

EXHIBIT B

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

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

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 plaintiffs, 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 VAu 510-781, copies of which have been produced by plaintiffs in this case with control numbers TIM 454 – 458.
- "4/20/01 Plans" refers to the eight sheets or drawings, in their computer-generated form and without the hand-written notations or "Aug 07 2001" date stamp, a copy of which has been produced by plaintiffs in this case with control

number TIM 412 – 420. For purposes of this definition, “4/20/01 Plans” does not include the hand-written notations or “Aug 07 2001” stamp on TIM 412 – 420.

- “9/05//01 Plans” refers to the fourteen sheets or drawings, a copy of which has been produced by plaintiffs in this case with control number TIM 440 – 453.

INTERROGATORIES

1. For each of the following:

T-Peg, Inc.
Timberpeg East, Inc.
Timberpeg South, Inc.
Timberpeg West, Inc.
Timberpeg Pacific, Inc.
Timberpeg Services, Inc.
Timberpeg Design Services (however organized)
Traditional Management, Inc.

identify (a) the officers for each period between June 1998 and present, (b) the directors for each period between June 1998 and present, (c) any person or entity holding more than 20% of its stock or equity for any period between June 1998 and present, and (d) any subsidiary or other business entity of which such person held a 20% or greater equity interest for any period between June 1998 and present. In addition, (e) state the state of incorporation or other organization of each of the listed persons and (f) state the principal business or businesses in which the person has engaged from June 1998 to present.

2. On what date did Stanley Isbitski (“Isbitski”) first contact Timberpeg. Identify the Timberpeg agent(s) involved in the initial contact.

3. On what date did Isbitski first contact T-Peg. Identify the T-Peg agent(s) involved in the initial contact.

4. If known, on what date did Isbitski first contact Old Hampshire Designs, Inc. Identify the Old Hampshire Designs agent(s) involved in the initial contact.

5. Identify each and every document you received from Isbitski or on his behalf depicting any architectural work or component thereof not generated by you. For each, state the date(s) the document was received, and identify your agent who received it. Provide a copy of the document if not previously produced.

6. List the dates on which you visited the Isbitski building site in Salisbury, New Hampshire and, for each, identify your representatives who visited it.

7. On what date did you first become aware that the Town of Salisbury had issued a building permit to Isbitski?

8. Identify all of your employees, agents, principals, partners, shareholders, or officers who were involved in any design work for Isbitski, and for each, identify his or her involvement or role.

9. Identify all of your employees, agents, principals, partners, shareholders, or officers who were involved in obtaining a payment from Sugar River Saving Bank concerning the Isbitski plans, and for each, identify his or her involvement or role.

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.

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 2002.

12. For each of the residential projects identified in response to No. 11, identify the total number of design hours spent on each project, and itemize that number by task performed.

13. For each of T-Peg and TEI, and for each of the years 2001 and 2002 (by completion of job), identify (a) the total number of timber frames sold, (b) the total number of residential timber frames sold, and (c) the total number of residential projects for which you provided timber frame erection services.

14. Identify each and every way you notified or made known to the Town of Salisbury, the Sugar River Savings Bank, other third parties, or the public that the VTW timber frame on the former Isbitski project was VTW's timber frame and not a Timberpeg brand timber frame.

15. Itemize and state the amount of each expenditure and/or other cost made by (a) T-Peg and (b) TEI concerning to the Isbitski project.

16. Itemize and state the amount of all revenue components received by (a) T-Peg and (b) TEI concerning the Isbitski project and/or Isbitski plans.

17. Describe in detail how you computed "Timberpeg's gross profit margin of 50.78%," and identify and produce all documents relating to the computation.

18. Identify and produce copies of (a) all advertising, promotional or informational materials relating to T-Peg and/or TEI used with the public or any third party from June 1999 to present, (b) all letters or communications of complaint or praise regarding T-Peg and/or TEI from June 1999 to present, (c) all articles concerning T-Peg and/or TEI written or published by third parties from the period June 1999 to present, (d) all letters of complaint regarding T-Peg

and/or TEI created from June 1999 to present, whether from customers, administrative agencies or trade organizations, and (e) all commendations or awards received by T-Peg and/or TEI from June 1999 to present.

19. Identify each person who to your knowledge is aware that a person other than T-Peg or TEI designed and constructed the timber frame on the Isbitski property and, for each, state how the person became aware and whether, to your knowledge, that person's perception of T-Peg and/or TEI has changed as a result of that knowledge.

20. Identify each person who has declined to purchase any product or service from you because VTW designed and constructed the timber frame on the Isbitski property.

21. Do you assert that VTW copied or duplicated the Registered Plans in any manner other than through the construction of a timber frame on the Isbitski property? If so, describe in detail each claimed instance of copying or duplication, state the method of copying or duplicating, and produce all documents concerning them.

22. Concerning your claim of unfair competition against VTW, do you claim unfair competition based on any act other than VTW's manufacture and erection of the VTW timber frame on Isbitski's property? If so, describe in detail each claimed act of unfair competition, stating for each the date(s) as precisely or approximately as known, identifying each person who participated in the act(s), and producing all documents concerning them.

23. Concerning Paragraph 54 of your Complaint, are you aware of any tracing, digitizing, copying and/or other utilization of the Registered Plans by VTW other than VTW's manufacture and erection of the VTW timber frame on Isbitski's property? If so, describe in detail each claimed act of tracing, digitizing, copying and/or other utilization, stating for each the date(s) as precisely or approximately as known, identifying each person who participated in the act(s), and producing all documents concerning them.

24. Concerning Paragraph 64 of your Complaint, are you aware of any unauthorized use of the Registered Plans by VTW other than VTW's manufacture and erection of the VTW timber frame on Isbitski's property? If so, describe in detail each claimed unauthorized use, stating for each the date(s) as precisely or approximately as known, identifying each person who participated in the use(es), and producing all documents concerning them.

REQUESTS FOR PRODUCTION

1. All documents requested in the above interrogatories or identified in response to them.

2. All documents constituting or concerning (a) prototypes or standard plans which were usable in designing all or a portion of a P20K8-44' + 8' shed building, and (b) "our standard Purling frame" as set forth in document TIM 197.

3. All documents constituting or concerning prototypes or standard plans created by either plaintiff or by Timberpeg Services, Inc. subsequent to May 2, 2004 and containing any design elements from the work depicted in TIM 198.

4. All documents constituting or concerning prototypes or standard plans created by either plaintiff or by Timberpeg Services, Inc. subsequent to May 2, 2001 and containing any design elements from the work depicted in TIM 085.

5. All documents concerning communications with third parties, including but not limited to Timberpeg South, Inc., Timberpeg West, Inc., Timberpeg Pacific, Inc., Timberpeg Services, Inc., Timberpeg Design Services, Traditional Management, Inc. and the Town of Salisbury, concerning the Isbitski project.

6. All documents, including contracts, concerning the relationship between Old Hampshire Designs, Inc. and you, in effect at any time from June 1999 to present.

7. All documents, including contracts, concerning the relationship between you and Timberpeg Services, Inc. and or Timberpeg Design Services.

8. All documents concerning the valuation of your goodwill and/or business reputation.

Date: April 2, 2004

VERMONT TIMBER WORKS, INC.
Defendant,

By: W. E. Whittington
Its Attorney

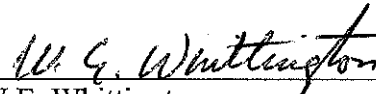
W. E. Whittington (Bar No. 6916)
Whittington Law Associates, PLLC
35 South Main Street
Hanover, NH 03755
(603) 643-2755

CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2004, I served the foregoing pleading on the following counsels of record, by e-mail and first class mail:

Daniel E. Will, Esq.
Devine, Millimet & Branch, P.A.
111 Amherst Street
Manchester, NH 03105

Stephen S. Woods, Esq.
Traditional Management Company
68 Lyme Road
Hanover, NH 03755


W.E. Whittington