

**CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

LINKCO, INC.,

Plaintiff,

v.

BOWNE & CO., INC.,

Defendant.

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Case No. 04 L 1794

Honorable Bill Taylor

NOTICE OF FILING

To: W. Dennis Drehkoff
Vedder, Price, Kaufman & Kamholz, PC
222 North LaSalle Street, Suite 2600
Chicago, Illinois 60601

Alan R. Borlack
Bailey Borlack Nadelhoffer LLC
135 South LaSalle Street, Suite 3950
Chicago, Illinois 60603

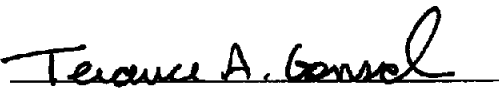
PLEASE TAKE NOTICE that on July 23, 2007 Defendant Bowne & Co., Inc., caused **Bowne & Co., Inc.'s Objections And Responses To LinkCo, Inc.'s Supplemental Requests To Admit** to be filed with the Clerk of the Circuit Court, Cook County, Illinois, Richard J. Daley Center, 50 West Washington Street, Chicago, Illinois 60602, a copy of which is hereby served upon you.

Dated: July 23, 2007

Respectfully submitted,

SONNENSCHN NATH & ROSENTHAL LLP

By:


One of the Attorneys for Defendant
BOWNE & CO., INC.

John C. Koski
Terance A. Gonsalves
Jacque McCray
SONNENSCHN NATH & ROSENTHAL LLP
7800 Sears Tower
233 South Wacker Drive
Chicago, Illinois 60606-6404
(312) 876-8000
Firm No. 9078



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LINKCO, INC.,)	
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Plaintiff,)	
)	Case No. 04 L 1794
v.)	
)	Honorable Bill Taylor
BOWNE & CO., INC.,)	
)	
Defendant.)	

**BOWNE & CO., INC.'S OBJECTIONS AND RESPONSES
TO LINKCO, INC.'S SUPPLEMENTAL REQUESTS TO ADMIT**

Bowne & Co., Inc. ("Bowne"), through its undersigned counsel, hereby responds to LinkCo, Inc.'s ("LinkCo") Supplemental Requests To Admit (the "Requests") as follows:

SPECIFIC OBJECTIONS AND RESPONSES

5. The email produced by Bowne in discovery herein and marked as B 32 and attached as Exhibit 3 (March 31, 1998 email from Kiyoto Kanda to Bill Penders, copy to Joseph Savarese and Lisa DeMeglio) (a) is genuine and (b) was not by produced by Bowne in response to the December 15, 2000 Subpoena.

RESPONSE: Subject to the General Objections, Bowne admits the allegations of Request No. 5.

7. The email produced by Bowne in discovery herein and marked as B34 and attached as Exhibit 4 (March 12, 1998 e-mail from Kyoto Kanda to Joseph Saverese, copy to Carl Crosseto, Bill Penders, John Penchollow, and Lisa DiMeglio) is (a) genuine and (b) was not by produced by Bowne in response to the December 15, 2000 Subpoena.

RESPONSE: Subject to the General Objections, Bowne admits the allegations of Request No. 7.

18. The video presentation referred to in request no. 17 of RFA was accessible through the internet including through at least http://www.emcsoftware.info.com/mk/get/REC_06-27-02-Bowne_EXP.

RESPONSE: In addition to the General Objections, Bowne objects to this Request on the grounds that the statement that the video presentation "was accessible through the internet" is

overly broad, not limited in time and is therefore vague and ambiguous. Bowne further objects to this Request on that grounds that it seeks information which is not in Bowne's control or possession. Bowne further lacks personal knowledge of the allegations contained in Request No. 18. Subject to these objections and the General Objections, Bowne states that it has made a reasonable inquiry and the information known or readily obtainable to Bowne is insufficient to enable Bowne to admit or deny the allegations of Request No. 18. Further answering, Bowne denies that video presentation referred to in Request No. 17 of RFA is accessible through the internet at http://www.emcsoftware.info.com/mk/get/REC_06-27-02-Bowne_EXP.

19. The version of DOD presented in the video presentation referred to in request no. 17 of RFA was a different version than the initial Bowne version of DOD.

RESPONSE: Subject to the General Objections, Bowne admits the allegations of Request No. 19.

29. The June 24, 1999 letter from Kiyoto Kanda to Joseph Savarese, copy to Bill Penders, attached as Exhibit 15 to RFA (a) was emailed or mailed to the recipients on or about the date it bears and (b) is genuine.

RESPONSE: In addition to the General Objections, Bowne objects to this Request on the grounds that it was not the custodian of and did not create the copy of the email attached as Exhibit 15. Therefore, Bowne lacks personal knowledge of the origin and authenticity of the Exhibit 15. Subject to these objections and the General Objections, Bowne admits that the email message attached as Exhibit 15 is genuine. Bowne states that it has made a reasonable inquiry and the information known or readily obtainable to Bowne is insufficient to enable Bowne to admit or deny whether the dates, times or any of the metadata/header information contained on Exhibit 15 are genuine. Therefore, Bowne cannot truthfully admit or deny whether the email attached as Exhibit 15 was emailed to the recipients on or about June 24, 1999. Bowne denies the remaining allegations of Request No. 29.

GENERAL OBJECTIONS APPLICABLE TO ALL REQUESTS

1. The following objections and responses are incorporated by reference in each of Bowne's specific Responses to the Requests. Any specific Response by Bowne to the Requests to Admit is made subject to these General Objections.
2. Bowne objects to the Requests to Admit to the extent they seek information protected by the attorney-client, work-product and/or other applicable privileges, and Bowne will not provide such privileged information.
3. Bowne states that its investigation into the allegations of this matter is ongoing, and Bowne reserves the right, but undertakes no obligation beyond that required by the applicable discovery rules, to supplement these Responses as additional information comes to light.
4. Bowne generally objects to any Request to Admit that seeks to impose an obligation on Bowne that is greater than the obligations imposed by the Illinois Supreme Court Rules and the Illinois Code of Civil Procedure.
5. Bowne objects to any Request to Admit that seeks information which: (a) is not in Bowne's control or possession; (b) is already in the possession and control of LinkCo; or (c) is obtainable with equal or greater facility by LinkCo.
6. Bowne objects to these Requests to the extent they seek information that is neither relevant to the claims and defenses in this case nor reasonably calculated to lead to the discovery of admissible evidence.
7. Bowne responds to these Requests without waiving, or intending to waive, but on the contrary, preserving and intending to preserve: (a) the right to object, on the grounds of competency, privilege, relevance or materiality, or any other proper grounds, to the use of any documents or other information for any purpose in whole or in part, in any subsequent

proceeding in this action or in any other action; (b) the right to object on any and all grounds, at any time, to other requests for production, interrogatories, or other discovery procedures involving or relating to the subject matter of the request to which the defendant has responded herein; and (c) the right at any time to revise, correct, add to, or clarify any of the responses made herein. The inadvertent production of any privileged document or information shall not be deemed a waiver of any applicable privilege with respect to such document or information or any other document or information.

Dated: July 23, 2007

SONNENSCHN NATH & ROSENTHAL LLP

By: Terance A. Gonsalves
One of the Attorneys for Defendant
BOWNE & CO., INC.

John C. Koski
Terance A. Gonsalves
Jacque McCray
SONNENSCHN NATH & ROSENTHAL LLP
7800 Sears Tower
233 South Wacker Drive
Chicago, Illinois 60606-6404
(312) 876-8000
Firm No. 9078


CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that he caused a copy of the foregoing to be sent via facsimile and United States mail, postage prepaid, to:

W. Dennis Drehkoff
VEDDER PRICE KAUFMAN & KAMMHOLZ
222 North LaSalle Street
Chicago, Illinois 60601

Alan R. Borlack
BAILEY BORLACK NADELHOFFER LLC
135 South LaSalle Street, Suite 3950
Chicago, Illinois 60603

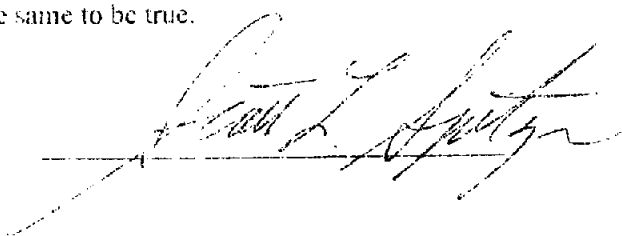
on this 23rd day of July, 2007.



Terance A. Gonsalves

VERIFICATION

Upon penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that he or she is an officer, partner, or agent of defendant Bowne & Co., Inc., that he or she has read the foregoing document, that the answers made herein are true, correct, and complete to the best of his or her knowledge and belief, except as to matters therein stated to be on information and belief, and as to such matters he or she certifies as aforesaid that he or she verily believes the same to be true.



A handwritten signature in cursive script, appearing to read "Robert L. Spitzer", is written over a horizontal line.

**CIRCUIT COURT OF COOK COUNTY, ILLINOIS
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LINKCO, INC.,

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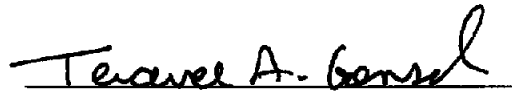
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Dated: July 23, 2007

Respectfully submitted,

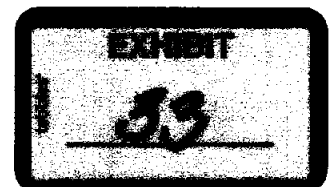
SONNENSCHN NATH & ROSENTHAL LLP

By:



One of the Attorneys for Defendant
BOWNE & CO., INC.

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Terance A. Gonsalves
Jacque McCray
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**BOWNE & CO., INC.'S SUPPLEMENTAL OBJECTIONS AND RESPONSES
TO LINKCO, INC.'S REQUESTS TO ADMIT**

Bowne & Co., Inc. ("Bowne"), through its undersigned counsel, hereby supplements its responses to LinkCo, Inc.'s ("LinkCo") Requests To Admit (the "Requests") as follows:

SPECIFIC OBJECTIONS AND RESPONSES

1. Each of the e-mails and other documents marked as KK 000001-0000201 attached as Exhibit 1 is genuine.

SUPPLEMENTAL RESPONSE: In addition to the General Objections, Bowne objects to this Request on the grounds that it was not the custodian of and did not create the emails and other documents attached to these Requests as Exhibit 1. Based on the affidavit of Kiyota Kanda dated June 28, 2006, the affidavit of Makoto Toyoshima dated July 10, 2006, and the affidavit of David Israel Rosen dated July 14, 2006, Kiyota Kanda produced these emails and documents to LinkCo, many of which were retrieved from Kiyota Kanda's personal computer. Therefore, Bowne lacks personal knowledge of the origin and authenticity of the emails and other documents attached to these Requests as Exhibit 1. Subject to these objections and the General Objections, Bowne admits that the complete email messages (and not any of the partial emails) contained on the following pages are genuine: KK 000001-5, 10-12, 15-39, 41-71, 73-74, 76-80, 83-85, 87-107. Bowne states that it has made a reasonable inquiry and the information known or readily obtainable to Bowne is insufficient to enable Bowne to admit or

deny whether the dates, times or any of the metadata/header information contained on the pages identified above are genuine. Further responding, Bowne states that it has made a reasonable inquiry and the information known or readily obtainable to Bowne is insufficient to enable Bowne to admit or deny the remaining allegations of Request No. 1.

4. None of the e-mails or other documents attached as Exhibit 1 was produced by Bowne in response to the Subpoena issued to Bowne dated December 15, 2000 ("December 15, 2000 Subpoena") in the case entitled LinkCo, Inc. v. Fujitsu, Inc. in the United States District Court for the Southern District of New York, No. 00 Civ 7242 ("Fujitsu case").

SUPPLEMENTAL RESPONSE: In addition to the General Objections, Bowne objects to this Request on the grounds that it was not the custodian of and did not create the emails and other documents attached to these Requests as Exhibit 1. Based on the affidavit of Kiyota Kanda dated June 28, 2006, the affidavit of Makoto Toyoshima dated July 10, 2006, and the affidavit of David Israel Rosen dated July 14, 2006, Kiyota Kanda produced these emails and documents to LinkCo, many of which were retrieved from Kiyota Kanda's personal computer. Therefore, Bowne lacks personal knowledge of the origin and authenticity of the emails and other documents attached to these Requests as Exhibit 1. Subject to these objections and the General Objections, Bowne acknowledges that the complete email messages (and not any of the partial emails) contained on the following pages are genuine: KK 000001-5, 10-12, 15-39, 41-71, 73-74, 76-80, 83-85, 87-107. Bowne states that it has made a reasonable inquiry and the information known or readily obtainable to Bowne is insufficient to enable Bowne to admit or deny whether the dates, times or any of the metadata/header information contained on the pages identified above are genuine. Further responding, Bowne states that it has made a reasonable inquiry and the information known or readily obtainable to Bowne is insufficient to enable Bowne to admit or deny whether remaining emails and documents are genuine. Further, Bowne denies that the emails on the following Bates numbered pages were not produced by Bowne in response to the December 15, 2000 Subpoena: KK 000001-02, 10-12, 15-24, 53-54, 76-80, 90-

103. Responding further, Bowne states that in making its production in response to the December 15, 2000 Subpoena its counsel and LinkCo's counsel reached an agreement regarding the scope of the production pursuant to which LinkCo's counsel agreed to follow-up with Bowne's counsel if LinkCo wished additional documents. LinkCo's counsel never did so.

17. In or about 2002, Thom Schiavone, Bowne's General Manager of Documents on Demand, made a video presentation of a version of Documents on Demand, a genuine copy of which video presentation was attached as Exhibit 6-B to the Affidavit of David Rosen Israel that was served on Bowne as part of LinkCo's response in opposition to Bowne's Motion To Dismiss the Second Amended Complaint ("DIR Affidavit").

SUPPLEMENTAL RESPONSE: In addition to the General Objections, Bowne objects to this Request on the grounds that it was not the custodian of and did not create the copy of the video presentation that was attached as Exhibit 6-B to the Affidavit of David Israel Rosen. Therefore, Bowne lacks personal knowledge of the origin and authenticity of the video presentation. Bowne further objects to this Request on the grounds that "In or about 2002" is overly broad and therefore vague and ambiguous. Subject to these objections and the General Objections, Bowne admits that the copy of the video presentation that was attached as Exhibit 6-B to the Affidavit of David Rosen Israel appears genuine. Bowne denies the remaining allegations of Request No. 17.

20. On or about March 14, 2003, Bowne's Chairman Robert Johnson made statements through a video accessible through Bowne's public website at www.bowne.com, a genuine copy of which was attached as a CD-ROM and served upon Bowne as Exhibit 24 to DIR Affidavit.

SUPPLEMENTAL RESPONSE: In addition to the General Objections, Bowne objects to this Request on the grounds that the statement that the video was "accessible through Bowne's public website at www.bowne.com" is not limited in time and is therefore vague and ambiguous. Bowne also objects on the grounds that it is vague and ambiguous as the Request does not identify the "statements" at issue. Bowne further objects to this Request on the grounds that it was not the custodian of and did not create the copy of the CD-ROM that was attached and

served upon Bowne as Exhibit 24 to the DIR Affidavit. Therefore, Bowne lacks personal knowledge of the origin and authenticity of the CD-ROM. Subject to these objections and the General Objections, Bowne admits that the copy of the video that was attached and served upon Bowne as Exhibit 24 to the DIR Affidavit appears genuine. Bowne denies the remaining allegations of Request No. 20.

28. The June 24, 1999 letter from Joseph Savarese to Kiyoto Kanda, copy to Bill Penders, attached as Exhibit 14 (a) was emailed or mailed to the recipients on or about the date it bears and (b) is genuine.

SUPPLEMENTAL RESPONSE: In addition to the General Objections, Bowne objects to this Request on the grounds that it was not the custodian of and did not create the copy of the email attached as Exhibit 14. Therefore, Bowne lacks personal knowledge of the origin and authenticity of the Exhibit 14. Subject to these objections and the General Objections, Bowne admits that the email message attached as Exhibit 14 is genuine. Bowne states that it has made a reasonable inquiry and the information known or readily obtainable to Bowne is insufficient to enable Bowne to admit or deny whether the dates, times or any of the metadata/header information contained on Exhibit 14 are genuine. Therefore, Bowne cannot truthfully admit or deny whether the email attached as Exhibit 14 was emailed to the recipients on or about June 24, 1999. Bowne denies the remaining allegations of Request No. 28.

39. The e-mail dated June 15, 1999 from Joseph Savarese to Mark Hjerpe, copy to Kiyoto Kanda, attached as Exhibit 20 (a) is genuine (b) was transmitted to the recipients on or about June 15, 1999, and (c) each of Joseph Savarese and Mark Hjerpe were employees of Bowne at the times of transmission and reception.

SUPPLEMENTAL RESPONSE: In addition to the General Objections, Bowne objects to this Request on the grounds that it was not the custodian of and did not create the copy of the email attached as Exhibit 20. Therefore, Bowne lacks personal knowledge of the origin and authenticity of the Exhibit 20. Subject to these objections and the General Objections, Bowne admits that the email message attached as Exhibit 20 is genuine. Bowne states that it has made a

reasonable inquiry and the information known or readily obtainable to Bowne is insufficient to enable Bowne to admit or deny whether the dates, times or any of the metadata/header information contained on Exhibit 20 are genuine. Therefore, Bowne cannot truthfully admit or deny whether the email attached as Exhibit 20 was transmitted to the recipients on or about June 15, 1999. Bowne further states that it has made a reasonable inquiry and the information known or readily obtainable to Bowne is insufficient to enable Bowne to admit or deny whether Joseph Savarese and Mark Hjerpe were employees of Bowne at the time of transmission and reception of Exhibit 20. Subject to these objections and the General Objections, Bowne admits that Joseph Savarese and Mark Hjerpe were employees of Bowne on June 15, 1999. Bowne denies the remaining allegations of Request No. 39.

40. The e-mail dated June 10, 1999 from Kiyoto Kanda to Joseph Savarese, copy to Mark Hjerpe and Bill Penders, attached as Exhibit 21 (a) is genuine (b) was transmitted to the recipients on or about June 10, 1999, and (c) each of Joseph Savarese, Mark Hjerpe, and Bill Penders were employees of Bowne at the times of transmission and reception.

SUPPLEMENTAL RESPONSE: In addition to the General Objections, Bowne objects to this Request on the grounds that it was not the custodian of and did not create the copy of the email attached as Exhibit 21. Therefore, Bowne lacks personal knowledge of the origin and authenticity of the Exhibit 21. Subject to these objections and the General Objections, Bowne admits that the email message attached as Exhibit 21 is genuine. Bowne states that it has made a reasonable inquiry and the information known or readily obtainable to Bowne is insufficient to enable Bowne to admit or deny whether the dates, times or any of the metadata/header information contained on Exhibit 21 are genuine. Therefore, Bowne cannot truthfully admit or deny whether the email attached as Exhibit 21 was transmitted to the recipients on or about June 10, 1999. Bowne further states that it has made a reasonable inquiry and the information known or readily obtainable to Bowne is insufficient to enable Bowne to admit or deny whether Joseph Savarese, Mark Hjerpe, and Bill Penders were employees of Bowne at the times of transmission

and reception of Exhibit 21. Subject to these objections and the General Objections, Bowne admits that Joseph Savarese, Mark Hjerpe, and Bill Penders were employees of Bowne on June 10, 1999. Bowne denies the remaining allegations of Request No. 40.

41. The e-mail dated June 3, 1999 from Lisa DiMeglio to "Kanda@tka.att.ne.jp", copy to Judy D'Amico and Harry Qui attached as Exhibit 22 (a) is genuine (b) was transmitted to the recipients on or about June 13, 1999, (c) "Kanda@tka.att.ne.jp" was an email address of Kiyoto Kanda, (d) that Lisa DiMeglio, Judy DAmico, and Harry Qui were employees of Bowne at the times of transmission and reception.

SUPPLEMENTAL RESPONSE: In addition to the General Objections, Bowne objects to this Request on the grounds that it was not the custodian of and did not create the copy of the email attached as Exhibit 22. Therefore, Bowne lacks personal knowledge of the origin and authenticity of the Exhibit 22. Subject to these objections and the General Objections, Bowne admits that the email message attached as Exhibit 22 is genuine. Bowne states that it has made a reasonable inquiry and the information known or readily obtainable to Bowne is insufficient to enable Bowne to admit or deny whether the dates, times or any of the metadata/header information contained on Exhibit 22 are genuine. Therefore, Bowne cannot truthfully admit or deny whether the email attached as Exhibit 22 was transmitted to the recipients on or about June 13, 1999. Bowne further states that it has made a reasonable inquiry and the information known or readily obtainable to Bowne is insufficient to enable Bowne to admit or deny whether Lisa DiMeglio, Judy DAmico, and Harry Qui were employees of Bowne at the times of transmission and reception of Exhibit 22. Subject to these objections and the General Objections, Bowne admits that Lisa DiMeglio, Judy DAmico, and Harry Qui were employees of Bowne on June 3, 1999. Bowne further states that it has made a reasonable inquiry and that the information known or readily obtainable to Bowne is insufficient to enable Bowne to admit or deny whether "Kanda@tka.att.ne.jp" was an email address of Kiyoto Kanda. Bowne denies the remaining allegations of Request No. 41.

42. The e-mail dated June 1, 1999 from Kiyoto Kanda to Lisa DiMeglio, copy to Judy D'Amico, Harry Qui, Joseph Savarese, and Bill Penders, attached as Exhibit 23 (a) is genuine (b) was transmitted to the recipients on or about June 1, 1999, and (c) each of Lisa DiMeglio, Judy D'Amico, Harry Qui, Joseph Savarese, and Bill Penders were employees of Bowne at the times of transmission and reception.

SUPPLEMENTAL RESPONSE: In addition to the General Objections, Bowne objects to this Request on the grounds that it was not the custodian of and did not create the copy of the email attached as Exhibit 23. Therefore, Bowne lacks personal knowledge of the origin and authenticity of the Exhibit 23. Subject to these objections and the General Objections, Bowne admits that the email message attached as Exhibit 23 is genuine. Bowne states that it has made a reasonable inquiry and the information known or readily obtainable to Bowne is insufficient to enable Bowne to admit or deny whether the dates, times or any of the metadata/header information contained on Exhibit 23 are genuine. Therefore, Bowne cannot truthfully admit or deny whether the email attached as Exhibit 23 was transmitted to the recipients on or about June 1, 1999. Bowne further states that it has made a reasonable inquiry and the information known or readily obtainable to Bowne is insufficient to enable Bowne to admit or deny whether Lisa DiMeglio, Judy D'Amico, Harry Qui, Joseph Savarese, and Bill Penders were employees of Bowne at the times of transmission and reception of Exhibit 23. Subject to these objections and the General Objections, Bowne admits that Lisa DiMeglio, Judy D'Amico, Harry Qui, Joseph Savarese, and Bill Penders were employees of Bowne on June 1, 1999. Bowne denies the remaining allegations of Request No. 42.

43. The e-mail dated June 3, 1999 from Kiyoto Kanda to Lisa DiMeglio, copy to Judy D'Amico, Harry Qui, Bill Penders and Joseph Savarese, attached as Exhibit 24 (a) is genuine (b) was transmitted to the recipients on or about June 1, 1999, and (c) each of Lisa DiMeglio, Judy D'Amico, Harry Qui, Bill Penders and Joseph Savarese were employees of Bowne at the times of transmission and reception.

SUPPLEMENTAL RESPONSE: In addition to the General Objections, Bowne objects to this Request on the grounds that it was not the custodian of and did not create the copy of the

email attached as Exhibit 24. Therefore, Bowne lacks personal knowledge of the origin and authenticity of the Exhibit 24. Subject to these objections and the General Objections, Bowne admits that the email message attached as Exhibit 24 is genuine. Bowne states that it has made a reasonable inquiry and the information known or readily obtainable to Bowne is insufficient to enable Bowne to admit or deny whether the dates, times or any of the metadata/header information contained on Exhibit 24 are genuine. Therefore, Bowne cannot truthfully admit or deny whether the email attached as Exhibit 24 was transmitted to the recipients on or about June 1, 1999. Bowne further states that it has made a reasonable inquiry and the information known or readily obtainable to Bowne is insufficient to enable Bowne to admit or deny whether Lisa DiMeglio, Judy DAMico, Harry Qui, Bill Penders and Joseph Savarese were employees of Bowne at the times of transmission and reception of Exhibit 24. Subject to these objections and the General Objections, Bowne admits that Lisa DiMeglio, Judy DAMico, Harry Qui, Bill Penders and Joseph Savarese were employees of Bowne on June 1, 1999. Bowne denies the remaining allegations of Request No. 43.

GENERAL OBJECTIONS APPLICABLE TO ALL REQUESTS

1. The following objections and responses are incorporated by reference in each of Bowne's specific Responses to the Requests. Any specific Response by Bowne to the Requests to Admit is made subject to these General Objections.
2. Bowne objects to the Requests to Admit to the extent they seek information protected by the attorney-client, work-product and/or other applicable privileges, and Bowne will not provide such privileged information.
3. Bowne states that its investigation into the allegations of this matter is ongoing, and Bowne reserves the right, but undertakes no obligation beyond that required by the

applicable discovery rules, to supplement these Responses as additional information comes to light.

4. Bowne generally objects to any Request to Admit that seeks to impose an obligation on Bowne that is greater than the obligations imposed by the Illinois Supreme Court Rules and the Illinois Code of Civil Procedure.

5. Bowne objects to any Request to Admit that seeks information which: (a) is not in Bowne's control or possession; (b) is already in the possession and control of LinkCo; or (c) is obtainable with equal or greater facility by LinkCo.

6. Bowne objects to these Requests to the extent they seek information that is neither relevant to the claims and defenses in this case nor reasonably calculated to lead to the discovery of admissible evidence.

7. Bowne responds to these Requests without waiving, or intending to waive, but on the contrary, preserving and intending to preserve: (a) the right to object, on the grounds of competency, privilege, relevance or materiality, or any other proper grounds, to the use of any documents or other information for any purpose in whole or in part, in any subsequent proceeding in this action or in any other action; (b) the right to object on any and all grounds, at any time, to other requests for production, interrogatories, or other discovery procedures involving or relating to the subject matter of the request to which the defendant has responded herein; and (c) the right at any time to revise, correct, add to, or clarify any of the responses made herein. The inadvertent production of any privileged document or information shall not be deemed a waiver of any applicable privilege with respect to such document or information or any other document or information.

Dated: July 23, 2007

SONNENSCHN NATH & ROSENTHAL LLP

By: Terance A. Gonsalves
One of the Attorneys for Defendant
BOWNE & CO., INC.

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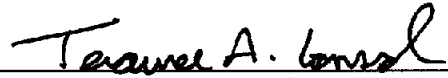
CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that he caused a copy of the foregoing to be sent via facsimile and United States mail, postage prepaid, to:

W. Dennis Drehkoff
VEDDER PRICE KAUFMAN & KAMMHOLZ
222 North LaSalle Street
Chicago, Illinois 60601

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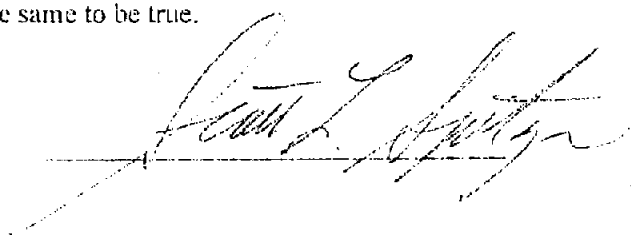
on this 23rd day of July, 2007.



Terance A. Gonsalves

VERIFICATION

Upon penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that he or she is an officer, partner, or agent of defendant Bowne & Co., Inc., that he or she has read the foregoing document, that the answers made herein are true, correct, and complete to the best of his or her knowledge and belief, except as to matters therein stated to be on information and belief, and as to such matters he or she certifies as aforesaid that he or she verily believes the same to be true.



A handwritten signature in cursive script, written in black ink, positioned above a horizontal line. The signature is somewhat stylized and difficult to decipher, but it appears to be a male name.

Tables and Figures:

**Analysis of Links in Directory
Glovia.fujitsu.com/jp/cybersmr**

Subdirectory Number		Japanese	Redacted English
1	Glovia.fujitsu.com/jp/cybersmr/gcv10	10	7
2	Glovia.fujitsu.com/jp/cybersmr/shicho/	44	43
3	Glovia.fujitsu.com/jp/cybersmr/renketsu	48	45
4	Glovia.fujitsu.com/jp/cybersmr/cashf	48	28
5	Glovia.fujitsu.com/jp/cybersmr/rennou/	37	34
6	Glovia.fujitsu.com/jp/cybersmr/kessho	49	48
7	Glovia.fujitsu.com/jp/cybersmr/kigyoyou	36	35
8	Glovia.fujitsu.com/jp/cybersmr/brn	51	22
9	Glovia.fujitsu.com/jp/cybersmr/kanri	51	17
	TOTALS	374	279

Notes:

- a) Redacted English includes white on a white background.
- b) Of the 374 links in Japanese, 279 or 75% are redacted in English.
- c) gcv10 is Enterprise Accounting Renaissance demonstrated below.



