

The ASP service where the ジェネラルソリューションズ supports the IR activity of enterprise in total to real development

< Domestic article > 2001.01.24

It announced the ジェネラルソリューションズ January 24th, enterprise for the investor demonstration does the mechanism which does explanatory meeting in the inside * head office of capital via Internet, fundamental rules develops the same service from the spring of 2001. In addition, it is the direction where consecutively keeps developing, the service 7 of total which such as automatic operation construction of the IR sight is named generically " the CorporateDirect " and transmission of IR information.

The same company made that the enterprise customer who utilizes the same service presently is 143 corporations clear. When service is developed in earnest, you say the system which is placed inside the company is transferred the icDc (Internet data center).

President harmony being present law Ichiro of the same company " the SEC (Securities and Exchange Commission) is moving to the direction which converts IR activity strictly. Already, several services have been started, but, now when enterprise is recognizing the importance of IR activity speaks with the chance of real development ".

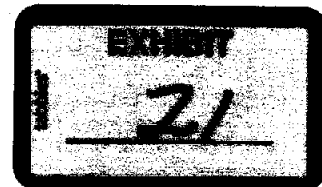
The same company the tool which actualizes the Web conversion of investor explanatory meeting are indispensable to IR activity, on demand broadcast is possible with the presentation " of the RoadshowDirect " and real time the speech communication which utilizes Voclp technology is made possible, " the ConferenceDirect " is offered.

In addition, IR information is transmitted automatically to Reuters and the ブルーンバーグ as the tool group which is conscious of strengthening the IR activity, to HP compilation tool to accumulate " HomePageDirect " in order to publish IR information " the IRDirect " and enterprise home page (HP) and investor information to the data base, communication of one two one is actualized offers " One-to-OneDirect ".

The same company, in order furthermore to be complete IR activity, takes the log of the IR information which is published to enterprise HP and the like, searches the information which has malice such as whistle-blowing and the circulation of rumor which are done on " the IRLogIt " and Internet also " the IRPatrol " added to the service line.

The same company anticipates the customer 400 and the sale of 2 hundred million Yen in 2001.

Service start time and fee



Service	Start time	Fee	Unit
RoadshowDirect	Start end	20 ten thousand Yen	Month
ConferenceDirect	Spring	30 - 50 ten thousand Yen	Time / time
IRDirect	Start end	1 ten thousand Yen 2500 Yen	Transmission file / month
HomePageDirect	Start end	5 ten thousand Yen	Month
One-to-OneDirect	Summer	Undecided	
IRLogIt	March	1 - 2 ten thousand Yen	Month
IRPatrol	Start end	10 ten thousand Yen	3 keywords / month

ジェネラルソリューションズ

URL <http://www.c-direct.net/>

<https://www.c-direct.ne.jp/gs/news/2003/n0109.html>

企業情報 GS の強み事業概要 IPO & Incubation IR & Communication Internet IR
Business Development 採用情報 2003 年 01 月 09 日

株式会社富士通システムソリューションズ「WebSERVE」サービスへ、インターネット IR ASP サービスの提供を開始

(関連記事が平成 15 年 1 月 9 日付日経産業新聞 3 ページに掲載されました)

ジェネラルソリューションズは、株式会社富士通システムソリューションズ（以下 FSOL）との提携により、これまでの自社ブランド『Corporate Direct』による提供に加え、FSOL の販売・提供するインターネット統合ソリューションサービス「WebSERVE」を通じてのインターネット IR ASP サービスの提供を開始いたします。

これによって、サービス提供形態の多様化を図ると共に、弊社の IR 及び FSOL の IT に関するノウハウを相互に活用し、共同でこれまで以上のインターネット IR ASP サービスの機能向上に当たってまいります。

【FSOL について】

FSOL は、富士通の情報サービス子会社で、富士通グループ最大のソリューションプロバイダーとして、5000 社を越えるお客様に対し、コンサルティングからシステム構築、運用・アウトソーシングサービスに至るまでトータルソリューションを提供しております。

[一覧へ戻る](#)

GS Company's business strengths Summary IPO & Incubation IR &
Communication Internet IR Business Development Jobs on Jan. 9, 2003

Fujitsu System Solutions "WebSERVE" service, Internet service providers
to start IR ASP

(Articles in January 2003 to 9, Nikkei Sangyo Shimbun published on page

General Solutions, Fujitsu System Solutions (FSOL) and the association with the brand of their previous offer of Corporate Direct, in addition, FSOL Internet sales provide integrated solutions "WebSERVE" through the Internet IR ASP Service providers to start.

This allows service providers to diversify its forms, as well as our IR and mutual FSOL's IT know-how to use the Internet more than ever joint IR ASP services to improve hitting.

FSOL [about]

FSOL, information services subsidiary of Fujitsu, Fujitsu tools as the largest group, of more than 5,000 customer companies, consulting to systems running to provide outsourcing services ranging from the total.

The List

I=20 suggest that you send him a note after you get the ticket = -
this=20 is \$.... that I paid for my ticket. Remember, = you
are critical witness for them = too. They=20 themselves fly
only=20 business class...

-----Original Message-----

From: Kiyoto Kanda=20 [mailto:kanda@tka.att.ne.jp]

Sent: Monday, September 30, = 2002 9:40=20 AM

To: Charny

Subject: Re: NY visiting=20 schedule

I will buy C class.

Thank you for = your=20 advice.
Anyway Fujitsu pays.

Best regards,

Kiyoto = Kanda

Charny wrote:

kandfa san, Please don't ask thm =
which class they would pay for! Tell them that you are buying an =
open-end ticket in an appropriate class and it costs such and =
such. O'Brien charges \$500/hour and Paul charges =
\$400/hour! These guys can afford to pay for your trip! =
-- LC-----Original =
Message-----From: Kiyoto Kanda [mailto:kanda@tka.att.ne.jp]se=
nt: Monday, September 30, 2002 1:08 AM To: O'Brien, Richard J. Cc: =
Veith, Paul E.; Kiyoto Kanda Subject: NY visiting =
schedule Dear Mr. O'Brien, I will make a reservation =
of the flight from Tokyo to NY, JFK on October 20. Please =
confirm which class (C class or Y class), you/Fujitsu support. After I =
receive your confirmation, I will make an actual reservation. As =
to the return ticket, it would be opened. Thank you for your =
confirmaiton. Best regards, Kiyoto =
Kanda



FI 000091

Content-Transfer-Encoding: 7bit Dear Kanda-san, This is good. Just remember, that by helping them you are also helping yourself. However, from THEIR point of view, you are a critical witness for THEIR case. Besides, if everything goes well, you may be able to restore your relationship with Fujitsu. I am meeting with Fujitsu's lead expert witness tomorrow - a Professor from MIT (Randy Davis). I took his course many years ago. He is a Chairman of some commission on Intellectual Computer Property. Frankly, I think Fujitsu has an iron-clad case. Talk to you later. -- LEON -----Original Message----- From: Kiyoto Kanda [mailto:kanda@tka.att.ne.jp] Sent: Monday, September 30, 2002 5:43 PM To: Leon Subject: [Fwd: RE: NY visiting schedule] Dear Leonid, Just for your info., I received a mail from Mr. O'Brien as follows. As you say, I seem to be an "important" witness. Talk to you soon, Best regards, Kiyoto Kanda ----- Original Message ----- Subject: RE: NY visiting schedule Date: Mon, 30 Sep 2002 17:00:10 -0500 From: "O'Brien, Richard J." To: "'kanda@tka.att.ne.jp'" CC: "Veith, Paul E." Go ahead and book business class. Richard J. O'Brien SIDLEY AUSTIN BROWN & WOOD Bank One Plaza 10 S. Dearborn Street Chicago, IL 60603 robrien@sidley.com Phone: 312-853-7283 Fax: 312-853-7036 website: www.sidley.com -----Original Message----- From: Kiyoto Kanda [mailto:kanda@tka.att.ne.jp] Sent: Monday, September 30, 2002 3:08 AM To: O'Brien, Richard J. Cc: Veith, Paul E.; Kiyoto Kanda Subject: NY visiting schedule Dear Mr. O'Brien, I will make a reservation of the flight from Tokyo to NY, JFK on October 20. Please confirm which class(C class or Y class), you/Fujitsu support. After I receive your confirmation, I will make an actual reservation. AS to the return ticket, it would be opened. Thank you for your confirmation. Best regards, Kiyoto Kanda "" made the following annotations on 09/30/2002 05:00:13 PM

----- This e-mail is sent by a law firm and may contain information that is privileged or confidential. If you are not the intended recipient, please delete the e-mail and any attachments and notify us immediately.

-----_NextPart_000_0118_01C268AA.DE058D30 Content-Type: text/html; charset="ISO-2022-JP" Content-Transfer-Encoding: quoted-printable
Dear=20 Kanda-san,

This=20 is good. Just remember, that by helping them you=20 are also helping yourself. However, from THEIR=20 point of view, you are a critical witness for THEIR = case. Besides, if everything goes well, you may=20 be able=20 to restore your relationship with Fujitsu.

I am=20 meeting with Fujitsu's lead expert witness tomorrow - a Professor from MIT (Randy=20 Davis). I took=20 his course many years ago. He is a Chairman of some commission on Intellectual = Computer=20 Property. Frankly, I think Fujitsu has = an=20 iron-clad case.

Talk=20 to you later.

---=20 LEON

-----Original Message-----
From: Kiyoto Kanda=20 [mailto:kanda@tka.att.ne.jp]
Sent: Monday, September 30, = 2002 5:43=20 PM
To: Leon
Subject: [Fwd: RE: NY visiting=20 schedule]

Dear Leonid,

Just for your info., = I=20 received a mail from Mr. O'Brien as follows.

As you say, I = seem to=20 be an "important" witness.

Talk to you soon,

Best=20 regards,

Kiyoto Kanda

----- Original Message = -----=20 Subject: RE: NY visiting schedule

Date: Mon, 30 Sep 2002 17:00:10 -0500
From: "O'Brien, Richard J." <robrien@sidley.com>
To: "Kanda@tka.att.ne.jp" <kanda@tka.att.ne.jp>< /TR>
CC: "Veith, Paul E." <pveith@sidley.com>

Go ahead and book business class.

Richard J. O'Brien

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FI 000093

Message-----
From: Kiyoto Kanda [<mailto:kanda@tka.att.ne.jp>]
Se=
nt: Thursday, September 12, 2002 3:14 PM
To: Leon
Cc: Kiyoto =
Kanda
Subject: Meeting with Fujitsu Lawyer

Dear =
Leonid,

I have a 2nd meeting with Mr. O'Brien and Mr. Veath in =
Tokyo
last night.

Mr. Veath was writing a mail to you and you =
were supposed to
receive it with my "say hello to him".

The =
meeting was same as before, checking document and
comment. By this =
time, both of them have a confidence that
every person's talk is =
same, which means "truth is one thing".

At last I have confirmed =
a visiting schedule to NY. The trial
will begins in the week of =
October 21. I should be in NY before
3 days of the trial date. =
Interesting issue is that there is a
little chance for arbitration =
between LinkCo and Fujitsu.
LinkCo begins to negotiate and p
ropose arbitration.
Mr. O'Brien said that in the case of arbitration, =
I need to
come to Chicago.

Anyway I come to the States, which =
is good. We can
discuss other issues all together.

Talk to you =
soon,

Best regards,

Kiyoto =
Kanda

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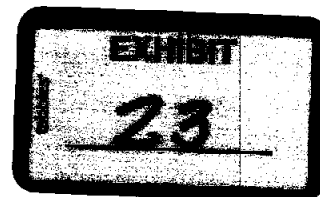
SETTLEMENT AND RELEASE

- A. LinkCo has recently learned that Mr. Kiyoto Kanda is in possession of a computer owned by LinkCo and containing LinkCo trade secrets.
- B. LinkCo has also recently learned that Mr. Kanda established a Japanese corporation and became its sole shareholder using money (10,000,000 Japanese Yen) from LinkCo. The Japanese corporation was intended to be a wholly owned subsidiary of LinkCo and LinkCo has never allowed or directed Mr. Kanda to become the shareholder of the Japanese corporation. Mr. Kanda has not compensated LinkCo despite the fact that LinkCo has no control over the Japanese corporation without being paid any consideration.

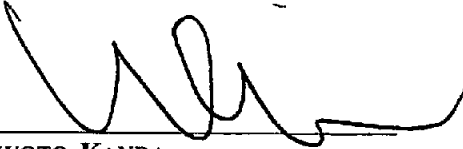
NOW THEREFORE, the parties have agreed as follows:

1. Mr. Kanda will deliver to LinkCo's attorney, Mr. Toyoshima, the aforementioned LinkCo owned computer and an IBM computer Mr. Kanda believes he bought in 2000 or 2001 with their original hard drives, power cords and plugs and other original parts.
2. Mr. Kanda will provide to Mr. Toyoshima all relevant passwords and access information. Mr. Kanda will authenticate, including by sworn testimony, the computers' contents, as and when reasonably requested by LinkCo.
3. Based on the foregoing, LinkCo hereby releases Mr. Kanda from any claim LinkCo may have for not having returned the aforesaid LinkCo computer or relating to the 10,000,000 Japanese Yen in LinkCo, or LinkCo Japan funds, on condition that Mr. Kanda has not given LinkCo any false information concerning LinkCo, Fujitsu, Bowne, Nichimen, Kambil, Israel-Rosen, himself or any other parties whose names are contained in the aforesaid computers. This release is not conditioned on LinkCo's ability to extract desired information from the computers.
4. LinkCo or its related parties will keep confidential any information unrelated to LinkCo, Fujitsu, Bowne, Nichimen, Kambil, or Israel-Rosen obtained from the above two computers and will not disclose such unrelated information to any third parties.

Wk M.T.



5. LinkCo or its related parties will neither sue Mr. Kanda anywhere in the world or demand a meeting related to the following: (a) a lawsuit in the United States District Court for the District of Massachusetts styled LinkCo Inc. v. Nichimen Corporation and Kiyoto Kanda, Case No. 00-11050; (b) a lawsuit in the United States District Court for the Southern District of New York styled LinkCo Inc. v. Fujitsu, Co., Ltd., Case No. 00 CIV 7242; (c) the misappropriation of LinkCo's intellectual properties or unfair competition by Bowne and Company as alleged in a lawsuit in the Circuit Court of Cook County Illinois County Department, Law Division styled LinkCo, Inc. v. Bowne and Company, Case No. 04 L 1794; (d) Mr. Kanda's not having returned above-mentioned computers; and (e) the dispute concerning the 10,000,000 Japanese Yen in LinkCo or LinkCo Japan funds. Notwithstanding the foregoing, a condition of this settlement is Mr. Kanda's performance of the requirements of paragraphs 1 and 2 above.

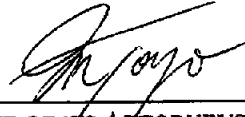


KIYOTO KANDA

Address
#118, 3-10-1, Komazawa,
Setagaya-ku, Tokyo 157-0012,
Japan

Date April 12, 2006

LINKCO, INC.

BY: 

ONE OF ITS ATTORNEYS
Makoto Toyoshima
Kojima Law Offices
Gobancho Kataoka Bldg.
2-7, Gobancho, Chiyoda-ku
Tokyo 102-0076, Japan

Date April 12, 2006

Steven M. Bierman (SB 6615)
SIDLEY & AUSTIN
875 Third Avenue
New York, New York 10022
(212) 906-2000

Richard J. O'Brien
Paul E. Veith
SIDLEY & AUSTIN
Bank One Plaza
10 South Dearborn Street
Chicago, Illinois 60603
(312) 853-7000

Attorneys For Defendant
FUJITSU LIMITED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
LINKCO, INC.,

: No. 00 CIV. 7242

Plaintiff,

: Hon. Shira A. Scheindlin

v.

FUJITSU LTD.,

Defendant.
-----x

**DEFENDANT FUJITSU LIMITED'S AMENDED RESPONSE
TO PLAINTIFF'S FIRST SET OF INTERROGATORIES (NOS. 1-12)**

Defendant Fujitsu Limited, by its attorneys and pursuant to Rule 34 of the Federal Rules of Civil Procedure, for its amended response to Plaintiff's First Set of Interrogatories (Nos. 1-12) ("LinkCo's Interrogatories"), states as follows:



LX006658

GENERAL OBJECTIONS

1. Fujitsu objects to LinkCo's interrogatories to the extent they call for information protected from disclosure by the attorney-client privilege, the work-product doctrine, or any other applicable statutory or common-law protection against disclosure.

2. Fujitsu objects to LinkCo's interrogatories to the extent they call for the disclosure of Fujitsu's trade secret or other confidential research, development, or commercial information ("Fujitsu Confidential Information") in the absence of the entry of a protective order and (a) a particularized description of the trade secrets alleged to have been disclosed to and misappropriated by Fujitsu; (b) a description of the measures taken to protect the same from disclosure; and (c) a showing of need to justify access to Fujitsu Confidential Information.

3. Fujitsu objects to LinkCo's definition of "Fujitsu's Technology" insofar as it includes "Fujitsu's related business and marketing plans to permit electronic disclosure and reporting worldwide of systematic and detailed business information regarding Japanese companies," and thereby implies the existence of a business and marketing plan that Fujitsu has not pursued and is not pursuing. For purposes of this response, "Fujitsu's Technology" will be taken to mean "Fujitsu's DisclosureVision, IR-Station, and IR-TanshinStation products, systems, technology, and software, including all versions, releases, upgrades, and components thereof." (See LinkCo's Interrogatories, p. 3, Def. E).

4. Where a person is named in response to these interrogatories and is currently an employee of Fujitsu or one of its subsidiaries, the person's home address will not be provided insofar as any attempt to contact such person is prohibited.

Subject to and without waiving these General Objections, Fujitsu further responds

as follows:

RESPONSE

Interrogatory No. 1: Identify all persons with knowledge of information relating to Fujitsu's Technology, and generally describe, identify the custodian of, and identify the location of any documents, physical evidence, or information that exists that is relevant to the same.

Answer: Subject to the foregoing General Objections and Fujitsu's right to supplement this Answer if necessary, Fujitsu hereby identifies the following persons:¹

Asakura, Takafumi	Fujitsu Limited	Tokyo
Atobe, Kazunori	Fujitsu Limited	Tokyo
Fujitsu Okayama Systems Engineering Ltd.	--	Okayama
Fujitsu Shizuoka Engineering	--	Shizuoka
Kamijyo, Hideki	Fujitsu Limited	Tokyo
Kitagawa, Yoshihito	Fujitsu Limited	Tokyo
Koga, Satoshi	Fujitsu Limited	Tokyo
Komuro, Hiroyuki	Fujitsu Shizuoka Engineering Ltd.	Shizuoka
Kubota, Toshinao	Fujitsu Limited	Osaka
Mita, Takahiro	Fujitsu Limited	Osaka
Nanbuya, Toru	Fujitsu Limited	Tokyo
Sakura KCS	--	Osaka
Sasakura, Takashi	Fujitsu Limited	Osaka
Shibata, Toru	Fujitsu Limited	Tokyo
Tada, Masami	Fujitsu Limited	Tokyo
Takaya, Mitsuhiro (former employee of Fujitsu Financial Systems Ltd.)	Tokyo Stock Exchange	Tokyo
Yamaguchi, Chisato	Fujitsu Limited	Tokyo
Yamamoto, Shuji	Fujitsu Limited	Tokyo
Yurino, Toshiki (former employee of Fujitsu Limited)	Unknown	Okayama

Documents, physical evidence, and/or information related to the subject matter of this interrogatory are in the custody of the named persons and/or Fujitsu Limited, the Tokyo

¹ The list of identified persons generally will follow the convention of last name, first name, present employer, location of present employment. Where the person identified is not a current employee of Fujitsu Limited or an identified subsidiary, Fujitsu will provide a last known address.

Stock Exchange, the Osaka Securities Exchange, Nihon Keizai Shimbun, Inc., and other Fujitsu customers. Where such information is in Fujitsu Limited's custody, it generally is located in Tokyo, Japan or Osaka, Japan. These include documents such as specifications, proposals, estimates, design documentation, source code, object code, manuals, and others created in the course of developing the systems and applications referenced in the interrogatory. To the extent LinkCo has requested such information in its request for production, the documents have been or will be provided subject to any objections Fujitsu has stated.

Interrogatory No. 2: Identify all persons with knowledge of information relating to the business and marketing plans of Fujitsu's Technology, and generally describe, identify the custodian of, and identify the location of any documents, physical evidence, or information that exists that is relevant to the same.

Answer: Subject to the foregoing General Objections and Fujitsu's right to supplement this Answer if necessary, Fujitsu hereby identifies the following persons:

Akutsu, Tomomi	Fujitsu Limited	Tokyo
Atobe, Kazunori	Fujitsu Limited	Tokyo
Ishibashi, Hitoshi	Fujitsu Limited	Tokyo
Kamijyo, Hideki	Fujitsu Limited	Tokyo
Saiki, Yasuyuki	Fujitsu Limited	Tokyo
Shibata, Toru	Fujitsu Limited	Tokyo

Documents, physical evidence, and/or information related to the subject matter of this interrogatory are in the custody of the named persons and/or Fujitsu Limited. Such information generally is located in Tokyo, Japan or Osaka, Japan. These include documents such as proposals, requests for proposal, business plan documents, marketing materials, reports and others created in the course of marketing Fujitsu's Technology. To the extent LinkCo has requested such information in its request for production, the documents have been or will be provided subject to any objections Fujitsu has stated.

Interrogatory No. 3: Identify all persons with knowledge of information relating to sales and projected sales related to or generated from or by Fujitsu's Technology, and

generally describe, identify the custodian of, and identify the location of any document, physical evidence, or information that exists that is relevant to the same.

Answer: Subject to the foregoing General Objections and Fujitsu's right to supplement this Answer if necessary, Fujitsu hereby identifies the following persons:

Akutsu, Tomomi	Fujitsu Limited	Tokyo
Atobe, Kazunori	Fujitsu Limited	Tokyo
Ito, Takeshi	Fujitsu Limited	Tokyo
Kamijyo, Hideki	Fujitsu Limited	Tokyo
Koga, Satoshi	Fujitsu Limited	Tokyo
Koga, Yuji	Fujitsu Limited	Osaka
Matsuzaki, Tadatoshi	Fujitsu Limited	Tokyo
Mochizuki, Shoukichi	Fujitsu Limited	Tokyo
Nakamura, Yoshiaki	Fujitsu Limited	Tokyo
Shibata, Toru	Fujitsu Limited	Tokyo
Tanoue, Hidehisa	Fujitsu Limited	Tokyo
Yukitomo, Satoshi	Fujitsu Limited	Tokyo

Documents, physical evidence, and/or information related to the subject matter of this interrogatory are in the custody of the named persons and/or Fujitsu Limited. Such information generally is located in Tokyo, Japan or Osaka, Japan. These include documents such as business plans, contracts with customers, promotional or marketing materials, and others created in the course of marketing Fujitsu's Technology. To the extent LinkCo has requested such information in its request for production, the documents have been or will be provided subject to any objections Fujitsu has stated.

Interrogatory No. 4: Identify all persons with knowledge of information relating to Fujitsu's efforts in the areas of sales, marketing, or promotion of its products or services, to the extent such efforts relate to any line of business or product relevant to the subject matter of this action, including the sales, marketing, or promotion of Fujitsu's Technology, and generally describe, identify the custodian of, and identify the location of any documents, physical evidence, or information that exists that is relevant to the same.

Answer: Fujitsu objects to this interrogatory as vague and ambiguous in its request for identification of persons with knowledge of sales, marketing, and promotional "efforts . . . to the extent such efforts relate to any line of business or product relevant to the

subject matter of this action . . ." because the question of which of Fujitsu's hundreds of businesses or products are relevant to the subject matter of this action cannot be determined without further articulation by LinkCo as to what trade secrets or other confidential information Fujitsu allegedly misappropriated. Subject to the foregoing objections and Fujitsu's right to supplement this Answer if necessary, Fujitsu hereby identifies the following persons with knowledge of Fujitsu's sales, marketing, or promotional efforts related to the subject of the electronic filing and dissemination of corporate reports:

Akutsu, Tomomi	Fujitsu Limited	Tokyo
Atobe, Kazunori	Fujitsu Limited	Tokyo
Hidehisa, Tanoue	Fujitsu Limited	Tokyo
Ishibashi, Hitoshi	Fujitsu Limited	Tokyo
Ito, Takeshi	Fujitsu Limited	Tokyo
Kamijyo, Hideki	Fujitsu Limited	Tokyo
Kikumori, Nobuhiko	Fujitsu Limited	Tokyo
Koga, Satoshi	Fujitsu Limited	Tokyo
Koga, Yuji	Fujitsu Limited	Osaka
Matsuzaki, Tadatoshi	Fujitsu Limited	Tokyo
Mochizuki, Shoukichi	Fujitsu Limited	Tokyo
Nakamura, Yoshiaki	Fujitsu Limited	Tokyo
Okazaki, Shunya	Fujitsu Limited	Tokyo
Saiki, Yasuyuki	Fujitsu Limited	Tokyo
Shibata, Toru	Fujitsu Limited	Tokyo
Shibue, Kazuyuki	Fujitsu Limited	Tokyo
Yukitomo, Satoshi	Fujitsu Limited	Tokyo

Documents, physical evidence, and/or information related to the subject matter of this interrogatory are in the custody of the named persons and/or Fujitsu Limited. Such information generally is located in Tokyo, Japan or Osaka, Japan. These include documents such as requests for proposal, proposals, business plan documents, contracts with customers, marketing materials, and others created in the course of marketing Fujitsu's Technology. To the extent LinkCo has requested such information in its request for production, the documents have been or will be provided subject to any objections Fujitsu has stated.

Kamijyo, Hideki
Otsuki, Fumihiko
Shibata, Toru
Temkin, Bruce
Tsuchiya, Yutaka
Yamaguchi, Chisato

Fujitsu Limited
Fujitsu Limited
Fujitsu Limited
48 White Oak Road
Fujitsu Limited
Fujitsu Limited

Tokyo
Tokyo
Tokyo
Waban, MA
Tokyo
Tokyo

Documents, physical evidence, and/or information related to the subject matter of this interrogatory are in the custody of the named persons and/or Fujitsu Limited. Where such information is in Fujitsu Limited's custody, it generally is located in Tokyo, Japan. These include documents such as contracts, e-mail, and reports. To the extent LinkCo has requested such information in its request for production, the documents have been or will be provided subject to any objections Fujitsu has stated.

Interrogatory No. 7: Identify all persons with knowledge of information relevant to the details of Ajit Kambil's relationship with Fujitsu, and generally describe, identify the custodian of, and identify the location of any documents, physical evidence, or information that exists that is relevant to the same.

Answer: Subject to the foregoing General Objections and Fujitsu's right to supplement this Answer if necessary, Fujitsu hereby identifies the following persons.³

Bodoff, David

Hong Kong University
of Science & Technology

Hong Kong

Ito, Takeshi
Kambil, Ajit

Fujitsu Limited
Accenture Consulting
New York University

Tokyo
Boston, MA
New York

Kanda, Kiyoto
Kamijyo, Hideki
Otsuki, Fumihiko

K and A, Inc.
Fujitsu Limited
Fujitsu Limited

Tokyo
Tokyo
Tokyo

³ Fujitsu employees other than those listed here may have had contact with Kambil in 1998. Specifically, additional employees of Fujitsu or its affiliates attended presentations of Kambil's research in August 1998. Those listed here, however, are the individuals who, upon reasonable inquiry, Fujitsu believes may have knowledge of the "details" of Kambil's relationship with Fujitsu.

Additionally, the following individuals attended a meeting with Kambil in New York in December 1997, although they are not believed to have knowledge of the "details" of

Kambil's relationship with Fujitsu:

Kitagawa, Manabu	Fujitsu Research Institute	Tokyo
Komuro, Hioyuki	Fujitsu Shizuoka Engineering Ltd.	Tokyo
Okazaki, Shunya	Fujitsu Limited	Tokyo
Sakai, Yuichi	Fujitsu Limited	Tokyo
Takaya, Mitsuhiro	Tokyo Stock Exchange	Tokyo
(former employee of Fujitsu Financial Systems Ltd.)		
Tamura, Masayasu	Fujitsu Research Institute	Tokyo
Tokutake, Yasuo	Fujitsu Limited	Tokyo
Tsuchiya, Yutaka	Fujitsu Limited	Tokyo

Documents, physical evidence, and/or information related to the subject matter of this interrogatory are in the custody of the named persons and/or Fujitsu Limited. Where such information is in Fujitsu Limited's custody, it generally is located in Tokyo, Japan. These include documents such as a proposal letter, contracts, e-mail, and reports. To the extent LinkCo has requested such information in its request for production, the documents have been or will be provided subject to any objections Fujitsu has stated.

Interrogatory No. 8: Excepting present or former employees of LinkCo, identify all persons with knowledge of information relevant to LinkCo's Technology and Trade Secrets or any component thereof (including but not limited to anyone who has compared LinkCo's Technology and Trade Secrets with Fujitsu's Technology) and generally describe, identify the custodian of, and identify the location of any documents, physical evidence, or information that exists that is relevant to the same.

Answer: Fujitsu's knowledge of LinkCo's Technology and Trade Secrets is limited to the information provided by LinkCo prior to and during the meeting of September 10, 1997, which amounted to a general description of LinkCo's business. (See FL 902-917). Apart from the foregoing and documents or information received from LinkCo in the course of this litigation, Fujitsu does not believe it is or has been privy to documents or other information that constitutes or is relevant to LinkCo's Technology and Trade Secrets. Apart from the documents

identified in this Answer, Fujitsu is not aware of the existence or location of any documents, physical evidence, or other information that is relevant to LinkCo's Technology and Trade Secrets.

Interrogatory No. 9: Excepting present or former employees of LinkCo, identify all persons with knowledge of information relevant to any communication or negotiations between Fujitsu, LinkCo, Kiyoto Kanda, and/or Ajit Kambil, and identify the location of any documents, physical evidence, or information that exists that is relevant to the same.

Answer: Fujitsu objects to this interrogatory in its use of the word "between" followed by a series of four persons, and therefore answers its interrogatory as if "between" was deleted and "among any of" was inserted. Subject to the foregoing objections and Fujitsu's right to supplement this Answer if necessary, Fujitsu hereby identifies the following persons:⁴

Atobe, Kazunori	Fujitsu Limited	Tokyo
Bodoff, David	Hong Kong University	Hong Kong
Futagami, Kimihiro	Fujitsu Limited	Tokyo
Inagaki, Hiromasa	Fujitsu Limited	Tokyo
Ito, Takeshi	Fujitsu Limited	Tokyo
Kamijyo, Hideki	Fujitsu Limited	Tokyo
Kitagawa, Manabu	Fujitsu Research Institute	Tokyo
Mochizuki, Shoukichi	Fujitsu Limited	Tokyo
Okazaki, Shunya	Fujitsu Limited	Tokyo
Otsuki, Fumihiko	Fujitsu Limited	Tokyo
Saiki, Yasuyuki	Fujitsu Limited	Tokyo
Sakai, Yuichi	Fujitsu Limited	Tokyo
Shibata, Toru	Fujitsu Limited	Tokyo
Shibue, Kazuyuki	Fujitsu Limited	Tokyo
Shimohata, Yoshikazu	Fujitsu Research Institute	Tokyo
Tamura, Masayasu	Fujitsu Research Institute	Tokyo
Tokutake, Yasuo	Fujitsu Limited	Tokyo
Tsuchiya, Yutaka	Fujitsu Limited	Tokyo
Uretsky, Mike	New York University	New York
Yamaguchi, Chisato	Fujitsu Limited	Tokyo

⁴ Fujitsu has not attempted to list all persons who attended (1) Kambil's presentation of the results of his research to Fujitsu in August 1998; or (2) Kanda's presentation of seminars related to the disclosure business, which seminars were given in 1999 and 2000.

Documents, physical evidence, and/or information related to the subject matter of this interrogatory are in the custody of the named persons and/or Fujitsu Limited. Where such information is in Fujitsu Limited's custody, it generally is located in Tokyo, Japan. These include documents such as a summary of LinkCo's business (English and Japanese), a proposal letter, contracts, e-mail, and reports. To the extent LinkCo has requested such information in its request for production, the documents have been or will be provided subject to any objections Fujitsu has stated.

Interrogatory No. 10: Identify all persons with knowledge of information relevant to any communication or negotiation between Fujitsu and Bowne, and generally describe, identify the custodian of, and identify the location of any documents, physical evidence, or information that exists that is relevant to the same.

Answer: Fujitsu objects to this interrogatory in that it contains no limitations in subject matter or time. Subject to its objections and Fujitsu's right to supplement this Answer if necessary, Fujitsu hereby identifies the following persons:

Crosetto, Carl	Bowne International	New York
Dalton, Paul	Bowne Hong Kong (other information unknown)	Hong Kong
Finn, Julie	Bowne International (Tokyo) 23-10, Takada 3-chome Toshima-ku Tokyo, Japan 171-0033	Tokyo
Hjerpe, Mark	Bowne of Singapore 6 Battery Road, #09-06 Singapore 049909	Singapore
Kamijyo, Hideki	Fujitsu Limited	Tokyo
Kanda, Kiyoto	K and A, Inc.	Tokyo
Otsuki, Fumihiko	Fujitsu Limited	Tokyo
Penders, William	Bowne International 345 Hudson Street, 10th Floor New York, New York 10014	New York
Saiki, Yasuyuki	Fujitsu Limited	Tokyo
Savarese, Joseph	Bowne International	New York

Documents, physical evidence, and/or information related to the subject matter of this interrogatory are in the custody of the named persons and/or Fujitsu Limited. Where such information is in Fujitsu Limited's custody, it generally is located in Tokyo, Japan. These include documents such as a press release, a letter to Bowne, e-mails, and business cards. To the extent LinkCo has requested such information in its request for production, the documents have been or will be provided subject to any objections Fujitsu has stated.

Interrogatory No. 11: Identify all persons with knowledge of information relevant to Fujitsu's efforts in the areas of products design, development, testing, and manufacturing, to the extent such efforts relate to any line of business or product relevant to the subject matter of this action prior to September 1997, including all predecessors of Fujitsu's Technology, and generally describe, identify the custodian of, and identify the location of any documents, physical evidence, or information that exists that is relevant to the same.

Answer: Fujitsu objects to this interrogatory as vague and ambiguous in its request for identification of persons with knowledge of product design, development, testing, and manufacturing "efforts . . . to the extent such efforts relate to any line of business or product relevant to the subject matter of this action . . ." because the question of which of Fujitsu's hundreds of businesses or products are relevant to the subject matter of this action cannot be determined without further articulation by LinkCo as to what trade secrets or other confidential information Fujitsu allegedly misappropriated. Subject to the foregoing objections and Fujitsu's right to supplement this Answer if necessary, Fujitsu hereby identifies the following persons with knowledge of Fujitsu's product design, development, testing, and manufacturing efforts related to the subject of the electronic filing and dissemination of corporate reports:

Hirata, Hideyo	Fujitsu Limited	Tokyo
Kitagawa, Manabu	Fujitsu Research Institute	Tokyo
Sakai, Yuichi	Fujitsu Limited	Tokyo
Shimohata, Yoshikazu	Fujitsu Research Institute	Tokyo
Tamura, Masayasu	Fujitsu Research Institute	Tokyo

Fujitsu further states that its proposed and actual work on systems and applications related to the electronic filing and dissemination of corporate reports was a natural outgrowth of its long-standing relationships with Japan's Ministry of Finance, the Tokyo Stock Exchange, the Osaka Securities Exchange, Nihon Keizai Shimbun, Inc., and other customers. Without limitation to work that may have been done by other groups, Fujitsu's Banking, Financial & Securities Sales Group and its Government and Public Utilities Sales Group have managed customer relationships that have involved work for the customers mentioned above and others. It would be virtually impossible to list all Fujitsu employees who have, over the years, devoted time to work on projects that might have some relationship to the "subject matter" of this action. In addition to the two sales groups mentioned above, several Fujitsu Limited engineering units and subsidiaries worked on projects prior to September 1997 that might have some relationship to the "subject matter" of this action. Again, without further articulation by LinkCo as to what trade secrets or other confidential information Fujitsu allegedly misappropriated, it is not possible to determine the identity of all persons who may have worked on relevant projects in the stated time period or to identify related documents. Documents, physical evidence, and/or information related to the subject matter of this interrogatory are in the custody of the named persons and/or Fujitsu Limited, or its customers. Where such information is in Fujitsu Limited's custody, it generally is located in Tokyo, Japan. These include documents such as specifications, requests for proposal, proposals, reports, design documentation, source code, object code, and others created in the course of developing systems and applications for customers. To the extent LinkCo has requested such information in its request for production, the documents have been or will be provided subject to any objections Fujitsu has stated.

Interrogatory No. 12. Identify all persons with knowledge of information relevant to Fujitsu's efforts in the areas of product design, development, testing, and manufacturing, to

the extent such efforts relate to any line of business or product relevant to the subject matter of this action between (and including) September 1997 and June 1998, including all predecessors of Fujitsu's Technology, and generally described, identify the custodian of, and identify the location of any documents, physical evidence, or information that exists that is relevant to the same.

Answer: Fujitsu objects to this interrogatory as vague and ambiguous in its request for identification of persons with knowledge of product design, development, testing, and manufacturing "efforts . . . to the extent such efforts relate to any line of business or product relevant to the subject matter of this action . . ." because the question of which of Fujitsu's hundreds of businesses or products are relevant to the subject matter of this action cannot be determined without further articulation by LinkCo as to what trade secrets or other confidential information Fujitsu allegedly misappropriated. Subject to the foregoing objections and Fujitsu's right to supplement this Answer if necessary, Fujitsu hereby identifies the following persons with knowledge of Fujitsu's sales, marketing, or promotional efforts related to the subject of the electronic filing and dissemination of corporate reports:

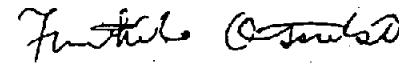
Asakura, Takafumi	Fujitsu Limited	Tokyo
Atobe, Kazunori	Fujitsu Limited	Tokyo
Fujitsu Okayama Systems Engineering Ltd.	--	Okayama
Fujitsu Shizuoka Engineering	--	Shizuoka
Hirata, Hideyo	Fujitsu Limited	Tokyo
Kamijyo, Hideki	Fujitsu Limited	Tokyo
Kitagawa, Manabu	Fujitsu Research Institute	Tokyo
Kitagawa, Yoshihito	Fujitsu Limited	Tokyo
Koga, Satoshi	Fujitsu Limited	Tokyo
Komuro, Hiroyuki	Fujitsu Shizuoka Engineering Ltd.	Tokyo
Nanbuya, Toru	Fujitsu Limited	Tokyo
Sakai, Yuichi	Fujitsu Limited	Tokyo
Shibata, Toru	Fujitsu Limited	Tokyo
Shimohata, Yoshikazu	Fujitsu Research Institute	Tokyo
Tamura, Masayasu	Fujitsu Research Institute	Tokyo
Tokutake, Yasuo	Fujitsu Limited	Tokyo
Yamamoto, Shuji	Fujitsu Limited	Tokyo
Yurino, Toshiki	Unknown	Okayama

Fujitsu further states that its proposed and actual work on systems and applications related to the electronic filing and dissemination of corporate reports was a natural outgrowth of its long-standing relationships with Japan's Ministry of Finance, the Tokyo Stock Exchange, the Osaka Securities Exchange, Nihon Keizai Shimbun, Inc., and other customers. Without limitation to work that may have been done by other groups, Fujitsu's Banking, Financial & Securities Sales Group and its Government and Public Utilities Sales Group have managed relationships that have involved work for the referenced customers and others. It would be virtually impossible to list all Fujitsu employees who have, devoted time to work on projects that might have some relationship to the "subject matter" of this action. In addition to the two sales groups mentioned above, several Fujitsu Limited engineering units and subsidiaries may have worked on projects between September 1997 and June 1998 that might have some relationship to the "subject matter" of this action. Again, without further articulation by LinkCo as to what trade secrets or other confidential information Fujitsu allegedly misappropriated, it is not possible to determine the identity of all persons who may have worked on relevant projects in the stated time period or to identify related documents. Certain documents, physical evidence, and/or information related to the subject matter of this interrogatory are in the custody of the named persons and/or Fujitsu Limited, or its customers. Where such information is in Fujitsu Limited's custody, it generally is located in Tokyo, Japan or Osaka, Japan. These include documents such as specifications, requests for proposal, proposals, reports, design documentation, source code, object code, and others created in the course of developing systems and applications for customers. To the extent LinkCo has requested such information in its request for production, the documents have been or will be provided subject to any objections Fujitsu has stated.

VERIFICATION

I, Fumihiko Otsuki, declare that I am employed by Fujitsu Limited as Manager, Capital Market Solutions, Business Development Dept., Sales Group, Banking, Insurance & Securities, and that I am authorized to execute this verification on behalf of Fujitsu Limited. I have read the foregoing Defendant Fujitsu Limited's Amended Response to Plaintiff's First Set of Interrogatories (Nos. 1-12) and it is my understanding that said document was prepared with the assistance and advice of Fujitsu Limited's counsel. I have contributed information toward the response of Interrogatory Numbers 6, 7, 9, and 10. As to the information I contributed, subject to any inadvertent or undiscovered errors and the right to make any changes if it appears that any omissions or errors have been made, the answers set forth are, to the best of my knowledge and belief, true and correct answers. As to the interrogatories whose answers I have not verified and as to the portions of answers containing information I did not provide, I do not have sufficient familiarity with the subject matter to allow me to verify the answers or portions thereof.

I declare under penalty of perjury under the laws of the United States of America that the foregoing statement is true and correct. Dated this 22nd day of March 2001 at Tokyo, Japan.

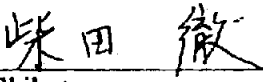


Fumihiko Otsuki

VERIFICATION

I, Toru Shibata, declare that I am employed by Fujitsu Limited as the Manager of Solution Development Department II, Systems Business Division I, Systems Engineering Group, and that I am authorized to execute this verification on behalf of Fujitsu Limited. I have read the foregoing Defendant Fujitsu Limited's Amended Response to Plaintiff's First Set of Interrogatories (Nos. 1-12) and it is my understanding that said document was prepared with the assistance and advice of Fujitsu Limited's counsel. I have contributed information toward the response of Interrogatory Numbers 1 through 7, and 9 through 12. As to the information I contributed, subject to any inadvertent or undiscovered errors and the right to make any changes if it appears that any omissions or errors have been made, the answers set forth are, to the best of my knowledge and belief, true and correct answers. As to the interrogatories whose answers I have not verified and as to the portions of answers containing information I did not provide, I do not have sufficient familiarity with the subject matter to allow me to verify the answers or portions thereof.

I declare under penalty of perjury under the laws of the United States of America that the foregoing statement is true and correct. Dated this 23 day of March 2001 at Tokyo, Japan.



Toru Shibata

LX006676

VERIFICATION

I, Yuichi Sakai, declare that I am employed by Fujitsu Limited as Manager, National Government Systems Department I, Systems Business Division III, Systems Engineering Group, and that I am authorized to execute this verification on behalf of Fujitsu Limited. I have read the foregoing Defendant Fujitsu Limited's Amended Response to Plaintiff's First Set of Interrogatories (Nos. 1-12) and it is my understanding that said document was prepared with the assistance and advice of Fujitsu Limited's counsel. I have contributed information toward the response of Interrogatory Numbers 4, 5, 7, 8, 9, 11, and 12. As to the information I contributed, subject to any inadvertent or undiscovered errors and the right to make any changes if it appears that any omissions or errors have been made, the answers set forth are, to the best of my knowledge and belief, true and correct answers. As to the interrogatories whose answers I have not verified and as to the portions of answers containing information I did not provide, I do not have sufficient familiarity with the subject matter to allow me to verify the answers or portions thereof.

I declare under penalty of perjury under the laws of the United States of America that the foregoing statement is true and correct. Dated this 2nd day of April 2001 at Tokyo, Japan.

酒 井 祐 一

Yuichi Sakai

LX006677

CERTIFICATE OF SERVICE

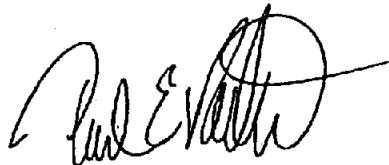
Paul E. Veith, an attorney, hereby certifies that he caused a true and correct copy of the foregoing document to be served upon all counsel of record by messenger or by first-class mail, postage prepaid, as follows:

Irving B. Levinson (by messenger)
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New York, New York 10020-1104

David Israel (by mail)
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3850 N. Causeway Boulevard, Suite 350
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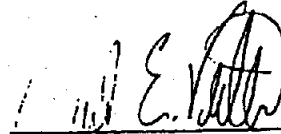
on this 20th day of March 2001.



Paul E. Veith

FUJITSU LIMITED

By:



One of its attorneys

Dated: March 20, 2001

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