Tanner Declaration Exhibit F

Thursday, October 3, 2002

Mr. Kevin Russell Chernoff, Vilhauer, McClung & Stenzel, LLP 1600 ODS Tower 601 S.W. Second Avenue Portland, Oregon 97204-3157 USA

Re: KAM Industries Patents, your communication of September 18th, 2002

Dear Mr. Russell:

I have received your communication of September 18<sup>th</sup>, 2002 in regard to the matter of Intellectual Property of KAM Industries (Mr. Matt Katzer).

Your concern is stated as software programs that have "...the capability of sending commands to one of a plurality of digital command stations....",

The software programs WinLok 1.5, released in 1993, and WinLok 2.0, released in 1995, have both been capable of being configured for the TannerSoft feature of "MultiDrive", by selectively sending commands, to operate a simultaneous plurality of digital command stations connected by different communication links from a plurality of graphical user interfaces within the software. Both of these products have been widely reviewed in model railroad publications in both Germany and the US in at least 1994 and 1995, and subsequently.

Tinclude in Annex I a copy of two reviews performed by Larry Puckett in the magazine "Model Rail-roading" in March, and December 1995. Note that The MultiDrive capability of WinLok 1.5 is clearly mentioned in the March 1995 review and again, Pucket notes that the WinLok 2.0 features remain "...essentially the same..." with the added capabilities he then enumerates. Also included in Annex I is an article by Tobias Frydman published in MIBA Special Nr. 33 from 1997 that reviews WinLok 2.0 and demonstrates multiple keyboards, track control diagrams and even an emulation of the Digitrax DT200 throttle that is implemented in a separate piece of software but is seamlessly integrated in the same graphical user interface.

For your convenience, in Annex II, I include a copy of relevant parts of the printed commercial WinLok 2.0 User Manual dated 1995, that provides explanation of this MultiDrive feature. Pages 95, 96 and 97 of the WinLok 2.0 User Manual provide unambiguous and definitive information that clearly estab-

lishes that the WinLok software has "..the capability of sending commands to one of a plurality of digital command stations..". Also enclosed is a copy of the box graphics used for international English language commercial sales of WinLok in the period 1995 onwards which clearly shows multiple user interfaces, which are all capable of sending commands via the MultiDrive technology to a plurality of digital command stations.

Annex III includes Sales Receipts and related VISA charge slips from DigiRR Enterprises, the US distributor of WinLok software prior to 1997, for sale of WinLok 2.0 to two US commercial customers, dated 1/4/96 and 8/22/96. There is a mass of similar evidentiary records to additionally establish the commercial sales of WinLok 1.5, 2.0 etc. Please take steps to guard the confidentiality of the Credit Card account numbers disclosed, since this information is being provided in good faith to establish evidence of US commercial sales of WinLok 2.0 software.

Note that the current 2002 sales version, WinLok 2.1 Rev. D, only differs from the 1995 WinLok 2.0 version by bug fixes, and employs no new technologies relating to the MultiDrive capability. In fact, the MultiDrive driver shipped with the current release still carries the original 1994 copyright message and all menus and dialogs are identical with the version shipped with WinLok 1.5.

It is believed that Katzer is in possession of a copy of WinLok 1.5 or 2.0 and a current evaluation copy of WinLok 2.1 can be conveniently downloaded from the Internet. If necessary, I can provide floppy disk distribution versions of the software so your technical expert, arbitrator or whomever, can definitively verify the claimed presence and ability of the MultiDrive capability in all the cited versions of WinLok software.

With the foregoing clear and convincing evidence, I believe, it is not possible or reasonable to claim infringement of the claims of Katzer as you allege, since the accused WinLok software clearly and distinctly predates in commercial use, by greater than 12 months, the earliest filing and priority date of June 24th 1998, for US 6,065,406, and the other quoted Katzer patents.

Case 3:06-cv-f1905-lsWire Document 47s, Teled 06/09/2006, Page 3 of 27 and capability of these WinLok products are definitively established as publicly used prior art by, at latest, 1995, and accordingly, this subject matter cannot be claimed under statue 35 U.S.C. 102 (A) (b) by any US Patent with a filing date later than 12 months from the initial commercial shipment of the TannerSoft "MultiDrive" technology and software processes. These demonstrated dates clearly prevail over the earliest possible June 24<sup>th</sup> 1997 Katzer US interference window, in all cases.

I retain records of the software distribution disks dated back to at least 1995, along with materials shown in Annex I, II and III and other corroborative and evidentiary materials that provide clear and convincing evidence that establishes the existence of the TannerSoft "MultiDrive" feature as prior art that predates your client's claims by over 1 year. For PCT and International patents the 1 year window does not apply, which further degrades Katzer's assertion of possible infringement by limiting his

earliest extant priority date to just June 24<sup>th</sup> 1998 anywhere else in the world except the Philippines. Documented prior art clearly prevails here and makes the claims unenforceable over this prior art.

Several other non-US software companies, for example Railroad & Co's "TrainController", have also introduced the capability to connect a plurality of digital command stations, that also were developed at least a year prior to June 24<sup>th</sup> 1998 and shipped commercially in Europe before this date. Some of these were spurred in part by the demonstrated capability of WinLok 1.5, and derivatives, and competitive pressures ensured these capabilities were emulated in a the marketplace very much earlier than June 24<sup>th</sup> 1998.

The Soft-Lok program by W. Schapals of Germany also demonstrated multiple digital command station capability in the early 1990's. In 1985 the MES software by Heinrich Maile of Spain, that also is capable of driving a plurality of digital command stations, was sold, and was also reviewed by the German railroad magazine MIBA. Annex IV includes a recent statement from Mr. Maile and a copy of promotional material.

This body of software products with these capabilities is additional prior art that also clearly supercedes the Katzer art, and is simply quoted here to establish the fact that there clearly exists, in addition to WinLok, a well-known and large body of public usage and knowledge for using computer software to control a plurality of digital command stations and that this is clearly prior art over Katzer.

The Katzer specification for US Patent 6,065,406 clearly admits knowledge of a "software program" from DigiToys Systems of Lawrenceville, Georgia, [column 1/lines 42-50] which can only be "WinLok", since this is the only software that was sold by DigiToys at that time. In view of the well-defined and widely known features of the WinLok software, this raises concerns of defective disclosure under duties mandated by 37 C.F.R. 1.56. The failure of Katzer to fully disclose the widely known and extant body of prior art software methods and processes that permit a plurality of user interfaces to communicate by multiple methods to a plurality of digital command stations makes it Case 3:06-cv/photolesmaticoforialism to ipoint contraction claim the subject matter which he considers his invention.

These facts, I believe, clearly establish non-infringement under 35 U.S.C. 273 (b) (1), and naturally follows directly from 35 U.S.C. 102 (A) (a) and (b) statutory concerns of the Katzer application(s). If you have any basis to contradict these facts, please contact me forthwith with the information.

Upon review of the "current investigations" of other possible infringements as stated in your letter, namely "claim 35 of US patent No. 6,267,061", "claim 39 of US patent No. 6,065,406" and "independent claims 10, 35, 57, 82, 104, 129, 151, 176, 198 and 223 of US patent No. 6,270,040", please note that it is almost certain that the Katzer art also is predated by demonstrated prior art from several software vendors in at least 1995, and earlier. The use of queues, synchronous and asynchronous communication mechanisms as well as message processing functions are standard programming

techniques within applications for the Windows operating system, therefore it is safe to assume that usage of these techniques was state of the art in Windows based Model Railroad software products prior to 1995, including WinLok 1.5.

It has been brought to my attention that a number of dealers who have sold my WinLok software as well as other Model Railroad software products claim to have been served with "cease and desist" letters by your firm as well. I therefore consider it as appropriate to present this factual and evidentiary information directly to affected parties, so they can make an informed decision on appropriate action. A decision about publishing this letter and supplementary documentation in part or entirely on our homepage and in selected, model railroad related Internet news groups is currently pending.

Yours sincerely,

DigiToys Systems

Dr. Hans R. Tanner, Developer of WinLok software

Cc: Model Railroad Software developers worldwide

American Model Railroad software dealers

File wrapper for US patents No. 6,065,046, No. 6,267,061, and No. 6,270,040

Annex I: Copies of 3 magazine reviews of WinLok 2.0

Annex It: WinLok 2.0 manual excerpts dated 1995, showing MultiDrive capability WinLok 2.0 cover

showing multiple user interfaces

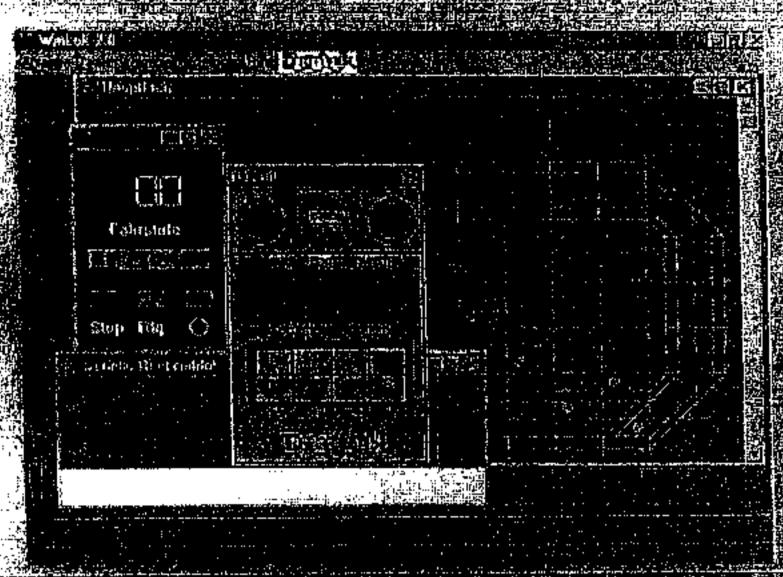
Annex III: Sales Receipts and Charge slips establishing US commercial sales

Annex IV: Statement of fact of origin of MES software (in German)

Case 3:06-cv-01905-JSW Document 47 Filed 06/09/2006 Page 5 of 27

Annex I: Copies of 3 magazine reviews of WinLok 2.0

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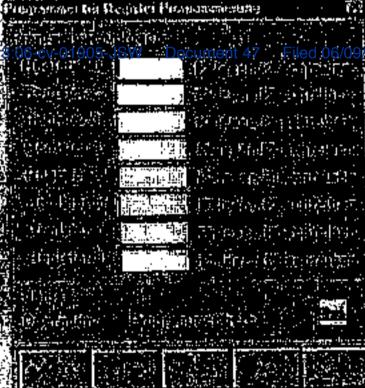
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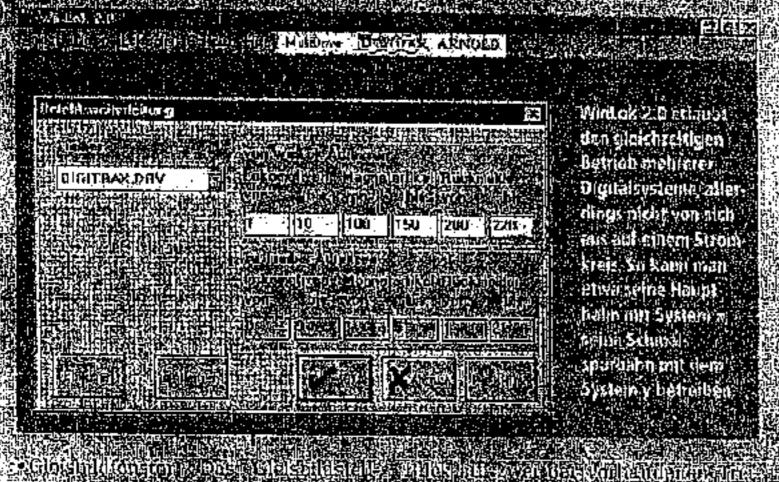
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### Computer für WinLok 2.0

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### COMPUTER APPLICATIONS

### WinLok 2.0 Brings New Functionality to DCC

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by Larry Puckett

E artier this year (March 1995) we took a look at WinLok Version 1.5 and look at WinLok Version 1.5 and promised an update as soon as the new version was released; so here it is. For those of you who missed the March issue, WinLok is a Windows-compatible program that allows you to interface your computer with many Digital Command Control (DCC) systems to control locomotives, switches and potentially, whole layouts. All of this can be accomplished using off-the-shelf components, giving you any level of control and automation you desire without having to resort to building sophisticated interfaces and components such as Bruce Chubb's CMRI system. Many of the features I described last March remain essentially the same so I'm going to concentrate on the two most important improvements, timetables and support for the Digitrax LocoNet communication network.

Timetables are the heart of WinLok's ability to automate train operation on your layout, Basically, timetables are programs that you write using a PASCAL-based programming language. Once a timetable is developed it can be assigned to a throttle for execution by the locomotive(s) assigned to that throttle. The automation includes control and monitoring of switches, block occupancy and locomotive speed and direction. More importantly, both automated trains on Catamenable 0 as not a described by the control of can be operated at the same time. This means that you could be operating a local switcher while passenger and through trains run past you on their timetables.

Learning the timetable programming language is going to involve a steep learning curve unless you're already familiar with PASCAL. Over 60 pages of the 182-page manual are dedicated to this subject. If you're like me, the most useful section will be the two example timetables that are provided. One example shows how to automate a push-pull commuter train while the other covers control of a train entering a hidden yard. I'll be going over timetable programming in a few months once I have a chance to gain some familiarity with it. Naturally, for this type of automation the computer has to have some means of detecting whether the track ahead is occupied and which way switches are thrown. The version of the software I received supported Märklin serial sensor feedback modules and an upgrade just out includes drivers that support Digitrax's new DS54 stationary decoder which brings us to the next topic.

In Version 1.5 WinLok supported Digitrax systems through the Direct Drive driver. While this functioned very well it meant that only WinLok's on-screen throttles could be used to control locomotives. Obviously this limited walk-around operations! WinLok 2.0 now has Digitrax LocoNet drivers that allow both the on-screen and hand-held DT200 and BT2 throttles to function in concert. In addition to mixing computer and hand-held throttles the new driver allows the various locomotive decoder addresses to be stored in the computer between operating sessions and then dispatched to the system at the beginning of the next operating session. This dispatching capacity includes the ability to display computer throttles for a given decoder address and monitor the speed and status of the locomotives under manual control. All of this now makes it possible to create a graphic on-screen representation of a layout from which a dispatcher can throw remote switches, monitor block occupancy and locomotive status, assign locomotives and control trains. The most impressive aspect of this is that you don't have to run miles of wires from the CTC panel to all the switches and detectors --- now all the signals DCC signal!

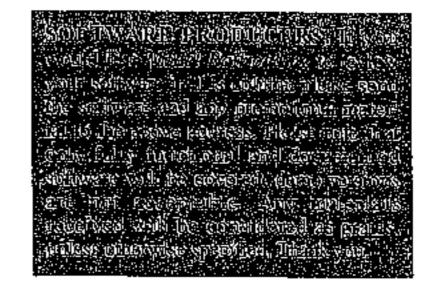
WinLok 2.0 is impressive, but there are still a lot of new features that I would like to see added. Although WinLok can access and control consists created by a DT200 throttle, you cannot create and dispatch consists to the system, only individual locomotives. Also at this time WinLok cannot act as the master controller, you have to have a DT200 running the system, and the computer acts just like another BT2 "Buddy" throttle. Having this capability would allow users to combine the computer with a booster and BT2s to create a system without having to purchase the DT200 or the soon-to-be-released DCS100 command stations. Both of these features may be included in the next release of WinLok. Another limitation of WinLok 2.0 is the rudimentary programming capabilities you still can't enter or modify speed tables. Hansruedi Tanner, the developer of Win-Lok, has produced a program for Digitrax that will be released with their PRI programmer that will allow advanced programming; a similar feature will be added to WinLok. As usual, time or the lack of it, is the reason all of these features didn't make it into the latest release. Hansruedi recently finished his doctorate, and it's amazing he had time to add what he did.

WinLok 2.0 requires a 386 or better processor, serial and/or parallel port, Windows 3.X, a mouse and about 4 M8 hard disk space. The setup utility does all the work for you, even creating the working directory and program group. Documentation is extensive (182-page manual). A new totorial carries you step-by-step through the basic setup and operations. The software-only package sells for \$119.95 and upgrades from Version 1.5 are \$29.95 from Digi RR Enterprises, 10395 Seminole Blvd. #H, Seminole, FL 34648. They are also a Digitrax dealer and offer several economical package deals.

Now for the rating (1-5, 5 is best):

Documentation	4.0
User Friendly	4.0
Technical	5.0
Application	4.0
Value	4
Level	2-5

That's all for this session. Until next time, stay on the right track and don't run out of steam. Send your comments, questions and programs to: Larry Puckett, 9618 Dublin Dr., Manassas, VA 22110. For those of you on CompuServe my userid is 71064,22 — feel free to leave me a message. If you submit a public domain or shareware program for review in this column please indicate whether or not you are willing to provide copies for interested readers and the conditions for that exchange.



### WinLok 1.5 Brings Your Computer Into the Train Room

by Larry Puckett

n the January column I promised that this month I would give you an introduction. to the future of using your computer to run your model railroad using off-the-shelf components. In the last few months there have been a number of ads in the hobby magazines for computerized layout control systems that are based on conventional cab-type blocking with routing being handled by the computer. These systems use conventional 12V DC to power locomotives and some type of "memory" to literally memorize your layout and route trains over it. What these systems fail to offer is the flexibility of a command-control system like the new NMRA DCC. At present I am only aware of two computer systems that interface with DCC systems --- Engine Commander from Karnm and WinLok from TannerSoft.

First, let's take a look at WinLok's capabilities, then discuss its shortcomings and finally gaze for a moment into the crystal ball for a look at what enhancements the near future will bring. WinLok is designed to provide two basic functions: 1) layout control through Digital Command Control (DCC) stationary sensors and decoders, and 2) locomotive control through mobile decoders. First I want to talk about using WinLok to control locomotives, then I'll describe the layout-control functions and occoders are provided for all the decoder types, along with a MultiDrive that can be used to simultaneously control all of the different types. Point-and-click mouse data entry makes programming a lot easier than the usual method of trying to hold down two buttons on the Digitrax decoders, you can select 14-, 28-, or 128-speed-step mode, acceleration and deceleration rates and the initial, midpoint and maximum voltage settings. Different drivers are provided for all the decoder types, along with a MultiDrive that can be used to simultaneously control all of the different types. Point-and-click mouse data entry makes programming a lot easier than the usual method of trying to hold down two buttons on the Digitrax trax).

Setting WinLok up is really straightforward — it is self installing. Data entry follows the usual Windows drop-down menu and point-and-click mouse entry. Connecting the computer to the Digitrax DB100 booster LocoNet connector was equally easy. I made up my own connector cable following the instructions provided and materials purchased from Radio Shack. If you're reluctant to try out your electronic skills, pre-built cables are available for about what the parts would run you. I did run into trouble getting the decoder out of 14-speed-step mode, but finally I went through the setup steps EXACTLY like the manual says and darned if it didn't work — when all else fails read the manual! Speed control was just as smooth with WinLok as I have gotten with the Digitrax DT200. I did have one question concerning the pin assignments on the connector cable that was answered within one day by the owner of Digi RR via a CompuServe message.

To keep this simple, let me say that locomotive control is basically the same as I've described in previous discussions of the Digitrax DCC system. The big difference here is that your computer is used to generate the DCC signal instead of the DT200 or the DB100. Within WinLok a locomotive controller is set up for each locomotive/decoder address. The controller is an on-screen tepresentation of a hand-held throttle containing a slider bar to control speed, a digital readout that displays an approximation of locomotive speed, and control buttons for stop, direction and functions. Each controller can be set up to control up to three decoder-equipped locomotives in MU lashups. Programming differs slightly depending on the type of decoders you use (Lenz, Märklin, Arnold, Trix, ZIMO or Digitrax). In the case of the Digitrax decoders, you can select 14-, 28-, or 128-speed-step mode, acceleration and deceleration rates and the initial, midpoint and maximum voltage settings. Different drivers are provided for all the decoder types, along with a MultiDrive that can be used to simultaneously control all of the different types. Point-andclick mouse data entry makes programming a lot easier than the usual method of trying to hold down two buttons on the Digitrax tions are stored on your hard disk, you never have to re-enter locomotive assignments.

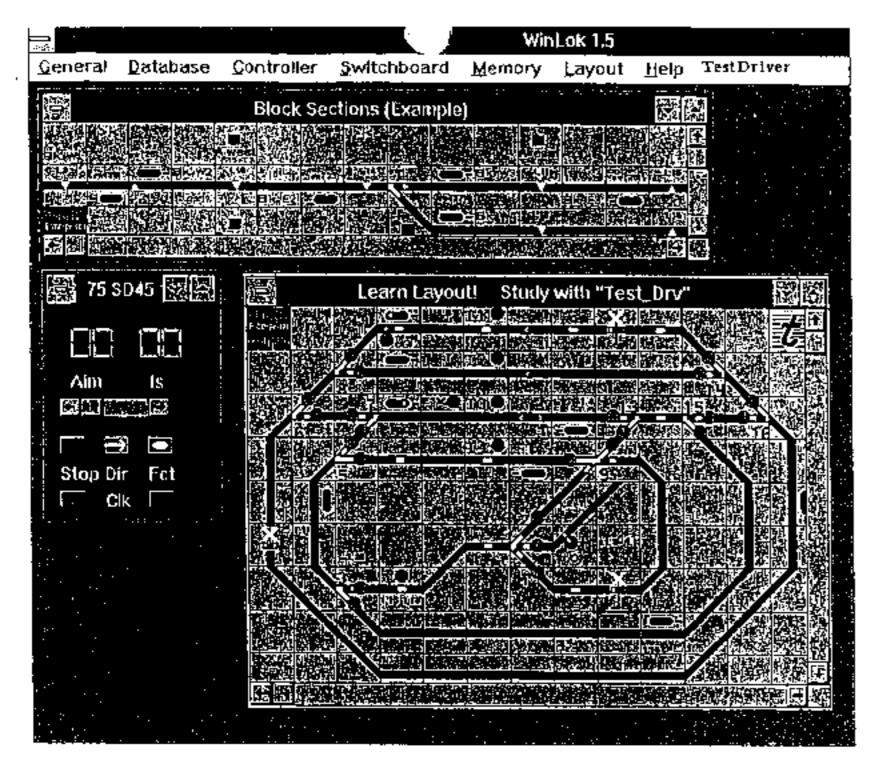
Layout control is accomplished using stationary decoders to throw turnouts from the computer and sensor modules that monitor block occupancy. All of the decoder (both stationary and mobile) addresses and information, along with locomotive information are entered into their respective databases. The information in the databases is used to set up switchboards that look sort of like the old gangs of Atlas turnout controls. The advantage of these is that up to 16 switches can be controlled by clicking on its number on the switchboard. The memory board allows you to combine control of several switch machines simultaneously into preset routes that can be set in a manner similar to using a diode-matrix-control system.

Another neat feature of WinLok is the ability to build a schematic of the layout or section of track to be controlled, along with switches, signals and routes. In use, the mouse cursor can be used to activate

switches and select routes by clicking on them or the switchboards I described earlier. Basically the computer display can replace the normal layout control panel and you or a dispatcher can control the layout from the computer. The really important thing to realize here is that all of these switches and sensors are accessed through the serial (or a parallel) port replacing all those wires that normally have to be run between the switch and sensor modules and a CTC board.

There are a few limitations in WinLok 1.5. First, all controls are through the computer -- that means that walk-around control is out. This is reflective of the European heritage of WinLok where everything is commonly run from a central control panel, much like was done in this country 20+ years ago. It also effectively limits you to a single operator since the mouse cursor or keyboard is used for control. Another holdover from the European version is the German language headings in the help file. I've been assured that these will be changed in the version 2.0 release. With respect to decoder functions, the 28-speed-step programmability is not supported. Otherwise, the program was easy to use, and although it could use some editing and grammatical tidying up, the manual was better than many I have seen. To make it easier to get an idea of how it all works, demo versions of all the functions are provided along with a tutorial explanation.

Now let's look into the future a bit. Version 2.0 of WinLok promises to alleviate the limitations I just mentioned. It will allow Digitrax users to communicate BI-directionally through the LocoNet system with their locomotive and stationary decoders. Most importantly, it will allow us to use the DT200 or BT2 "Buddy" throttles with the computer giving us a complete walk-around system. The computer will be able to sense the position of turnouts and control them, and a new level of programming will allow you to automate train routes. Once version 2.0 and the new Digitrax LocoNet driver and stationary decoders are available, I'll do a complete test of the combined system to automate a portion of a layout. In anticipation of receiving letters from fans and manufacturers of other types of DCC equipment (Lenz, Märklin, Arnold, Trix, ZIMO, System One) I would like to say at this point, I realize that we have



been giving Digitrax a lot of attention, not necessarily because it is the best or cheapest system available, but because they have been very cooperative in providing the materials necessary to do these tests. I would be more than willing to evaluate other manufacturers' systems and compatibility with programs like WinLok.

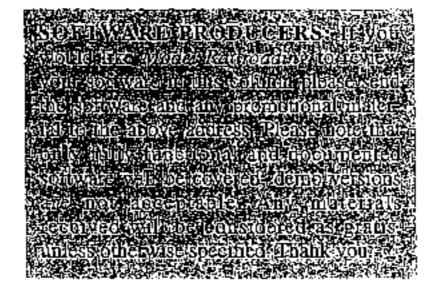
Several folks I have talked with about the capabilities of WinLok and DCC systems question the need or desirability of automating layout controls. My answer to that is, the flexibility of the system will allow us to automate as much or as little of our layout operations as we desire, while making it a lot easier and cheaper through standardizaautomation might be to control hidden staging yards, whereas it could get as complex as automating a display layout. For operations, the computer could run the passenger and through freights, while you and your operators could run the locals or any combination you desire. No matter what, you'll still be in control — having the turnouts connected to the computer need not eliminate local control from a fascia-mounted push-button switch, or automation could be limited just to mainline turnouts.

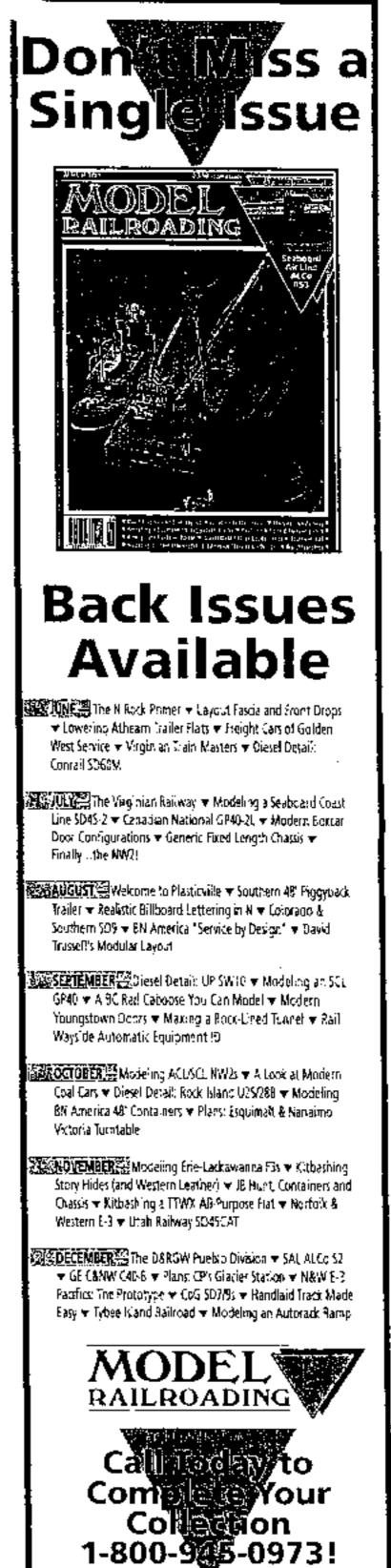
Basic system requirements are a 386 or better PC running Windows 3.0 or 3.1, mouse, 2.8 Mbytes of disk space, and 2 Mbytes RAM. WinLok retails for \$139.95 and a demo disk is available for \$30 which can be credited toward the purchase of the full version. A combination package including the full version of WinLok, a Digitrax DB100 booster, two decoders and instructions to build the Loconet-RS232 cable is priced at \$329.90. For those of you on CompuServe the manual can be downloaded from the Trainnet library --- look for the WINLOK.ZIP file. For a complete price list with the most up-to-date price information contact Digi RR Enterprises, 10395 Seminole Blvd. #E, Seminole, FL 34648 or you may call them at 813-397-5110.

Now for the rating (1-5, 5 is best):

Documentation	4
User Friendly	4.5
Technical	4.5
Application	4
Value	4
Level	2-5

That's all for this session. Until next Case 3:06-cv-01905-JSW Document 47 Filed 06/09/2006 Page 13 of 27 tion. For example, the simplest use of time, stay on the right track and don't run out of steam. Send your comments, questions, and programs to: Larry Puckett, 9618 Dublin Dr., Manassas, VA 22110. For those of you on CompuServe my userid is 71064,22 — feel free to leave me a message. If you submit a public domain or shareware program for review in this column please indicate whether or not you are willing to provide copies for interested readers and the conditions for that exchange.





MARCH 1995 MODEL RAILROADING ▼ 51 Case 3:06-cv-01905-JSW Document 47 Filed 06/09/2006 Page 14 of 27

Annex II: WinLok 2.0 manual excerpts dated 1995, showing MultiDrive capability WinLok 2.0 cover showing multiple user interfaces

WinLok 2.0 Operation Manual

# WinLok

Filed 06/09/2006

Mundal Control Saltware

Software Page igital Model Railroad

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Address information to: Digi RR Enterprises, 10395 Seminole Blvd.#E

Seminole, FL, 34648

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WinLok 2.0 Operation Manual

### Introdu ction:

equipped Model-railroad systems with the computer. This Version supports following Digital Command Systems: WinLok 2.0 is a Windows 3.1 based program to control digital

# From Serial Port:

- Märkli Märklin Digital Arnold Digitał & Märklin Digital = n 80f .... support of 4 functions
- OMIZ

(crane, turmtable, dancecar etc.)

- Trix-S electrix
- DirectDrive ..... digital packet format. Supporting the NMRA DCC

4 functions and ARNOLD functions, Lenz LE100S,-R / Lenz following loca-decoders LE100M, Märklin c82 with Any DIGITRAX with 1 to 3 simultaneously: steps. It will program and support DB100, 14,28 and 128 Speed-NMRA F7 or F8 Booster. Use full DIGITRAX decoder capability with

Page 18 of 27

Di@trax LocoNet ™ Bus allows simultaneous operation
of WinLok as "dispatcher" and
handhold throttles for the
engineers. Great for multiple person operation and club-layout

# From

Diget 99 The low cost, Do it yourself

Digital Command Systems simultaneously. Requires one RS232 Serial Port and/or Parallel Port, and the appropriate booster and/or Command Control equipment for each system. MULTID -0 NVE System. By Wolfgang Horn of Operate any of the above Modelibahn Elektronik.

WinLok 2.0 Operation Manual

# Test-Driver

system. Furthermore all driver-specific data can be changed to simulate any digital-system. See figure A.2.6.1. Driver Data Input. WinLok The Test Driver serves the purpose of testing the operation of without the need to hook up to a interface and digital-

### Set-up Driver Data

specific By clicking on this bar you open mouse ö your digital system. Enter data with the keyboard and a new window for input of data

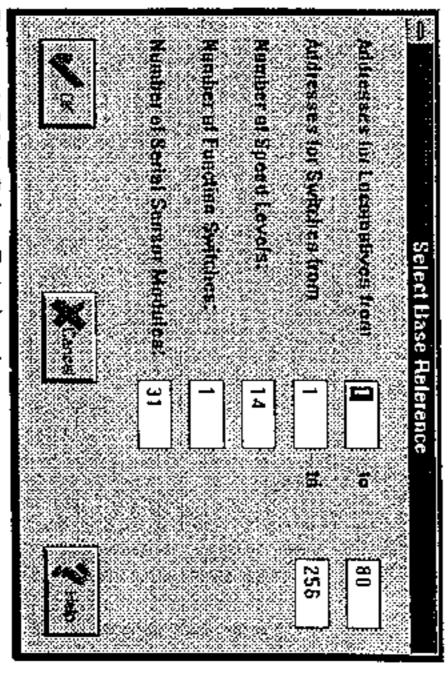


Figure A 2.6.1 Driver Data Input

railroad system for capacity and hardware specifics) to ensure the proper function. Enter all data correct (consult the manual of your digital model

WinLok when the track-power is turned ON the next time All data will be loaded and corresponding devices adjusted by

### About TannerSoft

Displays information, trademark and/or copy-protection etc

WinLok 2

Operation Manual

# A.2.7 TannerSoft MultiDrive

for each system and will then be translated into actual possible are many combinations possible. Addresses may be defined free addresses. at the same time controlling a N scale background system. There RR with different systems. Or HO 3rail main and foreground while enables for multiple The TannerSoft MultiDrive provides the capability to digital model-railroad systems simultaneously. This for example, to operate a HO Mainline and a HOm logging

# A.2.7.1 Driver pull-down menu.

manufacturers logo. The WinLok Menubar displays the selected driver with the

### ABOUT MULTIDRIVE DRIVER ALLOCATION

# A.2.7.2 Driver allocation

By clicking keyboard an ag on this bar you open a new window for input with the d mouse

Driver...2006 for this purpose. Select the driver you wish to change the

react an≰ can cause confusion and will result in faulty commands and errors. unique. @verlapping addresses will make corresponding drivers to are oversppping to an other driver since these addresses must be of the logos, Solenoid devices and Feedback-sensors you like to have cor∰rolled by the selected driver. Make sure that no addresses From WinLok addresses: Enter in these six fields the addresses

not be exgeeded. If you for example, enter 90 Loco addresses with a Marklinddriver, the invalid addresses will be ignored. and maxevalues are read from the selected driver data and To Driveg addresses: No input is possible here. These actual min.

c c

### Example:

PC also has two free RS232 ports available. sideline which you like to control with WinLok simultaneously. You have a layout with a Digitrax Mainline and a Arnold HOm Your

Arnold Drive. Install the MultiDrive with these two "Subdrivers" DirectDrive and

the installation of a additional I/O Board with a minimum of one RS Com-3, you can use Com-2 and Com-4 which will possibly require already use the Mouse, most likely on Com-1 and a modem on Important: You need the appropriate Command Control or Booster each system connected to a different Com-port. Since you

Now set the addresses as follows:

# Addresses Arnold drive:

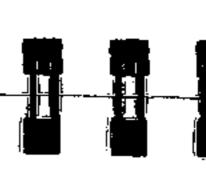
System	WinLok	Addresses DirectDr	System	WinLok
	101	)irectDrive (DIGITRAX		<u> </u>
99	199	ITRAX)	99	99
_	257		_	
256	512		256	256
	32		>	<b>→</b>
<b>⇔</b>	62 2		31	31

This address setup results in controlling your HOm Amold sideline with Loco addresses 1 - 99 while your Digitrax Mainline Locos respond to addresses from 101 to 199, yet there physical address is feedback-modules. 99. The same works with the solenoid decoders and

Digitrax. Just keep the possibility in mind, that a later expansion You could use Loco 1 may require adjustment. **Note:** You don't have to fully extend each drivers address capacity. - 20 from Arnold and Loco 21 40 with



WinLok 2.0



Dittal

Command Processing

Operation (Manual

16

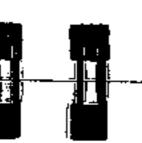
####JoraiD:101

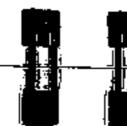
ion Which Address

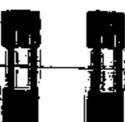
to Dilvas address

Solemeich

Feedback Y.









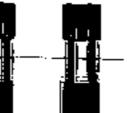
Person

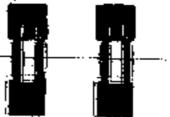
···



A 2.7.2

insert:

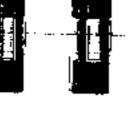


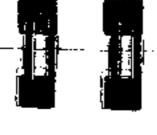


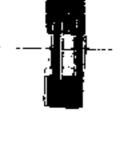


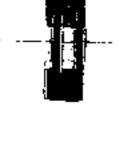






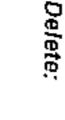












MultiDrive.

comes up with the next installation of the driver in

from MultiDrive. The address setup is saved and

Click on delete and the highlighted driver is deleted

menu accordingly.

be installed immediately and changes the WinLok

Highlight and click the OK button and the driver will

displaying all available drivers for your selection.

After clicking this button, a new box opens,

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Filed 06/09/2006

About MultiDrive

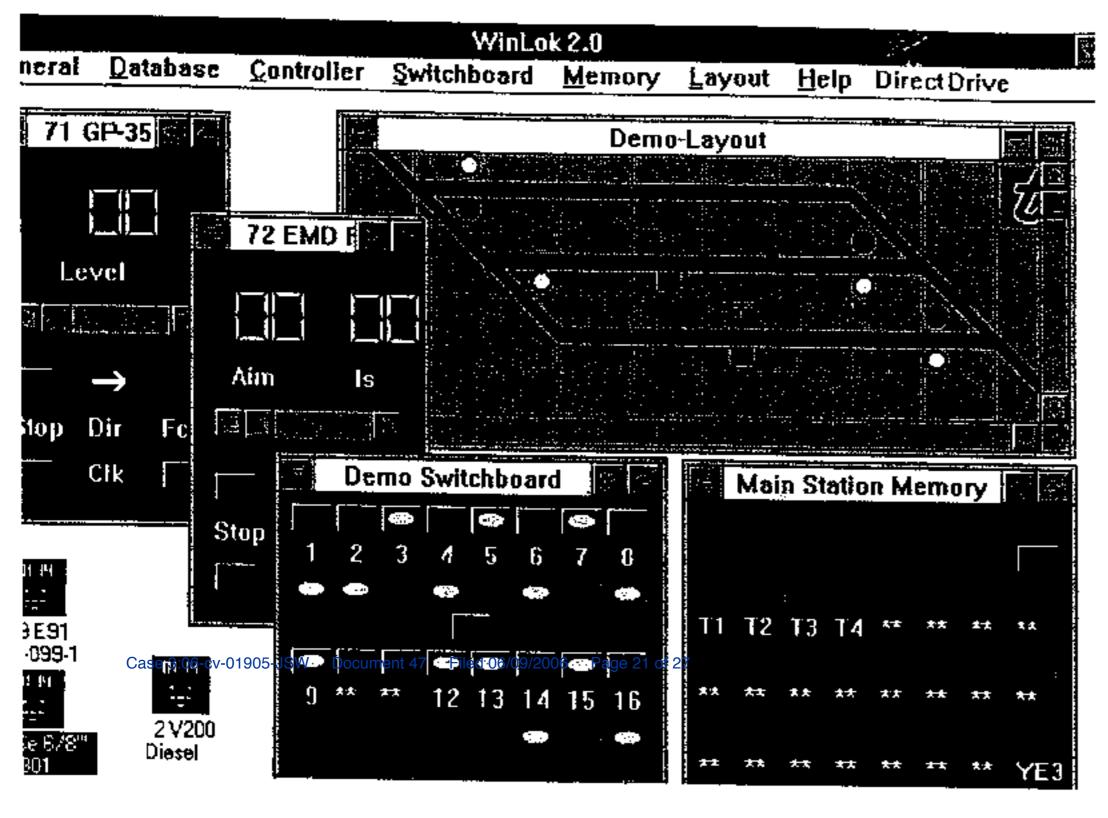
Displays information, trademark and/or copy-protection etc. Document 4

Case 3:06-cv-01905-JSW

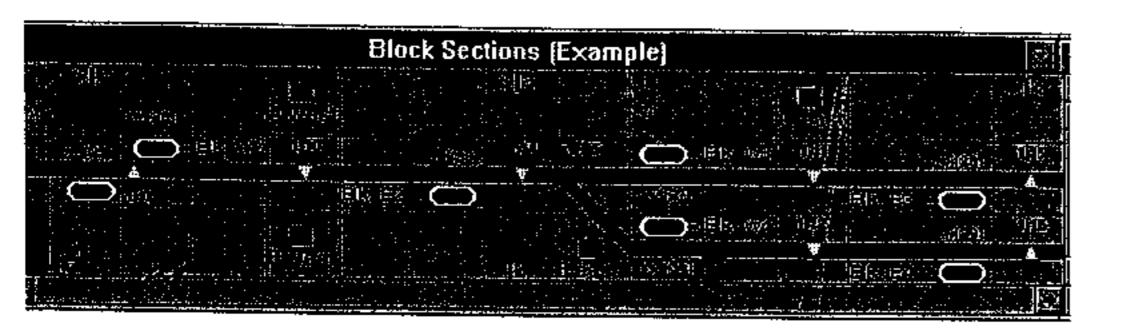
PAGE 96

### VinLok 2.0

igital Command Control Software for Windows



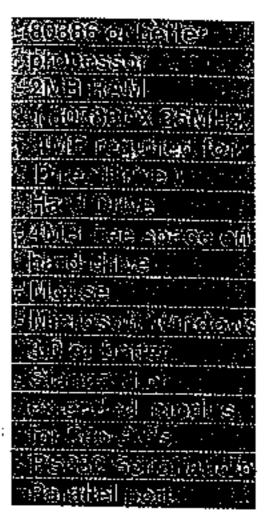
The New Dimension in Model Railroading



### WinLok 2.0⊚

### Systemrequirements.

WinLok 2.0 requires a IBM compatible PC with the following minimum configuration:



And for your Model Railroad: One of the following Digital Command Control Systems:

> Digitrax LENZ Arnold NMRA DCC märklin TrixSelectrix Zimo

Contains one 3.5" Floppy and Documentation

€PC

Wir Lor 20 कि । भागतिक ।

mara des មក្រោងដែរ

### Introduction:

The software for the serious Mode allows realistic operation of a jayo control all switches, routes and b indiviously created CTC panels: Hun trains with on screen titrottles simultaneous if selected commend (Digitrax LocoNet-Bus, Lepz B centra: unit and control 80 or 80)

### WinLok 2.0

is a Windows 3.1 baseo program to control digital equipped Model-railroad systems with the computer. This Version supports following: Digital Command Systems:

### From Serial Port:

- **Arnold Digital** & Märklin Digital =
- Märklin Digital
- Märklin 80f support of 4

functions(crane turntable dancecar etc)

- :06-cv-01905-JSW Document 47 Filed 06/09/2006 : Page 22:002
- Trix-Selectrix
- DirectDrive Supporting the NMRASDCC digital packet format, NMRA F7 or F8 Booster-





### DIGITRAX

Use full DIGITRAX decoder capability with DB100; 14:28 and #28 Speed-steps. It will program and support following icoo-decoders simultaneously: Any DIGITRAX with 1 to 3 functions, Lenz LE100S, R.7 Lenz LE100M, Markin c82 with 4 functions and ARNOLD

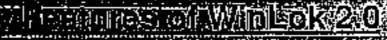
pigitrax LocoNet ™ Bust allows simultaneous eration of WinLok as dispatcher and handhold anto description engineers. Creation multiple person obaration and club-layouts.

Lenz X Buswill basically perform the same as above.

### From Parallel Port:

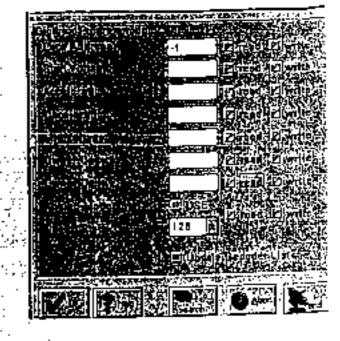
Digit 99 and the low cost, Do it yourse't System By Wolfgang Horn of Modellbahn Elektronik.

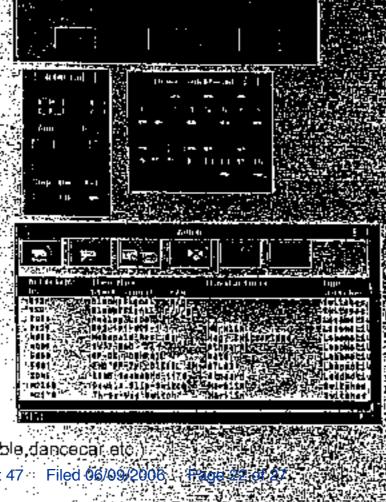
VULTI DRIVE: NOperate any of the above Digital intrand Systems simultaneously. Requires one AS232 Serial Port of the Republic of AS232 Serial Port of the Republic of the Appropriate possier and/or Command of the Republic of the Appropriate possier and/or Command of the Republic of the Appropriate possier and/or Command of the Republic of the Appropriate possier and/or Command of the Republic of the Appropriate possier and/or Command of the Republic of the Appropriate possier and/or Command of the Republic of the Appropriate possier and/or Command of the Appropriate possier and the Appropr



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Digi R.R. Enterprises

10395 Seminole Blvd.

Sales Receipt

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DATE 1/4/96

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Chambiee G	₫,	GA 30341		

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/h. Street
FL, 3261497793 P.O.Box 141793 4110 NW 64th. Street Digi RR Enterprises Gainesville, Digi RR Enterprises

SALE NO. 32061 8/22/96 DATE

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Annex IV: Statement of fact of origin of MES software (in German) Case 3:06-cv-01905-JSW Document 47 Filed 06/09/2006 Page 26 of 27

Heinrich Maile Montiel 19 E-38438 El Amparo

El Amparo, 26.September 2002

Spanien

Modellbahnstenerung MES - Simuliane Steuerung mehrer Digitalsysteme

Als Autor der Computer Modellbahnsteuerung MES (Modellbahn-Elektronik-Steuerungen) bestätige ich folgendes:

- 1. MES ist ein Software-Programm zur Steuerung von Modelleisenbahnen, das auf einem Personal-Computer ausgeführt wird.
- 2. MES wurde 1985 entwickelt und beschrieben.
- 3. Das grundsätzliche Funktionsprinzip und die Architektur wurde von 1985 bis heute beibehalten.
- 4. Seit 1985 ist das Programm in der Lage, mehrere digitale Zentraleinheiten gleichzeitig anzusteuern. Dies umfasst insbesondere die Fähigkeit Kommandes anzeine von mehreren digitalen Zentraleinheiten zur Steuerung einer Modellbahn senden zu können.
- MES wird mit der unter 3. genannten F\u00e4higkeit seit 1989 f\u00fcr jeden erh\u00e4ltlich u.a. in Deutschland, Schweiz und Spanien verkauft.
- 6. In den Jahren 1985 bis 1990 wurde MES zusammen mit einer Vorführanlage der Firma TRIX, Nürnberg, öffentlich ausgestellt. Die Anlage wurde dem interessierten Publikum teilweise über mehrere Monate am Standort in Nürnberg sowie bei allen wichtigen Modellbahnausstellungen vorgeführt. Bei dieser Anlage wurde zur Steuerung u.a. ein Personal-Computer verwendet, der über zwei getrennte, serielle Schnittstellen mit zwei digitalen Zentraleinheiten verbunden war. Dabei wurde die eine Zentraleinheit für die Steuerung der Lokomotiven, die andere Zentraleinheit für die Steuerung von Weichen und Signalen verwendet. Auf diesem Steuer-Computer wurde also die Fähigkeit der MES, Kommandos an eine von mehreren digitalen Zentraleinheiten zur Steuerung einer Modellbahn senden zu konnen, offentlich vorgeführt.
- 7. Im Jahre 1992 wurde vom MIBA Verlag, Nürnberg, als Bend 17 ein Video veröffentlicht, in dem MES u.a. im Zusammenhang mit der unter 6. beschriebenen Verführenlage dargestellt wird. Der MIBA Verlag ist einer der führenden Fachverlage des deutschsprechigen Raums auf dem Gebiet der Modelleisenbahn.

El Antpuro, 26. September 2002

Had. Di