

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

T-PEG, INC and	)	
TIMBERPEG EAST, INC.,	)	
Plaintiffs,	)	
	)	
v.	)	No. C-03-462-M
	)	
STANLEY J. ISBITSKI and.	)	
VERMONT TIMBER WORKS, INC.,	)	
Defendants.	)	

SUPPLEMENTAL ANSWERS TO  
VTW'S FIRST INTERROGATORIES AND  
REQUESTS TO PRODUCE TO PLAINTIFFS

Defendant Vermont Timber Works, Inc. ("VTW"), submits the following interrogatories and requests to produce to plaintiff, T-Peg, Inc. and Timberpeg East, Inc., for response and production by each within 30 days under FRCP 33 and 34.

DIRECTIONS, INSTRUCTIONS AND DEFINITIONS

The Definitions And General Instructions contained in plaintiffs' first set of interrogatories and first request for production, both dated February 24, 2004, are incorporated by reference, except that

- "you," "your," and "yourself" refer to the plaintiffs, and/or either of them, and/or any other person or representative acting or purporting to act on their behalf.
- "T-Peg" refers to plaintiff T-Peg, Inc.
- "TEI" and "Timberpeg" refer to plaintiff Timberpeg East, Inc.
- "Registered Plans" refers to the five sheets filed with the U.S. Copyright Office and registered as V Au 510-781, copies of which have been produced by plaintiffs in this case with control numbers TIM 454 – 458.

Plaintiffs answer that Stephen Woods, Brian Pattison, Robert Britton, and Richard Neroni, had involvement with negotiations with Sugar River Savings Bank.

10. Identify the total number of design hours (a) T-Peg and (b) TEI spent on the Isbitski project, and itemize that number by task performed.

**ANSWER:**

T-Peg, Inc. did not directly perform any design time on the Isbitski project. Timberpeg East, Inc. does not keep a record of design time spent by Timberpeg East employees. However, Timberpeg Services, Inc., which operates as the design department for Timberpeg East and T-Peg, Inc. on a work-for-hire basis spent approximately 108 hours of drafting time, four (4) hours of engineering time, six (6) hours of design checking, three (3) hours on design details, and nine (9) hours on conventional framing drafting time on the Isbitski project.

11. Identify the names, addresses and completion dates of all of the residential timberframe projects of (a) T-Peg and (b) TEI completed during 2001 and 200\_\_.

**ANSWER:**

Plaintiffs object to this request as overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. In addition, Plaintiffs object to this request as seeking information invasive of the privacy of Timberpeg East, Inc.'s clients. Without waiving the foregoing objections, Timberpeg East, Inc. produces the following list of Timberpeg East's projects shipped in 2001 and 2002. Timberpeg East has identified each project by contract number rather than customer name and address. T-Peg, Inc. did not ship any projects in 2001 or 2002.

2001:

Contract No.	Date Shipped	Ship-To-State
TEI0001103	01/18/01	PA
TEI0001101	01/22/01	NH
TEI0000407	02/01/01	MA
TEI0001102	02/08/01	NH
TEI0001203	03/14/01	NH
TEI0001204	03/15/01	ME
TEI0010104	03/15/01	NH
TEI0010102	03/20/01	NY
TEI0000402	03/22/01	MA
TEI0001201	03/28/01	NY
TEI0001202	03/29/01	NY
TEI0010105	04/11/01	PA
TEI0010103	05/10/01	NJ
TEI0010302	05/15/01	NY
TEI0010301	05/17/01	NY
TEI0010101	05/31/01	NJ
TEI0010202	06/12/01	NY
TEI0010403	06/12/01	NH
TEI0010303	06/25/01	VT

Date: July 13, 2004

T-PEG, INC. AND  
TIMBERPEG EAST, INC.  
Plaintiff,

By: 

\_\_\_\_\_  
Their Attorney

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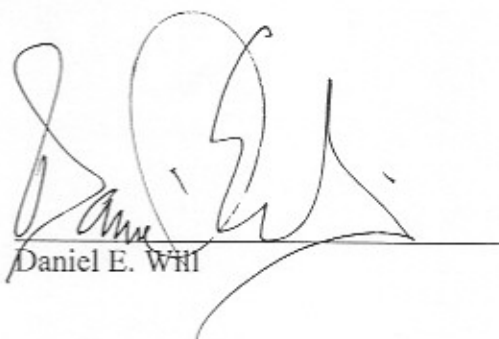
Of Counsel:

Stephen S. Woods, Esquire  
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**CERTIFICATE OF SERVICE**

I hereby certify that on July 13, 2004, I served the foregoing pleading on the following counsels of record, by e-mail and first class mail:

W.E. Whittington (Bar No. 6916)  
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Daniel E. Will

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