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13 ADDITIONAL COUNSEL

14 IN THE UNITED STATES DISTRICT COURT  
15 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
16 SOUTHERN DIVISION

18 ECHOSTAR SATELLITE CORP., *et al.*,  
19 Plaintiffs,  
20 v.  
21 NDS GROUP PLC, *et al.*,  
22 Defendants.

Case No. SA CV 03-950 DOC (JTLx)  
NDS'S RESPONSES TO  
ECHOSTAR'S SEVENTH SET OF  
INTERROGATORIES  
(NOS. 32-33)

25 CASE NO.  
26 SA CV 03-950 DOC (JTLx)  
27 ECHOSTAR SATELLITE CORP., *et al.*,

vs.

NDS GROUP PLC, *et al.*

HIGHLY CONFIDENTIAL

NDS'  
SEVEN  
Cs

PLAINTIFF'S EXHIBIT 1082

DATE \_\_\_\_\_ IDEN.

DATE \_\_\_\_\_ EVID.

BY \_\_\_\_\_  
Deputy Clerk

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18 ECHOSTAR SATELLITE CORP., *et al.*,

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Case No. SA CV 03-950 DOC (JTLx)

**NDS'S RESPONSES TO  
ECHOSTAR'S SEVENTH SET OF  
INTERROGATORIES  
(NOS. 32-33)**

**HIGHLY CONFIDENTIAL**

NDS'S RESPONSES TO ECHOSTAR'S  
SEVENTH SET OF INTERROGATORIES  
Case No. SA CV 03-950 DOC (JTLx)

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**INTERROGATORY RESPONSES**

**INTERROGATORY NO. 32:**

With respect to the document bates labeled NDS013290-NDS013291 produced by Defendants, please identify the author, all recipients, the date of transmission, and state the identities of "the field" and NDS's "contact" referenced in this document.

**RESPONSE TO INTERROGATORY NO. 32:**

NDS objects to the extent that this Request seeks information protected from disclosure by attorney-client privilege and/or the attorney work-product doctrine. NDS further objects on the basis that this interrogatory comprises at least five in number including all discrete subparts within the meaning of FRCP 33.

Subject to and without waiving any of its objections, NDS responds as follows:

Based on a reasonable investigation and the best information available to NDS, both of which have been materially impacted by the serious illness of the author of the document (Chaim Shen-Orr, who is undergoing radiation therapy in an isolation ward for his third recurrence of cancer): the author of the document was Chaim Shen-Orr; the only known recipient of the document was John Norris;

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1 the document was transmitted some time on or after August 23, 1998; NDS has  
2 been unable to determine the identities of either "the field" or NDS's "contact"  
3 referenced in the document.  
4

5 **INTERROGATORY NO. 33:**

6 Please explain the meaning behind, and all facts and circumstances related to,  
7 the following statement in the document bates labeled NDS013290-NDS013291  
8 produced by Defendants: "They need to be absolutely certain there is not the hidden  
9 possibility of identifying the ID of the E\* card that their code comes from, some  
10 kind of a 'fingerprint' or a receiver's serial number (if a card has been paired) in the  
11 code that is developed."

12 **RESPONSE TO INTERROGATORY NO. 33:**

13 NDS objects to the extent that this Request seeks information protected from  
14 disclosure by attorney-client privilege and/or the attorney work-product doctrine.  
15 NDS further objects to this Request as overly broad and unduly burdensome and  
16 not reasonably calculated to lead to the discovery of admissible evidence.

17 Subject to and without waiving any of its objections, NDS responds as  
18 follows:

19 Based on a reasonable investigation and the best information available to  
20 NDS, both of which have been materially impacted by the serious illness of the  
21 author of the document (Chaim Shen-Orr, who is undergoing radiation therapy in  
22 an isolation ward for his third recurrence of cancer): NDS has been unable to  
23 confirm the meaning behind the referenced statement; NDS believes that the facts  
24 and circumstances related to that statement relate to additional materials needed for  
25 the reverse engineering work performed by NDS in Windsor, Ontario during  
26 September 1998.  
27  
28

1 Dated: August 13, 2007

2  
3 NATHANIEL L. DILGER  
4 DARIN W. SNYDER  
5 DAVID R. EBERHART  
6 O'MELVENY & MYERS LLP

7 By *David R. Eberhart*

8 David R. Eberhart

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11 NDS AMERICAS, INC.

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13 YARMUTH WILSDON CALFO PLLC  
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16 NDS AMERICAS, INC.

17 RICHARD L. STONE  
18 KENNETH D. KLEIN  
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20 Attorneys for Defendants  
21 NDS GROUP PLC and  
22 NDS AMERICAS, INC.

23 SF1:680157.2

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