

EXHIBIT E

to

Microsoft's Reply in Support of its Motion to Stay Litigation Pending Reexaminations

INTERROGATORY NO. 5:

Identify by product name, model number, serial number or other distinctive designation every version of every game controller manufactured, used, sold, offered for sale, or imported by Microsoft since July 31, 2000 including, but not limited to the Microsoft Accused Controllers and other game controllers designed for use with the Xbox video game console, the Xbox 360 video game console, another video game console, or personal computers.

RESPONSE:

Microsoft incorporates its general objections as its objections to this interrogatory.

Microsoft objects to the term “game controller” as vague and ambiguous, overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it might encompass any device that controls a game, including such items as a mobile phone, mouse, keyboard, television remote control, computer, game console, and others. Microsoft will construe this term to mean a peripheral device whose primary intended use is as an input device for video games.

Microsoft also objects to the request to identify any game controller that has been “used” by Microsoft. Given the expansive definition Anascape has given to “Microsoft” in its interrogatories, this interrogatory could seek any game controller that has ever been used by employees of Microsoft. Microsoft will construe the interrogatory to seek information regarding those game controllers that Microsoft has manufactured, imported, offered for sale, or sold.

Subject to the foregoing objections, to the extent that Microsoft understands this interrogatory, and without waiving any objection, Microsoft answers as follows:

Since June 31, 2000, Microsoft has imported, offered for sale, or sold the following devices whose primary intended use is as input device for video games:

- Sidewinder Gamepad
- Sidewinder Game Pad Pro
- Sidewinder Plug & Play Game Pad
- Sidewinder 3D Pro
- Sidewinder Precision Pro
- Sidewinder Force Feedback Pro
- Sidewinder Precision 2
- Sidewinder Force Feedback 2
- Sidewinder Joystick
- Sidewinder Force Feedback Wheel
- Sidewinder Precision Racing Wheel
- Sidewinder Strategic Commander
- Sidewinder Game Voice
- Sidewinder Freestyle Pro
- Sidewinder Dual Strike
- Xbox Controller
- Xbox Controller S
- Xbox 360 Controller
- Xbox 360 Wireless Controller
- Xbox 360 Controller for Windows
- Xbox 360 Wireless Controller for Windows
- Xbox 360 Wireless Racing Wheel

INTERROGATORY NO. 6:

For each of the Microsoft Accused Controllers, state the date each such product was first offered for sale, released for sale and, if no longer sold, removed from sale, and for products with multiple versions, describe the significant changes, if any, from the immediately preceding version of each such product.

RESPONSE:

Microsoft incorporates its general objections as its objections to this interrogatory.

Microsoft objects to this interrogatory as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it seeks information regarding sales anywhere other than the United States.