

**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-Counterdefendants,)

v.)

GOOGLE INC.,)

Defendant-Counterplaintiff.)

Civil Action No. 09-cv-2572

Judge Harry D. Leinenweber

**APPENDIX OF EXHIBITS IN SUPPORT OF
P. ANDREW FLEMING AND NOVACK AND MACEY'S
RESPONSE IN OPPOSITION TO GOOGLE INC.'S
MOTION FOR ATTORNEY'S FEES AND SANCTIONS**

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A

**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-Counterdefendants,)

v.)

GOOGLE INC.,)

Defendant-Counterplaintiff.)

Civil Action No. 09-cv-2572

Judge Harry D. Leinenweber

DECLARATION OF P. ANDREW FLEMING

I, P. Andrew Fleming, declare:

1. I am over the age of 21, have knowledge of the facts set forth herein and could competently testify thereto if called as a witness.

2. I am a partner at Novack and Macey LLP (the "Firm") and formerly one of the attorneys for record for Plaintiffs in the above captioned case against Google Inc. ("Google").

3. Neither I nor any other lawyer at the Firm was involved in the preparation or filing of Plaintiff's Motion For Reconsideration filed on January 1, 2011 (Dkt. No. 302) or the brief filed in support thereof (Dkt. No. 303).

4. As of November 19, 2009, Plaintiffs were still in the process of reviewing over ten years of electronically stored information ("ESI") and had not yet produced any of it. Most of Plaintiffs' ESI production took place between December 2009 and March 2010.

5. On December 29, 2009, Plaintiffs served an amended response to Google's First Interrogatories, identifying hundreds of pages of documents that supported the facts stated therein. This response required dozens of hours of work to complete, and the documents identified contained every responsive fact Plaintiffs knew at the time that response was served.

6. Plaintiffs issued a subpoena to Christopher White on May 4, 2010, and then reissued the subpoena twice thereafter -- on May 28, 2010 and June 29, 2010 -- because White avoided service and Google's counsel (who appeared for White earlier in the case) refused to accept service on his behalf or even confirm that Plaintiffs were attempting service at the correct address. It was only after the Court told Google's counsel that Plaintiffs were entitled to depose White and asked Google's counsel to assist in scheduling the deposition that Plaintiffs' counsel finally got a call from White's California attorney agreeing to schedule the deposition.

7. On June 23, 2010, Plaintiffs served a Notice for Tong's deposition. Google's counsel informed Plaintiffs' counsel that, contrary to its witness list, Tong was no longer with Google and could not be contacted through him. Thus, Plaintiffs had to obtain Tong's deposition by subpoena. On July 12, 2010, counsel for Google sent Tong's last known address to Plaintiffs' counsel. Plaintiffs' counsel repeatedly attempted to serve a subpoena on Tong, both at the address provided by Google and an address obtained through independent research, but Plaintiffs were never able to locate Tong to serve her with a subpoena.

8. Plaintiffs issued a subpoena to Motorola on November 19, 2009, seeking discovery of licensing agreements between Motorola and Lucasfilm for use of the name "Droid." Plaintiffs maintained that any such agreement could be relevant to determining a reasonable royalty in this case.

9. Plaintiffs then tried to obtain licensing documents from two Verizon entities. Those entities served objections asserting that they had no responsive documents in Illinois or employees in Illinois who possessed or controlled such documents. Rather than occupy the Court's time litigating this issue, Plaintiffs elected to seek production of the documents directly from Lucasfilm Ltd. in California.

10. On March 31, 2010, Plaintiffs served subpoenas on Cisco Systems, Inc. and Apple Computer Inc. These subpoenas were extremely narrow in scope and requested only two categories of documents to assist in the calculation of a reasonable royalty. Ultimately, following discussions with counsel for Apple concerning information in its possession, Plaintiffs elected not to pursue a motion to compel.

11. Plaintiffs issued two identical subpoenas to Lucasfilm out of the United States District Court for the Northern District of California. The reason for issuance of the second subpoena was that the first was inadvertently not served on Google's counsel before service on Lucasfilm. Lucasfilm objected and refused to produce any documents or witnesses in response thereto. Pursuant to Local Rule 37-1(a) of the district court and local practice, counsel for Plaintiffs and Lucasfilm conferred in an effort to resolve the dispute and then exchanged detailed written correspondence setting forth their positions on the requested discovery and citing relevant legal authority. This process occurred over a five week period. On July 7, 2010, Plaintiffs initiated a proceeding in the Northern District of California to compel the requested discovery. The matter was assigned to Magistrate Judge Beeler, who had a special standing order governing discovery motions. In particular, she does not accept formal discovery motions. Instead, the Judge requires counsel to meet and confer in person and then submit a joint letter to the Court outlining the unresolved issues. Accordingly, Plaintiffs' motion was denied without prejudice, and Plaintiffs were required to start the process anew. Ultimately, following discussions with counsel for Lucasfilm concerning information in its possession, Plaintiffs decided not to pursue a motion to compel.

12. On February 23, 2010, the parties discussed a proposed discovery schedule that called for “written discovery” to close at the end of March 2010. Plaintiffs understood that proposed deadline to apply only to written discovery between the parties.

13. Before the close of discovery, Plaintiffs provided Google with supplemental interrogatory responses and a supplemental document production. Plaintiffs had a good faith basis for supplementing, which was explained in Plaintiffs’ Opposition to Google’s Motion to Exclude Timely Produced Evidence (Dkt. No. 265), and Fed. R. Civ. Pro. 26(e) expressly required Plaintiffs to supplement these discovery responses. The production principally contained documents generated as a result of Plaintiffs’ ongoing business operations. To avoid any possible prejudice to Google from the supplemental production or disclosures, Plaintiffs offered to make Specht available for a second deposition, but Google declined.

14. Plaintiffs never refused to agree to the entry of a reasonable protective order. In fact, Plaintiffs’ response to Google’s Motion for Entry of a Protective Order (Dkt. No. 149) acknowledged that a protective order was appropriate but objected to certain terms proposed by Google. Plaintiffs filed a cross-motion for the entry of a competing protective order.

15. Google document production in this case did not include a single signed contract with any wireless carrier, or any accounting records of revenues Google earned from Android devices or shared with carriers or manufacturers.

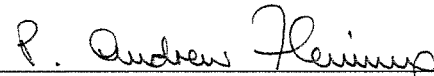
16. I never approached Google about settlement. Google initiated settlement discussions twice. Early on in the case Google’s attorneys called me with a settlement proposal. Plaintiffs declined the offer and made no counteroffer. Google again initiated settlement discussions after summary judgment was granted. In particular, on January 11, 2011, Google’s

counsel presented me and Martin Murphy with a settlement demand. I did not participate in any discussions concerning that demand because I withdrew as Plaintiffs' counsel.

17. The Firm's contingency fee agreement with Martin Murphy and Plaintiffs provided, among other things, that if there was any recovery made as a result of an appeal, both Mr. Murphy and the Firm would receive an increased share of any contingency fee (i.e., relative to their shares in the event of a recovery made prior to an appeal) and Plaintiffs would receive a decreased share.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 19, 2011



P. Andrew Fleming

B

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

ERICH SPECHT, et al.,)	
)	Civil Action No. 09-cv-2572
Plaintiffs,)	
v.)	Judge Leinenweber
)	
GOOGLE, INC., et al.,)	Magistrate Judge Cole
)	
Defendants.)	

GOOGLE INC.'S FIRST SET OF INTERROGATORIES TO PLAINTIFFS

Defendant GOOGLE INC. ("Google"), pursuant to the Court's Order of June 4, 2009 and the Rules 26 and 33 of the Federal Rules of Civil Procedure, requests that Plaintiffs ERICH SPECHT ("Specht"), doing business as ANDROID DATA CORPORATION ("ADC"), and THE ANDROID'S DUNGEON INCORPORATED ("ADI") (collectively "Plaintiffs") answer the following interrogatories within thirty (30) days of service of this document.

These interrogatories are to be deemed continuing and to require supplemental answers if further information of the character called for by the interrogatories is developed at any time prior to trial. The interrogatories shall apply to any and/or all divisions or representatives of Plaintiffs having knowledge of the information sought herein.

DEFINITIONS AND INSTRUCTIONS

As used herein:

A. "Document" shall mean any writing, record and/or electronically stored information ("ESI") of every type and description in the possession, custody or control of Plaintiffs including, without limitation, correspondence; memoranda; stenographic or handwritten notes; studies; books, charts; agreements; communications, including intra-company communications and correspondence; e-mails; cablegrams; faxes; radiograms and telegrams; summaries, minutes and records or telephone conversations, meetings and conferences;

summaries and records of personal conversations or interviews; manuals, publications and diaries; computer readable media; laboratory and engineering reports and notebooks; plans; sketches and drawings; photographs; reports and/or summaries of investigations and/or surveys, opinions and reports of consultants; opinions of counsel; reports and summaries of negotiations; brochures; pamphlets; catalogs and catalog sheets; advertisements, including story-boards, mock-ups, blueprints, layout schematics and/or scripts for television, radio, magazine commercials, trade show publications, and/or trade displays of any kind; circulars, trade letters; press or trade publicity and releases; drafts of original or preliminary notes on and marginal comments appearing on any document; graphs; maps, pictures and voice recordings (including but not limited to video tapes, film clips and audio tapes); computer software; voicemails; podcasts; audio or video files; digital photographs; instant messages; and electronic data of any kind; and shall mean a copy where the original is not in possession, custody or control of Plaintiffs and shall mean each copy of every document where such copy is not an identical copy of an original.

B. "Person" shall mean an individual, firm, partnership, corporation or other organization.

C. "Identify", when used in reference to documents and/or electronically stored information shall mean to state:

(i) The nature or type of documents or electronically stored information (e.g., letter, contract, memorandum, catalog, advertisement, package, e-mail, word processing document, spreadsheet, etc.);

(ii) A brief description of its contents;

(iii) The name, business address, job title and responsibilities of the author and of each person who has made any notation thereon, or who has signed or initialed the document;

(iv) The date of the document;

(v) The name, business address, job title and responsibilities of each recipient and designated recipient of the document or any copy thereof;

(vi) The name, business address, job title and responsibilities of any person who now has (or is last known to have had) possession, custody, or control of the original document; and

(vii) Whether Plaintiffs will claim the document as privileged or otherwise not a proper subject of discovery, and the legal or factual basis for any such claim.

D. "Identify", when used in reference to a (an):

(i) Natural person means to state his/her full name, present or last known business address and home address, employer, or business, or professional affiliations, job title, position, vocation, and associated responsibilities;

(ii) Corporation means to state its full name, date and State of its incorporation, and the address of its principal office or place of business;

(iii) Partnership, association, or other legal entity means to state the full name, date of formation and the address of its principal office or place of business; and

(iv) Act shall mean to state a description of the act; when it occurred; the identity of the person or persons performing said act (or in the case of an omission, the identity of the person or persons failing to act); and the identity of all Persons who have knowledge, information or belief about the act.

E. "Communicate" or "communication" includes written or oral communications. "Oral communication" includes any utterance heard by any person, electronic device or otherwise.

F. "Specht" shall refer to Plaintiff ERICH SPECHT.

G. "ADC" shall refer to ANDROID DATA CORPORATION, and any predecessors, successors, parent corporations, subsidiaries, affiliates, segments or divisions thereof, any present or former members of its Board of Directors, and any present or former officers, employees, agents, representatives, attorneys, accountants or other persons acting or purporting to act on its behalf.

H. "ADI" shall refer to THE ANDROID'S DUNGEON INCORPORATED, and any predecessors, successors, parent corporations, subsidiaries, affiliates, segments or divisions thereof, any present or former members of its Board of Directors, and any present or former officers, employees, agents, representatives, attorneys, accountants or other persons acting or purporting to act on its behalf.

I. "Plaintiffs" shall refer collectively to ERICH SPECHT, ANDROID DATA CORPORATION, and THE ANDROID'S DUNGEON INCORPORATED.

J. "Google" shall refer to Defendant GOOGLE INC. and any predecessors, successors, parent corporations, subsidiaries, affiliates, segments or divisions thereof, any present or former members of its Board of Directors, and any present or former officers, employees, agents, representatives, attorneys, accountants or other persons acting or purporting to act on its behalf.

K. The "Non-Google Defendants" shall collectively refer to each and every one of the entities named as co-Defendants in Plaintiffs' First Amended Complaint, other than Google Inc.

L. Unless otherwise indicated, the relevant time period for the information requested herein shall be from January 1, 1998 to the present date.

INTERROGATORIES

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.

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.

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.

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.

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.

INTERROGATORY NO. 6

Identify the annual gross revenue, net revenue, gross profit and net profit realized by each respective Plaintiff, for each year from 1999 to the present.

INTERROGATORY NO. 7

Identify by Plaintiff all domain names utilized by each Plaintiff in connection with the offer for sale, sale, license, distribution and/or promotion of any goods or services in association with the ANDROID DATA trademark, including for each such domain name the period of time during which the respective Plaintiff or any person associated with Plaintiff was the registrant of record for that domain name, the dates that products or services in association with the

ANDROID DATA trademark were present on the website and all persons having relevant knowledge.

INTERROGATORY NO. 8

Identify, by year, all employees, shareholders, officers and/or directors of each Plaintiff from 1998 to date who have knowledge of the use of the ANDROID DATA mark by each Plaintiff.

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.

INTERROGATORY NO. 10

Identify all persons, including counsel, if any, involved with the preparation and/or filing of the "Declaration of Use of Mark in Commerce under Section 8" for U.S. Trademark Registration No. 2,639,556, which was submitted to the U.S. Patent and Trademark Office by ADI on or about April 21, 2009.

INTERROGATORY NO. 11

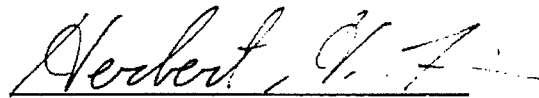
Identify all persons, including counsel, if any, involved with the preparation and/or filing of an "Application for Reinstatement – Domestic/Foreign Corporations" for ADC, which was filed with the Illinois Secretary of State's Office on or about April 24, 2009.

INTERROGATORY NO. 12

Identify all persons expected to testify on behalf of Plaintiffs at trial or otherwise regarding each Plaintiffs' use of the ANDROID DATA trademark and/or the issue of Plaintiffs' alleged abandonment of the ANDROID DATA trademark.

Respectfully submitted,

Dated: June 22, 2009



Herbert H. Finn
Richard D. Harris
Jeffrey P. Dunning
GREENBERG TRAURIG, LLP
77 West Wacker Drive, Suite 3100
Chicago, IL 60660

COUNSEL FOR GOOGLE INC.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of GOOGLE INC.'S FIRST SET OF INTERROGATORIES TO PLAINTIFFS was served upon counsel for Plaintiffs on the date set forth below, via electronic mail and first-class mail addressed to:

Martin J. Murphy, Esq.
2811 RFD
Long Grove, IL 60047
martym@villageinvestments.com

Dated: June 22, 2009



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,)	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.

3. Plaintiffs object to the Interrogatories and the Requested Supplement to the extent that they call for the disclosure of information that is protected by the attorney-client privilege, the attorney work-product doctrine, any other applicable privilege, or otherwise protected from disclosure.

4. Plaintiffs object to the Interrogatories and the Requested Supplement to the extent that they are overbroad, unduly burdensome and/or seek documents that are and neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

5. Plaintiffs object to the Interrogatories and the Requested Supplement to the extent that they are vague, ambiguous or contain undefined terms.

6. Plaintiffs object to providing narrative answers to the Interrogatories and the Requested Supplement where such answers may be determined by examining, auditing, compiling, abstracting or summarizing Plaintiffs' business records as contemplated by Federal Rule of Civil Procedure 33(d).

7. Plaintiffs object to the Interrogatories and the Requested Supplement because, including subparts, they exceed the number of permissible interrogatories under Federal Rule of Civil Procedure 33(a)(1).

8. By responding to the Interrogatories, Plaintiffs do not admit the relevancy or admissibility of any fact, or waive any objection based thereon.

9. Plaintiffs' investigation is ongoing and Plaintiffs reserve the right to supplement and/or amend their answers at any appropriate time.

SUPPLEMENTAL ANSWERS

Each Supplemental Answer incorporates, and is subject to, the General Objections set forth above and the general and specific objections set forth in Plaintiffs' Objections to Google's First Set of Interrogatories dated July 23, 2009, which are not waived.

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.

SUPPLEMENTAL ANSWER:

Plaintiffs object to this Interrogatory as overbroad and unduly burdensome, as the "complete factual basis" for Plaintiffs' use of the ANDROID DATA mark in commerce contemplates a response that references every document, communication, meeting, sale, license, contract, proposal, invoice, agreement, telephone call, check, deposit, expense and every other fact relating to Plaintiffs' business in connection with 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. Plaintiffs object to this Interrogatory as seeking information that is protected by the attorney-client privilege, the attorney work-product doctrine, any other applicable privilege, or otherwise protected from disclosure. Plaintiffs object to the Requested Supplement as seeking information outside the scope of the Interrogatory and posing additional interrogatories. Subject to the foregoing General Objections and specific objections, Plaintiffs refer Google to the twenty page response previously provided to this Interrogatory. 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.

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.

SUPPLEMENTAL ANSWER:

Plaintiffs object to this Interrogatory as overbroad and unduly burdensome, as stating the "complete factual basis" for Plaintiffs' marketing, advertising and promotion efforts related to the ANDROID DATA mark in commerce contemplates a response that references every document, communication, meeting, sale, license, contract, proposal, invoice, agreement, telephone call, check, deposit, expense and every other fact relating to Plaintiffs' marketing, advertising and promotion efforts in connection with 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. Plaintiffs object to the Requested Supplement as seeking information outside the scope of the Interrogatory and posing additional interrogatories. 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.

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.

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.

SUPPLEMENTAL ANSWER:

Plaintiffs object to this Interrogatory as overbroad and unduly burdensome, as the identification of “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” contemplates a response that references every document, communication, meeting, sale, license, contract, proposal, invoice, agreement, telephone call, check, deposit, expense and every other fact relating to Plaintiffs’ marketing, advertising and promotion efforts in connection with the ANDROID DATA mark over greater than a ten year period, including the precise dates and locations of such efforts. 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.

Notwithstanding the foregoing, Plaintiffs state that, from 1999 to 2009, Plaintiffs' marketing efforts included, among other things: (1) seeking referrals from customers; (2) Plaintiffs' web sites; (3) web sites containing links to Plaintiffs' web site; (4) brochure mailings in or around 2002 and 2007; (5) classified advertisements in the New York Times and Chicago Tribune; and (6) email solicitations.

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.

SUPPLEMENTAL ANSWER:

Plaintiffs object to the Requested Supplement as seeking information outside the scope of the Interrogatory and posing additional interrogatories. Subject to the foregoing General Objections and specific objection, Plaintiffs refer Google to the response previously provided to Interrogatory No. 6. 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.

Notwithstanding the foregoing, Plaintiffs state that the total dollar amount of goods and/or services sold, licensed and/or distributed by Plaintiffs reflected in the documents produced by Plaintiffs will not reflect the fair market value of goods and/or services sold, licensed and/or distributed by Plaintiffs in at least the following ways: (1) certain clients

received discounted or free services based upon an ongoing personal or business relationship with Plaintiffs, and therefore no invoices were generated; (2) certain clients were not billed for services where it appeared that they could not afford to pay, and therefore no invoices were generated; and (3) consultations with certain clients were often not billed in the hope of receiving future business and no time sheets or other records of these consultations were kept.

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.

SUPPLEMENTAL ANSWER:

Plaintiffs object to this Interrogatory as overbroad and unduly burdensome, as the identification of “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” contemplates a response identifying at least hundreds of individuals and entities who bought, used, sold or contributed, directly or indirectly, to the production of goods and/or services in connection with the ANDROID DATA mark over greater than a ten year period. Plaintiffs object to this Interrogatory as seeking information outside their possession, custody or control. Plaintiffs object to this Interrogatory as seeking information that is protected by the attorney-client privilege, the attorney work-product doctrine, any other applicable privilege, or otherwise protected from disclosure. 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.

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
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(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

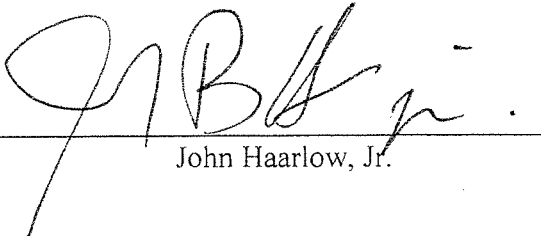
Date

CERTIFICATE OF SERVICE

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

Herbert H. Finn
Jeffrey P. Dunning
GREENBERG TRAURIG, LLP
77 West Wacker Drive, Suite 3100
Chicago, IL 60660

this 19th day of November, 2009.



John Haarlow, Jr.

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,)	Civil Action No. 09-cv-2572
)	
v.)	Judge Harry D. Leinenweber
)	
GOOGLE INC.,)	Magistrate Judge Jeffrey Cole
)	
Defendant.)	

**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.

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.

SECOND SUPPLEMENTAL ANSWER:

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

Answering further, Plaintiffs state that the mark and a link to Plaintiffs' AndroidData.com and/or Android-Data.com web sites appeared on other web sites, including: wendymurphy.com (July 2000 through October 2008 and July 2009 to the present); saztv.com (2001 to the present); designtoscano.com (November 1999 through October 2001); basilstreetgallery.com (November 1999 through November 2002); pushpuppets.net (July 2009 to the present); sonixms.com (May 2001 through September 2005); and erichspecht.com (April 2009 to the present).

Answering further, Plaintiffs state that the title bar of an application created by Plaintiffs for Northwest Recovery, Inc. includes the ANDROID DATA mark and the "®" symbol.

Google can ascertain dates during which Plaintiffs provided goods and/or services to the clients listed in the Initial Answer and Supplemental Answer to this Interrogatory by examining invoices and other documents specifically identified in the Second Supplemental Answer to Interrogatory No. 3.

Google can ascertain when Plaintiffs corresponded with, or solicited business from, "Respondents to Advertisements" previously identified in the Initial Answer and Supplemental Answer to this Interrogatory by examining correspondence and other documents specifically identified in 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. 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.

SECOND SUPPLEMENTAL ANSWER:

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

Answering further, Plaintiffs state that they created brochures in 2000, 2002, 2003 and 2007 that were sent to business prospects, including by email. The 2000 brochure was designed by Prisca Tibbetts and printed by Image Systems. Documents relating to the design and printing of this brochure include documents labeled Specht D 44-47, D 51-56 and D 224. The 2002, 2003 and 2007 brochures were created and/or modified by Plaintiffs. These brochures were sent to business prospects and given to clients and other individuals for promotional purposes and further distribution, including EIDE CPA. For a list of prospects to whom Plaintiffs sent brochures and other materials mailed in or around 2000 and 2002, see the file "Android_potential_customers2k.mdb", labeled PL-E 0004716. For a list of prospects to whom Plaintiffs sent brochures mailed in 2007, see the file "Android_potential_customers2007.mdb", labeled PL-E 00099548. Other documents related to communications with business prospects

include the list of prospects labeled 12089-12118, and communications labeled Specht E 19, Specht D 77-78 and PL 16948-49.

In addition to the 2000, 2002, 2003 and 2007 brochures, Plaintiffs procured professionally printed letterhead, business cards and other materials from Artistry in Printing in 1999. The approximate date and amount of Plaintiffs' payment to Artistry in Printing can be found in QuickBooks files produced by EIDE CPA, LLC in response to Defendant's subpoena labeled EIDE 1853 and in a hard copy invoice labeled Specht C 64.

Plaintiffs similarly procured printed business cards from American Quick Print. The invoice representing the approximate date and amount of Plaintiffs' payment to American Quick Print can be found in a hard copy invoice labeled Specht E 75.

Plaintiffs paid over \$95,000 from January 2003 to March 2005 for co-location space and business class internet service that was used to host client sites and Plaintiffs' online marketing materials. Vendors to whom Plaintiffs made such payments included GTE Internetworking (previously nap.net), Genuity and AT&T. Records related thereto include documents labeled Specht C 9-27. In addition, records showing the dates and amounts of payments made to such vendors can be found in QuickBooks files produced by EIDE CPA, LLC in response to Defendant's subpoena labeled EIDE 1853. Moreover, hard copy invoices from Plaintiffs' suppliers and records of Plaintiffs' payments to such suppliers include documents labeled Specht C 56, C 64, Specht E 65, PL 13530-14316, 14682-14673, 14798-16947 and 16950.

Plaintiffs purchased online advertisements on bizbuysell.com and usbx.com in August 2002. Correspondence related to these ads includes the documents labeled Specht D 169-171. Plaintiffs placed one or more classified ads in the New York Times in or around 2002. Plaintiffs placed one or more classified ads in the Chicago Tribune in or around 2002. People who

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;

- 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.

SECOND SUPPLEMENTAL ANSWER:

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

Answering further, Plaintiffs state that information concerning transactions wherein Plaintiffs sold, licensed or otherwise provided products and/or services can be found in invoices labeled Specht 000001-000332, Specht E 67-68, PL 14318, 14341, 14366-14672 and 14720-14760, QuickBooks files produced by EIDE CPA, LLC in response to Defendant's subpoena labeled EIDE 1853, checks produced by Wendy Murphy in response to Defendant's subpoena labeled WM 000064-000066, agreements, purchase orders, additional work estimates, correspondence and other documents labeled Specht C 1-8, C 34-38, C 47-49, C 51-55, C 57-59, C 62-63, C 66-78, C 80-96, C 98-100, Specht D 1-30, D 57-70, D 76, D 95-123, D 128 -131, D 141-160, D 164, D 172-200, D 213-220 and Specht G 1-144. Additional documents related to transactions wherein Plaintiffs sold, licensed or otherwise provided products and/or services include documents labeled PL 17660-61, 17664-75, 17678, 17701-03, 17872-75, 17893-916, 17920-24, 17932, 17981, 17985-18000, 18009, 18028 and 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. 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

DATA” trademark will not reflect the fair market value of goods and/or services sold, licensed and/or distributed by each respective Plaintiff in association with the “ANDROID DATA” trademark in at least the following ways: (1) Plaintiffs prepared proposals for potential customers that did not generate business from those potential customers, including proposals for Keith Searls and Gil Chaves of Mindwave in 2002 labeled Specht D 213-220, Steven Robb in 2002 and Henry Blaufeld of Surgimesh in 2009; (2) Plaintiffs prepared proposals for existing customers that did not generate additional business from those existing customers, including proposals for Jordan May of Hutech in 2008 (Specht E 44) and Mike Stopka of Design Toscano in 2009; (3) certain clients received discounted or free services, including website design and hosting for Wendy Murphy from June 2000 to March 2005, and July 2009 to present, website design and hosting for Village Investments from March 2001 to February 2005, hosting for Jonathan Sazonoff from July 2001 to January 2005, hosting for Bill Rodencal until November 2002, hosting and consulting for EIDE CPA from January 2000 to February 2003 and in December 2009 and other discounts reflected in invoices labeled Specht 000001-000332, Specht E 67-68, PL 14318, 14341, 14366-14672 and 14720-14760; (4) consulting services for certain existing clients were often not billed in the hope of receiving future business, including Picket Fence Realty from 1999 to 2009; and (5) Plaintiffs did not send out invoices at least \$5,750 in goods and/or services sold, licensed and/or distributed to Summit Recruiting in 2001 to 2002.

In addition, Plaintiffs state that, since 2003, Erich Specht has used both the “ANDROID DATA” and “ANDROID’S DUNGEON” trademarks in association with computer software goods and/or services.

Moreover, this Interrogatory does not state whether 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 is sought on a cash accounting basis or an accrual accounting basis. On a cash accounting basis, which does not reflect the dates income was earned or the time spent by Plaintiffs, the answer to this Interrogatory may be determined by examining documents including invoices labeled Specht 000001-000332, Specht E 67-68, PL 14318, 14341, 14366-14672 and 14720-14760, a check register labeled PL 14761-14794, QuickBooks files produced by EIDE CPA, LLC in response to Defendant's subpoena labeled EIDE 1853 and tax returns labeled EIDE 731-1405, 1854-1952, 13261-13355.

On an accrual accounting basis, determining the answer to this Interrogatory would require a much more detailed analysis, up to and including a forensic accounting analysis of the contracts, agreements, invoices, tax returns, communications, QuickBooks files and other relevant documents. In addition to the documents listed in the previous paragraph, these documents would include agreements, purchase orders, additional work estimates, correspondence and other documents labeled Specht C 1-8, C 34-38, C 47-49, C 51-55, C 57-59, C 62-63, C 66-78, C 80-96, C 98-100, Specht D 1-30, D 57-70, D 76, D 95-123, D 128 -131, D 141-160, D 164, D 172-200, D 213-220 and Specht G 1-144, documents related to transactions wherein Plaintiffs sold, licensed or otherwise provided products and/or services labeled PL 17660-61, 17664-75, 17678, 17701-03, 17872-75, 17893-916, 17920-24, 17932, 17981, 17985-18000, 18009, 18028, hard copy invoices from Plaintiffs' suppliers, records of Plaintiffs' payments to such suppliers and documents reflecting expenses labeled Specht C 56, C 64, Specht E 65, PL 13530-14316, 14682-14673, 14798-16947 and 16950 and emails to be produced in this case as part of Plaintiffs' ongoing electronic document production.

Under Generally Accepted Accounting Principles, GAAP; an accrual basis accounting is preferred because it creates a more accurate financial picture. For example, an examination of invoices would disclose whether a particular invoice was for past or future services. Likewise, an examination of contracts or service agreements would disclose the basis for the revenues and when the revenue was earned, i.e., what services were required, what the payment terms were, and when the income was considered earned. The tax returns and QuickBooks files would disclose the dates of actual cash receipts and the dates expenses were paid. Finally, an examination of any agreements with third parties and the related invoices for payments made would allow for a matching of revenues to their related expenses. This forensic analysis has not been undertaken, would require the services of an accountant and the burden of performing such a forensic analysis to derive or ascertain an answer to this Interrogatory on an accrual accounting basis will substantially be the same for either party.

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. 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.

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. 3.

Answering further, Plaintiffs state that information concerning transactions with suppliers for Plaintiffs' products and/or services can be found in QuickBooks files produced by EIDE CPA, LLC in response to Defendant's subpoena labeled EIDE 1853. Moreover, hard copy invoices from Plaintiffs' suppliers and records of Plaintiffs' payments to such suppliers include documents labeled Specht C 56, C 64, Specht E 65, PL 13530-14316, 14682-14673, 14798-16947 and 16950.

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.

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

By: P. Andrew Fleming
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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

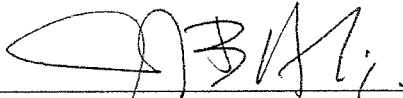
Date

CERTIFICATE OF SERVICE

John Haarlow, Jr., an attorney, certifies that he caused copies of the foregoing Plaintiffs' Second Supplemental Answers to First Set of Interrogatories Propounded by Google, Inc. to be served by electronic mail and U.S. Mail, proper postage prepaid, to:

Herbert H. Finn
Jeffrey P. Dunning
GREENBERG TRAURIG, LLP
77 West Wacker Drive, Suite 3100
Chicago, IL 60660

this 29th day of December, 2009.



John Haarlow, Jr.