Document 66

Filed 02/06/2007

Page 1 of 5

Exhibit 2

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS LUFKIN DIVISION

ANASCAPE, LTD.,

Plaintiff,

Hon. Ronald Clark

٧.

Civil Action No.: 9:06-CV-00158-RC

MICROSOFT CORP. and

NINTENDO OF AMERICA INC.,

CONFIDENTIAL

Defendants.

DEFENDANT NINTENDO OF AMERICA INC.'S RESPONSES TO PLAINTIFF ANASCAPE, LTD.'S CORRECTED FIRST SET OF INTERROGATORIES

Pursuant to Rule 33 of the Federal Rules of Civil Procedure and the Local Rules of this Court, Defendant Nintendo of America Inc. ("NOA"), by and through its undersigned counsel, hereby objects and responds to the Corrected First Set of Interrogatories ("the Interrogatories") of Plaintiff Anascape, Ltd. ("Anascape").

The general objections to Anascape's definitions and instructions set forth below shall be deemed incorporated into the objections and responses to each and every specific Interrogatory.

GENERAL OBJECTIONS TO INTERROGATORIES

1. NOA objects to the Interrogatories and to the definitions and instructions set forth with the Interrogatories to the extent that they purport to create obligations that exceed the requirements of Rules 26 and 33 of the Federal Rules of Civil Procedure or the Local Rules of this Court.

INTERROGATORY NO. 6:

For each of the Nintendo Accused Controllers, state that 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:

NOA objects to this Interrogatory on the ground that it is overbroad, unduly burdensome, seeks information that is not relevant or reasonably calculated to lead to the discovery of admissible evidence to the extent that it requests information on activities that occurred outside of the United States. NOA further objects to this Interrogatory on the ground that it is vague and

ambiguous to the extent that it requests information on "significant changes." NOA also objects to this Interrogatory on the ground that phrase "first offered for sale" is vague and ambiguous; for purposes of responding to this Interrogatory, NOA will interpret this phrase to mean first offered for sale to consumers/end users in the United States.

Subject to and without waiver of the foregoing general and specific objections, NOA responds as follows:

Product	GameCube Controller	GameCube Wavebird Wireless Controller	Wii Classic Controller	Wii Remote Controller	Wii Nunchuk Controller
U.S. Release Date	11/18/01	6/10/02	11/19/06	11/19/06	11/19/06
U.S. First Offered for Sale Date	11/18/01	6/10/02	11/19/06	11/19/06	11/19/06

Dated: January 29, 2007

Respectfully submitted,

By: /s/ James S. Blank

Robert J. Gunther, Jr.

(robert.gunther@lw.com)

James S. Blank

(james.blank@lw.com)

LATHAM & WATKINS LLP

885 Third Avenue

New York, NY 10022

Tel.:

(212) 906-1200

Fax:

(212) 751-4864

Robert W. Faris

(rwf@nixonvan.com)

Joseph S. Presta

(jsp@nixonvan.com)

NIXON & VANDERHYE, P.C.

1100 North Glebe Road

8th Floor

Arlington, VA 22201

Tel.:

(703) 816-4000

Fax:

(703) 816-4100

Charles W. Goehringer, Jr.

(cwgoehringer@germer.com)

Lawrence L. Germer

(llgermer@germer.com)

Texas Bar No. 07824000

GERMER GERTZ L.L.P.

550 Fannin, Suite 400

P.O. Box 4915

Beaumont, Texas 77704

Tel.:

(409) 654-6700

Fax:

(409) 835-2115

Attorneys for Defendant and Counterclaimant Nintendo of America Inc.