Software	2002
Mailboxes Etc.	2003
Martin, Craig, Chester & Sonnenschein	2000-2002
Microsoft	1999
Myoda Computer Center	2000
Network Solutions	1999-2002
NiCor	1999-2002
Office Depot	2009
OfficeMax	1999
Paddock Publications	2002
Pair Networks	2009-2010
Polyline	2002
Prisca Tibbetts	2000
Quill Corporation	1999

RCM	2000-2002
RCN	2000-2001
Radio Shack	2002
Richard Moore	1999-2000
Roger Eide, CPA	1999-2009
rvDavid.net	2008
Sam's Club	1999
Scott Westgard	2002
Sonix Media Systems	2000-2001
Sprint PCS	1999-2002
Target	2010
T-Mobile	2002
Thawte	1999-2002
Trader's Self-Park	1999-2002
Tri-State Digital	1999
tummy.com	1999-2003
US Postal Service	1998-2010
Verisign	2001-2003
VoiceStream	2002
Walgreen's	2002-2005, 2009
Web.com	2005-2007
Woodbury Financial	2002
Worldwide Fulfillment	1999
Xpedx Paper Store	2003
Zenicom	2002

Plaintiffs further state that document discovery in this case is ongoing, and Plaintiffs are continuing to review and produce electronic documents. Plaintiffs expect that additional information responsive to this Interrogatory will be ascertainable from electronic documents that have not yet been produced. Accordingly, Plaintiffs reserve their right to supplement this Response.

ERICH SPECHT, an individual, and doing
business as ANDROID DATA
CORPORATION, and THE ANDROID'S
DUNGEON INCORPORATED


By: P. Andrew Fleming
One of Their Attorneys

P. Andrew Fleming
John F. Shonkwiler
John Haarlow, Jr.
NOVACK AND MACEY LLP
100 North Riverside Plaza
Chicago, IL 60606
(312) 419-6900
Doc. #333996

Martin Murphy
2811 RFD
Long Grove, IL 60047
(312) 933-3200

VERIFICATION OF ERICH SPECHT

I, Erich Specht, state that I have answered the foregoing Plaintiffs' Third Supplemental Answers to First Set of Interrogatories Propounded by Google, Inc. on behalf of myself individually and as the authorized agent of Android Data Corporation and The Android's Dungeon, Inc., and I declare under penalty of perjury that the foregoing is true and correct.



Erich Specht
2/3/10

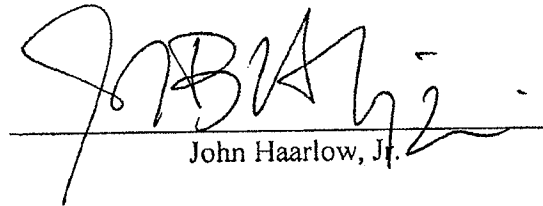
Date

CERTIFICATE OF SERVICE

John Haarlow, Jr., an attorney, certifies that he caused copies of the foregoing Plaintiffs' Third Supplemental Answers to First Set of Interrogatories Propounded by Google, Inc. to be served by electronic mail to:

Herbert H. Finn (finnh@gtlaw.com)
Jeffrey P. Dunning (dunning@gtlaw.com)
GREENBERG TRAURIG, LLP
77 West Wacker Drive, Suite 3100
Chicago, IL 60660

this 4th day of February, 2010.



John Haarlow, Jr.

EXHIBIT E

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ERICH SPECHT, an individual)
and doing business as)
ANDROID DATA CORPORATION and)
THE ANDROID'S DUNGEON,)
INCORPORATED,)
)
Plaintiff,)
)
vs.) No. 09-CV-2572
)
GOOGLE, INC.,)
)
Defendant.)

The videotaped deposition of ERICH
SPECHT, called for examination, taken before
KIMBERLY WINKLER CHRISTOPHER, CSR No. 084-002752,
a Certified Shorthand Reporter of the State of
Illinois, at 77 West Wacker Drive, Suite 3100,
Chicago, Illinois, on the 21st day of July, A.D.
2010, at 8:40 a.m.

Job No. CS273022

1 A. In addition to e-commerce software, as
2 I've said before, I provide a variety of other
3 services; and this was another of those services
4 to be provided.

5 Q. The question was you hadn't launched it
6 as of April 28th, 2009?

7 A. I had created a prototype, but I
8 hadn't -- hadn't --

9 Q. Where would I find that in your
10 production? I have been unable to locate it.

11 A. It -- I provided it to Novack and Macey.

12 Q. Any particular key words I would use to
13 locate it?

14 A. Rated beta. There would be --

15 Q. I've tried that and it didn't work.

16 A. I'm not sure. I know I produced it.
17 I'm not sure if it's in the supplementary stuff
18 that may be coming. I have no idea what they have
19 or have not produced.

20 Q. What supplementary stuff that may be
21 coming?

22 A. I -- I produce seasonal up- -- updates
23 of discovery as the case has gone on, as I'm
24 supposed to.

1 Q. Well, this is something that existed as
2 of the time you filed -- you had some documents
3 related to this as of the time you filed the
4 lawsuit, correct?

5 A. Right. I -- yes.

6 Q. When is the last time you gave documents
7 to your counsel?

8 A. The last time I gave documents to
9 counsel was probably a week ago, two weeks ago.

10 Q. When is the last time before that?

11 A. Four to six months prior, something like
12 that.

13 Q. Okay. That stuff you gave him a week
14 ago, is it all new documents that came into
15 existence since the last time you produced
16 documents?

17 A. The majority of it is. I was told also
18 that there was -- that your side was requesting
19 some additional materials such as I think the
20 Android Data automobile management application.
21 So I provided that to --

22 Q. That existed at the time you filed the
23 lawsuit too, though, correct?

24 A. No. The -- the product itself did not

1 exist, but the -- the proposals had already been
2 underway. We had a verbal agreement on it. I had
3 to learn .NET in -- in a short period of time
4 there. So I believe that project started
5 somewhere around August of 2009.

6 Q. It certainly existed the last --

7 A. But, I mean --

8 Q. (Continuing) -- time you produced
9 documents, right, before last week?

10 MR. MURPHY: Objection. Assumes a fact not
11 in evidence.

12 THE WITNESS: No. I believe in -- in
13 speaking with -- with my counsel, that the
14 document production that had to have been done
15 prior to that was right before that application
16 was officially started on. I mean --

17 MR. NELSON: Okay.

18 THE WITNESS: (Continuing) -- the proposal
19 was out there and, you know, I was meeting with
20 them since February 2009.

21 BY MR. NELSON:

22 Q. Briefly by naming the product, without
23 describing the product, any other products that
24 you're referring to in this paragraph?

EXHIBIT F

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

ERICH SPECHT, an individual and doing business)	
as ANDROID DATA CORPORATION, and THE)	
ANDROID'S DUNGEON INCORPORATED,)	
)	Civil Action No. 09-cv-2572
Plaintiffs-Counterdefendants,)	
v.)	Judge Harry D. Leinenweber
)	
GOOGLE INC.,)	
)	
Defendant-Counterclaimant.)	

**PLAINTIFFS' FOURTH SUPPLEMENTAL ANSWERS TO
FIRST SET OF INTERROGATORIES PROPOUNDED BY GOOGLE, INC.**

Plaintiffs Erich Specht, an individual, and doing business as Android Data Corporation, and The Android's Dungeon Incorporated (collectively, "Plaintiffs"), by their attorneys, hereby submit their Fourth Supplemental Answers to First Set of Interrogatories Propounded by Google, Inc. (the "Interrogatories").

FOURTH SUPPLEMENTAL ANSWERS

Each Fourth Supplemental Answer incorporates, and is subject to, the general and specific objections set forth in the following documents, which are not waived: (1) Plaintiffs' Objections to Google's First Set of Interrogatories dated July 23, 2009 and Plaintiffs' Answer to First Set of Interrogatories Propounded by Google, Inc. dated July 31, 2009 (together, the "Initial Answer"); (2) Plaintiffs' Supplemental Answers to First Set of Interrogatories Propounded by Google, Inc. dated November 19, 2009; (3) Plaintiffs' Second Supplemental Answers to First Set of Interrogatories Propounded by Google, Inc. dated December 29, 2009; and (4) Plaintiffs' Third Supplemental Answers to First Set of Interrogatories Propounded by Google, Inc. dated February 4, 2010 (the "Third Supplemental Answer") (collectively, the "Initial and Supplemental Answers").

INTERROGATORY NO. 1:

Identify the complete factual basis for Plaintiffs' allegation, in ¶52 of their First Amended Complaint, that Plaintiff(s) "has/have continuously used Android Data in interstate commerce," including all persons having relevant knowledge.

FOURTH SUPPLEMENTAL ANSWER:

Except as set forth herein, Plaintiffs hereby incorporate the answer to this Interrogatory contained in the Initial and Supplemental Answers.

Answering further, Plaintiffs state that the ANDROID DATA mark appeared in a business listing along with contact information on dnb.com.

Answering further, Plaintiffs state that the ANDROID DATA mark appeared on sonixms.com from on or about May 19, 2001 until at least on or about September 15, 2005.

Answering further, Plaintiffs state that the mark appears in every XML representation of data, enclosed within an <AndroidData></AndroidData> element, which is used in the UI layer of Android Server, also known as Caching Server, to enable XSLT to transform the content into the desired type of output.

Answering further, Plaintiffs state that the title bar and splash screen of an application created by Plaintiffs for Northwest Recovery, Inc. called "Android Data® Automobile Inventory Management" include the ANDROID DATA mark and the "®" symbol and that ANDROID DATA icons are associated with the executable for launching the application.

The statement "with every XML document that is used for the transmission of data" contained in the answer to this Interrogatory in the Initial Answer is amended to state "with XML documents that are used for the transmission of data."

Plaintiffs further state that their business is ongoing, and Plaintiffs are continuing to generate, review and produce electronic and paper documents. Plaintiffs expect that additional

information responsive to this Interrogatory will be ascertainable from electronic and paper documents that have not yet been produced. Accordingly, Plaintiffs reserve their right to supplement this Response.

INTERROGATORY NO. 2:

Identify the complete factual basis for Plaintiffs' allegation, in ¶75 of their First Amended Complaint, that "Plaintiffs have expended considerable resources marketing, advertising and promoting goods under its Android Data mark," including all persons having relevant knowledge.

FOURTH SUPPLEMENTAL ANSWER:

Plaintiffs hereby incorporate the answer to this Interrogatory contained in the Initial and the Supplemental Answers.

Answering further, Plaintiffs produced business cards in house in approximately 2006 and/or 2007 which they distributed to clients and/or potential clients.

Answering further, Plaintiffs sent Android Data® wine from Galena Winery to clients in or about 2000 and/or 2001, including Design Toseano, O/S Services and Eide CPA, among others.

Answering further, Plaintiffs state that they attended events where they promoted goods under the ANDROID DATA mark by, among other things, distributing business cards, including:

Derby Gala
Location: Arlington Park ballroom
Date: Saturday, May 7, 2005

Hands for Habitat
Location: Home of Kelly Springer, Arlington Heights
Date: Saturday, November 19, 2005

Golden Gala
Location: Arlington Heights Historical Society
Date: Friday, November 3, 2006

Winestyles Wine Tasting
Location: Arlington Heights Historical Society
Date: Friday, November 2, 2007

Arlington Heights Historical Society Annual Dinner
Location: Old Orchard Country Club
Date: Thursday, April 29, 2010

Buzz Dodge Ball Tournament
Location: Soccer City, Palatine

Plaintiffs further state that their business is ongoing, and Plaintiffs are continuing to generate, review and produce electronic and paper documents. Plaintiffs expect that additional information responsive to this Interrogatory will be ascertainable from electronic and paper documents that have not yet been produced. Accordingly, Plaintiffs reserve their right to supplement this Response.

INTERROGATORY NO. 3:

Identify each and every product or service that any of the Plaintiffs have offered for sale, sold, licensed or distributed in association with the ANDROID DATA trademark, at any time, and for each product or service, further identify each and every consummated sale, license or distribution of such product or service, including:

- a) the method and date of the sale, license or distribution;
- b) the identity of the person who purchased, licensed or received the product or service;
- c) the amount of revenue received by any of the Plaintiffs in association with that sale, license or distribution; and
- d) all persons having relevant knowledge of those sales, licenses or distribution.

FOURTH SUPPLEMENTAL ANSWER:

Except as set forth herein, Plaintiffs hereby incorporate the answer to this Interrogatory contained in the Initial and Supplemental Answers.

Plaintiffs amend the answer to this Interrogatory contained in the Third Supplemental Answer concerning the products and services that they have offered for sale, sold, licensed or distributed in association with the ANDROID DATA trademark as follows. Plaintiffs state that

they have offered for sale, sold, licensed or distributed the following e-commerce products and services in association with the ANDROID DATA trademark:

- (1) A proprietary software suite that was licensed to clients, including under the names Android Data® 3, Android Data® 4, Android Data® 5 and Android Data® 6;
- (2) Web site design services;
- (3) Web site hosting services;
- (4) Web site registration services;
- (5) Custom programming services, including custom database and/or application development;
- (6) Computer consulting services;
- (7) An application to be licensed to towing companies for managing inventory;
and
- (8) Real estate services.

Plaintiffs amend the answer to this Interrogatory contained in the Third Supplemental Answer concerning Northwest Repossession as follows:

Customer: Northwest Repossession

Product or service: Custom database application development and development of an application to be licensed to towing companies for managing inventory

<u>Invoice date</u>	<u>Amount</u>	<u>Invoiced from</u>
5/19/2009	\$1,000.00	The Android's Dungeon Incorporated
5/14/2010	\$1,000.00	The Android's Dungeon Incorporated

Plaintiffs amend the answer to this Interrogatory contained in the Third Supplemental Answer concerning real estate services provided to Picket Fence Realty as follows:

Customer: Picket Fence Realty

Product or service: Real estate services

Method of sale: Paid by check

<u>Date Received</u>	<u>Amount</u>	<u>Received By</u>
7/22/2005	\$6,125.88	The Android's Dungeon Incorporated
8/03/2005	\$7,192.50	The Android's Dungeon Incorporated
9/20/2005	\$2,590.00	The Android's Dungeon Incorporated
10/03/2005	\$7,743.75	The Android's Dungeon Incorporated
11/22/2005	\$103.75	The Android's Dungeon Incorporated
12/22/2005	\$15,060.00	The Android's Dungeon Incorporated
3/06/2006	\$7,903.13	The Android's Dungeon Incorporated

3/24/2006	\$3,975.00	The Android's Dungeon Incorporated
5/26/2006	\$6,993.75	The Android's Dungeon Incorporated
6/05/2006	\$23,827.90	The Android's Dungeon Incorporated
6/20/2006	\$6,993.75	The Android's Dungeon Incorporated
6/23/2006	\$3,534.38	The Android's Dungeon Incorporated
7/12/2006	\$3,956.25	The Android's Dungeon Incorporated
7/31/2006	\$2,671.88	The Android's Dungeon Incorporated
9/14/2006	\$2,581.25	The Android's Dungeon Incorporated
10/06/2006	\$6,025.50	The Android's Dungeon Incorporated
11/2006	\$2,048.44	The Android's Dungeon Incorporated
7/20/2007	\$7,194.25	The Android's Dungeon Incorporated
12/04/2007	\$4,355.98	The Android's Dungeon Incorporated
5/05/2008	\$3,336.00	The Android's Dungeon Incorporated
6/09/2008	\$4,049.15	The Android's Dungeon Incorporated
7/02/2008	\$5,544.00	The Android's Dungeon Incorporated
7/03/2008	\$9,960.00	The Android's Dungeon Incorporated
9/26/2008	\$1,000.00	The Android's Dungeon Incorporated
10/02/2008	\$4,548.38	The Android's Dungeon Incorporated
10/20/2008	\$3,470.00	The Android's Dungeon Incorporated
11/07/2008	\$1,875.00	The Android's Dungeon Incorporated
1/8/2009	\$2,675.00	The Android's Dungeon Incorporated
1/12/2009	\$1,387.38	The Android's Dungeon Incorporated
4/6/2009	\$1,870.00	The Android's Dungeon Incorporated
4/9/2009	\$2,160.00	The Android's Dungeon Incorporated
5/20/2009	\$900.00	The Android's Dungeon Incorporated
5/29/2009	\$3,680.00	The Android's Dungeon Incorporated
6/9/2009	\$600.00	The Android's Dungeon Incorporated
7/3/2009	\$1,220.00	The Android's Dungeon Incorporated
7/7/2009	\$2,108.48	The Android's Dungeon Incorporated
9/11/2009	\$2,160.00	The Android's Dungeon Incorporated
9/16/2009	\$2,610.00	The Android's Dungeon Incorporated
10/6/2009	\$4,046.09	The Android's Dungeon Incorporated
11/20/2009	\$2,040.00	The Android's Dungeon Incorporated
12/2/2009	\$2,771.50	The Android's Dungeon Incorporated

Plaintiffs amend the answer to this Interrogatory contained in the Third Supplemental

Answer concerning Village Investments as follows.

Customer: Village Investments

Product or service: Complimentary web site hosting services

Method of sale: None, not invoiced

Date Services Provided

3/2001-2/2005

Individuals with knowledge:

Martin J. Murphy and Wendy Murphy
2811 RFD
Long Grove, IL 60047

Answering further, Plaintiffs state that the products and/or services Plaintiffs provided also include:

Customer: CFE Media LLC

Product or service: Computer consulting services

Method of sale: Paid by check

<u>Invoice Date</u>	<u>Amount</u>	<u>Received By</u>
5/14/2010	\$250.00	The Android's Dungeon Incorporated
7/1/2010	\$312.50	The Android's Dungeon Incorporated

Individuals with knowledge:

Steve Rourke and Jim Langhenry
3309 North Bell Street
Chicago, IL 60618

Answering further, Plaintiffs state that their offers of products and/or services also included:

<u>Date of Offer</u>	<u>Offeree</u>	<u>Product Offered</u>	<u>Reference</u>
7/26/2010	Steve Rourke and Jim Langhenry, CFE Media	Custom programming services	PL-E 00188817-21

Plaintiffs further state that their business is ongoing, and Plaintiffs are continuing to generate, review and produce electronic and paper documents. Plaintiffs expect that additional information responsive to this Interrogatory will be ascertainable from electronic and paper documents that have not yet been produced. Accordingly, Plaintiffs reserve their right to supplement this Response.

ERICH SPECHT, an individual, and doing
business as ANDROID DATA
CORPORATION, and THE ANDROID'S
DUNGEON INCORPORATED

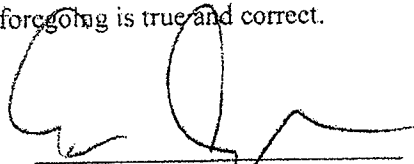
By: P. Andrew Fleming
One of Their Attorneys

P. Andrew Fleming
John F. Shonkwiler
John Haarlow, Jr.
NOVACK AND MACEY LLP
100 North Riverside Plaza
Chicago, IL 60606
(312) 419-6900
Doc. #375872

Martin J. Murphy
Law Offices of Martin J. Murphy
2811 RFD
Long Grove, IL 60047
(312) 933-3200

VERIFICATION OF ERICH SPECHT

I, Erich Specht, state that I have answered the foregoing Plaintiffs' Fourth Supplemental Answers to First Set of Interrogatories Propounded by Google, Inc. on behalf of myself individually and as the authorized agent of Android Data Corporation and The Android's Dungeon, Inc., and I declare under penalty of perjury that the foregoing is true and correct.



Erich Specht

7/30/2010

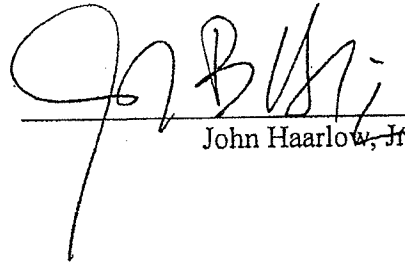
Date

CERTIFICATE OF SERVICE

John Haarlow, Jr., an attorney, certifies that he caused copies of the foregoing Plaintiffs' Fourth Supplemental Answers to First Set of Interrogatories Propounded by Google, Inc. to be served by electronic mail to:

Herbert H. Finn (finnh@gtlaw.com)
Jeffrey P. Dunning (dunning@gtlaw.com)
GREENBERG TRAURIG, LLP
77 West Wacker Drive, Suite 3100
Chicago, IL 60660

this 30th day of July, 2010.



John Haarlow, Jr.

EXHIBIT G

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

ERICH SPECHT, an individual and doing business)	
as ANDROID DATA CORPORATION, and THE)	
ANDROID'S DUNGEON INCORPORATED,)	
)	Civil Action No. 09-cv-2572
Plaintiffs-Counterdefendants,)	
v.)	Judge Harry D. Leinenweber
)	
GOOGLE INC.,)	
)	
Defendant-Counterclaimant.)	

**THIRD SUPPLEMENTAL ANSWERS AND OBJECTIONS TO
GOOGLE, INC.'S SECOND SET OF INTERROGATORIES TO PLAINTIFFS**

Erich Specht, an individual and doing business as Android Data Corporation, and The Android's Dungeon Incorporated, by their attorneys, hereby submit their Third Supplemental Answers and Objections to Google, Inc.'s Second Set of Interrogatories.

THIRD SUPPLEMENTAL ANSWERS

Each Third Supplemental Answer incorporates, and is subject to, the general and specific objections set forth in the following documents, which are not waived: (1) Plaintiffs' Answers and Objections to Google, Inc.'s Second Set of Interrogatories to Plaintiffs dated March 1, 2010 (the "Initial Answer"); (2) Plaintiffs' Supplemental Answers and Objections to Google, Inc.'s Second Set of Interrogatories to Plaintiffs dated April 20, 2010 (the "Supplemental Answer"); and (3) Plaintiffs' Second Supplemental Answers and Objections to Google, Inc.'s Second Set of Interrogatories to Plaintiffs dated June 25, 2010 (the "Second Supplemental Answer") (collectively, the "Initial and Supplemental Answers").

INTERROGATORY NO. 15

Identify, by year, the total dollar amount of revenue received by each Plaintiff that was not due to the sale or license of products or provision of services related to “computer hardware and software services” as those terms are used in ¶10 of Plaintiffs’ Second Amended Complaint.

THIRD SUPPLEMENTAL ANSWER:

Except as set forth herein, Plaintiffs hereby incorporate the answer to this Interrogatory contained in the Initial and Supplemental Answers.

Plaintiffs amend the answer to this Interrogatory contained in the Supplemental Answer as follows. Plaintiffs state that the total dollar amount, by year, of revenue received by each Plaintiff that was not due to the sale or license of products or provision of services related to “computer hardware and software services” as those terms are used in ¶10 of Plaintiffs’ Second Amended Complaint is as follows:

The Android’s Dungeon, Inc.

2005	\$38,815.88
2006	\$70,611.23
2007	\$11,550.23
2008	\$33,782.53
2009	\$30,289.24

Plaintiffs further state that their business is ongoing, and Plaintiffs are continuing to generate, review and produce electronic and paper documents. Plaintiffs expect that additional information responsive to this Interrogatory will be ascertainable from electronic and paper documents that have not yet been produced. Accordingly, Plaintiffs reserve their right to supplement this Response.

INTERROGATORY NO. 18

Identify, by year, all customers for, vendors of and/or suppliers for any product or service offered, sold, licensed or distributed by each Plaintiff in association with the ANDROID SERVER and/or ANDROID DATA WEB EDITOR marks.

THIRD SUPPLEMENTAL ANSWER:

Plaintiffs hereby incorporate the answer to this Interrogatory contained in the Initial and Supplemental Answers.

Answering further, with respect to customers for any product or service offered, sold, licensed or distributed by each Plaintiff in association with the ANDROID SERVER and/or ANDROID DATA WEB EDITOR marks, Plaintiffs state that the following customers also held licenses in association with the ANDROID SERVER and/or ANDROID DATA WEB EDITOR marks during the following years:

Customer	Date
Picket Fence Realty	May 7, 2010 to present

Answering further, with respect to customers for any product or service offered, sold, licensed or distributed by each Plaintiff in association with the ANDROID SERVER and/or ANDROID DATA WEB EDITOR marks, Plaintiffs state that the following customers were also offered, among other things, licenses and/or products in association with the ANDROID SERVER and/or ANDROID DATA WEB EDITOR marks on or about the following dates:

Offeree	Date(s)
<u>Various ad respondents:</u> Chris Curie	2003-2004

Plaintiffs further state that their business is ongoing, and Plaintiffs are continuing to generate, review and produce electronic and paper documents. Plaintiffs expect that additional

information responsive to this Interrogatory will be ascertainable from electronic and paper documents that have not yet been produced. Accordingly, Plaintiffs reserve their right to supplement this Response.

ERICH SPECHT, an individual and doing business
as ANDROID DATA CORPORATION, and
THE ANDROID'S DUNGEON INCORPORATED

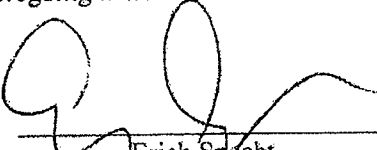
By: P. Andrew Fleming
One of Their Attorneys

P. Andrew Fleming
John F. Shonkwiler
John B. Haarlow
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Chicago, IL 60606
(312) 419-6900

Martin J. Murphy
Law Offices of Martin J. Murphy
2811 RFD
Long Grove, IL 60047
(312) 933-3200
#375941

VERIFICATION OF ERICH SPECHT

I, Erich Specht, state that I have answered the foregoing Plaintiffs' Third Supplemental Answers And Objections To Google Inc's Second Set Of Interrogatories on behalf of myself individually and as the authorized agent of Android Data Corporation and The Android's Dungeon, Inc., and I declare under penalty of perjury that the foregoing is true and correct.



Erich Specht
7/30/2010

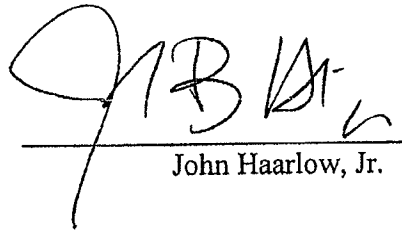
Date

CERTIFICATE OF SERVICE

John Haarlow, Jr., an attorney, certifies that he served the foregoing Plaintiffs' Third Supplemental Answers And Objections To Google Inc's Second Set Of Interrogatories, by causing a true and correct copy to be delivered by electronic mail to:

Herbert F. Finn
Jeffrey P. Dunning
GREENBERG TRAURIG, LLP
77 West Wacker Drive
Suite 3100
Chicago, IL 60601
finnh@gtlaw.com
dunningj@gtlaw.com

on this 30th day of July, 2010.



John Haarlow, Jr.

EXHIBIT H

Cameron M. Nelson
Tel 312.456.6590
Fax 312.456.8435
NelsonC@gtlaw.com

Via Email & Regular Mail

September 13, 2010

John F. Shonkwiler
John B. Haarlow
P. Andrew Fleming
NOVACK & MACEY
100 North Riverside Plaza
Chicago, IL 60606

**Re: Specht, et al. v. Google Inc.
N.D. Ill. Civil Action No. 09-cv-2572
Our File No. 073794.010900**

Gentlemen:

We are writing to address the flurry of document production we received at the close of discovery. Beginning on July 28, 2010, and through the evening of July 30, 2010, we received over two thousand pages of production from the Plaintiffs. The bulk of these documents were recent printouts of Internet webpages. The remainder of these documents were comprised of documents such as tax returns (dated in March, 2010), invoices (dated in May, 2010), handwritten notes (undated), a business license (dated May 17, 2010), correspondence between Plaintiffs and Picket Fence (dated 2009), brochures (dating back to 2000), an invoice to Picket Fence (dated in 2004), a presentation to the Palatine Democrats (from 2008), and correspondence with CFE Media (from May and June of 2010). Plaintiffs likewise submitted last-minute "updated" written discovery responses indicating Plaintiffs' intent to rely on these late-produced documents.

Google objects to Plaintiffs' withholding and last-minute production of documents and last-minute production of written discovery. Plaintiffs have not provided any excuse for their failure to produce these documents or written discovery responses at an earlier date -- such as before Mr. Specht's deposition in this case. It appears that every document produced at the close of discovery could have been produced months, and in some cases years, earlier. Plaintiffs' written discovery is especially late, given that Google sought this type of information via court intervention last year.

Absent any substantial justification why these documents were not produced sooner, Plaintiff's last-minute production -- and especially Plaintiffs' decision to wait until *after* Mr. Specht's deposition to disclose these documents -- constitutes a failure to

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HOUSTON
LAS VEGAS
LONDON*
LOS ANGELES
MIAMI
MILAN**
NEW JERSEY
NEW YORK
ORANGE COUNTY
ORLANDO
PALM BEACH
COUNTY
PHILADELPHIA
PHOENIX
ROME**
SACRAMENTO
SAN FRANCISCO
SHANGHAI
SILICON VALLEY
TALLAHASSEE
TAMPA
TYSONS CORNER
WASHINGTON, D.C.
WHITE PLAINS
ZURICH**

*OPERATES AS GREENBERG
TRAURIG MAHER LLP

**STRATEGIC ALLIANCE

disclose pursuant to Fed.R.Civ.P. 37(c)(1) and 26(e). We intend to seek a court order preventing Plaintiffs from relying on these late-disclosed documents and written discovery responses, and we assume Plaintiffs will oppose that motion. However, pursuant to our meet-and-confer obligations under Rule 37, please advise what, if any, reasons Plaintiffs claim to “substantially justify” the late disclosure of these documents, so that we may take those reasons into consideration before filing any motion with the Court. Moreover, if there are documents within these late productions that Plaintiffs do not intend to rely on, please identify those documents. Finally, if there are any documents in these late productions that Plaintiffs do intend to rely on (in response to Google’s motion for summary judgment or otherwise), and which Plaintiffs believe to be particularly significant, please identify those documents so that we may address those documents specifically.

We would appreciate your response before Thursday, September 16, 2010.

Very truly yours,

A handwritten signature in black ink, appearing to read "Cameron M. Nelson", with a long horizontal flourish extending to the right.

Cameron M. Nelson

/ct

cc: Herbert H. Finn
Jeffrey P. Dunning

EXHIBIT I

novack > macey

P. Andrew Fleming
andrewf@novackmacey.com

September 15, 2010

VIA E-MAIL

Cameron M. Nelson
Greenberg Traurig, LLP
77 West Wacker Drive, Suite 3100
Chicago, IL 60601

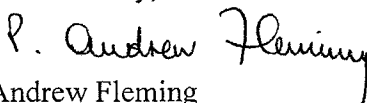
Re: Specht, et al. v. Google Inc.
Case No. 09 CV 2572

Dear Cameron:

This letter is written in response to your letter dated September 13, 2010 concerning discovery produced from July 28, 2010 to July 30, 2010 (the "Discovery Materials"). We disagree with many, if not all, of the characterizations and assertions contained in your letter and reserve the right to address them at any later appropriate time.

Without limiting the generality of the foregoing, we are currently drafting our response to your Motion for Summary Judgment (the "Response"). Accordingly, we cannot say whether we will be relying on the Discovery Materials in connection therewith at this time. To the extent we do rely on any of the Discovery Materials, we are willing to identify those materials in due course prior to filing our Response and, if necessary, to offer Mr. Specht for a limited deposition with respect thereto.

Yours sincerely,


P. Andrew Fleming

PAF:nl

Novack and Macey LLP

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