

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GAMES WORKSHOP LIMITED,

Plaintiff,

v.

CHAPTERHOUSE STUDIOS LLC and JON
PAULSON d/b/a PAULSON GAMES

Defendants.

Civil Action No. 1:10-cv-8103

Hon. Matthew F. Kennelly
Hon. Jeffrey T. Gilbert

**PLAINTIFF GAMES WORKSHOP LIMITED'S SECOND SUPPLEMENTAL RESPONSE
TO DEFENDANT CHAPTERHOUSE STUDIOS LLC'S INTERROGATORIES SET FOUR**

Pursuant to Fed.R.Civ.P. Rules 26 and 33, Games Workshop responds as follows to the Fourth Set Interrogatories of Defendant Chapterhouse Studios LLC.

GENERAL OBJECTIONS

1. Games Workshop incorporates by reference the general objections in Games Workshop Limited's Response and Supplemental Response to Defendant Chapterhouse Studios LLC's Interrogatories Set Four.

INTERROGATORIES

INTERROGATORY NO. 18:

Separately for each mark YOU allege in this action, provide the date of first "use in commerce" of the mark (as that term is defined in 15 U.S.C. § 1127) by you in the U.S., and the nature of such use.

RESPONSE:

Games Workshop objects that this request seeks information that is irrelevant and not likely to lead to the discovery of admissible evidence insofar as Chapterhouse does not purport to claim priority of use over Games Workshop with respect to any of its marks in issue. As a result

the request is also overbroad and unduly burdensome.

Without prejudice to or waiver of the foregoing objections, Games Workshop states that the following marks were used by Games Workshop to identify itself and its Warhammer 40K line of books, magazines, miniatures, boxed sets, and other similar merchandise. The nature of such use involved the use in commerce of the Mark in the United States through the sale of a book, magazine, miniature, boxed set, or other similar merchandise at least as early as the date specified.

Mark	Date of first “use in commerce” in the U.S. at least as early as
Warhammer	1983
Warhammer 40K	1987
40K	1987
40,000	1987
Games Workshop	1981
GW	1981
Space Marine	1986
Eldar	1988
Dark Angels	1987
Tau	2001
Aquila	1987
Adeptus Mechanicus	1987
Assault Alpha Legion	1987
Black Templars	1993
Blood Angels	1997
Blood Ravens	2004
Cadian	1995
Carnifex	1993
Chaos Space Marines	1989
Chaplain	1987

Chimera	1995
Crimson Fists	1987
Dark Angel	1987
Deathwatch	2001
Devastator	1989
Dreadnought	1987
Drop Pod	1990
Eldar	1987
Eldar Farseer	1990
Eldar Jet Bike	1988
Eldar Warlock	1990
Eldar Seer Council	2000
Empire	1986
Exorcist	1989
Flesh Tearers	1987
Gene Stealer	1987
Grenade Launcher	1987
Halberd	1987
Heavy Bolter	1987
Heresy Armour	1991
Hellhound	1995
High Elf	1992
Hive Tyrant	1987
Horus Heresy	1988
Howling Banshee	1991
Imperial Fist	1991
Imperial Guard	1989
Inquisition	1987
Iron Hands	1987
Jetbike	1987
Jump Pack	1987

Land Raider	1987
Land Speeder	1987
Legion of the Damned	1988
Librarian	1989
Lightning Claw	1989
Melta	1987
Mk II Armour	1991
Mk V Armour	1991
Plasma	1987
Predator	1989
Rhino	1988
Salamander	1989
Scorpion	1991
Soul Drinker	2002
Space Wolves	1987
Stormraven	2009
Storm Shield	1989
Tactical	1989
Techmarine	1989
Termagants	1993
Terminator	1989
Thousand Sons	1988
Thunder Hammer	1989
Tyrant	1987
Tyranid Warrior	1987
Skulls	1987
Wings (eagle wings, angel wings)	1987
Lions	1993
Griffon	1989
Triptychs	2006
Broadwords	1987

Skull with horns	1989
Storm bolter (gun)	1989
Sawblade with blood-drop	1987
Clenched fist in a gauntlet	1987
Snakes	2002
Flaming skulls	2007
Flaming chalice	1987
Salamander	1989
Dragon/salamander scales pattern	1989
Tau Symbol	2001
Tau – Oval vents	2001
Tau – X marking on power/ammo packs	2001
Tau – circle with a diagonal line through it	2001
Tau – geometric grooves	2001
Roman numerals (combined with) arrows	1991
X crosses and inverted V	1995
Cog	1995
Iron hands icon – gauntleted left hand shown palm downwards	1987
Overlapping/banded armour	1991
Wolf fur	1989
Wolf skulls	1989
Wolf tails	1989
Raven wings with blood drop in center	1987

I symbol (for Inquisition)	1987
Scarab beetles	2004
Spirit stones	1991
Eldar iconography/symbols (seer icons, etc.)	1991
Eldar – Spirit Stones	1991
Eldar – decorative gems on weapons	1991

Dated: March 9, 2012

Respectfully submitted,

By: /s/ Jonathan E. Moskin

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CERTIFICATE OF SERVICE

I, Jason J. Keener, an attorney, hereby certify that on March 9, 2012, I caused a copy of the foregoing GAMES WORKSHOP LIMITED'S SECOND SUPPLEMENTAL RESPONSE TO INTERROGATORIES SET FOUR to be served on the interested parties by causing copies of this document to be served on the following *via* email to the following:

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/s/ Jason J. Keener

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