IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, Plaintiff, v. MICROSOFT CORPORATION, Defendant.	Civil Action No. 98-1232 (TPJ)
STATE OF NEW YORK *ex rel.* Attorney General DENNIS C. VACCO, *et al.*, Plaintiffs, v. MICROSOFT CORPORATION, Defendant.	Civil Action No. 98-1233 (TPJ)

PLAINTIFF UNITED STATES' MOTION TO COMPEL MICROSOFT CORPORATION TO COMPLY WITH DISCOVERY

Pursuant to Rule 37 of the Federal Rules of Civil Procedure, the United States hereby moves the Court to compel Microsoft to comply within twenty-four hours to the following specific requests in Plaintiffs' Third Joint Request for Production of Documents, served on August 14, 1998:

1) Request for Production No. 1, concerning Microsoft databases relating to OEMs and Microsoft operating system products;

2) Request for Production No. 2, requesting documents relating to any meetings or communications between Paul Maritz or Bill Gates and any representative of Intel Corporation that took place between January 1, 1995 and December 31, 1997;

3) Request for Production No. 4, requesting documents relating to any meetings or communications between Eric Engstrom or Chris Phillips of Microsoft and any representative of Apple Computer, Inc. that occurred between January 1, 1996 and August 14, 1998; and

4) Request for Production No. 5, requesting documents relating to any meetings or communications with any OEM relating to Apple's QuickTime technology.

This motion is made on the grounds that the document requests are relevant to the subject matter of the action and do not relate to privileged matters, and the refusal to comply is without justification. This Motion is supported by the Memorandum filed herewith.

DATED: September 2, 1998

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Christopher S Crook
Chief
Phillip R. Malone
Erika Frick
Attorneys
David Boies
Special Trial Counsel

U.S. Department of Justice
Antitrust Division
450 Golden Gate Ave., Room 10-0101
San Francisco, CA 94102
(415) 436-6660