

# Exhibit 60

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

GAMES WORKSHOP LIMITED,	)	
	)	
Plaintiff,	)	
	)	Case No. 1:10-cv-08103
v.	)	
	)	
CHAPTERHOUSE STUDIOS LLC and	)	
JON PAULSON d/b/a PAULSON GAMES,	)	Judge Matthew F. Kennelly
	)	
Defendants.	)	

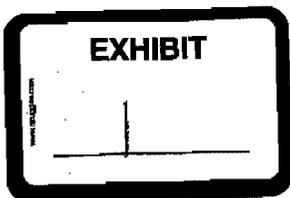
**RE-NOTICE OF SUBPOENA TO GAMES WORKSHOP RETAIL, INC.**

PLEASE TAKE NOTICE that pursuant to Rule 45 of the Federal Rules of Civil Procedure, defendant Chapterhouse Studios LLC served the attached subpoena on Games Workshop Retail, Inc. ("GWRI"). GWRI must appear for a deposition on March 1, 2012, at 9:30 a.m., at the offices of Adams and Rees LLP, Brinkley Plaza, 80 Monroe Avenue, Suite 700, Memphis TN 38103. The deposition will be recorded stenographically, by videotape, and through LiveNote or other instant visual display of testimony both through on-site and off-site feed. The address of GWRI's agent is C T Corporation System, 800 S Gay St., Ste. 2021, Knoxville, TN 37929-9710.

Dated: February 17, 2012

WINSTON & STRAWN LLP

By: /s/ K. Joon Oh  
 Jennifer Golinveaux (CA Bar No. 203056)  
 Dean A. Morehous (CA Bar No. 111841)  
 Kevin Joon Oh (CA Bar No. 246142)  
 Thomas J. Kearney (CA Bar No. 267087)  
 Shane B. Witnov (CA Bar No. 274830)  
 WINSTON & STRAWN LLP  
 101 California Street  
 San Francisco, CA 94111-5802  
 Phone: (415) 591-1000



Fax: (415) 591-1400  
jgolinveaux@winston.com  
dmorehous@winston.com  
koh@winston.com  
tkearney@winston.com  
switnov@winston.com

Eric Mersmann (IL Bar No. 6286859)  
Jon C. Raffensperger (IL Bar No. 6302802)  
WINSTON & STRAWN LLP  
35 West Wacker Drive  
Chicago, IL 60601-1695  
Phone: (312) 558-5600  
Fax: (312) 558-5700  
emersmann@winston.com  
jraffensperger@winston.com

*Attorneys for defendant Chapterhouse Studios LLC*

AO 88A (Rev. 06/09) Subpoena to Testify at a Deposition in a Civil Action

UNITED STATES DISTRICT COURT

for the

Western District of Tennessee

Games Workshop Limited )

Plaintiff )

v. )

Chapterhouse Studios LLC and Jon Paulson d/b/a )

Paulson Games )

Defendant )

Civil Action No. 1:10-cv-08103

(If the action is pending in another district, state where:  
Northern District of Illinois )

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: Games Workshop Retail Inc.

**Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization that is *not* a party in this case, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

See Attachment A

Place: Adams and Reese LLP Brinkley Plaza 80 Monroe Avenue, Suite 700, Memphis TN 38103	Date and Time: 03/01/2012 9:30 am
---	--------------------------------------

The deposition will be recorded by this method: stenographic, videotape, Livenote

**Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

See Attachment B (Subpoena to Produce Documents to Games Workshop Retail, for January 13, 2012)

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date: 02/17/2012

CLERK OF COURT

OR

\_\_\_\_\_  
Signature of Clerk or Deputy Clerk

\_\_\_\_\_  
/s/ K. Joon Oh  
Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party) Chapterhouse Studios LLC, who issues or requests this subpoena, are:

K. Joon Oh, 101 California Street, San Francisco CA 94111  
koh@winston.com, (415) 591-1564

AO 88A (Rev. 06/09) Subpoena to Testify at a Deposition in a Civil Action (Page 2)

Civil Action No. 1:10-cv-08103

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

This subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_.

I served the subpoena by delivering a copy to the named individual as follows: \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

I returned the subpoena unexecuted because: \_\_\_\_\_  
\_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_  
\_\_\_\_\_ *Server's signature*

\_\_\_\_\_ *Printed name and title*

\_\_\_\_\_ *Server's address*

Additional information regarding attempted service, etc:

## Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)

**(c) Protecting a Person Subject to a Subpoena.**

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

**(A) Appearance Not Required.** A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

**(B) Objections.** A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

**(i)** At any time, on notice to the commanded person, the serving party may move the issuing court for an order compelling production or inspection.

**(ii)** These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

**(A) When Required.** On timely motion, the issuing court must quash or modify a subpoena that:

**(i)** fails to allow a reasonable time to comply;

**(ii)** requires a person who is neither a party nor a party's officer to travel more than 100 miles from where that person resides, is employed, or regularly transacts business in person — except that, subject to Rule 45(c)(3)(B)(iii), the person may be commanded to attend a trial by traveling from any such place within the state where the trial is held;

**(iii)** requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

**(iv)** subjects a person to undue burden.

**(B) When Permitted.** To protect a person subject to or affected by a subpoena, the issuing court may, on motion, quash or modify the subpoena if it requires:

**(i)** disclosing a trade secret or other confidential research, development, or commercial information;

**(ii)** disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party; or

**(iii)** a person who is neither a party nor a party's officer to incur substantial expense to travel more than 100 miles to attend trial.

**(C) Specifying Conditions as an Alternative.** In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

**(i)** shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

**(ii)** ensures that the subpoenaed person will be reasonably compensated.

**(d) Duties in Responding to a Subpoena.**

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

**(A) Documents.** A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

**(B) Form for Producing Electronically Stored Information Not Specified.** If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

**(C) Electronically Stored Information Produced in Only One Form.** The person responding need not produce the same electronically stored information in more than one form.

**(D) Inaccessible Electronically Stored Information.** The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**

**(A) Information Withheld.** A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

**(i)** expressly make the claim; and

**(ii)** describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

**(B) Information Produced.** If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(e) Contempt.** The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty's failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

**ATTACHMENT A**

**Deposition Subpoena – Games Workshop Retail Inc.**

For the purpose of this subpoena for production of documents and things, the following instructions shall apply and the following terms will have the meaning indicated:

**DEFINITIONS**

- 1) The terms “YOU” and “YOUR” mean you and any persons controlled by you or acting on your behalf, including any parent, subsidiary, sister, related, or predecessor companies and expressly including, without limitation, Games Workshop, Inc.; Games Workshop Maryland, Inc.; Games Workshop America, Inc.; and GW USA Manufacturing, LLC.
- 2) The terms “Plaintiff” and “Games Workshop Ltd.” refer to Plaintiff Games Workshop Limited and include any persons controlled by or acting on behalf of that entity, including without limitation all past and present officers, directors, agents, employees, contractors, agents, licensees, attorneys, predecessors, subsidiaries, parent companies (including without limitation Games Workshop Group PLC), sister companies, related companies, or affiliated companies, persons or entities acting in joint venture or partnership relationships with Games Workshop Ltd. and any others acting on their behalf and/or pursuant to their authority or control.
- 3) The terms “Chapterhouse” and “Defendant” refer to Defendant Chapterhouse Studios LLC as well as any officers, directors, employees, and authorized representatives.
- 4) The term “Sabertooth Games” refers to Sabertooth Games, Inc., including without limitation all past and present officers, directors, agents, employees, contractors, agents, licensees, attorneys, predecessors, subsidiaries, sister companies, related companies, or affiliated companies, persons or entities acting in joint venture or partnership relationships with Sabertooth

Games and any others acting on their behalf and/or pursuant to their authority or control.

5) The terms “this Action” and “this Litigation” refer to *Games Workshop Ltd., v. Chapterhouse Studios LLC et al.*, Case No. 10-cv-8103 in the Northern District of Illinois.

6) The term “Plaintiff’s Exhibit A” means Exhibit A to Games Workshop Ltd.’s Answer to Interrogatory No. 1, which is attached hereto as Exhibit 1.

7) The term “Second Amended Complaint” means the Second Amended Complaint Plaintiff filed in this Action, which is attached hereto as Exhibit 2.

8) The term “Person” means any natural person or any business, legal or governmental entity, or association.

9) The term “Document” is synonymous in meaning and equal in scope to the term in Federal Rule of Civil Procedure 34 and its interpretation by the courts, including originals, copies, drafts or other productions of any written, graphic or otherwise recorded matter, however produced or reproduced, whether inscribed by hand, by computer or by mechanical, electronic, or photographic means.

10) The terms “work” or “works” refer to literary, pictorial, graphic, sculptural, or other works, as well as characters.

11) The term “Plaintiff’s Trademarks” refers to the registered and unregistered trademarks that are the subject of this Action, including without limitation as set forth in the Second Amended Complaint and Plaintiff’s Exhibit A.

12) The term “Plaintiff’s Copyrights” refers to the registered and unregistered copyrights that are the subject of this Action, including without limitation as set forth in the Second Amended Complaint and Plaintiff’s Exhibit A.

13) The term “Plaintiff’s Intellectual Property” refers to Plaintiff’s Trademarks,

Plaintiff's Copyrights, and any other intellectual property that is the subject of this Action, including without limitation as set forth in the Second Amended Complaint and Plaintiff's Exhibit A.

14) The term "Plaintiff's Works" refers to any of the works Plaintiff claims in this Action, including without limitation as set forth in the Second Amended Complaint and Plaintiff's Exhibit A.

15) The term "Relating to" with respect to any given subject, means constituting, containing, embodying, evidencing, reflecting, identifying, stating, dealing with, or in any way pertinent to that subject.

16) The term "Concerning" means relating to, referring to, describing, evidencing or constituting.

17) The terms "all" and "each" shall be construed to include all and each.

18) The terms "and" and "or" shall be construed to include "and" and "or" and shall be the equivalent of "and/or."

19) The use of the singular form of any word also includes the plural and vice versa.

#### **TOPICS FOR DEPOSITION:**

1) Contracts, agreements, licenses, permissions, rights, and/or releases between YOU and any other party, including without limitation Plaintiff, to use Plaintiff's Intellectual Property or to develop works based upon Plaintiff's Intellectual Property, including records or correspondence maintained by YOU that would reflect this information.

2) The design, creation, authorship, and ownership of any of Plaintiff's Works, including without limitation any documents concerning chain of title of such works; any design

guidelines, concept art, or references given to any artist, designer, writer, model painter, sculptor, or other author or creator for use in creating works relating to Warhammer or Warhammer 40,000; and the nature of such documents.

3) The publication (as publication is defined under United States copyright law at 17 U.S.C. § 101), release schedule, and printer or manufacturer of any of the graphical, printed, or sculptural works Plaintiff claims in this Action, including without limitation Plaintiff's Works referenced in the Second Amended Complaint and Plaintiff's Exhibit A, and the following works:

- Necromunda Rulebook, 1995;
- Warhammer 40,000 Eldar, 2006
- Warhammer 40,000 Tau Empire, 2001;
- Warhammer 40,000 Tau Empire, 2005;
- Warhammer 40,000 Space Wolves, 2000;
- Warhammer 40,000 Space Wolves, 2009;
- Warhammer 40,000 rule book (editions 1 through 5);
- Space Marine Collectors' Guide (editions 1 and 2);
- Warhammer 40,000 Tyranids (editions 1 through 5);
- Warhammer 40,000 Space Marines (editions 1 through 4);
- Warhammer 40,000 Dark Angels (editions 1 through 3);
- Warhammer 40,000 Chaos Space Marines (editions 1 through 4);
- Warhammer Orks, 1994;
- Imperial Guard Collectors Guide, 2003;
- Warhammer 40,000 Wargear 2005;
- Warhammer 40,000 Apocalypse, 2007;
- Index Astartes;
- Index Astartes II;
- Index Astartes III;
- Index Astartes IV;

- The Horus Heresy Collected Visions;
- The Art of Warhammer 40,000;
- White Dwarf Magazine 249;
- How to Paint Space Marines;
- Soul Drinker;
- The Soul Drinkers Omnibus;
- Brothers of the Snake;
- Games Workshop Complete Catalog & Hobby Reference 2006-2007;

and including records or correspondence maintained by YOU that would reflect this information.

4) The development, design, and creation of works relating to Warhammer or Warhammer 40,000, including without limitation the identity of any natural persons involved in such development, design, and creation, whether they are currently YOUR employees or were YOUR employees at the time of creation of the work, and the records or correspondence maintained by YOU that would reflect this information.

5) The employment, contractual, or other relationship between YOU and any natural person involved in the development, design, and creation of works relating to Warhammer or Warhammer 40,000, and the records or correspondence maintained by YOU that would reflect this information.

6) The employment, contractual, or other relationship between YOU and any natural person involved in the development, design, and creation of Plaintiff's Works, and the records or correspondence maintained by YOU that would reflect this information.

7) The sources of works manufactured, sold, distributed, or offered for sale by YOU, including but not limited to the submission, acceptance, and publication process for works created or authored in whole or in part by non-Games Workshop employees, any contractual

agreements regarding copyrights with parties providing or submitting such material, and the records or correspondence maintained by YOU that would reflect this information.

8) How Plaintiff's Trademarks are used, licensed, and enforced by YOU and when each was first used in commerce both in the United States.

9) The corporate formation, corporate organization, directors, officers, staff, employees, personnel and consultants, of YOU, Plaintiff, or any of YOUR affiliates, parents, or related companies, and any documents reflecting such information.

10) YOUR total gross revenues, expenses, and annual profits from Plaintiff's Intellectual Property and each of the works Plaintiff claims in this Action for the past five years, and the records that would reflect this information.

11) YOUR communications with or concerning Nick Villacci, Defendant, Defendant's products, Defendant's designers, or this Action, and records or correspondence maintained by YOU that would reflect this information.

12) YOUR current and past relationship to Sabertooth Games, including without limitation any ownership interest, executive position, or board membership in Sabertooth Games held by YOU or YOUR officers, directors, employees, or agents; YOUR ownership or licensing of any copyrights, trademarks, or other intellectual property owned by or developed for Sabertooth Games; and all records or correspondence maintained by YOU that would reflect this information.

13) YOUR policies regarding retention, storage, filing, and destruction of documents and things.

14) YOUR policies and practices regarding storage or archiving of paper documents and tangible things.

15) YOUR computer network architecture, including without limitation 1) the name, identity, and contents of any file servers, shared hard drives, or other file storage; and 2) file-naming and storage conventions, including disk or tape labeling conventions.

16) YOUR email system, including without limitation the software and hardware that YOU use for email and any centralized storage or administration of email.

17) YOUR policies relating to employee use of company computers, data, and other technology.

18) YOUR actions to identify, preserve, and collect documents and things relevant to this Action, or responsive to the subpoena served on you dated December 27, 2011 or to discovery requests in this Action.

## **Exhibit 1**

to

Subpoena to Games Workshop Retail, Inc. to Testify at a Deposition, Attachment A

(EXHIBIT A to Games Workshop Ltd.'s Answer to Interrogatory No. 1)

**EXHIBIT A to Games Workshop Ltd.'s Answer to Interrogatory No. 1**

No.	Chapterhouse Product and Website Description	Games Workshop Works
1	<p>Eagle Thunder Hammer for Space Marine (12)</p> <p>This is a hammer sculpted with a Eagle or Feather theme in mind. It can be used as a power weapon or a thunder hammer. It is well suited as a Imperial Thunder Hammer for 40k or even used in Imperial Fantasy Armies. Customers have also used this for high elf and empire fantasy armies. It is a pewter bit.</p>	<p>Games Workshop sells Thunder Hammers available on its website.  <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1400033&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1400033&amp;rootCatGameStyle=</a></p> <p><a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1060025&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1060025&amp;rootCatGameStyle=</a></p> <p>Miniatures designed by Jes Goodwin, Martin Footit and Dave Thomas.                      The Thunder Hammer is a power weapon used by Space Marines. A power weapon is a close combat weapon such as a hammer or sword with a power generator built into it to produce an additional combat effect.</p> <p>40K is the generally accepted abbreviation for Warhammer 40,000. It is registered as a CTM in classes 9, 16 and 28, and in the US in class 28.</p> <p>Space Marines use eagles as part of their iconography.</p> <p>Space Marine Collector's Guide 2003, page 14</p> <p>High Elf and Empire are both Warhammer fantasy armies.</p>
2	<p>Shoulder Pad w/ Shield &amp; Studs for Space Marine -- Tactical (3)</p> <p>This is a studded shoulder pad a shield on the side. This is similiar to the Heresy era shoulder pads that early space marines used. This shoulder pad works well with any loyalist or chaos Space Marine® armies, works especially well with black templars. This is a pewter model that fits on tactical Space Marine® models as well as other sci-fi models.</p>	<p>The Heresy era is a period of history in Warhammer 40,000 called the Horus Heresy. It is also a type of Space Marine armour – Mk V Heresy armour.</p> <p>Forge World sell Mark V Heresy Space Marines available on its website  <a href="http://www.forgeworld.co.uk/Warhammer-40000/Space_Marines/Space_Marine-Infantry-Accessories/MK-V-HERESY-ARMOUR.html">http://www.forgeworld.co.uk/Warhammer-40000/Space_Marines/Space_Marine-Infantry-Accessories/MK-V-HERESY-ARMOUR.html</a></p> <p>Models designed by Will Hayes and Phil Stutcinkas,                      Chaos Space Marines are a Warhammer 40,000 army.</p> <p>The Black Templars are a Space Marine Chapter. Their Chapter colours are black and white. The Chapter's icon is a black cross with a skull at its centre.</p> <p>Index Astartes II 2003, page 45                      (NH663 / NH672 / Neil Hodgson / 2000)</p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
		<p>Warhammer 40,000 Space Marine Land Speeder 1998, page 5 (NH002 / Neil Hodgson / 1998)</p> <p>Tactical refers to a type of Space Marine squad.</p>
3	<p>Skull or Chaplain Head Bit for Space Marines (23)</p> <p>This is a unique sculpt of a skull power armor head for 28 mm scale. Tired of the same old chaplain Space Marine® head, we decided to do our own. Scaled for use with GW power armor figures.</p>	<p>Chaplains are a rank within the Space Marines army. Their iconography heavily features skulls.</p> <p>Miniature designed by Juan Diaz Ramos</p> <p>This is just one example of a Space Marine Chaplain with skull helmet available on the Games Workshop website:  <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1050244&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1050244&amp;rootCatGameStyle=</a></p> <p>Power armour refers to the type of armour Space Marines use.</p>
4	<p>Shoulder Pads for Blood Eagle – Tactical (2)</p> <p>This is a shoulder pad with a Eagle or Blood raven on the face, the wings of the bird are surrounding an inverted blood drop or gem. This shoulder pad works well with Blood Raven or Blood Angel themed armies. This is the standard size Space Marine® Tactical Marine shoulder pad cast in pewter.</p>	<p>The Blood Ravens are a Space Marine Chapter for the Dawn of War computer game (produced under licence by THQ) -  <a href="http://www.dawnofwargame.com/us/game/index/gameId/1">http://www.dawnofwargame.com/us/game/index/gameId/1</a></p> <p>The Art of Warhammer 40,000 2006, page 71 (NH Blood Raven / Neil Hodgson / 2005)</p> <p>The Blood Raven's icon is a raven with outstretched wings (like the Aquila, double headed eagle) with a blood drop centred on its torso.</p> <p>Forge World sell a Blood Raven decal/transfer sheet on its website:  <a href="http://www.forgeworld.co.uk/Warhammer-40000/BLOOD-RAVENS-TRANSFER-SHEET.html">http://www.forgeworld.co.uk/Warhammer-40000/BLOOD-RAVENS-TRANSFER-SHEET.html</a></p> <p>Decals are used to decorate Space Marines, including shoulder pads.</p> <p>(Blood Raven Transfer / Paul Rudge / 2010)</p> <p>The Blood Angels are a Space Marine Chapter. Their iconography includes blood drops.</p> <p>(NH Angels Graph Paper/ Neil Hodgson / 2001)</p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
		(WE322 Blood Angels Icon / Wayne England / 1995)  Index Astartes II 2002, page 31
5	Shoulder Pads for Blood Eagle – Terminator (2)  This is a shoulder pad with a Eagle or Blood raven on the face, the wings of the bird are surrounding an inverted blood drop or gem. This shoulder pad works well with Blood Raven or Blood Angel themed armies. This is the standard size Space Marine® Terminator shoulder pad cast in pewter.	Blood Ravens – see product 4  Terminator refers to a type of Space Marine armour. Games Workshop sells Space Marines in Terminator armour: <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1060028">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1060028</a>  Miniatures designed by Jes Goodwin, Martin Footit and Dave Thomas.
6	Celestial Lions Left Arm Shoulder Pad Bit - Tactical (2)  This is a Lion Shoulder pad for the left arm, can be used for Celestial Lions or Lions Rampant. This is the standard size Space Marine tactical shoulder pad cast in pewter.	The Celestial Lions is a Space Marine Chapter.  White Dwarf magazine issue 249, page 33 (NH672c celestial lions/ Neil Hodgson / 2000)  The Celestial Lions Chapter symbol is the head of a Lion on a blue or black background.  The Lions Rampant is a fan created Space Marine Chapter.  Tactical – see product 56  This product is designed to be used with other Games Workshop Products and to fit within the Warhammer 40,000 Universe. It is of a size and scale to fit with Games Workshop products. The product description uses Games Workshop terms: Celestial Lions & Tactical.
7	Celestial Lions Right Arm Shoulder Pad Bit - Tactical (2)  This is a Lion Shoulder pad for the Right arm, can be used for Celestial Lions or Lions Rampant. This is the standard size Space Marine® tactical shoulder pad cast in pewter.	Celestial Lions/Lions Rampant – See product 6  Tactical – see product 56  This product is designed to be used with other Games Workshop Products and to fit within the Warhammer 40,000 Universe. It is of a size and scale to fit with Games Workshop products. The product description uses Games Workshop marks: Celestial Lions & Tactical.
8	Shoulder Pads for Deathwatch or Dark Angels - Tactical (2)	The Dark Angels is a Space Marine Chapter.

No.	Chapterhouse Product and Website Description	Games Workshop Works
	<p>This is shoulder pad is sculpted with a number of gothic style icons on the face of the shoulder pad. It would look good in any deathwatch, inquisition or dark angels themed army. This is the standard size space marine® tactical shoulder pad cast in pewter.</p>	<p>Index Astartes I 2002, page 19 (NH703C Dark Angel Variant 2/ Neil Hodgson / 2000)</p> <p>The Death Watch is a Space Marine Chapter.</p> <p>The product description uses Games Workshop marks: Death Watch, Dark Angels and Tactical.</p> <p>Index Astartes II 2002, page 42 (NH Grey Knights Death Watch / Neil Hodgson / 2001)</p> <p>The Inquisition is a Warhammer 40,000 army.</p>
9	<p>Shoulder Pads for Deathwatch or Dark Angels - Terminator (2)</p> <p>This is shoulder pad is sculpted with a number of gothic style icons on the face of the shoulder pad. It would look good in any deathwatch, inquisition or dark angels themed army. This is the standard size space marine® terminator shoulder.</p>	<p>The product includes 3 arches: middle arch contains a Long Sword; right arch contains an angel wing - these are Dark Angel icons. The left arch may contain a storm bolter (a type of Space Marine gun).</p> <p>The Dark Angels Chapter colours are bone white and green. Their iconography includes images of angel wings, broadswords and figures in hooded cassocks. Triptychs (three panelled artwork) also form a part of their iconography.</p> <p>(DG1019_DA_OC / Dave Gallagher / 2006)</p> <p>Triptychs are shown on the central character's belt and also the gun being fired at the bottom of the artwork.</p> <p>Death Watch and Inquisition – see product 8</p>
10	<p>Power Armour Pad for Exorcist (2)</p> <p>This power armor sized shoulder pad has a demon skull sculpted on the front as well as a raised rim with the word "perdition" etched into it. Styled after the Exorcist Space Marine® chapter. Looks good as a pad for Librarians as well.</p>	<p>Games Workshop's Space Marine Chapter is called Exorcists in the plural. Their icon is a skull with horns curving downwards.</p> <p>White Dwarf magazine issue 249, page 33 (NH672c Exorcists/ Neil Hodgson / 2000)</p> <p>Librarian is a rank in the Space Marine army.</p>
11	<p>Terminator pad for Exorcist Space Marine (2)</p> <p>This terminator sized shoulder pad has a demon skull sculpted on a pentagram as well as a raised rim with the word "perdition" etched into it. Styled after the Exorcist space marine® chapter. Looks good as a</p>	<p>Exorcists &amp; Librarians - see product 10</p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
	pad for Librarians as well.	
12	<p>Sawblade Shoulder Pad &amp; Jewel (1)</p> <p>This is a shoulder pad that fits is about the same size a GW shoulder pad. It has a sawblade on it and we also include a seperate jewel drop. This looks great as an evil sun or if you use the jewel drop, looks spectacular for "Fleshtearer" Space Marine® shoulder pads. Supplied in pewter.</p>	<p>The Flesh Tearers are a Space Marine Chapter. Their icon is a circular saw blade with a blood drop in the centre. The Chapter's colours are black and red.</p> <p>Index Astartes II, page 49 (NH672c Flesh Tearers/ Neil Hodgson / 2000)</p> <p>Games Workshop sells Flesh Tearers shoulder pads - <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod550012a&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod550012a&amp;rootCatGameSt yle=</a></p> <p>The Orks are a Warhammer 40,000 race. Evil Sun(z) is an Ork clan. Their icon is a circle with 'sun rays' extending outwards.</p> <p>Codex Orks 1994, page 36 (WE258C Ork Evil Sunz Icon/ Wayne England / 1994)</p>
13	<p>Terminator Shoulder Pad for Flesh Tearers (2)</p> <p>This is a shoulder pad that fits is about the same size a GW terminator shoulder pad. It has a stone sawblade on it adorned with a jeweled drop and 2 smaller drops in the corner. This pad looks spectacular on "Fleshtearer" Space Marines®.</p>	<p>Flesh Tearers - see product 12</p> <p>Terminator – see product 5</p>
14	<p>Howling Griffon Shoulder Pads for Space Marines (2)</p> <p>If you are searching for Howling Griffon shoulder pads, you have come to the right website. These work perfectly for Howling Griffons space marines or any other chapters that use Griffons as their chapter symbol. This fits standard space marine® armored shoulders and should fit in with any standard space marine® model shoulder pads. This is a single shoulder pad - quality cast in pewter.</p>	<p>The Howling Griffons are a Space Marine Chapter. Their icon is a griffon and their Chapter colours are red and yellow.</p> <p>The Art of Warhammer 40,000 2006, page 71 (NH Howling Griffon / Neil Hodgson / 2005)</p>
15	Shoulder Pads for Imperial Fist – Tactical Marines (2)	Loyalist refers to the Space Marine Chapters that fight for the Imperium of Mankind.

No.	Chapterhouse Product and Website Description	Games Workshop Works
	<p>This is a shoulder pad with mailed fist on it, the fist has a wreath of flame or leaves along the top. This shoulder pad works well with any loyalist or Imperial Fist (Crimson Fist) or second founding space marine® chapter. This shoulder pad would look especially good on Imperial Fist Space Marines®. This is a pewter model that fits on tactical space marine® models as well as other sci-fi models.</p>	<p>The Imperial Fists are a Space Marines Chapter. Their icon is a clenched hand. The hand is always shown in a gauntlet (armoured glove). Their Chapter colour is yellow.</p> <p>Index Astartes II 2002, page 13 (NH Imperial Fist Graph/ Neil Hodgson / 2001)</p> <p>Games Workshop sells Imperial Fists shoulder pads - <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1110187&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1110187&amp;rootCatGameStyle=</a></p> <p>The Crimson Fists are a Space Marines Chapter. Their icon is also a clenched hand in a gauntlet. Their Chapter colours are red and blue.</p> <p>Index Astartes IV 2004, page 39 (KK289 SM Crimson Fist Pads/ Karl Kopinski/ 2003)</p> <p>Games Workshop sells Crimson Fists shoulder pads - <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod330003a&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod330003a&amp;rootCatGameStyle=</a></p> <p>The Second Founding is when the Space Marine Legions (First Founding) were first split down into Chapters (Second Founding).</p> <p>Tactical - see product 56</p>
16	<p>Shoulder Pad for Imperial Fist – Terminator Marine (2)</p> <p>This is a shoulder pad with mailed fist on it, the fist has a wreath of flame or leaves along the top. This shoulder pad works well with any loyalist or Imperial Fist (Crimson Fist) or second founding space marine® chapter. This shoulder pad would look especially good on Imperial Fist Space Marines®. This is a pewter model that fits on terminator space marine® models as well as other sci-fi models.</p>	<p>Loyalist – see product 15</p> <p>Imperial Fist – see product 15</p> <p>Crimson Fist – see product 15</p> <p>Second Founding – see product 15</p> <p>Terminator – see product 5</p>
17	<p>Shoulder Pads for Serpent or Iron Snakes - Tactical (2)</p> <p>This is a Serpent or snake in a Greek style, the edges of the pads have chains on them. This is the standard size space marine® tactical shoulder pad cast in pewter. This shoulder pad fits well with any greek, serpent or iron snakes themed army.</p>	<p>The Iron Snakes are a Space Marine Chapter used in the Games Workshop Black Library novels. <a href="http://www.blacklibrary.com/">http://www.blacklibrary.com/</a></p> <p>The Art of Warhammer 40,000 2006, page 70 (NH Iron Snakes / Neil Hodgson / 2005)</p>

No.	Chapter house Product and Website Description	Games Workshop Work
		<p>(CL Bro of Snake / Clint Langley / Black Library / 2007)</p> <p>The Iron Snakes icon is a snake facing left with its mouth open and its body arched.</p>
18	<p>Shoulder Pads for Serpent or Iron Snakes - Terminator (2)</p> <p>This is a Serpent or snake in a Greek style, the edges of the pads have chains on them. This is the standard size space marine® terminator shoulder pad cast in pewter. This shoulder pad fits well with any greek, serpent or iron snakes themed army. This pad is meant for the right arm.</p> <p>There are two variants of this pad that ship out, one with a scroll and another with a tooth (not available for individual order).</p>	<p>Iron Snakes – see product 17</p> <p>Terminator – see product 5</p>
19	<p>Shoulder Pad w/ Studs and Skull for Space Marine - Tactical (2)</p> <p>This is a shoulder pad with a skull on it, the rest of the shoulder pad has armored studs. This shoulder pad works well with any loyalist or chaos space marine® army. Would work great for legion of the damned marines. This could also be a chapter icon for the left shoulder. This is a pewter model that fits on tactical space marine® models as well as other sci-fi models.</p>	<p>The shoulder pad shown is based on Mk V Heresy armour – see product 2</p> <p>Loyalist – see product 15</p> <p>Chaos Space Marine – see product 2</p> <p>The Legion of the Damned is a Space Marine Chapter.</p> <p>How to paint Space Marines 2004, page 85 (NH Legion of the Damned/ Neil Hodgson / 2005)</p> <p>Their armour colour is black. They use the skull emblem on their shoulderpads.</p> <p>Games Workshop sells Legion of the Damned models on its website - <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod380007a&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod380007a&amp;rootCatGameStyle=</a></p> <p>Tactical – see product 56</p> <p>Miniatures designed by Juan Diaz Ramos.</p>
20	Shoulder Pad w/ Skull and Flames for Space Marines - Tactical (2)	Space Marines show their Chapter icon on their left shoulder.

No.	Chapterhouse Product and Website Description	Games Workshop Works
	<p>This is a shoulder pad with Skull on it, the skull has flames coming out of the top. This shoulder pad works well with any loyalist or chaos space marine® army. This shoulder pad would look especially good on legion of the damned armies. This could also be a chapter icon for the left shoulder. This is a pewter model that fits on tactical space marine® models as well as other sci-fi models.</p>	<p>Warhammer 40,000 Chaos Space Marines 2007, page 21 (NH CH_Sanct / Neil Hodgson / 2007)</p> <p>The Sanctified is a Chaos Space Marine Legion. It has a flaming skull as its icon.</p> <p>Loyalist – see product 15</p> <p>Chaos Space Marine – see product 2</p> <p>Legion of the Damned - see product 19</p> <p>Tactical – see product 56</p>
21	<p>Shoulder Pad Star Fox / Luna Wolves Tactical (2)</p> <p>This is a stylized fox or wolf head shoulder pad. This is the standard size tactical space marine® shoulder pad cast in pewter. This pad works well with fox, or luna wolves style armies.</p>	<p>The Star Fox is a fan created Space Marine Chapter.</p> <p>The Luna Wolves are a Space Marine Legion.</p> <p>Index Astartes IV 2004, page 3 (NH lunar wolves / Neil Hodgson / 2004)</p> <p>Their Legion icon incorporates a black wolf's head shown face on.</p> <p>Index Astartes IV, 2004, page 3 (NH lunar wolves icon / Neil Hodgson / 2004)</p> <p>Tactical – see product 56</p>
22	<p>Shoulder Pad Star Fox / Luna Wolves Terminator (2)</p> <p>This is a stylized fox or wolf head shoulder pad. This pad works well with fox, or luna wolves style armies.</p> <p>This is the standard size space marine® terminator shoulder pad cast in pewter. This sculpt to be used as a right arm pad.</p>	<p>Star Fox/Luna Wolves – see product 21</p> <p>Terminator – see product 5</p>
23	<p>Shoulder Pads for Chalice or Soul Drinker - Tactical (2)</p> <p>This is a shoulder pad with a grail or chalice sculpet on the face, the upper ridge has a raised face with details sculpted along the edge. This shoulder pad works well with Soul Drinker themed armies. This is the standard size space marine® tactical shoulder pad cast in pewter.</p>	<p>The Soul Drinkers are a Space Marine Chapter used in the Games Workshop Black Library novels. <a href="http://www.blacklibrary.com">http://www.blacklibrary.com</a>.</p> <p>Soul Drinkers 2002, front cover (PAS030C Soul Drinker / Adrian Smith / Black Library / 2002)</p> <p>The Soul Drinkers Chapter colour is purple and their icon is a gold chalice with</p>

No.	Chapter, Issue, Product and Model Description	Games Workshop Works
		spikes rising up from the bowl of the cup.  Tactical – see product 56
24	Shoulder Pads for Chalice or Soul Drinker - Terminator (2)  This is a shoulder pad with a grail or chalice sculpt on the face, the upper ridge has a raised face with details sculpted along the edge. This shoulder pad works well with Soul Drinker themed armies. This is the standard size space marine® terminator shoulder pad cast in pewter.	Soul Drinkers – see product 23  Terminator – see product 5
25	Dragon or Salamander Icon Shoulder Pad Bit - Tactical (2)  This is a Dragon or Salamander flat icon on a scaled background. This is the standard size space marine® tactical shoulder pad cast in pewter.	The Salamanders are a Space Marine Chapter.  Index Astartes 2004, page 19 (NH Salamander Graph / Neil Hodgson / 2004)  Their iconography is a crested lizard head and they use scales as armour decoration. The Chapter's colours are green and black.  Index Astartes IV, 2004, page 19 (NH Salamander Icon / Neil Hodgson / 2004)  Games Workshop sells Salamanders shoulder pads – <a href="http://www.forgeworld.co.uk/Warhammer-40000/SALAMANDERS-TERMINATOR-SHOULDER-PADS.html">http://www.forgeworld.co.uk/Warhammer-40000/SALAMANDERS-TERMINATOR-SHOULDER-PADS.html</a>  Models designed by Simon Egan Tactical – see product 56
26	Dragon or Salamander Icon Shoulder Pad - Terminator (2)  This is a Dragon or Salamander Skull on a scaled background. This is the standard size space marine® terminator shoulder pad cast in pewter. This sculpt to be used as a right arm pad.	Salamanders – see product 25  Terminator – see product 5
27	Dragon or Salamander Power Fist (2)  A left arm that can be used as a power fist or lightning claw on regular infantry size miniatures, works well on terminator or power armor.	Salamanders – see product 25  A power fist is a Space Marine weapon. Forge World sells a power fist as part of this pack - <a href="http://www.forgeworld.co.uk/Warhammer-40000/SPACE-MARINE-">http://www.forgeworld.co.uk/Warhammer-40000/SPACE-MARINE-</a>

No.	Chapterhouse Product and Website Description	Games Workshop Works
	<p>There are scales sculpted onto the forearm.</p>	<p><u><a href="#">CHARACTER-CONVERSION-SET.html</a></u></p> <p>Model designed by Phil Stutcinkas,</p> <p>A lightning claw is a Space Marine weapon. Games Workshop sells lightning claws on its website – <u><a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1400026&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1400026&amp;rootCatGameStyle=</a></u></p> <p>Miniatures designed by Jes Goodwin.</p> <p>Terminator – see product 5</p> <p>Power armour – see product 3</p>
28	<p>Dragon or Salamander Storm Shield Diamond Scales (2)</p> <p>A high detail shield based on dragon theme, useful on high elf or emperor fantasy models as well as dragon or salamanders space marine models.</p> <p>The front of this shield has dragon skull on the top and diamond scales sculpted onto the front, the rear of the shield has a hand hold that enables power armor marines to hold the shield (not shown in photo). It is designed to be modeled on either power armor marines or terminators. This highly detailed bit is cast in PEWTER.</p>	<p>Salamanders – see product 25</p> <p>Space Marines use Storm Shields – a type of shield. Games Workshop sells these on its website - <u><a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1400033&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1400033&amp;rootCatGameStyle=</a></u></p> <p>High Elf – see product 1</p> <p>Power armour – see product 3</p> <p>Terminator – see product 5</p> <p>Miniature designed by Jes Goodwin.</p> <p>The Chapterhouse shield is designed to be used with Games Workshop products. The product description uses Games Workshop marks Salamanders and Storm Shield.</p>
29	<p>Dragon or Salamander Storm Shield - Smooth no skull (2)</p> <p>A high detail shield based on dragon theme, useful on high elf or emperor fantasy models as well as dragon or salamanders space marine@ models.</p> <p>The front of this shield has dragon head and scales sculpted onto it, the rear of the shield has a hand hold that enables power armor marines to</p>	<p>Storm shield – see product 28</p> <p>Index Astartes IV 2004, page 19 (NH Salamanders / Neil Hodgson / 2004)</p> <p>High Elf – see product 1</p> <p>Power armour – see product 3</p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
	hold the shield (not shown in photo). It is designed to be modeled on either power armor marines or terminators. This highly detailed bit is cast in PEWTER.	Terminator – see product 5
30	<p>Dragon or Salamander Storm Shield - Smooth w/ skull (2)</p> <p>A high detail shield based on dragon theme, useful on high elf or emperor fantasy models as well as dragon or salamanders space marine® models.</p> <p>The front of this shield has dragon head and scales sculpted onto it as well as as skulls, the rear of the shield has a hand hold that enables power armor marines to hold the shield (not shown in photo). It is designed to be modeled on either power armor marines or terminators. This highly detailed bit is cast in white metal</p>	<p>Salamanders – see product 25</p> <p>Storm shield – see product 28</p> <p>High Elf – see product 1</p> <p>Power armour – see product 3</p> <p>Terminator – see product 5</p>
31	<p>Dragon or Salamander Thunder Hammer (2)</p> <p>This is a hammer sculpted with a dragon or salamander theme in mind. It can be used as a power weapon or a thunder hammer. It can be used for dragon or salamander space marine® armies. Customers have also used this for high elf and empire fantasy armies. It is a pewter bit.</p>	<p>Thunder hammer – see product 1</p> <p>Power weapon – see product 1</p> <p>Salamanders – see product 25</p> <p>High Elf and Empire – see product 1</p>
32	<p>Salamander, Alpha Legion or Dragon Conversion Kit for Land Raider (1)</p> <p>Our Flagship covnersion kit for landraider tanks, its composed of 9 resin components and 4 pewter components. Included in this package are 2 Front side armor panels, 2 Rear side armor panels, 2 front track guards, 2 dragon head lascannon sponson covers, 1 dragon head Heavy Bolter/Assault Cannon cover and 2 Pewter Braziers.</p>	<p>The Land Raider is a Space Marine vehicle. Games Workshop sells Land Raiders on its website - <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1580015&amp;rootCatGameSt yle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1580015&amp;rootCatGameSt yle=</a></p> <p>Miniature designed by Jes Goodwin.</p> <p>Salamanders – see product 25</p> <p>Forge World sells a Salamanders conversion kit for the Land Raider on its website - <a href="http://www.forgeworld.co.uk/Warhammer-40000/SALAMANDERS-LAND-RAIDER-DOORS.html">http://www.forgeworld.co.uk/Warhammer-40000/SALAMANDERS-LAND-RAIDER-DOORS.html</a></p> <p>Models designed by Simon Egan,</p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
		<p>The Alpha Legion is a Space Marine Legion.</p> <p>Index Astartes IV 2004, page 31 (NH Alpha Legion / Neil Hodgson / 2004)</p> <p>Its icon is a creature that has the body of a snake and three horned dragon heads. The colour of the icon is bright green.</p> <p>Index Astartes IV, 2004, page 31</p> <p>Forge World sells an Alpha Legion Land Raider conversion kit on its website - <a href="http://www.forgeworld.co.uk/Warhammer-40000/ALPHA-LEGION-LAND-RAIDER-DOORS.html">http://www.forgeworld.co.uk/Warhammer-40000/ALPHA-LEGION-LAND-RAIDER-DOORS.html</a></p> <p>Models designed by Simon Egan Heavy bolter and Assault cannon are Space Marine weapons.</p>
33	<p>Vehicle Icons for Flesh Tearers (2)</p> <p>This kit consist of 7 pairs of sawblade/drops cast in resin.</p> <p>Large icons measure 31 mm diameter (good for Land Raiders or Rhino top hatches)</p> <p>Two medium icons measure 23.5 mm diameter (good for Rhino fronts and Land Raider side doors)</p> <p>Four small icons measure 16 mm diameter (droppods, dreadnoughts, landspeeders, etc).</p>	<p>Flesh Tearers – see product 12</p> <p>Rhinos, Land Raiders, Drop pods and Land Speeders are Space Marine vehicles.</p> <p>A Dreadnought is a type of Space Marine. Games Workshop sells Dreadnoughts - <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1080088&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1080088&amp;rootCatGameStyle=</a></p> <p>Miniature designed by Jes Goodwin.</p>
34	<p>Combi Weapon Magnetic Kit (1)</p> <p>This kit consist of one bolter combi-weapon body, one combi flamer attachment, one grenade launcher attachment, one combi plasma gun attachment and one combi melta gun attachment. We also include 5 rare-earth magnets that fit in the pre-drilled holes on the main body and on each attachment.</p> <p>This is a pewter kit that allows you to switch out your special weapon choices anytime you want. The magnet has the strength to keep the</p>	<p>Each of the weapons is a GW weapon by name and look.</p> <p><a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1560135&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1560135&amp;rootCatGameStyle=</a></p> <p>A combi weapon is a weapon such as a rifle or pistol which can have a second weapon mounted on to it.</p> <p>A melta gun fires a wave of energy that heats up the target, causing it to explode. A</p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
	<p>attachments from falling off with pretty heavy handling. Coupled with our unique fitting design, there is little chance of losing the attachments when on the mini.</p> <p>This is a pewter kit, see our pictures for size detail</p> <p>One of the first projects I had in mind were completely interchangeable combi-weapons. If you are anything like me, you magnetize your army to save money and headaches.</p> <p>One of the best options out there for imperial armies is combi-weapons. Alas, combi-weapons are very rare in any plastic form, and the ones you do see go for thier weight in gold.</p> <p>Enter the Chapterhouse Studios Combi-weapon Magnetic kit.</p> <p>As you can see, it is a standard weapon stock and barrel (could be a bolter, could be a heavy MG), we designed some useful tracks and grips so the different combi-weapon parts will fit nice and smooth. To add to the ease of use, we also have holes pre-drilled and include the correct size rare-earth magnets with the kit (5 total).</p> <p>So in essence we have:</p> <ol style="list-style-type: none"> <li>1) base ranged weapon</li> <li>2) flame thrower attachment</li> <li>3) grenade launcher attachment</li> <li>4) plasma gun attachment</li> <li>5) melta gun attachment</li> <li>6) 5 rare earth magnets to fit in predrilled holes.</li> </ol>	<p>plasma gun fires a ball of super heated energy.</p> <p>In the Warhammer 40,000 background, Space Marines can use combi-weapons. In the game's rules this is represented by the Space Marine player having the optin of arming his models with one of three types of combi-weapon: melta, plasma or flamer. The rules also provide the option of attaching a grenade launcher to the Space Marine's combi-weapon. See Warhammer 40,000 Space Marines, page 97.</p> <p>The Space Marine model shown is made from a combination of Games Workshop Space Marine components and Chapterhouse Studios Salamanders components.</p>
35	<p>Farseer Jetbike Seer Council Kit (1)</p> <p>Games Workshop Jetbike kit not included - necessary to assemble as seen</p> <p>This is a 12 piece resin conversion kit that when added to a Games Workshop Eldar jetbike will form the model shown. It is perfect for converting a regular jetbike kit into a Farseer on Jetbike model.</p> <p>Each Farseer Jetbike Rider kit comes with 2 weapon choices, 1 left</p>	<p>A Farseer is a character from the Eldar army – see the 'Guide to the Warhammer 40,000 Universe' document. Games Workshop sells Eldar Farseers on its website - <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1060019&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1060019&amp;rootCatGameSt yle=</a></p> <p>Miniature designed by Jes Goodwin and Martin Footit</p> <p>Oval shaped gems are frequently used on Eldar clothing, weapons and vehicles (see models above and below).</p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
	<p>arm, 2 upper torso choice (male or female), 1 lower torso, 1 Farseer head, 1 control panel, 2 shield generators and 2 bike accessories.</p>	<p>There is an icon on the component under the sword second from left – it may be one of the Eldar runes Games Workshop has created but we can't get a clear image of it.</p> <p>A jetbike is an Eldar army vehicle. Games Workshop sells Eldar jetbikes on its website – <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1090102&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1090102&amp;rootCatGameStyle=</a></p> <p>Miniature designed by Jes Goodwin The Seer Council are a unit in the Eldar army. Games Workshop sells the Seer Council on its website - <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1060064&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1060064&amp;rootCatGameStyle=</a></p> <p>Miniatures designed by Jes Goodwin and Adam Clarke</p> <p>The Chapterhouse kit can make a complete rider model, plus additional components to decorate the Games Workshop Eldar Jetbike.</p>
36	<p>Warlock Jetbike Seer Council Kit (1)</p> <p>Games Workshop Jetbike kit not included - necessary to assemble as seen</p> <p>This is a 11 piece resin conversion kit that when added to a Games Workshop Eldar jetbike will form the model shown. It is perfect for converting a regular jetbike kit into a Warlock on Jetbike model.</p> <p>Each Warlock Jetbike Rider kit comes with 2 weapon choices, 1 left arm, 1 top torso, 1 lower torso, 1 Warlock head, 1 control panel, 2 shield generators and 2 bike accessories.</p>	<p>Jetbike – see product 35</p> <p>Seer Council – see product 35</p> <p>The Warlock is a character from the Eldar army – see the 'Guide to the Warhammer 40,000 Universe' document. Games Workshop sells Warlocks on its website – <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1060088&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1060088&amp;rootCatGameStyle=</a></p> <p>Miniature designed by Jes Goodwin</p> <p>The Chapterhouse kit can make a complete rider model, plus additional components to decorate the Games Workshop Eldar Jetbike.</p>
37	<p>Conversion kit for Tyranid Tervigon (1)</p> <p>This resin set contains 5 high detail modular components that fit with the current Games Workshop Carnifex kit. Once assembled, it can be used as a Tyranid® Tervigon. Please note this set does NOT include a</p>	<p>Tyranids are a Warhammer 40,000 army. The Tervigon is a type of Tyranid creature.</p> <p>Warhammer 40,000 Tyranids 2009, page 52 (AB930_Tervagon / Alex Boyd / 2009)</p> <p>Chapterhouse's components are designed to fit on Games Workshop's Tyranid</p>

No.	Chapterhouse Product and Website Description	Games Workshop Website
	<p>Games Workshop Tyranid Carnifex.</p> <p>Each kit contains 5 pieces:</p> <p>Top Center Torso Spine piece (fits in between the two side torsos of the carnifex)</p> <p>Central Armor and Spine Bank (fits on top of the upper torso)</p> <p>Head mount piece</p> <p>Lower abdomen containing birth sacs and embryonic termagaunts</p> <p>Standard Size Oval base (matches Trygon base diameter).</p> <p>Please note while this kit is sculpted to fit a carnifex kit with no modification to either kit, some modification may be necessary to the minute variations that are present in both GW and Chapterhouse Kits.</p>	<p>Carnifex model – <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1050178&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1050178&amp;rootCatGameStyle=</a></p> <p>Miniature designed by Jes Goodwin</p> <p>Games Workshop has characters and details in its books.</p> <p>Nick Villacci states on Warseer:</p> <p>“RE: TERVIGON CONVERSION KIT FOR TYRANID CARNIFEX FROM CHAPTERHOUSE STUDIOS nvillacci 19/09/2010 - 19:52</p> <p>Hmm,, maybe tell me why you think it is lazy?</p> <p>My goal was to make a kit that is similiar to GWs single illustration of the Tervigon.</p> <p>The other part of that goal was not to charge alot for a kit and to let people use the unused carnifexes we all have stockpiled since the new codex.</p> <p>Another benefit of our kit is that it still conforms to GWs 50% rule for conversions in GW events.”</p> <p><a href="http://www.warseer.com/games_news/tervigon_conversion_kit_for_tyranid_carnifex_from_chapterhouse_studios">http://www.warseer.com/games_news/tervigon_conversion_kit_for_tyranid_carnifex_from_chapterhouse_studios</a></p> <p>The Termagants and Trygon are also creatures from the Tyranid army.</p>
38	<p>Lashwhips - Tyrant Size (1)</p> <p>This is a single pewter Lashwhip created by Chapterhouse Studios for Tyranid® monsters, it is sized to be used with Tyrants and other Large size models. Sculpted so it can be used on the right or left arm socket, it is also bendable due to the sculpting. These Lashwhips hold the foes still so a killing strike may be inflicted.</p>	<p>The Tyrant is a Tyranid creature – see product 37.</p> <p>The lashwhip is a weapon used by Tyranid creatures, including the Tyrant. The lashwhip forms part of the creature’s arm rather than it being held in its hand.</p> <p>Games Workshop sells the Tyrant on its website - <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1050112&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1050112&amp;rootCatGameStyle=</a></p> <p>Miniature designed by Jes Goodwin</p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
		The lashwhip is in the model's left hand above.
39	<p>Lashwhips - Warrior Size (1)</p> <p>This is a single pewter Lashwhip created by Chapterhouse Studios for Tyranid® monsters, it is sized to be used with warriors and other medium size models. Sculpted so it can be used on the right or left arm socket, it is also bendable due to the sculpting. These Lashwhips hold the foes still so a killing strike may be inflicted.</p>	<p>Tyranids – see product 37</p> <p>Lashwhip – see product 38</p> <p>A Warrior is a type of Tyranid creature. Games Workshop sells Tyranid Warriors - <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1050114&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1050114&amp;rootCatGameSt yle=</a></p> <p>Miniatures designed by Jes Goodwin</p>
40	<p>Tyrant Bonesword Arms for Tyranids (1)</p> <p>This is a pair of Chapterhouse Studios resin Bonesword arms for Tyranid® Hive Tyrant or other monstrous creatures. Works great for converting a Swarmlord. Each pair consist of 1 left and 1 right arm scaled for the larger tyranid® creatures. Sculpted with details showing the symbiotic weapons of the Tyranid® race, the swords have bio-organic crystalline growths that enable the weapons to inflict death on anyone they strike.</p>	<p>A bonesword is a weapon used by Tyranid creatures. It forms part of the creature's arm rather than being held in its hand.</p> <p>Codex Tyranids 2009, page 66</p> <p>Miniature dcsigned by Jes Goodwin</p> <p>A Swarmlord is a Tyranid creature – see the 'Guide to the Warhammer 40,000 Universe' document for further information. Games Workshop has not made a model for the Swarmlord.</p> <p>Warhammer 40,000 Tyranids 2009, page 56 (PD518_Swarmlord / Paul Dainton / 2009)</p>
41	<p>Warrior Bonesword Arms for Tyranids (1)</p> <p>This is a pair of Chapterhouse Studios resin Bonesword arms for Tyranid® Warriors. Each pair consist of 1 left and 1 right arm scaled for Tyranid® warriors. Sculpted with details showing the symbiotic weapons of the Tyranid® race, the swords have bio-organic crystalline growths that enable the weapons to inflict death on anyone they strike.</p>	<p>Bonesword – see product 40</p> <p>Warrior – see product 39</p>
42	<p>Xenomorph 28mm Head bits for Tyranids (1)</p> <p>This is a six (6) piece set of 28mm resin heads. You will receive three(3) of Head A and three(3) of Head B. These heads are sculpted in the style of the classic "Aliens" xenomorphs. They work</p>	<p>Chapterhouse's products use Games Workshop's marks: Tyranid, Tyranid Warrior and Genestealer.</p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
	great on many of the Tyranid® bodies, gaunts, genestealers and tyranid warriors.	
43	<p>Ymgarl Heads for Tyranid Genestealers - Set (1)</p> <p>This is a 6 piece set of pewter Alien Heads. These are scaled for 28mm heroic miniatures. You can use them as Cthulhu or Ymgarl heads on your models. We have many customers that use these on their Tyranid® Genestealers® to represent Ymgarl Genestealers® .</p> <p>Each set of 6 heads includes 3 different variants, you will receive 2 of each head in this set. There are almost no mold lines on these heads, so minimal clean-up is required. Superglue is recommended for assembling metal bits on plastic kits.</p> <p>We developed these in 2009 as variant heads that would be useful on Tyranid® Genestealers® . When GW released the new Tyranid® codex, the Ymgarl Genestealers® look incredibly like these heads! We have dated post and concept art to prove our idea came first.</p> <p>Regardless, these heads will set your miniatures apart from the rest of the crowd!</p>	<p>Genestealers are creatures in the Tyranid army. The Ymgarl is a variant of a Genestealer.</p> <p><a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1050149">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1050149</a></p> <p>As part of the Tyranid Genestealer boxed set, Games Workshop included a head component which can convert a Genestealer model into a Genestealer Ymgarl. The components are © Games Workshop 2004.</p> <p>Miniature designed by Jes Goodwin and Mark Harrison</p> <p>Chapterhouse say in their description opposite that the Ymgarl Genestealers from Games Workshop's new Tyranid codex look like their heads. There have been no new Games Workshop Ymgarl Genestealer miniatures released since 2004. The only new visual material from the latest Warhammer 40,000 Tyranids book for the Ymgarl was the artwork below. This artwork was created in 2009 and was based on the 2004 Games Workshop model above.</p> <p>Warhammer 40,000 Tyranids 2010, page 61 (DG1192_Ymgarl_Stealer/ Dave Gallagher / 2009)</p>
44	<p>Female Heads - Imperial Guard 28mm (1)</p> <p>This is a sprue of 6 unpainted resin female Imperial Guard heads. These are scaled for 28mm heroic miniatures. Perfect additions to any miniature line, and look great on imperial guard figures.</p>	<p>Chapterhouse's products use Games Workshop's Imperial Guard mark.</p> <p>The Imperial Guard is a Warhammer 40,000 army.</p>
45	<p>SXV-141 Super-Heavy Assault Walker SAW (1)</p> <p>Our first vehicle kit, we decided to go crazy on Tau.</p> <p>This is a resin model kit consisting of over 50 parts, weighing in at approximately 2kg and standing almost 30cm tall when complete. The kit components are supplied "as cast" and require cleanup, assembly</p>	<p>The Tau refers to the Tau Empire, a Warhammer 40,000 army.</p> <p>The Tau Empire use rail guns as weapons on their vehicles.</p> <p><a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1090208">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1090208</a></p>

Chapterhouse Product and Website Description	Games Workshop Works
<p>and painting for the finished product.</p> <p>Needless to say I think the Imperial Titans will have their hands/fist full.</p> <p><a href="http://chapterhousestudios.com/index.php?route=product/product&amp;path=59&amp;product_id=201">http://chapterhousestudios.com/index.php?route=product/product&amp;path=59&amp;product_id=201</a></p>	<p>The rail gun is the long gun which is shown firing on the model above.</p> <p>The Tau decorate their clothing, weapons and vehicles with the Tau Empire symbol.</p> <p>Tau Empire decal sheet, 2001</p> <p>Miniature designed by Jes Goodwin</p> <p><a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1620020">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1620020</a></p> <ul style="list-style-type: none"> <li>• Geometric grooves on hull and weapons</li> <li>• Circular hatches</li> <li>• Geometric grooves on the hatches</li> <li>• Large oval vents on the hull</li> <li>• Long thin 'nose' section of the hull</li> <li>• Geometric Grooves on the nose</li> <li>• 'X' marks on power/ammo packs</li> <li>• Rail gun weapon</li> <li>• Burst Cannon weapon</li> </ul> <p>The Chapterhouse Walker hull fits snugly underneath the Tau Hammerhead hull with the circle sections lining up to the rear.</p> <p>Games Workshop's rail gun design.</p> <ul style="list-style-type: none"> <li>• Rectangular shape.</li> <li>• Two separate sections to the 'barrel'</li> <li>• Barrel joined by a coupler mid-way down the length</li> <li>• Square block nozzle with vents</li> <li>• Short under-slung cylinder connecting the barrel to the power source</li> </ul> <p>Cover Art, Codex: Tau ©2001 AS098 Tau Codex detail cropped from larger original)By Adrian Smith</p> <p>At the end of the Tau guns there is a circle with diagonal line design.</p>

Chatterhouse Product and Website Description					Games Workshop Works																																		
<b>SXV-141 SUPERHEAVY ASSAULT WALKER</b>																																							
<b>SAW</b>	<b>BS</b>	<b>FRONT</b>	<b>SIDE</b>	<b>REAR</b>																																			
	3(4)	14	13	13																																			
<p>POINTS: 750                  SUPER HEAVY WALKER                  STRUCTURE POINTS: 2</p> <p><b>WEAPONS AND EQUIPMENT</b>                  HEAVY RAIL CANNON X 2                  HEAVY SMART MISSILE RACK (6 X PENETRATOR, 6 X CLUSTER)                  LONG BARRELLED BURST CANNON                  TARGETING ARRAY (INCLUDED), MULTI TRACKER, UPGRADED DISRUPTION POD,                  NETWORKED MARKER LIGHTS X 5, BLACK SUN FILTER, POSITIONAL RELAY, TACHYON                  MARKER, TARGET LOCKS</p> <p><b>OPTIONS:</b>                  SENSOR SPINES 20 PTS                  FLECHETTE DISCHARGER 40PTS</p>																																							
<table border="1"> <thead> <tr> <th>WEAPON</th> <th>RANGE</th> <th>STR</th> <th>AP</th> <th>SPECIAL</th> </tr> </thead> <tbody> <tr> <td>RAIL CANNON (SUBMUNITION)</td> <td>120"</td> <td>7</td> <td>3</td> <td>APOC BLAST TEMPLATE</td> </tr> <tr> <td>HEAVY BURST CANNON</td> <td>80"</td> <td>6</td> <td>3</td> <td></td> </tr> <tr> <td>HEAVY MISSILE RACK (PENETRATOR)</td> <td>48"</td> <td>8</td> <td>3</td> <td>NO LOS NEEDED- TREAT AS SMART MISSILE</td> </tr> <tr> <td>HEAVY MISSILE RACK (CLUSTER)</td> <td>48"</td> <td>8</td> <td>3</td> <td>NO LOS NEEDED- TREAT AS SMART MISSILE</td> </tr> <tr> <td>NETWORKED MARKER LIGHTS (NWML X5)</td> <td>36"</td> <td>/</td> <td>/</td> <td></td> </tr> </tbody> </table>										WEAPON	RANGE	STR	AP	SPECIAL	RAIL CANNON (SUBMUNITION)	120"	7	3	APOC BLAST TEMPLATE	HEAVY BURST CANNON	80"	6	3		HEAVY MISSILE RACK (PENETRATOR)	48"	8	3	NO LOS NEEDED- TREAT AS SMART MISSILE	HEAVY MISSILE RACK (CLUSTER)	48"	8	3	NO LOS NEEDED- TREAT AS SMART MISSILE	NETWORKED MARKER LIGHTS (NWML X5)	36"	/	/	
WEAPON	RANGE	STR	AP	SPECIAL																																			
RAIL CANNON (SUBMUNITION)	120"	7	3	APOC BLAST TEMPLATE																																			
HEAVY BURST CANNON	80"	6	3																																				
HEAVY MISSILE RACK (PENETRATOR)	48"	8	3	NO LOS NEEDED- TREAT AS SMART MISSILE																																			
HEAVY MISSILE RACK (CLUSTER)	48"	8	3	NO LOS NEEDED- TREAT AS SMART MISSILE																																			
NETWORKED MARKER LIGHTS (NWML X5)	36"	/	/																																				
					<p>p.9 Codex: Tau Empire ©2005                  PD116 Tau Castes &amp; Contact (detail cropped from larger original)                  By Paul Dainton                  This Tau pilot wears the design on his chest and arm.</p> <p>Games Workshop's Tau rules.</p> <table border="1"> <thead> <tr> <th></th> <th>Points</th> <th>Front</th> <th>Side</th> <th>Rear</th> <th>BS</th> </tr> </thead> <tbody> <tr> <td>Hammerhead</td> <td>90</td> <td>18</td> <td>12</td> <td>10</td> <td>3(4)</td> </tr> </tbody> </table> <p>Front, side and rear armour values are given as well as the Ballistic Skill (BS) of the vehicle.</p> <p>'Structure points' are used for Super Heavy vehicles in the game of 'Warhammer 40,000 Apocalypse'</p> <p>'Str' stands for 'Strength' of the weapon.                  'AP' stands for 'Armour Penetration' of the weapon.                  'Assault 3' means the weapon can be fired 3 times.</p> <p>The list of weapons and equipment for the Super Heavy Walker fits the lists of Tau weapons and equipment from pp.25-31 Codex: Tau Empire ©2005 corresponding text copied below.</p> <p>Railgun: The Tau battlesuit railgun uses linear accelerator technology to project a solid projectile at hypervelocity. It is capable of punching through the thickest armour and of taking down the largest of enemies.                  Range: 72" Str: 10 AP: 1</p> <p>Smart missile system: The smart missile system fires self-guiding missiles with the intelligence of a drone, which first search for then hunt down the target, passing around any blocking terrain.                  Range: 24" Str: 5 AP: 5</p> <p>Burst cannon: The burst cannon finds use across the Tau military, primarily mounted on battlesuits and vehicles. Utilising the plasma induction technology found in the pulse rifle and other systems, the burst cannon is a multi-barrel weapon able to sustain high rates of</p>						Points	Front	Side	Rear	BS	Hammerhead	90	18	12	10	3(4)																		
	Points	Front	Side	Rear	BS																																		
Hammerhead	90	18	12	10	3(4)																																		

No.	Chapter House Product and Website Description	Games Workshop Website
		<p>fire.                      Range: 18" Str: 5 AP: 5 Assault 3</p> <p>Targeting array: Targeting arrays assist the vehicle gunner's aim by adjusting for the target's range and speed. Add 1 to the vehicle's BS</p> <p>Multi-tracker: The vehicle-mounted multi-tracker is combined with advanced stabilisers enabling a vehicle to fire as if it were a fast vehicle.</p> <p>Distribution pod: A distribution pod throws out distorting images in both visual and magnetic spectra, making it hard to target at range.</p> <p>Networked markerlights: A networked markerlight is a specialised version of the standard system, but it is larger and less common.</p> <p>Blacksun filter: This advanced optical filter enables the user to double the distance rolled for determining how far they can see when fighting at night.</p> <p>Positional relay: This records detailed battlefield data and relays it in a tight-band, encrypted burst to a single unit operating as a strategic reserve.</p> <p>Target lock: The target lock identifies potential targets and plots fire plans to counter them, granting the vehicle gunner far more choice about the targets to be engaged.</p> <p>Sensor spines: Sensor spines are used to feed data to an advanced ground-following flight control system.</p> <p>Flechette discharger: Powerful clusters of reactive charges are attached to the hulls of many Tau vehicles. If the enemy approach, they fire off vicious clouds of high velocity flechettes.</p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
46	<p>Assault Shoulder Pad for Space Marine with number 7 (4)</p> <p>This is a number 7 Assault Shoulder pad for regular power armor, it has raised crossed arrows on the pad with a roman numeral 7 above the arrows. This is the standard size space marine® tactical shoulder pad cast in pewter.</p>	<p>Assault is a type of Space Marine squad. An Assault squad will have an 'X' symbol and their squad number shown on their right shoulder pads. The squad number will be between 1-10.</p> <p>Games Workshop sells assault squad shoulderpads – <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1110190&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1110190&amp;rootCatGameStyle=</a></p> <p>Power armour – see product 10</p> <p>Tactical – see product 56</p>
47	<p>Assault Shoulder Pad for Space Marine with number 8 (4)</p> <p>This is a number 8 Assault Shoulder pad for regular power armor, it has raised crossed arrows on the pad with a roman numeral 8 above the arrows. This is the standard size space marine® tactical shoulder pad cast in pewter.</p> <p>See 46 above</p>	<p>Assault – see product 46</p> <p>Power armour – see product 10</p> <p>Tactical – see product 56</p>
48	<p>Assault Squad Shoulder Pad for Space Marine - Plain (4)</p> <p>See 46 above</p> <p>This is a unmarked Assault shoulder pad for regular power armor, it has raised arrows on the pad. This is the standard size space marine® tactical shoulder pad cast in pewter.</p>	<p>Assault – see product 46</p> <p>Power armour – see product 10</p> <p>Tactical – see product 56</p>
49	<p>Crested Pad for Space Marine (4)</p> <p>This is a shoulder pad with a raised crest on it. This shoulder pad works well with any loyalist or chaos space marine® army. This is a pewter model that fits on tactical space marine® models as well as other sci-fi models.</p> <p>See 46 above</p>	<p>This Space Marine Captain has a crested shoulderpad with 'rivets' along the edge where the crest attaches to the pad - <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?catId=cat440176a&amp;prodId=prod1060070&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?catId=cat440176a&amp;prodId=prod1060070&amp;rootCatGameStyle=</a></p> <p>Miniature designed by Juan Diaz Ramos</p> <p>Loyalist – see product 16</p> <p>Chaos Space Marine – see product 2</p> <p>Tactical – see product 56</p>

No.	Chapterhouse Product and Website Description	Games Workshop Work
50	<p>Devastator Shoulder Pad for Space Marine - Plain (4)</p> <p>This is a unmarked Devestator shoulder pad for regular power armor, it has a raised arrow on the pad. This is the standard size space marine® tactical shoulder pad cast in pewter.</p> <p>See 46 above</p>	<p>Devastator is a type of Space Marine squad. A Devastator squad has an inverted 'V' symbol on their right shoulderpads.</p> <p>Warhammer 40,000 Space Marines 2004, page 70 (NH SM Pads/ Neil Hodgson / 2004)</p> <p>A Devastator squad member will have their squad number shown on their right shoulder pads. The squad number will be between 1-10. The 'X' on this pad indicates this is Devastator squad 10.</p> <p>The colours on the shoulderpad refer to a Chapter colour, ie, blue and gold are the colours of the Ultramarines Space Marine Chapter.</p> <p>Index Astartes III 2003, page 23 (NH Ultramarines Graph / Neil Hodgson / 2001)</p> <p>Power armour – see product 3</p>
51	<p>Devastator Shoulder Pad for Space Marine with number 9 (4)</p> <p>This is a number 9 Devestator Shoulder pad for regular power armor, it has raised arrow on the pad with a roman numeral 9 embossed into the arrow. This is the standard size space marine® tactical shoulder pad cast in pewter.</p> <p>See 46 above</p>	<p>Devastator – see product 50</p> <p>Tactical – see product 56</p>
52	<p>Devastator Shoulder Pad for Space Marine with number 10 (4)</p> <p>This is a number 10 Devestator Shoulder pad for regular power armor, it has raised arrow on the pad with a roman numeral 10 embossed into the arrow. This is the standard size space marine® tactical shoulder pad cast in pewter.</p> <p>See 46 above</p>	<p>Devastator – see product 50</p> <p>Tactical – see product 56</p>
53	<p>First Squad or I Shoulder Pads - tactical (4)</p> <p>This is a shoulder pad with a roman numeral "1" or an I on the face, it is stylized and has more detail then the typical I shoulder pad. This shoulder pad works well with any loyalist space marine® armies. This could also be a chapter icon for the left shoulder. This is a pewter model that fits on tactical space marine® models as well as other sci-fi</p>	<p>Loyalist – see product 15</p> <p>Tactical – see product 56</p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
	<p>models.</p> <p>See 46 above</p>	
54	<p>Generic Power Armour Shoulder Pad for Space Marine - Plain (4)</p> <p>Just a regular Space Marine® Power Armor pad, similiar to the standard one with raised edges.</p> <p>See 46 above</p>	<p>This is Games Workshop's unique expression of a Sci-Fi Shoulderpad, including the following unique characteristics:</p> <ul style="list-style-type: none"> <li>○ Covering from start of shoulder to above the elbow</li> <li>○ Large border around outer edge</li> <li>○ Left shoulderpad – squad markings</li> <li>○ Right shoulderpad – Chapter symbol</li> </ul>
55	<p>Smooth Shoulder Pad for Space Marine - no raised areas (3)</p> <p>Another regular Space Marine® shoulder pad, this one has no raised areas, perfectly smooth for something different.</p> <p>Single pewter bit.</p> <p>See 46 above</p>	See 54 above
56	<p>Tactical Shoulder Pad for Space Marine (3)</p> <p>This is a Tactical Shoulder pad for regular power armor, it has a raised arrow on the pad. This is the standard size space marine® tactical shoulder pad cast in pewter.</p> <p>See 46 above</p>	<p>Tactical is a type of Space Marine squad. A Tactical squad will have an upward pointing arrow symbol on their right shoulder pad.</p> <p>Games Workshop sells Tactical shoulder pads - <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1110189&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1110189&amp;rootCatGameSt yle=</a></p> <p>A Tactical squad member will have their squad number shown on their right shoulder pads. The squad number will be between 1-10.</p> <p>The colours on the shoulder pad refer to a Chapter colour, ie, red and gold are the colours of the Blood Angels Space Marine Chapter.</p> <p>See product 4.</p>
57	<p>Tactical Shoulder Pad for Space Marine with number 1 (3)</p> <p>This is a number 1 Tactical Shoulder pad for regular power armor, it has a raised arrow on the pad with a roman numeral 1 inlaid in the</p>	Tactical – see product 56

No.	Chapterhouse Product and Website Description	Games Workshop Works
	<p>arrow. This is the standard size space marine® tactical shoulder pad cast in pewter.</p> <p>See 46 above</p>	
58	<p>Tactical Shoulder Pad for Space Marine with number 2 (3)</p> <p>This is a number 2 Tactical Shoulder pad for regular power armor, it has a raised arrow on the pad with a roman numeral 2 inlaid in the arrow. This is the standard size space marine® tactical shoulder pad cast in pewter.</p> <p>See 46 above</p>	Tactical – see product 56
59	<p>Tactical Shoulder Pad for Space Marine with Number 3 (3)</p> <p>This is a number 3 Tactical Shoulder pad for regular power armor, it has a raised arrow on the pad with a roman numeral 3 inlaid in the arrow. This is the standard size space marine® tactical shoulder pad cast in pewter.</p> <p>See 46 above</p>	Tactical – see product 56
60	<p>Tactical Shoulder Pad for Space Marine with Number 4 (3)</p> <p>This is a number 4 Tactical Shoulder pad for regular power armor, it has a raised arrow on the pad with a roman numeral 4 inlaid in the arrow. This is the standard size space marine® tactical shoulder pad cast in pewter.</p> <p>See 46 above</p>	Tactical – see product 56
61	<p>Tactical Shoulder Pad for Space Marine with number 5 (3)</p> <p>This is a number 5 Tactical Shoulder pad for regular power armor, it has a raised arrow on the pad with a roman numeral 5 inlaid in the arrow. This is the standard size space marine® tactical shoulder pad cast in pewter.</p> <p>See 46 above</p>	Tactical – see product 56

No.	Chapterhouse Product and Website Description	Games Workshop Works
62	<p>Tactical Shoulder Pad for Space Marine with number 6 (3)</p> <p>This is a number 6 Tactical Shoulder pad for regular power armor, it has a raised arrow on the pad with a roman numeral 6 inlaid in the arrow. This is the standard size space marine® tactical shoulder pad cast in pewter.</p> <p>See 46 above</p>	Tactical – see product 56
63	<p>Salamanders or Dragon Drop Pod Armor or door panel (1)</p> <p>This is a highly detailed resin armored panel that fits on the Drop Pod Kit door. It is a single piece that fits over the standard door, this is sculpted with a dragon or salamanders icon in the center, surrounded by scales. This is a single door. We recomend buying a set of 5 for the regular drop pod model kit.</p>	<p>A drop pod is a Space Marine vehicle. Games Workshop sells drop pods on its website – <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1560026&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1560026&amp;rootCatGameSt yle=</a></p> <p>Miniature designed by Tom Watton</p> <p>The icon on the Chapterhouse door is based on the Salamanders Chapter icon – see product 25.</p>
64	<p>Salamander Dragon Skull Shoulder Pad Bit –Tactical (2)</p> <p>This is a Dragon or Salamander Skull on a scaled background. This is the standard size space marine® terminator shoulder pad cast in pewter. This sculpter to be used as a right arm pad.</p>	The icon on the Chapterhouse pad is based on the Salamanders Chapter icon – see product 25.
65	<p>Salamander Dragon Skull Shoulder Pad - Terminator (2)</p> <p>This is a Dragon or Salamander Skull on a scaled background. This is the standard size space marine® tactical shoulder pad cast in pewter. We are not concerned about copyright in this product, just trademark use.</p>	<p>The icon on the Chapterhouse pad is based on the Salamanders Chapter icon – see product 25</p> <p>Tactical – see product 56</p> <p>Terminator – see product 5</p>
66	<p>Salamander Dragon Thunder Hammer - Smooth (2)</p> <p>This is a hammer sculpted with a dragon or salamander theme in mind. It can be used as a power weapon or a thunder hammer. It can</p>	<p>The icon on the left side of the head on the far left hammer shown opposite is based on the Salamanders Chapter icon – see product 25</p> <p>Power weapon and thunder hammer – see product 1</p>

No.	Chapin House Product and Website Description	Games Workshop Works
	<p>be used for dragon or salamander space marine® armies. This is our new "smooth" salamander hammer. Customers have also used this for high elf and empire fantasy armies. It is a pewter bit.</p>	<p>Terminator – see product 5</p> <p>High Elf and Empire – see product 1</p>
67	<p>Dragon Salamander Head Bit Space Marine (3)</p> <p>This is a pewter bit of the Dragon Special Character resin kit head. We have had many request for just the head so have made these available. A single pewter space helmet in the dragon or salamander style.</p>	<p>Salamanders – see product 25</p> <p>Chaplains are a rank within the Space Marines army. Their iconography heavily features skulls.</p> <p>Miniature designed by Jes Goodwin</p> <p>This is just one example of a Space Marine Chaplain with skull helmet available on the Games Workshop website.  <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1050244&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1050244&amp;rootCatGameStyle=</a></p> <p>This is based on a Space Marine Mk 7 helmet.</p> <p>Warhammer 40,000 Space Marines 2008, page 71 (AB835_SM_Techmarine / Alex Boyd / 2008)</p> <p>Note the following characteristics:</p> <ul style="list-style-type: none"> <li>• Rectangular open vent on top of helmet</li> <li>• Shape of eyes</li> <li>• Two tubes entering the jawline on each side</li> <li>• Box shape covering ear section</li> </ul>
68	<p>Banded Tech Power Armor Pad (4)</p> <p>This is a shoulder pad that is about the same size as a GW power armor shoulder pad. It consist of horizontal plates or "bands" of armor similiar to older MK 1 armor. This pad looks spectacular as a "Iron Hands" space marine® shoulder pad. Sized to fit regular power armor figures.</p>	<p>Mk1 refers to a type of Space Marine armour. Games Workshop sells a Mk1 armoured Space Marine – <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1140240&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1140240&amp;rootCatGameStyle=</a></p> <p>Miniature designed by Jes Goodwin</p> <p>The Horus Heresy - Collected Visions 2007, page 139 (3086 LemanRuss/ Franz Vohwinkel / Black Library / 2004)</p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
		<p>Chapterhouse's shoulder pad looks most like the right hand pad on the grey armoured Space Marine above.</p> <p>Iron Hands – see product 70</p> <p>Power armour – see product 3</p>
69	<p>Cog Shoulder Pad - Power Armor (3)</p> <p>This is a shoulder pad that is about the same size as a GW shoulder pad. It has a cog. The shoulder pad itself is armored strips similiar to older MK shoulder pads. This pad looks spectacular as a "Iron Hands" space marine® shoulder pad or even as Adeptus Mechanicus or Techmarines. Sized to fit regular power armor figures.</p>	<p>Iron Hands – see product 70</p> <p>The Adeptus Mechanicus are an organisation in the Warhammer 40,000 background. Their icon is a skull within a cog.</p> <p>The Art of Warhammer 40,000 2006, page 201 (WE274C Titan Icon / Wayne England / 1995)</p> <p>Techmarines are a rank within the Space Marines army. They are the mechanics of the army and are strongly associated with the Adeptus Mechanicus and technology.</p> <p>The Chapterhouse product is designed and of a size and scale to be used with Games Workshop products and to fit within the Warhammer 40,000 Universe. The product description uses Games Workshop Trademarks: Iron Hands, Adeptus Mechanicus and Techmarines.</p>
70	<p>Shield for Iron Hands (2)</p> <p>A high detail shield based on the Iron Hands chapter theme, useful for fantasy models as well as Iron Hand or other hand based space marine® models.</p> <p>The front of this shield has mailed hand and scales sculpted onto a round shield with power cables around the edges, the rear of the shield has a hand hold that enables power armor marines to hold the shield (not shown in photo). It is designed to be modeled on either power armor marines or terminators. This highly detailed bit is cast in white metal.</p>	<p>The Iron Hands are a Space Marine Chapter.</p> <p>Index Astartes 2003, page 3 (NH Iron Hands Graph/ Neil Hodgson / 2001)</p> <p>The Iron Hands Chapter icon is a gauntleted left hand, shown palm downwards. Index Astartes III 2003, page 3 (NH Iron Hands Icon Neil Hodgson / 2001)</p> <p>The Chapter is strongly associated with technology - cogs and power cables feature both functionally and decoratively on their armour and vehicles.</p> <p>Index Astartes III 2003, page 3 (NH Iron Hands Graph/ Neil Hodgson / 2001)</p> <p>Power armour – see product 3</p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
		Terminator – see product 5
71	<p>Shoulder Pad for Iron Hands Power Armor (2)</p> <p>This is a shoulder pad that is about the same size as a GW shoulder pad. It has a mailed hand on it in a clawing motion. The shoulder pad itself is armored strips similiar to older MK shoulder pads. This pad looks spectacular as a "Iron Hands" space marine® shoulder pad. Sized to fit regular power armor figures.</p>	Iron Hands – see product 70
72	<p>Shoulder Pad for Iron Hands Terminator armor (2)</p> <p>This is a shoulder pad that is about the same size as a GW shoulder pad. It has a mailed hand on it in a clawing motion. The shoulder pad itself is armored strips similiar to older MK shoulder pads. This pad looks spectacular as a "Iron Hands" space marine® shoulder pad. Sized to fit regular terminator armor figures.</p>	<p>Power armour – see product 3</p> <p>Iron Hands – see product 70</p> <p>Terminator – see product 5</p>
73	<p>Banded Armor Terminator Pad (3)</p> <p>This is a shoulder pad that is about the same size as a GW shoulder pad. It consist of horizontal plates or "bands" of armor similiar to older MK 1 armor. This pad looks spectacular as a "Iron Hands" space marine® shoulder pad. Sized to fit regular terminator armor figures.</p>	<p>This is Mk1 Space Marine Armour – see 68 above</p> <p>Iron Hands – see product 70</p> <p>Terminator – see product 5</p>
74	<p>Banded Power Armour Shoulder Pads (3)</p> <p>This is a shoulder pad that is about the same size as a GW power armor shoulder pad. It consist of horizontal plates or "bands" of armor similiar to older MK 1 armor. This pad looks spectacular as a "Iron Hands" space marine® shoulder pad. Sized to fit regular power armor figures.</p>	<p>This is Mk1 Space Marine Armour – see 68 above</p> <p>Power armour – see product 3</p> <p>Iron Hands – see product 70</p>
75	<p>Studded Rimmed Shoulder Pad MKV (3)</p> <p>This is a shoulder pad with a raised crest on it. This shoulder pad works well with any loyalist or chaos space marine® army. This is a pewter model that fits on tactical space marine® models as well as other sci-fi models.</p>	<p>Mk V armour – see product 2</p> <p>Loyalist – see product 15</p> <p>Chaos Space Marines – see product 2</p> <p>Tactical – see product 56</p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
76	<p>Five (5) Heresy Era Jump Packs for Space Marines (1)</p> <p>This is a set of FIVE (5) Resin and Metal Jump Pack for Space Marines®. It is sculpted to fit in with the Heresy Style Jump Packs. The main Jump Pack is Resin and the control flaps are metal. Designed to fit on the standard Space Marines® back. Suitable for any other 28mm scale miniatures as well.</p>	<p>Space Marines use jump packs. Heresy refers to the type of jump pack used during the Horus Heresy.</p> <p>The Horus Heresy – Collected Visions 2007, page 284 (2121 assault squad/ James Brady / Black Library / 2005)</p> <p>Back pack designed by Aly Morrison</p>
77	<p>Masked Heresy Heads for Space Marines – 4 (2)</p> <p>This is a resin sprue of 4 "Heresy" style heads for space marines® with rebreather mask. Each sprue comes with 4 heads.</p>	<p>Heresy refers to Mk V Heresy armour – see product 2.</p>
78	<p>Mk I Heresy Era for Space Marine "Thunder Armor" Shoulder Pad (3)</p> <p>This is a shoulder pad with armored plates on it, commonly known as "Thunder Armor" or Mk I space marine power armor. This shoulder pad works well with any loyalist or chaos space marine® army. Perfect for Heresy era armies. This is a pewter model that fits on tactical space marine® models as well as other sci-fi models.</p>	<p>Thunder armour is the alternative name for Mk 1 Space Marine armour. See product 68.</p> <p>Loyalist – see product 15</p> <p>Chaos Space Marines – see product 2</p> <p>Tactical – see product 56</p>
79	<p>Spikey Heresy Heads for Space Marines (2)</p> <p>This is a resin sprue of 4 "Heresy" style heads for space marines®.</p>	<p>Heresy refers to Mk V Heresy armour – see product 2.</p> <p>p111 <i>Horus Heresy: Collected Visions</i> ©2007 artwork by Justin Norman</p> <p>p197 <i>Horus Heresy: Collected Visions</i> ©2007 artwork by Kenson Low</p> <p>p309 <i>Horus Heresy: Collected Visions</i> ©2007 artwork by Kenson Low</p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
80	<p>Studded Power Armor Pad for MK 5 (3)</p> <p>This is a studded power armor shoulder pad. It works well as a MK V shoulder pad. Dimensions are equivalent to current GW plastic pads.</p>	<p>Mk V armour – see product 2</p> <p>Power armour – see product 3</p>
81	<p>Celtic Wolf Shield for Space Wolves (3)</p> <p>This is a celtic style round Storm or Combat shield with a wolf on the front, it utilizes the same handles as our other shields (seperate component for the hand grip). It looks great for Space Wolf (Space Wolves) armies or any other Sons of Russ Space Marine® Chapter.</p> <p>Cast in pewter. Diameter of shield is 22 mm.</p>	<p>Space Wolves are a Space Marine Chapter.</p> <p>Index Astartes II 2002, page 3 (NH Space Wolves Graph / Neil Hodgson / 2001)</p> <p>Sons of Russ is a reference to Leman Russ, the Space Wolves founder (Primarch).</p> <p>Storm shields and combat shields are used by Space Marines.</p> <p>Chapterhouse's products use Games Workshop's marks: Space Wolves and Space Marines.</p> <p>Miniatures in the Warhammer 40,000 game are based on a 28mm scale.</p>
82	<p>Rhino Conversion Kit for Space Wolves (2)</p> <p>This is a resin conversion kit for the games workshop rhino kit. It consist of 2 side doors, 1 front panel, and 1 top hatch. The style incorporates wolf totems, furs, and viking like icons. Looks great when used for space wolf armies.</p>	<p>A Rhino is a Space Marine vehicle used by the Space Wolves Chapter.</p> <p>Codex Space Wolves 2000, page 19 Miniature designed by Bob Naismith</p> <p>The Space Wolves Chapter's iconography includes wolf skulls, wolf tails and fangs - <a data-bbox="1024 1024 1911 1105" href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?catId=cat440177a&amp;prodId=prod260002a&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?catId=cat440177a&amp;prodId=prod260002a&amp;rootCatGameStyle=</a></p> <p>Miniature designed by Jes Goodwin, Martin Footit and Juan Diaz Ramos</p> <p>Space Marine Collector's Guide 2003, page 32 Miniature designed by Jes Goodwin</p> <p>Forge World sells a Space Wolves conversion pack for the Rhino -- <a data-bbox="1024 1292 1911 1373" href="http://www.forgeworld.co.uk/Warhammer-40000/SPACE-WOLVES-RHINO-DOORS-AND-FRONT-PLATE.html">http://www.forgeworld.co.uk/Warhammer-40000/SPACE-WOLVES-RHINO-DOORS-AND-FRONT-PLATE.html</a></p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
		Miniature designed by Simon Egan
83	<p>Storm Combat Space Tech Shield for Wolves (3)</p> <p>This is a Storm or Combat shield with a Tech-Wolf on the front, it utilizes the same handles as our other shields (seperate component for the hand grip). It is a light weight white metal bit. It looks great for Space Wolf (Space Wolves) armies or any other Sons of Russ Space Marine® Chapter. Supplied unpainted.</p>	See 81 & 82 above for information about Space Wolves, storm shields and Sons of Russ
84	<p>Celtic Storm or Combat Shield (3)</p> <p>This is a white metal combat or storm shield for 28 mm figures. It works great on space marines® or any fantasy models. We have designed a circular celtic shield, this is more suitable for a power armor marine, vs a Terminator marine (it would look a bit small for the larger armor). It includes a seperate grip guard. Supplied unpainted.</p>	<p>Storm shield and combat shield – see product 81</p> <p>This shield does not incorporate any Games Workshop Copyright.</p> <p>Power armour – see product 3</p> <p>Terminator – see product 5</p>
85	<p>Generic Hammer 2 (2)</p> <p>This is a Generic Thunder or Power hammer. Sold as a single white metal pewter bit. Works well with fantasy or sci-fi 28mm figures. Looks great on Empire models or on Space Marines®.</p>	<p>Thunder hammers – see product 1</p> <p>Empire – see product 1</p>
86	<p>Imperial or Eagle Storm Shield (2)</p> <p>A high detail shield based on an eagle theme, useful on high elf or emperor fantasy models as well as space marine® models. The front of this shield has an eagle head and feathers sculpted, the rear of the shield has a hand hold that enables power armor marines to hold the shield. It is designed to be modeled on either power armor marines or terminators. This highly detailed bit is cast in PEWTER.</p>	<p>High Elf and Empire – see product 1</p> <p>Storm shields – see product 28</p> <p>Power armour – see product 1</p> <p>Terminators – see product 5</p>
87	<p>“Heresy” Armoured Drop Pod Door (1)</p> <p>This is a highly detailed resin armored panel that fits on the Drop Pod Kit door. It is a single piece that fits over the standard door, this is sculpted to resemble an "heresy era" armored panel. This is a single door. We recomend buying a set of 5 for the regular drop pod model kit.</p>	<p>Drop pod – see product 63</p> <p>Heresy is a reference to Mk V Space Marine armour – see product 2. The pattern more closely resembles Mk 1 Space Marine armour.</p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
88	<p>Armoured Predator Armour Kit – side (1)</p> <p>This is a new Armored Predator kit for Space Marines®, it includes 3 strips of Reactive armor that can be cut to size as well as ONE heavily armored "off-centered cockpit" Fits the standard Games Workshop Space Marine® Predator kit.</p> <p>This is our answer to the silly idea that a more heavily armored predator tank has the same front as a flimsy rhino tank. This is a Resin kit.</p>	<p>A Predator is a Space Marine Tank. It is a variant of the Space Marine Rhino tank.</p> <p>Games Workshop sells Predator tanks – <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1660001&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1660001&amp;rootCatGameStyle=</a></p> <p>Miniature designed by Jes Goodwin and Tim Adcock Rhino - see product 28</p> <p>Chapterhouse's products use Games Workshop's marks: Predator, Space Marines, Games Workshop, and Rhino.</p>
89	<p>Armoured Predator Kit - Centred (1)</p> <p>This is a new Armored Predator kit for Spacc Marines®, it includes 3 strips of Reactive armor that can be cut to size as well as a heavily armored "centered cockpit" Fits the standard Games Workshop Space Marine® Predator kit.</p> <p>This is our answer to the silly idea that a more heavily armored predator tank has the same front as a flimsy rhino tank. This is a Resin kit.</p>	<p>Predator – see product 88</p> <p>Rhino – see product 28</p> <p>Chapterhouse's products use Games Workshop's marks: Predator, Space Marines, Games Workshop, and Rhino.</p>
90	<p>Armoured Rhino for Space Marine Tank Door &amp; Armor Kit (1)</p> <p>This is an new and original Armored Space Marine® Rhino kit, it includes 2 side doors, 2 rear armor panels, 2 front armor panels, 2 top hatch armored panels and a front armored cockpit panel. Fits the standard Games Workshop Space Marine® Rhino kit. This is very similiar to MK I Space Marine® armor and would fit well with an Heresy era army.</p>	<p>The pattern on these components is Mk I type Space Marine armour – see product 68.</p> <p>Rhino – see product 82</p> <p>Heresy – see product 2</p>
91	<p>Brazier – Dragon / Serpent - 2 pieces (1)</p> <p>This is a stylized dragon or snake brazier, it comes in 2 pieces (flat backing and the front) and is pwwter. It is approximately .63 millimeters tall and .36 millimeters at its widest. This is perfectly designed to add to any vehicles, we include it with our Salamanders Landraider kit. Looks great on dreadnoughts and any other vehicles with flat areas.</p>	<p>Salamanders – see product 25</p> <p>Land Raiders – see product 32</p> <p>Chapterhouse's products use Games Workshop's marks: Salamanders, Land Raider and Dreadnought.</p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
92	<p>Brazier – Eagle – 2 pieces (1)</p> <p>This is a stylized eagle brazier, it comes in 2 pieces (flat backing and the front) and is pewter. It is approximately .62 millimeters tall and .33 millimeters at its widest. This is perfectly designed to add to vehicles, we include it with our Salamanders Landraider kit. Looks great on dreadnoughts and any other vehicles with flat areas.</p>	<p>Salamanders – see product 25</p> <p>Land Raiders – see product 32</p> <p>Chapterhouse's products use Games Workshop's marks: Salamanders, Land Raider and Dreadnought.</p>
93	<p>Mark I Rhino Conversion Kit (1)</p> <p>This is an new and original Mark I or Heresy Era Rhino conversion kit, it includes 2 side doors, 2 Left Side Engine Grates, 2 Right side Engine Grates, 2 choices for the front cockpit armor panel, and one old style bolter cuppola cover. Fits the standard CURRENT Games Workshop Space Marine® Rhino kit.</p>	<p>Heresy – see product 2</p> <p>Rhino – see product 82</p> <p>Mk 1 – see product 68</p> <p>A bolter is a Space Marine weapon.</p> <p>Warhammer 40,000 Wargear 2005 (NK020K Bolter / Nuala Kinrade / 1998)</p> <p>Chapterhouse's products use Games Workshop's marks: Rhino and Games Workshop.</p>
94	<p>Rhino Tank Conversion Kit for Space Marine Dragon or Salamander (1)</p> <p>The rhino accessory kit is composed of doors, front panels and armor sections to accessorize the current space marine® rhino model kit. Themed in a dragon or salamander style also good for alpha legion. It currently includes - 1 front armor panel, 2 side door, 2 top hatch panels, and 4 scaled armor panels. This kit is composed completely of unpainted resin-plastic, sometimes parts must be cut down to fit due to the casting process.</p>	<p>Rhino – see product 82</p> <p>Salamanders – see product 25</p> <p>Index Astartes IV, 2004, page 19 (NH Salamander Graph/ Neil Hodgson / 2004)</p>
95	<p>Mycetic Spore for Tyranids (1)</p> <p>We have our first cast in of our Mycetic Spore, available <a href="#">here</a>, as you can see it could realistically transport a carnifex ora brood of gaunts. This is a 4 piece model and will be selling for \$30.00. We will have another set that will come with a base for \$34.50 in the near future. This is Chapterhouse Studios version of the Mycetic Spore. The spore</p>	<p>Tyranids and Carnifex – see product 37</p> <p>A Mycetic spore is a Tyranid creature. It is used to transport other Tyranid creatures from vessels in orbit onto a planet.</p> <p>Warhammer 40,000 Tyranids 2009, page 54 (AB929 Mycetic Spore / Alex Boyd / 2009)</p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
	<p>is a highly detailed 4 piece resin model which includes an option weapon arm (that can have a tyranid weapon glued on the end). It is easily assembled (coming in 2 halves and a top piece). Each spore is large enough to realistically hold a swarm of models or even a large monstrous creature like the carnifex. The Mycetic Spore is approximately 6 inches tall and 4.5 inches in diameter. We have this item in limited stock and will ship out as they are produced.</p>	<p>Games Workshop has not made a model of a Mycetic.</p> <p>Gaunts are a type of Tyranid creature.</p> <p>The two Tyranid miniatures in Chapterhouse's top right image are a Carnifex and a Games Workshop Termagaunt.</p>
96	<p>Pre-Heresy Scarab Shoulder Pads for Thousand Sons Marines – Term (1)</p> <p>These shoulder pads are designed to replace the current era Space Marine® Terminator Shoulder Pads. Each pad is in the pre-heresy style and has a scarab sculpted onto the surface. These pads work well with any egyptian themed army, and is similar to those worn by heresy era Thousand Sons Space Marines®. Sold in pairs or a right and left pad. Two shoulder pads cast in pewter.</p>	<p>The Thousand Sons are a Chaos Space Marine Legion.</p> <p>Index Astartes 2003, page 41 (NH Thousand sons / Neil Hodgson / 2003)</p> <p>Scarabs were featured on their armour prior to and during the Horus Heresy. (2374_TS_tacsqd / Chris Trevas / Black Library / 2007)</p> <p>The Horus Heresy – Collected Visions 2007, page 90</p>
97	<p>Scarab Shoulder Pad for Thousand Sons - Power Armor (1)</p> <p>This is a shoulder pad that is about the same size as a GW power armor shoulder pad. It consist of a Egyption Style Scarab on a shoulder pad. This pad works well with any egyptian themed army, and is similar to those worn by heresy era Thousand Sons Space Marines® shoulder pad. Sized to fit regular power armor figures. Single Pad Cast in pewter.</p>	<p>Thousand Sons - see product 96.</p>
98	<p>Starburst Shoulder Pad for Thousand Sons Marines - Power Armor (1)</p> <p>This is a shoulder pad that is about the same size as a GW power armor shoulder pad. It consist of a Starburst on a shoulder pad. This pad is similar to those worn by heresy era Thousand Sons Space Marines® shoulder pad. Sized to fit regular power armor figures. Single Pad Cast in pewter.</p>	<p>The Thousand Sons Chapter icon was originally a circle with eight points.</p> <p>(2107_Devastators1 / Ralph Horsley/ Black Library / 2003) The Horus Heresy – Collected Visions 2007, page 48</p>
99	<p>Shoulder Pad for Mantis Warriors Marines - Power Armor (1)</p>	<p>The Mantis Warriors are a Space Marine Chapter.</p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
	<p>We also have a rather nice Mantis Warriors space marine pad set, these were done for a customer. They turned out great and he allowed us to use his painted pads to showcase the new releases. We were able to do a Power Armor and a Terminator piece.</p> <p>This is a shoulder pad with a Praying Mantis head on the surface, with added chains sculpted on the edges . This shoulder pad works well with Mantis Warrior space marine armies®. This is the standard size space marine® tactical shoulder pad cast in pewter.</p> <p>One pewter pad.</p>	<p>White Dwarf 101 1988, page 72 (Mantis Warrior / Gary Chalk / 1988)</p>
100	<p>Shoulder Pad for Mantis Warriors Marines – Terminator (1)</p> <p>This is a shoulder pad with a Praying Mantis head on the surface, with added chains sculpted on the edges . This shoulder pad works well with Mantis Warrior space marine armies®. This is the standard size space marine® terminator armor shoulder pad cast in pewter.</p> <p>One pewter pad.</p>	<p>The Mantis Warriors are a Space Marine Chapter.</p> <p>Chapterhouse's products use Games Workshop's marks: Space Marine; Terminator &amp; Mantis Warriors.</p>
101	<p>Shoulder Pad for Blood Ravens Marines - Terminator (1)</p> <p>Lastly for the pads, we resculpted the Blood Ravens shoulder pads to have a blood drop instead of an inverted drop. The previous pads will be listed as Blood Eagle pads, while the updated sculpts will be listed as Blood Ravens pads.</p> <p>This is our NEW shoulder pad with a raven on the surface, the wings of the bird are surrounding a blood drop or gem. This shoulder pad works well with Blood Raven or Blood Angel themed armies. This is the standard size space marine® terminator armor shoulder pad cast in pewter.</p> <p>Single Pewter Pad.</p>	<p>Blood Raven/Blood Angles – see product 4</p>
102	<p>Shoulder Pad for Blood Ravens Marines - Power Armor (1)</p> <p>This is our NEW shoulder pad with a raven on the surface, the wings of the bird are surrounding a blood drop or gem. This shoulder pad works well with Blood Raven or Blood Angel themed armies. This is the standard size space marine® Tactical Marine shoulder pad cast in</p>	<p>Blood Raven/Blood Angles – see product 4</p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
	<p>pewter.</p> <p>Single Pewter Pad.</p>	
103	<p>Dragon or Salamander Variant Rhino Door Kit (1)</p> <p>We also have 3 new Rhino Conversion Kits for the Space Wolves, Dragon based Chapters, and a Tactical Door kit with skulls (click on photos for product page).</p> <p>The rhino accessory kit is composed of 2 side doors and 1 front panel to accessorize the current space marine® rhino model kit. Themed in a dragon or salamander style also good for alpha legion.</p> <p>This kit is composed completely of unpainted resin-plastic, sometimes parts must be cut down to fit due to the casting process.</p>	<p>Space Wolves – see product 82</p> <p>Rhino – see product 82</p> <p>Alpha Legion – see product 32</p> <p>The components are decorated with Salamanders Chapter icons – see product 25</p>
104	<p>Rhino Conversion #2 kit For Space Wolves (1)</p> <p>This is a resin conversion kit for the games workshop rhino kit. It consist of 2 side doors, 1 front panel, and 1 top hatch and extra armor. The style incorporates wolf totems, furs, and viking like icons. Looks great when used for space wolf armies.</p> <p>8 piece resin kit.</p>	<p>Space Wolves - see product 82.</p> <p>The Space Wolves Chapter decorates its vehicles with wolf's heads shown face on.</p> <p>Warhammer 40,000 Space Wolves 2009, page 78.</p> <p>(NH821 SW Filler/ Neil Hodgson / 2009)</p>
105	<p>Tactical Rhino Doors with Skulls Kit (1)</p> <p>The rhino accessory kit is composed of 2 side doors and 1 front panel to accessorize the current space marine® rhino model kit. Sculpted with the standard Tactical Arrow and integrating skulls..</p> <p>This kit is composed completely of unpainted resin-plastic, sometimes parts must be cut down to fit due to the casting process.</p>	<p>Games Workshop sells products decorated with piles of skulls.</p> <p>Basilica Administratum - <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1095506&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1095506&amp;rootCatGameStyle=</a></p> <p>Miniature designed by Dave Andrews</p> <p>Realm of Battle board - <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod730814&amp;rootCatGameStyle=">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod730814&amp;rootCatGameStyle=</a></p> <p>Product designed by Dave Andrews</p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
106	<p>Rhino Tank Conversion Kit for Iron Snakes (1)</p> <p>The rhino accessory kit is composed of 2 side doors, 1 top hatch, 1 front panel and 4 scaled armor sections to accessorize the current space marine® rhino model kit. Themed in a greek and snake style with shields and spears this kit makes a great Iron Snake Rhino. This kit is composed completely of unpainted resin-plastic, designed to fit on a standard Games Workshop Rhino kit.</p>	The components have Iron Snakes icons on them. See product 17.
107	<p><u>28mm Spartan Heads released this week - Friday, 18 February 2011 05:58</u></p> <p>Spartan Heads compatible with Space Marine® models</p> <p>This is a single pewter sprue of 5 different spartan armored heads that are scaled to be compatible with Games Workshop Space Marine® models.</p> <p>The "<u>Spartan Heads compatible with Space Marines</u>" consist of a sprue of 5 pewter heads. Each head is different and this set sells for \$5.50.</p> <p>Original sculpt and painted by Tomas Fiertek.</p>	Chapterhouse's products use Games Workshop's marks.
108	<p><u>Doomseer Iyanar Model Released</u></p> <p>Friday, 29 April 2011 19:22</p>	<p><a href="http://www.dakkadakka.com/dakkaforum/posts/list/60/347567.page">http://www.dakkadakka.com/dakkaforum/posts/list/60/347567.page</a> See post by Nick Villacci at 19.58.36 on 29/04/2011 referring to this model as "New Female Farseer Stand-in model from ChapterhouseStudios.com - Doomseer Iyanar"</p> <p><a href="http://www.dakkadakka.com/dakkaforum/posts/list/90/347567.page">http://www.dakkadakka.com/dakkaforum/posts/list/90/347567.page</a> See post by Nick Villacci at 21.30.26 referring to the product being an Eldar model.</p> <p><a href="http://www.dakkadakka.com/dakkaforum/posts/list/150/347567.page">http://www.dakkadakka.com/dakkaforum/posts/list/150/347567.page</a> See post by Nick Villacci at 14.23.09 on 30.04.11 comparing this model to GW Eldar models</p> <p><a href="http://www.dakkadakka.com/dakkaforum/posts/list/180/347567.page">http://www.dakkadakka.com/dakkaforum/posts/list/180/347567.page</a></p> <p>See image from Dawn of War shown on a Relic wiki</p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
	<p>Just added a new model to the website. This model is special for us in a few ways. Its our first full metal miniature, not just an accessory piece. We also have recently hired Angel Giraldez as a painter for many of our pieces.</p> <p>If you have ever wanted a female HQ model for your army, this may be your lucky day. So with no more delays...</p> <p>Doomseer Iyanar-Duanna</p> <p>Doomseer Iyanar-Duanna is cursed with the ability to foresee the slow death of her race. She shares the ability of all seers, to see the path of her race, but is only able to see the deaths of her people and nothing else. She was psychically scarred when she witnessed the death of an entire world-ship, she is now doomed to spend every moment of her life tracking down the creature responsible.</p> <p>The "Doomseer" is only available from Chapterhouse Studios. The unpainted 28mm scale pewter model consist of 5 pieces - body and 4 variant arms. A 25mm slotted base is included.</p>	<p><a href="http://wiki.reliccommunity.com/index.php?title=Farseer_Taldeer">http://wiki.reliccommunity.com/index.php?title=Farseer_Taldeer</a></p> <p><a href="http://www.dakkadakka.com/dakkaforum/posts/list/210/347567.page">http://www.dakkadakka.com/dakkaforum/posts/list/210/347567.page</a> See post by Nick Villacci at 22.23.28 on 02/05/2011 confirming that he is trying to fill in the blanks in the GW range.</p> <p>Similarities to Games Workshop's Eldar models include:</p> <ul style="list-style-type: none"> <li>• Icons on the helmet and the back of robes</li> <li>• Shape of the sword</li> <li>• All Eldar models have spirit stone, usually on the chest. She also has one on her back.</li> <li>• Clad in robes</li> <li>• Singing Spear</li> <li>• Shape of the helmet and cut out face</li> </ul> <p><a href="http://www.games-workshop.com/gws/content/article.jsp?categoryId=&amp;pIndex=1&amp;aId=9000012a&amp;start=2">http://www.games-workshop.com/gws/content/article.jsp?categoryId=&amp;pIndex=1&amp;aId=9000012a&amp;start=2</a></p> <p>Standard Eldar Helmet. Miniature designed by Jes Goodwin</p> <p><a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?catId=cat440239a&amp;prodId=prod1060055">http://www.games-workshop.com/gws/catalog/productDetail.jsp?catId=cat440239a&amp;prodId=prod1060055</a></p> <p>Miniature designed by Mike McVey Eldar Farseer helmet which elaborates on the standard helmet design by adding:</p> <ul style="list-style-type: none"> <li>• two side extensions topped with stones, and</li> </ul> <p>a design on the forehead featuring a triangle with a lower triangular stem, a central eye-like circle and lines coming out of the sides of the triangle.</p>
109	<p><u>June Releases out today!</u></p> <p>Tuesday, 14 June 2011 00:15</p> <p>A release that is due this month is our wheeled conversion kit for the Games Workshop Imperial Guard Chimera APC Kit. Call it a "rapid response" variant if you want. This resin kit is designed to replace the</p>	<p>Chapterhouse's products use Games Workshop's marks: Imperial Guard, Chimera.</p> <p>Imperial Guard Chimera <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1140040a">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1140040a</a></p> <p>Model designed by Adrian Wild</p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
	<p>side hull and treads of the rugged Chimera APC with All Terrain Tires and a hazard-clearing front bumper. It consist of 9 resin parts and is in final stages of production.</p> <p>This month we have a few items that are for sale starting today.</p> <p>First off is this nice conversion kit for the Imperial Guard Chimera. Call it a rapid-response variant if you want, we just refer to is a the "Wheeled Chimera Conversion Kit". This kit is composed of 9 highly-detailed resin pieces and easily replaces the tracked side pieces on the Games Workshop Imperial Guard Chimera. MSRP will be \$13.50.</p> <p>Rapid Response Wheeled Kit for Chimera</p> <p>This highly detailed resin conversion kit will convert the normal Games Workshop Imperial Guard Chimera (or any other vehicle that shares that chassis) into a Rapid Response Wheeled vehicle.</p> <p>Each kit consist of 9 highly detailed resin pieces, Games Workshop Chimera (or other vehicle that shares same hull) required to assemble as seen.</p> <p>Shown assembled model uses Games Workshop Imperial Guard Chimera which is not a Chapterhouse Studios product.</p> <p>Designed by Jeffrey Nagy.</p>	
110	<p>Some things in the work, we are continuing to expand our "space elf" line that many players may enjoy. If you have ever wondered what male Eldar Howling Banshees may look like in a warped universe, you may like what is in the works here. I think a little more work is due for the concept. The sculptor has dubbed them "Hell Hounds".</p>	<p>The Eldar army is an army of 'Space Elves'.</p> <p>They are using our ELDAR trademark</p> <p><a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1160111a">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1160111a</a></p> <p>Miniature by sculpted by Juan Diaz Ramos from a Jes Goodwin design Eldar Howling Banshee model.</p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
		<p>Howling Banshee Warriors have:</p> <ul style="list-style-type: none"> <li>• Eldar conical style helmet with hair coming out of the back</li> <li>• Segmented armour plates over a bodysuit</li> <li>• Grid-like mouth</li> </ul> <p>Long loin cloths held up by circular stones</p>
111	<p>TRU-Scale Conversion Kit for Space Marine Storm Raven.</p> <p>We are also releasing a much-needed (in this humble hobbyist opinion) TRU-Scale Conversion kit for the Games Workshop Space Marine Storm Raven. This resin kit expands the hull of the Storm-Raven making it much longer and actually makes it realistic to think the Storm-Raven can carry the troops it is supposed to carry. We also included a grapple for carrying dreadnoughts (easily magnetized if you want to actually mount your walkers on the transport) as well as a hatch to cover the turret mount if you are inclined. MSRP \$17.50 for the 9-piece resin kit. Availability in 2 weeks.</p>	<p>The Chapter House product is a conversion kit for Games Workshop's 'Stormraven Gunship'.</p> <p>Miniature by sculpted by Dale Stringer from a Jes Goodwin design</p> <p><a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod900149a">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod900149a</a></p>
112	<p>Conversion Kits.</p> <p>Next up are three smaller conversion kits. First is a set of five resin "gun-halberds" for 28mm scale models (or Heroic Scale). These weapons are composed of a power halberd that incorporates a bolter at the head. These may be a good match for "Grey Knight" players or for those custom made custodes models. Each 5 weapon set MSRP is \$6.00.</p>	<p>Games Workshop sells Halberds</p> <p><a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1570033">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1570033</a></p> <p>'Custodes' are the personal guard of the Emperor of Mankind. Games Workshop does not yet sell miniatures of Custodes but they are depicted in artwork in <i>Horus Heresy: Collected Visions</i> ©Games Workshop Limited 2007. Custodes are armed with halberds with built in 'bolters' at the head.</p> <p><i>Horus Heresy: Collected Visions</i>, ©Games Workshop Limited 2007, p152. (Legio Custodes / Sam Wood / 2004)</p> <p>Grey Knights are a Space Marine Chapter that fight using Halberds.</p> <p>Miniature by sculpted by Martin Footit from a Jes Goodwin design</p> <p><a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1160008a">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1160008a</a></p>

No.	Chapter House Product and Website Description	Games Workshop Works
113	<p>Conversion Beamer Servo Harness Kit for Space Marine Model</p> <p>This resin kit sculpted and designed by Stephen Smith consist of 5 resin components. The kit fits on a standard Games Workshop Space Marine model. The design of the servo-backpack and conversion beamer weapon allow the model to hold the weapon under-slung on either arm.</p> <p>Next we have a conversion-beamer and servo arm backpack set that is sculpted to work seamlessly with Games Workshop Space Marine models. If you are an aspiring tech-marine and are tired of trying to put together your very own conversion-beamer, this kit may save you some headaches. Consisting of 4 resin pieces, this easily poseable and magnetized kit MSRP's for \$9.50.</p>	<p>A 'Conversion Beamer' is a Space Marine weapon of great power and can be used as a weapon option for a Space Marine Master of the Forge. The conversion beamer was included in <i>Codex Space Marines</i> ©Games Workshop Limited 2008, p70. Chapter House released their product after the Codex description was released.</p> <p><i>Codex Space Marines</i> ©Games Workshop Limited 2008, p70. ( DG551 Conversion Techmarine/ Dave Gallagher / 2002)</p> <p>VALTHEX ASTRAL CLAWS MASTER OF THE FORGE</p> <p>Miniature designed by Mark Bedford <a href="http://www.forgeworld.co.uk/Home/Search-Results.html?filter_type=6&amp;filter_Action=0&amp;filter_name=SearchTerm&amp;submit=GO&amp;filter_value=conversion+beamer">http://www.forgeworld.co.uk/Home/Search-Results.html?filter_type=6&amp;filter_Action=0&amp;filter_name=SearchTerm&amp;submit=GO&amp;filter_value=conversion+beamer</a></p> <p>Contemptor Heavy Conversion Beamer</p> <p>Miniature designed by Will Hayes <a href="http://www.forgeworld.co.uk/Home/Search-Results.html?filter_type=6&amp;filter_Action=0&amp;filter_name=SearchTerm&amp;filter_value=valthex">http://www.forgeworld.co.uk/Home/Search-Results.html?filter_type=6&amp;filter_Action=0&amp;filter_name=SearchTerm&amp;filter_value=valthex</a></p>
114	<p>Death Angel Doors for Space Marine Land Raider kit</p> <p>The Death Angel Land Raider door kit was designed to replace the standard doors on the Games Workshop Space Marine Land Raider. Incorporating original art work, each piece allows you to add further detail to your model by adding images of the Grim Reaper or the Dark Angel.</p> <p>Each piece was sculpted by and designed by Tomas Fiertek.</p>	<p>This kit uses the trademarks Games Workshop, Space Marine, Land Raider and Dark Angel.</p> <p>The 'death angel' on the left carries a Heavy Flamer which is a Games Workshop weapon. <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod350007a">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod350007a</a></p> <p>Miniature designed by Juan Diaz Ramos</p> <p>The 'death angel' on the right carries a gun which looks like Games Workshop's Assault Cannon. This style of barrelled machine gun is not unique to Games Workshop but does fit with the Warhammer 40,000 range <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1400034">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1400034</a></p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
	<p>Kit consist of 6 finely sculpted resin components.</p> <p>Lastly we have a new door kit for Games Workshop's Land Raider vehicle. This 6 piece resin kit consist of 4 doors, 1 set of wings (for side door) and one chain of ammo (for same door). The set features grim-reaper or death angels in various battle poses. Whether you are a Dark Angel fan or just like the gloominess of grim-reapers, this set adds a personal touch to the already awesome Games Workshop Land Raider plastic kit. This kit simply replaces the standard doors that come with the GW model. MSRP is \$11.500.</p> <p>The Death Angel Land Raider door kit was designed to replace the standard doors on the Games Workshop Space Marine Land Raider. Incorporating original art work, each piece allows you to add further detail to your model by adding images of the Grim Reaper or the Dark Angel.</p> <p>Each piece was sculpted by and and designed by Tomas Fiertek.</p> <p>Kit consist of 6 finely sculpted resin components.</p>	
115	<p>SCAR &amp; Sniper Rifle 28mm Pack - 8</p> <p>A set of 8 Various SCAR and Sniper Rifles cast in resin. Each set includes 8 highly detailed 28mm weapons modeled after present day weapons. Scaled for use with 28mm wargame minis (GW Imperial Guard).</p> <p>Set contains: 2 SCAR Autoguns, 2 SCAR Autoguns with Grenade Launchers, 2 SCAR Lasguns, 2 Sniper Rifles</p> <p>This product is sold unpainted and some cleaning may be required.</p> <p>Master sculpt by Jeff Nagy.</p>	<p>Combo pack. See products 116-118</p> <p>Chapterhouse's products use Games Workshop's marks: Imperial Guard.</p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
116	<p>SCAR Drum Magazine Autoguns Resin 28mm - 6</p> <p>A set of 6 SCAR Drum Magazine Autoguns cast in resin. Each set includes 6 highly detailed 28mm weapons modeled after present day SCAR rifles. Scaled for use with 28mm wargame minis (GW Imperial Guard).</p> <p>This product is sold unpainted and some cleaning may be required.</p> <p>Master sculpt by Jeff Nagy.</p> <p>Painted by Jason Phillips</p>	<p>An 'autogun' is a gun in the Warhammer 40,000 universe. P49, <i>Necromunda Rulebook</i> 1995.</p> <p>( DH049K Autogun / Des Hanley / 1995)                      Escher Ganger with Autogun, p119 <i>Necromunda Rulebook</i> 1995.                      Now sold in a set under the product name 'House Escher Troops Booster Pack'</p>
117	<p>SCAR Lasguns Resin 28mm - 6</p> <p>A set of 6 SCAR Lasguns cast in resin. Each set includes 6 highly detailed 28mm weapons modeled after present day SCAR rifles with laser modifications. Scaled for use with 28mm wargame minis (GW Imperial Guard).</p> <p>This product is sold unpainted and some cleaning may be required.</p> <p>Master sculpt by Jeff Nagy.</p> <p>Painted by Jason Phillips</p>	<p>'Lasguns' are the standard weapon of the Imperial Guard infantryman. A key feature of 'las' weapons is the angled end to the gun rifle.</p> <p>Imperial Guard Cadian Shock Troops <a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod2070014">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod2070014</a></p> <p>Miniatures designed by Brian Nelson</p>
118	<p>Javelin Class Jet Bike.</p> <p>It has been a little while since our last release. We have been hard at work at Chapterhouse Studios, looking for the next toy to release for the Heresy Era 40k players. I am happy to show the Javelin Class Jet Bike.</p> <p>This multi-part customizable resin kit contains 8 resin components. We have included 2 engine options, this will allow you to make a regular</p>	<p>Emperor's Children Space Marine Jet Bike Squad. p15, <i>Horus Heresy: Collected Visions</i> ©2007                      This shows a Space Marine Jet Bike from the Horus Heresy era.</p> <p>Space Marine Bike Sprue                      (2034_Jet Bike Squad / Eric Ren / 2003)                      The bike is copied from the artwork in <i>Horus Heresy: Collected Visions</i> using elements from the current Space Marine Bike model sold by Games Workshop.</p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
	<p>and a scout version of the Javelin Jet Bike. We also included 2 different bolt gun mounts that will allow the addition of different special weapons (plasma, melta, grenade launchers etc). These conveniently fit our combi-weapon conversion bits.</p> <p>Also included in the kit are a set of legs and arms that will allow you to use other companies torsos and heads to model a rider. Flight stand will be included.</p> <p>Our target price for the Javelin Jet Bike is \$14.00 and the release will be on November 5th.</p> <p>Kit is shown with Chapterhouse Studios helmets and torso (not included).</p> <p>Concept sketches from designer posted on DakkaDakka <a href="http://www.dakkadakka.com/dakkaforum/posts/list/335180.page">http://www.dakkadakka.com/dakkaforum/posts/list/335180.page</a></p>	<p><u>Artwork</u> – Distinctive front grill in large straight vertical lines with the chassis protruding underneath out in front of the bike. Two boltguns on top of the front of the bike. Two exhaust pipes on the side of the bike.</p> <p><u>Bike Model</u> (See sprue comparison below) – the tank (section below handle bars) has been copied as the shape, trim and circle decoration are the same. Three tubes lead into engine below the tank. The Space Marine arms are identical in design.</p> <p>The model riding the bike copies several key features of a Space Marine:</p> <ul style="list-style-type: none"> <li>• Leg Armour <ul style="list-style-type: none"> <li>○ Flared with angled edges to match width of boots</li> <li>○ Cut at bottom of leg around shape of boot</li> <li>○ Joints at hips and back of knee are joined by grooved sections</li> </ul> </li> <li>• Shoulderpads <ul style="list-style-type: none"> <li>○ Covering from start of shoulder to above the elbow</li> <li>○ Large border around outer edge</li> <li>○ Large round studs on the shoulder pads are a feature of Mark V Space Marine armour worn during the Horus Heresy period.</li> </ul> </li> </ul> <p><a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1060092">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1060092</a></p> <p>Miniature designed by Jes Goodwin</p>
119	<p>Death Angel Storm Shield</p> <p>This is a single pewter combat or storm shield for 28 mm figures. This oval shaped shield has an image of a grim reaper or dark angel standing on a pile of skulls.</p> <p>If to be used on Games Workshop models, this is more suitable for a terminator model as opposed to a space marine model (it would look a bit large for the smaller armor).</p> <p><a href="http://chapterhousestudios.com/webshop/component/virtuemart/?page=shop_product_details&amp;category_id=15&amp;flypage=flypage.tpl&amp;product_id=127&amp;vmcchk=1">http://chapterhousestudios.com/webshop/component/virtuemart/?page=shop_product_details&amp;category_id=15&amp;flypage=flypage.tpl&amp;product_id=127&amp;vmcchk=1</a></p>	<p>see 28 for Storm Shield</p> <p>see 1 for Terminators with Storm Shield</p>

No.	Chapter House Product and Website Description	Games Workshop Works
120	<p>Armana'serq Warrior Priestess</p> <p>Monday, 29 August 2011 01:37</p> <p>Today our second complete miniature figure is released for sale.</p> <p><i>The gods have always demanded worship and sacrifice but in return they grant their most zealous followers with supernatural strength and skills. Serqitet, goddess of the scorpion protects her followers through her warrior priestess. Armed with sword and pistol, Armana'serq leads her fellow warrior-priest into combat through stealth and subterfuge.</i></p> <p>This unpainted 28mm scale pewter model consist of 6 components - body and 5 variant arms. A 25mm slotted base is included. Armana'serq is available <a href="#">here</a> for \$13.50</p> <p>Look for our exciting TRU-Scale Storm Raven Extension kit next week!</p> <p>Nick- Chapterhousestudios.com</p>	<p>This model has been copied from Jes Goodwin's sketches:</p> <p><a href="http://eldar.arhicks.co.uk/miniatures/craftworld/craftworld_striking_scorpions_squad_1.php">http://eldar.arhicks.co.uk/miniatures/craftworld/craftworld_striking_scorpions_squad_1.php</a></p> <p><a href="http://www.dakkadakka.com/dakkaforum/posts/list/240/347567.page">http://www.dakkadakka.com/dakkaforum/posts/list/240/347567.page</a></p> <p>There is discussion that these are Eldar on this thread confirming confusion.</p> <p><a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1160108a">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod1160108a</a></p> <p>Eldar Striking Scorpions</p> <ul style="list-style-type: none"> <li>• Plate armour</li> <li>• Chainswords</li> <li>• Thick locks of hair coming from the top of the head</li> <li>• "The signature attack of the Striking Scorpion is made by the weapon pods housed on either side of the warrior's helmet, known as mandiblasters. These are short-ranged laser weapons used to deliver a deadly energy sting in close combat." P.33 <i>Codex Eldar</i> ©2006.</li> </ul> <p>The Chapter House model has a similar device either side of the jaw.</p> <ul style="list-style-type: none"> <li>• Striking Scorpions are stealthy infiltrators. P.33 <i>Codex Eldar</i> ©2006.</li> </ul> <p>P.81 <i>Codex Eldar</i> ©2006</p> <p>A unit champion known as an 'Exarch' can be armed with special weapons. One is the 'Scorpion's claw', a pincer claw with a mounted gun attachment. The other is a 'Biting blade', which is a long two handed chainsword. Both these weapons are available with Chapterhouse's model.</p>
121	<p>Abbithan Banshees Guardswoman 28mm figures – 10</p> <p>This resin conversion kit contains 12 torsos, 12 legs, 12 heads, 12 backpacks and enough bases to assemble a 12 woman unit of Abbithan Banshees Guardswoman. Models are scaled for 28mm wargames.</p>	<p>Imperial Guard Cadian Shock Troops</p> <p><a href="http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod2070014">http://www.games-workshop.com/gws/catalog/productDetail.jsp?prodId=prod2070014</a></p>

No.	Chapterhouse Product and Website Description	Games Workshop Works
	<p>Models do not come with arms and weapons.</p> <p>Display models shown assembled with Games Workshop Cadian Imperial Guard arms and weapons for compatibility purposes.</p> <p>(Chapterhouse Studios recommends Games Workshop Imperial Guard weapons and arms, in particular Cadian Imperial Guardsman arms: <a href="http://chapterhousestudios.com/index.php?route=product/product&amp;path=77&amp;product_id=163">http://chapterhousestudios.com/index.php?route=product/product&amp;path=77&amp;product_id=163</a> )</p>	<p>The arms and weapons from this kit have used on the Chapter House 'Abbithan Banshees'</p>

## **Exhibit 2**

to

Subpoena to Games Workshop Retail, Inc. to Testify at a Deposition, Attachment A

(Second Amended Complaint)

**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

**JURY TRIAL DEMANDED**

**SECOND AMENDED COMPLAINT FOR COPYRIGHT INFRINGEMENT,  
TRADEMARK INFRINGEMENT, TRADEMARK DILUTION, UNFAIR AND  
DECEPTIVE TRADE PRACTICES, AND UNFAIR COMPETITION**

Games Workshop Limited, by its attorneys, FOLEY & LARDNER LLP, for its First Amended Complaint against Chapterhouse Studios LLC and Jon Paulson (collectively “Defendants”), alleges as follows:

**PARTIES AND JURISDICTION**

1. Games Workshop Limited is a United Kingdom corporation and a subsidiary of Games Workshop Group, plc, which has numerous store locations in and around Chicago, Illinois, which is its single largest selling market in the United States.

2. Upon information and belief, Chapterhouse Studios LLC is a Texas limited liability company with offices at 3930 Glade Road, Suite 108 #174, Colleyville, Texas, 76034.

3. Upon information and belief, Jon Paulson is an individual and the principal owner of Paulson Games, having an address at 2232 College Road, Downers Grove, Illinois, 60516.

Case: 1:10-cv-08103 Document #: 147 Filed: 01/19/12 Page 2 of 25 PageID #:1534

4. This is an action for copyright infringement under 17 U.S.C. § 101 *et seq.*; trademark infringement under 15 U.S.C. § 1114(1) and Illinois common law; for use of false designations of origin under 15 U.S.C. § 1125(a); for dilution under 15 U.S.C. § 1125(c) and 765 ILCS 1036/65; for violation of the Illinois Deceptive Trade Practices Act under 815 ILCS 510/1 *et seq.*; for violation of the Illinois Consumer Fraud and Deceptive Business Practices Act under 815 ILCS 505/2 *et seq.*; and for unfair competition under Illinois common law.

5. This Court has subject matter jurisdiction over the claims pursuant to 15 U.S.C. § 1121 and 28 U.S.C. §§ 1331 and 1338, and supplemental jurisdiction over the claims arising under the statutory and common law of the State of Illinois pursuant to 28 U.S.C. §1367(a) because the state law claims are so related to the federal claims that they form part of the same case or controversy.

6. The Court has personal jurisdiction over Defendants because, upon information and belief, each of the Defendants sells and offers to sell infringing products within this jurisdiction; because Defendant Chapterhouse maintains an interactive commercial website through which Illinois residents are able to make purchases of the subject infringing goods; because Defendant Paulson has his principal place of business in this jurisdiction; and because, at all times material to this action, each of the Defendants was the agent, servant, employee, partner, alter ego, subsidiary, and/or joint venturer of each of the other Defendant; certain of the material acts of the Defendants were performed in the scope of such relationship; in doing the acts complained of herein, each of the Defendants acted with the knowledge, permission, and/or consent of the other Defendant.

Case: 1:10-cv-08103 Document #: 147 Filed: 01/19/12 Page 3 of 25 PageID #:1535

7. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) and (c) because the Defendants reside in this District and because a substantial part of the events giving rise to the claims occurred in this District.

**FACTS COMMON TO ALL COUNTS**

**A. Games Workshop's Copyrighted WARHAMMER and WARHAMMER 40,000 Games and WARHAMMER and WARHAMMER 40,000 Trademarks**

8. Games Workshop is the largest and most successful tabletop fantasy wargames company in the world, with a following of millions of gamers and hobbyists devoted to collecting, creating, painting, and building armies for use in Games Workshop's popular WARHAMMER and WARHAMMER 40,000 war games.

9. Games Workshop's WARHAMMER and WARHAMMER 40,000 war games are played, not on a board with defined game places, but in an open-ended world defined only by the underlying literary works and rules that define and depict the characters and armies of the games.

10. The game WARHAMMER, for instance, takes place in a fantasy world of dark magic and powerful gods, populated by mighty heroes and foul monsters, in which armies of humans stand shoulder to shoulder with noble elves and grim dwarves battling unending attacks from enemies such as rat-like Skaven that crawl beneath cities, restless dead who stir in their graves, and daemons who lead mutated hordes of the Chaos Gods into war.

11. The game WARHAMMER 40,000 similarly takes place in a fantasy universe, but one set in a dark and forbidding world of the 41st millennium, a place ravaged by thousands of years of conflict in which gothic armies of the universe do battle and in which the foremost defenders of humanity are Space Marines; genetically engineered super-warriors armed with the most inventive weapons imaginable, supported by vast armies of the Emperor and tanks of the

Case: 1:10-cv-08103 Document #: 147 Filed: 01/19/12 Page 4 of 25 PageID #:1536

Imperial Guard who confront foes such as the alien armies of the Tau; the savage Orks; enigmatic Eldar; and unfathomable Tyranids, while lurking in the background are once-loyal Space Marines, turned traitorous supporters of the unspeakable Daemon Lords of Chaos.

12. The various characters, armies and accessories in the WARHAMMER 40,000 universe have distinct names, colors, symbols, and other characteristics by which they are known and by which they are immediately recognized by the many fans and followers of the game.

13. Games Workshop produces and sells army figures for its games and a wide range of accessories for those armies and games, including weapons, vehicles, equipment, and other accessories for its armies; the names, symbols, features and appearances of which derive from and are complemented by underlying and highly detailed background publications, including the Warhammer 40,000 rule book (now in its fifth edition); the Space Marine Collectors' Guide, (Second Edition, July 2003) and the following listed volumes (including all of the earlier editions of each of these works):

Codexes (which contain, for a particular army, specific game rules  
and guides to collecting and painting)

Necromunda Rulebook, 1995

Warhammer 40,000 Tyranids, Fourth Edition, January 2010

Warhammer 40,000 Space Marines, Fourth Edition, October 2008

Warhammer 40,000 Space Marines, Fourth Edition, 2004

Warhammer 40,000 Eldar, 2006

Warhammer 40,000 Tau Empire, 2001

Warhammer 40,000 Tau Empire, 2005

Warhammer 40,000 Space Wolves, 2000

Warhammer 40,000 Space Wolves, 2009

Warhammer 40,000 Dark Angels, Third Edition, February 2007

Warhammer 40,000 Chaos Space Marines, Fourth Edition, September 2007

Warhammer Orks, 1994

Background Work

Index Astartes II, January 2002

Index Astartes, 2002

Index Astartes III, February 2004

Index Astartes IV, June 2005

Case: 1:10-cv-08103 Document #: 147 Filed: 01/19/12 Page 5 of 25 PageID #:1537

Space Marine Collectors Guide, 2003  
Imperial Guard Collectors Guide, 2003  
Warhammer 40,000 Wargear 2005  
Warhammer 40,000 Apocalypse, 2007

Art Book/Background work

The Horus Heresy Collected Visions, June 2007  
The Art of Warhammer 40,000, January 2006

Magazine

White Dwarf Magazine 249, September 2000  
White Dwarf Magazine 101, 1988

How to Book

How to Paint Space Marines, April 2005

Novel

Soul Drinkers, September 2002  
Brothers of the Snake, 2007

Each of the foregoing have been created by or for Games Workshop in England and are protected by copyright belonging exclusively to Games Workshop.

14. The underlying stories, myths, fictional histories, character names, symbols or icons, overall appearances, and unique characteristics of the many armies used in Games Workshop's games, such as their language, culture, major worlds, weapons, methods of waging war, heraldry and iconography, and how they look, behave, and function are all derived from detailed books and other publications (which are supplemented by other written materials, such as specific game rules, novels, licensed products, hobby guides, and datasheets separately) all of which are created by Games Workshop and are protected by copyright, including those literary works referenced above.

15. None of the foregoing copyrighted works created in the United Kingdom are United States works for which registration is required under 17 U.S.C. § 411(a); however,

Case: 1:10-cv-08103 Document #: 147 Filed: 01/19/12 Page 6 of 25 PageID #:1538

Games Workshop does own numerous registrations in the United States Copyright Office for its works, including Registration No. TX0006541286, "Games Workshop Complete Catalog & Hobby Reference 2006-2007", containing many of the individual works at issue herein.

16. Games Workshop also owns all copyright in a computer game, produced for it under license, entitled Dawn of War, permitting head-to-head or cooperative multiplayer participation in a game set in the WARHAMMER 40,000 universe.

17. Games Workshop has pending in the United States Copyright Office applications to register "Dawn of War" and "Dawn of War II".

18. Since at least as early as 1984, Games Workshop has sold in the United States games, models, parts and equipment therefore, and related items and services under the name and trademark WARHAMMER (and related names and marks described more fully herein), and, since long prior to the acts of Defendants complained of herein, the WARHAMMER trademark and other trademarks associated with the WARHAMMER game have come to identify Plaintiff's goods and services and to distinguish them from the goods and services of others.

19. Since at least as early as 1987, Games Workshop has sold in the United States games, models, parts and equipment therefor, and related items and services under the name and trademark WARHAMMER 40,000 (and related names and marks described more fully herein), and, since long prior to the acts of Defendants complained of herein, the WARHAMMER 40,000 trademark and other trademarks associated with the WARHAMMER 40,000 game have come to identify Plaintiff's goods and services and to distinguish them from the goods and services of others.

20. Games Workshop's "Forge World" division has for eleven years been selling conversion kits, replacement doors, and additional products for its customers made to fit existing

Case: 1:10-cv-08103 Document #: 147 Filed: 01/19/12 Page 7 of 25 PageID #:1539

WARHAMMER and WARHAMMER 40,000 products to use to decorate and modify their models for use in connection with the WARHAMMER and WARHAMMER 40,000 games.

21. Plaintiff's WARHAMMER and WARHAMMER 40,000 games have achieved enormous success, and for many years have been among the best known and most popular table top hobby war games in this country.

22. Plaintiff owns numerous registrations for its trademarks on the Principal Register in the United States Trademark Office, including the following registrations:

Trade Mark	Country	Registration Number
WARHAMMER	USA	2,718,741
WARHAMMER 40,000	USA	3,707,457
40K	USA	3,768,909
40,000	USA	3,751,267
GAMES WORKSHOP	USA	3,612,759
GW	USA	3,878,431
SPACE MARINE	USA	1,922,180
ELDAR	USA	1,944,847
DARK ANGELS	USA	1,913,474
TAU	USA	2,820,748
AQUILA Design	USA	3,646,312

23. Plaintiff's foregoing WARHAMMER trademarks (collectively, the "WARHAMMER Registered Marks") are valid, subsisting, unrevoked, and uncanceled, and Registration Nos. 2,718,741, 2,820,748, 2,070,887, 2,820,748, 2,100,767, 1,944,847, and 1,913,474 are now incontestable under the provisions of 15 U.S.C. § 1065.

24. Games Workshop has very substantial annual sales of products bearing its WARHAMMER, WARHAMMER 40,000, 40K, DARK ANGELS, ELDAR, TYRANID, CHAOS, TAU, and SPACE MARINE brand names, with annual sales in this country alone of approximately \$40 million, and Games Workshop invests considerable sums each year in marketing and promoting these brands and in developing new products under these brand names.

Case: 1:10-cv-08103 Document #: 147 Filed: 01/19/12 Page 8 of 25 PageID #:1540

Games Workshop has thereby built up substantial goodwill and reputation in the marks WARHAMMER, WARHAMMER 40,000, 40k, DARK ANGELS, ELДАР, TYRANID, CHAOS, TAU, and SPACE MARINE (collectively, the "WARHAMMER Marks"), which it uses in connection with its tabletop games and miniatures and accessories for such games.

25. The area in and around Chicago, Illinois is one of the most active for Games Workshop, being part of the single largest selling market in the United States; being home to the AdeptiCon, the largest independent convention for miniature wargaming hobbyists in the country (at which the WARHAMMER and WARHAMMER 40,000 games are featured), and the site selected by Games Workshop for its 2011 Games Day Convention (which attracted thousands of fans of the WARHAMMER and WARHAMMER 40,000 games at the Donald E. Stephens Convention Center).

26. As a result of the great success of Games Workshop's WARHAMMER and WARHAMMER 40,000 games, since long prior to the acts of Defendants complained of herein, the name and trademarks WARHAMMER, WARHAMMER 40,000, 40k, DARK ANGELS, ELДАР, TYRANID, CHAOS, TAU and SPACE MARINE have come to represent substantial and highly valuable goodwill belonging exclusively to Plaintiff.

27. The foregoing WARHAMMER Marks are now, and since long prior to the acts of Defendants complained of herein have been, widely recognized throughout the United States and at all relevant times have been famous marks within the meaning of 15 U.S.C. § 1125(c).

28. Games Workshop also has a large number of well-known unregistered trade marks (including names of armies, Chapters, and other products) including without limitation: Adeptus Mechanicus, Assault, Alpha Legion, Black Templars, Blood Angels, Blood Ravens, Cadian, Carnifex, Chaos Space Marines, Chaplain, Chimera, Crimson Fists, Dark Angel, Death

Case: 1:10-cv-08103 Document #: 147 Filed: 01/19/12 Page 9 of 25 PageID #:1541

Watch, Devastator, Dreadnought, Drop Pod, Eldar, Elder Farseer, Eldar Jetbike, Eldar Warlock, Eldar Seer Council, Empire, Exorcist, Flesh Tearers, Gene Stealer, Grenade Launcher, Halberd, Heavy bolter, Heresy Armour, Hellhound, High Elf, Hive Tyrant, Horus Heresy, Howling Banshee, Imperial Fists, Imperial Guard, Inquisition, Iron Hands, Jetbike, Jump Pack, Land Raider, Land Speeder, Legion of the Damned, Librarian, Lightning Claw, Melta, Mk II Armour, Mk V Armour, Plasma, Predator, Rhino, Salamander, Scorpion, Soul Drinker, Space Wolves, Stormraven, Storm Shield, Tactical, Techmarine, Termagants, Terminator, Thousand Sons, Thunder Hammer, Tyrant, Tyranid Warrior.

29. Many of the symbols associated with the characters and armies of the WARHAMMER 40,000 universe, as well as the accessories for these characters and armies, have also become well-known and immediately recognizable to the many fans of the game as used on and in connection with the respective characters, including without limitation: skulls, Wings (eagle wings, angel wings), Lions, Griffon, Triptychs, Broadswords, Skull with horns, Storm bolter (gun) Sawblade with blood-drop, Clenched fist in a gauntlet, Snakes, Flaming skulls, Flaming chalice, Salamander, Dragon/salamander scales pattern, Tau Symbol, Tau - Oval vents, Tau - X marking on power/ammo packs, Tau - circle with diagonal line through it, Tau - geometric grooves, Roman numerals (combined with) arrows, X crosses and inverted V, Cog, Iron hands icon - gauntleted left hand shown palm downwards, Overlapping/banded armour, Wolf fur, Wolf skulls, Wolf tails, Raven wings with blood drop in centre, I symbol (for Inquisition), Scarab beetles, Spirit stones, Eldar iconography/symbols (seer icons etc), Eldar - Spirit Stones, Eldar - decorative gems on weapons.

30. The foregoing unregistered WARHAMMER word marks and symbols are also very well known among the hobbying and gaming communities. Games Workshop's annual

Case: 1:10-cv-08103 Document #: 147 Filed: 01/19/12 Page 10 of 25 PageID #:1542

sales of products bearing these marks is likewise significant, and it invests great sums each year in marketing and promoting these brands and in developing new products under these brand names. As a result, Games Workshop has built up substantial goodwill and reputation in these unregistered trade marks in the U.S. and around the world

**B. Defendants' Infringing Conduct**

31. Upon information and belief, after having initiated some modest sales on eBay in 2008, sometime in or about May 2009, Chapterhouse began manufacturing and selling gaming miniatures and accessories at its website located at [www.chapterhousestudios.com](http://www.chapterhousestudios.com) ("the Website").

32. Chapterhouse makes no secret of the fact that its products are derived from, inspired by, and copied from Games Workshop's copyrighted works and, indeed, although Chapterhouse recently changed its website as a result of the allegations of infringement against it, the banner at the top of each page of the Website had, until November 2011, described its business as "Specializing in Custom Sculptps and Bits for Warhammer 40,000 and Fantasy".

33. The website does not identify any sources of inspiration for any of the products other than Games Workshop.

34. Every one of Chapterhouse's products is identified on its website by the names created and adopted by Games Workshop to identify its corresponding characters, armies and the accessories therefor, as well as images and descriptions derived or copied from Games Workshop's original copyrighted materials.

35. The very name "Chapterhouse" is a direct reference to Games Workshop's proprietary Space Marines characters from the WARHAMMER 40,000 game, each of which

Case: 1:10-cv-08103 Document #: 147 Filed: 01/19/12 Page 11 of 25 PageID #:1543

belongs to a specific "Chapter" (of which there are many), with each Chapter having its own unique expressions, such as its own heraldry and iconography.

36. Chapterhouse further admits on its website that Games Workshop is the owner of all of the copyrights and trademarks at issue herein by expressly stating:

Adeptus Astartes, Battlefleet Gothic, Black Flame, Black Library, the Black Library logo, BL Publishing, Blood Angels, Bloodquest, Blood Bowl, the Blood Bowl logo, The Blood Bowl Spike Device, Cadian, Catachan, the Chaos device, Cityfight, the Chaos logo, Citadel, Citadel Device, City of the Damned, Codex, Daemonhunters, Dark Angels, Dark Eldar, Dark Future, the Double-Headed/Imperial Eagle device, 'Eavy Metal, Eldar, Eldar symbol devices, Epic, Eye of Terror, Fanatic, the Fanatic logo, the Fanatic II logo, Fire Warrior, Forge World, Games Workshop, Games Workshop logo, Genestealer, Golden Demon, Gorkamorka, Great Unclean One, the Hammer of Sigmar logo, Horned Rat logo, Inferno, Inquisitor, the Inquisitor logo, the Inquisitor device, Inquisitor:Conspiracies, Keeper of Secrets, Khemri, Khorne, Kroot, Lord of Change, Marauder, Mordheim, the Mordheim logo, Necromunda, Necromunda stencil logo, Necromunda Plate logo, Necron, Nurgle, Ork, Ork skull devices, Sisters of Battle, Skaven, the Skaven symbol devices, Slaanesh, Space Hulk, Space Marine, Space Marine chapters, Space Marine chapter logos, Talisman, Tau, the Tau caste designations, Tomb Kings, Trio of Warriors, Twin Tailed Comet Logo, Tyranid, Tyrannid, Tzeentch, Ultramarines, Warhammer, Warhammer Historical, Warhammer Online, Warhammer 40k Device, Warhammer World logo, Warmaster, White Dwarf, the White Dwarf logo, and all associated marks, names, races, race insignia, characters, vehicles, locations, units, illustrations and images from the Blood Bowl game, the Warhammer world, the Talisman world, and the Warhammer 40,000 universe are either ®, TM and/or © Copyright Games Workshop Ltd 2000-2010, variably registered in the UK and other countries around the world.

37. Because many of the characteristics of the many armies used in Games Workshop's WARHAMMER and WARHAMMER 40,000 games, such as their language, culture, major worlds, weapons, methods of waging war, heraldry and iconography, and their appearances, behaviors and functions can be found in or derived from numerous Games Workshop books and other publications, as alleged above, only defendants know for certain which of these books and other publications they accessed and relied upon in creating the works

at issue herein. However, by way of example, the following exemplify some of the ways in which Chapterhouse infringes Games Workshop's copyrighted works:

a. Chapterhouse produces and sells a kit to convert a Games Workshop "Carnifex" into a "Tervigon" (both of which terms are original and proprietary to Games Workshop). Games Workshop's Tyranid Codex describes the Tervigon and provides a representation of it, and Defendant's conversion kit will create a Tervigon having unique expressions proprietary to Games Workshop, including having the same number of spine pieces and in the same configuration; the same number, type and configuration of limbs; and similar abdomen sacs; all of which are as depicted and described in Games Workshop's Warhammer 40,000 Tyranids, Fourth Edition, January 2010. However, Chapterhouse may also have referred to and relied upon other Games Workshop publications, including the Tyranid Codexes for 1995, 2001 and 2004

b. Chapterhouse is producing shoulder pads for "Space Marines" that very clearly derive from many of the background works published by Games Workshop for its Space Marine Chapters. Games Workshop's Space Marine units are classified by specific names, shapes and icons on their shoulder pads, the features of which are clearly and uniquely defined in Games Workshop's background works, such as an arrow for the Tactical Squad, the use of Roman numerals, inverted "V" icons and other iconography and heraldry specific to the Chapter and squad to which a soldier belongs.

c. Chapterhouse is selling shoulder pads for Space Marines featuring symbols and bearing other unique expressions taken from a number of Games Workshop's Assault and Tactical Space Marine unit types. For example, many of the shoulder pads that Chapterhouse is selling bear not only the unique expressions described above as applying more generally to Games Workshop's products but also have studs, arrow and cross arrow designs, inverted "V" and Roman numeral icons, as well as icons associated with a number of Games Workshop's proprietary Chapters, including the Black Templars, Blood Ravens, Thousand Sons, Blood Eagles, Celestial Lions, Exorcists, Flesh Tearers, Howling Griffons, Imperial Fists, Iron Snakes, Soul Drinkers and Salamander Chapters. Chapterhouse is also selling pads that convert standard Games Workshop Space Marines into characters for other Chapters, such as the Salamander and Fleshtearers Chapters, and which borrow unique expressions relevant to that Chapter which are proprietary to Games Workshop.

d. Chapterhouse's conversion and armor kits reproduce all or substantial distinctive features of the vehicles and miniatures upon which they are based, as they are specifically configured to fit to Games Workshop's products, including: (i) the surface decoration of defendant's Salamander Drop Pod overlays, which is derived from and reproduces Games Workshop's Salamander iconography; and (ii) defendant's Rhino Tank Conversion Kits for Space Marine® Dragon or Salamander, the doors, front panels and armor sections of which, in Defendant's own words, have been specifically designed to "...accessorize the current space marine® rhino model kit. Themed in a dragon or salamander style also good for alpha legion..."

Case: 1:10-cv-08103 Document #: 147 Filed: 01/19/12 Page 13 of 25 PageID #:1545

e. For use in its conversion kits, including without limitation its Storm Raven Extension Kit and Carnifex conversion kit, Chapterhouse copies parts of the instructions and drawings from the original Games Workshop assembly instructions.

38. Subsequent to the commencement of this action, Chapterhouse has also introduced numerous new products copied from Games Workshop's original WARHAMMER 40,000 universe, including without limitation an "Armana'serq warrior" that is simply a female version of Games Workshop's masculine Eldar figures; a "Doomseer Iyanar-Duanna" figure that similarly is a female version of certain Games Workshop masculine Eldar Farseer characters and models; and a "Javelin Jet Bike" copied from Games Workshop's Space Marine Bike.

39. Chapterhouse has also announced the forthcoming release (and has published drawings) of an "Eldar Howling Banshee" that is copied from Games Workshop's Eldar Howling Banshee.

40. Consistent with the pervasive copying by defendant of Games Workshop's original works, Chapterhouse has in its possession hundreds if not thousands of Games Workshops publications and products, and has ready access to all of Games Workshop's copyrighted works.

41. By letter dated June 12, 2009, Games Workshop placed Chapterhouse directly on notice that it deemed many of its products to infringe Games Workshop's intellectual property rights. However, since then, Chapterhouse has simply expanded its business in disregard of Games Workshop's rights.

42. Upon information and belief, many consumers of Plaintiff's original WARHAMMER and WARHAMMER 40,000 books and other products and services are users of and make purchases from Defendants', including many such individuals and users in the State of Illinois.

Case: 1:10-cv-08103 Document #: 147 Filed: 01/19/12 Page 14 of 25 PageID #:1546

43. Upon information and belief, all of the products that Chapterhouse currently markets and sells are derived from and bear unique characteristics and expressions of Games Workshop's copyrighted works, including unique expressions created and set forth in great detail in Games Workshop's background published works described above.

44. Upon information and belief, all of the items produced, marketed, and sold by Chapterhouse have copied elements from (and infringe upon) Games Workshop's copyrighted characters and stories and sculptural works and/or use trademarks and symbols owned by Games Workshop to identify these sources of inspiration.

45. Similarly, at least 14 of the 15 items produced, marketed, and sold by Paulson Games have been copied from (and infringe upon) Games Workshop's copyrighted characters and stories and sculptural works.

46. On information and belief, Paulson entered his agreement with Chapterhouse for the "Super-Heavy Assault Walker" because of an inability to satisfy great consumer demand for the product, which Chapterhouse now sells at retail for \$285.

47. Defendants' development, production, marketing, and sale of their derivative works based on Games Workshop's proprietary works is without authorization or approval of Games Workshop.

48. Defendants' development, production, marketing, and sale of their derivative works based on Games Workshop's proprietary works preempts Games Workshop's ability to develop and sell its own such derivative works and compete directly with Games Workshop's "Forge World" products.

Case: 1:10-cv-08103 Document #: 147 Filed: 01/19/12 Page 15 of 25 PageID #:1547

49. Beyond the copying of protected original elements of Games Workshop's copyrighted works, Chapterhouse makes extensive unauthorized use of Games Workshop's registered and unregistered trademarks and symbols.

50. Chapterhouse makes pervasive references to Games Workshop's trademarks and symbols to identify its products (and adopts a distinctly British phrasing by use of the term "bits" to underscore the connection), including without limitation: "Vehicle Accessory Kits for Space Marines", "Imperial Guard Conversion Bits", "Assault Shoulder Pad for Space Marine with Number 7", "Soul Drinker Bits", "Salamander Bits", and "Xenomorph Head Bits for Tyranid Gaunts".

51. The very title of Chapterhouse's Website "Specializing in Custom Sculpts and Bits for Warhammer 40,000 and Fantasy" indicates prominently - and falsely - that Chapterhouse is literally acting "for" Games Workshop in creating, marketing, and selling such "bits" for the WARHAMMER 40,000 game when it has not been authorized by Games Workshop to use its brand or product names in any way.

52. Upon information and belief, such references create an association in the minds of customers between Defendants' products and those of Games Workshop and give the false impression that Chapterhouse's products are licensed by or endorsed by Games Workshop or are otherwise associated with Plaintiff.

53. As a result of the foregoing, Games Workshop has received many customer complaints and inquiries about Chapterhouse's products, indicating that customers are confused and will continue to be confused as to the origin and sponsorship of Chapterhouse's products, including whether Games Workshop has licensed Chapterhouse or otherwise given it authority to produce the products being sold through the Website.

Case: 1:10-cv-08103 Document #: 147 Filed: 01/19/12 Page 16 of 25 PageID #:1548

54. Upon information and belief, products produced and sold by Chapterhouse copied from Games Workshop's copyrighted originals and bearing trademarks and other indicia of origin with Games Workshop are also sold in substantial quantities in the secondary market (such as on eBay and other similar platforms), where purchasers are likely to be confused as to the origin of those products.

55. Exacerbating the injury to Games Workshop's reputation, the quality of many of Defendants' products is materially inferior to the quality of Games Workshop's originals, which will cause injury to Games Workshop's reputation among purchasers of Defendants' products in the original or secondary markets.

56. Chapterhouse's use of the Games Workshops trademarks, including without limitation the marks WARHAMMER, WARHAMMER 40,000, 40K, SPACE MARINE, CHAOS SPACE MARINES, ELDAR, ELDAR FARSEER, ELDAR JETBIKE, ELDAR WARLOCK, ELDAR SEER COUNCIL, TYRANID, ADEPTUS MECHANICUS, BLOOD ANGELS, DARK ANGELS, BLOOD RAVENS MARINES, IMPERIAL GUARD, BLACK TEMPLARS, ALPHA LEGION, BONESWORD, CARNIFEX, CRIMSON FISTS, FLESH TEARERS, GENESTEALER, GAUNT, HERESY ARMOUR, HORUS HERESY, HOWLING GRIFFONS, IRON HANDS, IMPERIAL FISTS, LASHWHIP, LEGION OF THE DAMNED, LIGHTNING CLAW, LUNA WOLVES, MANTIS WARRIORS, MK ARMOUR, MYCETIC SPORE, RHINO, SALAMANDER, SONS OF RUSS, SOUL DRINKER, SPACE WOLVES, SWARMLORD, TECHMARINES, TAU, THUNDER ARMOUR, THUNDER HAMMER, TERMAGANTS, TERVIGON, and YMGARL (among others) are likely to cause confusion, to cause mistake, or to deceive.

Case: 1:10-cv-08103 Document #: 147 Filed: 01/19/12 Page 17 of 25 PageID #:1549

57. The WARHAMMER Marks and WARHAMMER Registered Marks were famous at the time Defendants began using these marks.

58. Chapterhouse's use of the logos and symbols associated with Games Workshops WARHAMMER \$40,000 on and in connection with the same characters, armies and accessories for which Games Workshop uses the same, are likely to cause confusion, to cause mistake, or to deceive, including without limitation: Wings (eagle wings, angel wings), Lions, Griffon, Triptychs, Broadswords, Skull with horns, Storm bolter (gun) Sawblade with blood-drop, Clenched fist in a gauntlet, Snakes, Flaming skulls, Flaming chalice, Salamander, Dragon/salamander scales pattern, Tau Symbol, Tau - Oval vents, Tau - X marking on power/ammo packs, Tau - circle with diagonal line through it, Tau - geometric grooves, Roman numerals (combined with) arrows, X crosses and inverted V, Cog, Iron hands icon - gauntleted left hand shown palm downwards, Overlapping/banded armour, Wolf fur, Wolf skulls, Wolf tails, Raven wings with blood drop in centre, I symbol (for Inquisition), Scarab beetles, Spirit stones, Eldar iconography/symbols (seer icons etc), Eldar - Spirit Stones, Eldar - decorative gems on weapons.

59. Defendants' use of the Games Workshops trademarks has been without Plaintiff's authorization or consent.

60. Upon information and belief, Defendants' acts complained of herein have been willful and malicious, and intended to trade upon the reputation of Plaintiff and its products and services sold under its WARHAMMER Marks and thereby cause harm to Plaintiff.

**FIRST CAUSE OF ACTION**

**[Copyright Infringement by Defendants Under 17 U.S.C. § 101 et seq.]**

61. Plaintiff realleges and incorporates by reference Paragraphs 1 through 60 as though fully set forth herein.

62. Defendants' conduct as aforesaid constitutes infringement of Games Workshop's copyright in and to its literary and sculptural works.

63. For those of the infringing works produced by Paulson Games for Chapterhouse, Defendants share liability jointly and severally for said infringing conduct.

64. Defendants' conduct as aforesaid has caused great and irreparable injury to Plaintiff, and unless such conduct is enjoined, it will continue and Plaintiff will continue to suffer great and irreparable injury.

65. Plaintiff has no adequate remedy at law.

**SECOND CAUSE OF ACTION**

**[Trademark Infringement by Chapterhouse Under 15 U.S.C. § 1114(1)]**

66. Plaintiff realleges and incorporates by reference Paragraphs 1 through 65 as though fully set forth herein.

67. Chapterhouse's use in commerce of the WARHAMMER Registered Marks is likely to cause confusion, or to cause mistake, or to deceive.

68. The foregoing conduct of Chapterhouse constitutes trademark infringement in violation of 15 U.S.C. §1114(1).

69. Chapterhouse's conduct as aforesaid has caused great and irreparable injury to Plaintiff, and unless such conduct is enjoined, it will continue and Plaintiff will continue to suffer great and irreparable injury.

Case: 1:10-cv-08103 Document #: 147 Filed: 01/19/12 Page 19 of 25 PageID #:1551

70. Plaintiff has no adequate remedy at law.

**THIRD CAUSE OF ACTION**

**[False Designations of Origin by Chapterhouse Under 15 U.S.C. § 1125(a)]**

71. Plaintiff realleges and incorporates by reference Paragraphs 1 through 70 as though fully set forth herein.

72. Chapterhouse's conduct as aforesaid is likely to cause confusion, to cause mistake, or to deceive the relevant public that Chapterhouse, its products and services are authorized by or are affiliated with Games Workshop.

73. The above-described conduct of Chapterhouse constitutes use of false designations of origin and false and misleading descriptions or representations that are likely to cause confusion, to cause mistake, or to mislead as to the affiliation, connection, or association of Chapterhouse or its goods or services, with Plaintiff and its goods and services in violation of 15 U.S.C. §1125(a).

74. Chapterhouse's conduct as aforesaid has caused great and irreparable injury to Plaintiff, and unless such conduct is enjoined, it will continue and Plaintiff will continue to suffer great and irreparable injury.

75. Plaintiff has no adequate remedy at law.

**FOURTH CAUSE OF ACTION**

**[Dilution and Tarnishment by Chapterhouse Under 15 U.S.C. § 1125(c)]**

76. Plaintiff realleges and incorporates by reference Paragraphs 1 through 75 as though fully set forth herein.

77. The WARHAMMER Registered Marks are now and at all relevant times have been famous within the meaning of 15 U.S.C. § 1125(c)(2).

Case: 1:10-cv-08103 Document #: 147 Filed: 01/19/12 Page 20 of 25 PageID #:1552

78. Chapterhouse's use in commerce of the WARHAMMER Marks is likely to create associations that will impair the distinctiveness of and tarnish Plaintiff's WARHAMMER Marks.

79. Chapterhouse's conduct as aforesaid has caused great and irreparable injury to Plaintiff, and unless such conduct is enjoined, it will continue and Plaintiff will continue to suffer great and irreparable injury.

80. Plaintiff has no adequate remedy at law.

**FIFTH CAUSE OF ACTION**

**[Violation by Chapterhouse of the Illinois Anti-Dilution Statute, 765 ILCS 1036/65]**

81. Plaintiff realleges and incorporates by reference Paragraphs 1 through 80 as though fully set forth herein.

82. The WARHAMMER Registered Marks are now and at all relevant times have been famous within the meaning of 765 ILCS 1036/65.

83. Chapterhouse's use in commerce of the WARHAMMER Marks causes dilution of the distinctive quality of Plaintiff's WARHAMMER Marks.

84. Chapterhouse's conduct as aforesaid has caused great and irreparable injury to Plaintiff, and unless such conduct is enjoined, it will continue and Plaintiff will continue to suffer great and irreparable injury.

85. Plaintiff has no adequate remedy at law.

**SIXTH CAUSE OF ACTION**

**[Violation by Chapterhouse of the Illinois Deceptive Trade Practices Act,  
815 ILCS 510/1 *et seq.*]**

86. Plaintiff realleges and incorporates by reference Paragraphs 1 through 85 as though fully set forth herein.

Case: 1:10-cv-08103 Document #: 147 Filed: 01/19/12 Page 21 of 25 PageID #:1553

87. This is a claim for deceptive trade practices under the Illinois Deceptive Trade Practices Act, 815 ILCS 510/1 *et seq.*

88. Upon information and belief, Chapterhouse have/has knowingly made false and misleading representations as to the source of its goods and services, and knowingly made false representations as to its affiliation with Plaintiff.

89. Chapterhouse has caused a likelihood of confusion or misunderstanding as to the source, sponsorship, approval, or certification of goods and services by making false and misleading representations of fact.

90. Chapterhouse has caused a likelihood of confusion or misunderstanding as to the affiliation, connection, or association with or certification by Plaintiff by making false and misleading representations of fact.

91. The conduct complained of herein constitutes unfair and deceptive trade practices, in violation of 815 ILCS 510/1 *et seq.*

92. Chapterhouse's conduct as aforesaid has caused great and irreparable injury to Plaintiff, and unless such conduct is enjoined, it will continue and Plaintiff will continue to suffer great and irreparable injury.

93. Plaintiff has no adequate remedy at law.

**SEVENTH CAUSE OF ACTION**

**[Violation by Chapterhouse of the Illinois Consumer Fraud and Deceptive Business Practices Act, 815 ILCS 510/1 *et seq.*]**

94. Plaintiff realleges and incorporates by reference Paragraphs 1 through 93 as though fully set forth herein.

Case: 1:10-cv-08103 Document #: 147 Filed: 01/19/12 Page 22 of 25 PageID #:1554

95. This is a claim for unfair and deceptive trade practices under the Illinois Consumer Fraud and Deceptive Business Practices Act, 815 ILCS 505, Section 2.

96. Chapterhouse's business practices directed at Plaintiff and Plaintiff's customers constitutes an unfair and deceptive business practice as defined and prohibited by Illinois law.

97. Chapterhouse has made false and deceptive representations of material fact to Plaintiff's customers with the intent that Plaintiff's customers rely on the misrepresentations.

98. Chapterhouse has made false and deceptive representations of material fact relating to the source, sponsorship, approval, or certification of its goods and services with the intent that Plaintiff's customers rely on the misrepresentations.

99. Chapterhouse has made false and deceptive representations of material fact relating to its affiliation, connection, or association with Plaintiff or certification by Plaintiff with the intent that Plaintiff's customers rely on the misrepresentations.

100. Chapterhouse's conduct as aforesaid has caused great and irreparable injury to Plaintiff, and unless such conduct is enjoined, it will continue and Plaintiff will continue to suffer great and irreparable injury.

101. Plaintiff has no adequate remedy at law.

**EIGHTH CAUSE OF ACTION**

**[Common Law Unfair Competition–Trademark Infringement by Chapterhouse]**

102. Plaintiff realleges and incorporates by reference Paragraphs 1 through 101 as though fully set forth herein.

103. Chapterhouse's conduct as aforesaid is likely to confuse and deceive consumers about the origin of Defendants' goods and services.

Case: 1:10-cv-08103 Document #: 147 Filed: 01/19/12 Page 23 of 25 PageID #:1555

104. The foregoing conduct of Chapterhouse constitutes infringement and misappropriation of Plaintiff's common law rights in its trademarks in violation of the common law of the State of Illinois.

105. Chapterhouse's conduct as aforesaid has caused great and irreparable injury to Plaintiff, and unless such conduct is enjoined, it will continue and Plaintiff will continue to suffer great and irreparable injury.

106. Plaintiff has no adequate remedy at law.

**JURY DEMAND**

Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff demands a trial by jury as to all issues so triable in this action.

**WHEREFORE**, Plaintiff respectfully requests judgment against Defendants as follows:

1. Preliminarily and permanently enjoining Defendants, their agents, representatives, employees, assigns, and suppliers, and all persons acting in concert or privity with them, from infringing Plaintiff's copyrighted works or using any of Plaintiff's names or marks in a manner that is likely to cause confusion, to cause mistake, or from otherwise infringing, diluting, or tarnishing Plaintiff's trademarks, or from competing unfairly with Plaintiff;
2. Directing the destruction of all infringing merchandise and molds and means of producing the same;
3. Awarding Plaintiff its damages and Defendants' profits derived by reason of the unlawful acts complained of herein and/or statutory damages as provided by law;
4. Awarding Plaintiff treble damages as provided by law; and

Case: 1:10-cv-08103 Document #: 147 Filed: 01/19/12 Page 24 of 25 PageID #:1556

5. Awarding Plaintiff its reasonable attorney fees, prejudgment interest, and costs of this action as provided by law.

Dated: January 19, 2012 Respectfully submitted,

By: /s/ Scott R. Kaspar

Scott R. Kaspar (IL Bar No. 6284921)

Aaron J. Weinzierl (IL Bar No. 6294055)

FOLEY & LARDNER LLP

321 North Clark Street, Suite 2800

Chicago, IL 60654-5313

Telephone: 312.832.4500

Facsimile: 312.832.4700

Email: skaspar@foley.com; aweinzierl@foley.com

Jonathan E. Moskin (*pro hac vice*)

FOLEY & LARDNER LLP

90 Park Avenue

New York, New York 10016

Telephone: (212) 682-7474

Facsimile: (212) 687-3229

Email: jmoskin@foley.com

*Attorneys for Plaintiff Games Workshop Limited*

Case: 1:10-cv-08103 Document #: 147 Filed: 01/19/12 Page 25 of 25 PageID #:1557

**CERTIFICATE OF SERVICE**

I, Scott R. Kaspar, an attorney, hereby certify that on January 19, 2012, I caused to be filed electronically the foregoing PLAINTIFF'S SECOND AMENDED COMPLAINT with the Clerk of the Court using the CM/ECF system, which will send an electronic copy of the foregoing to counsel of record and constitutes service under Federal Rule of Civil Procedure 5(b)(2)(D) pursuant to Local Rule 5.9 of the Northern District of Illinois.

/s/ Scott R. Kaspar

**Attachment B**

**to**

**Subpoena to Testify at a Deposition in a Civil Action  
to Games Workshop Retail, Inc.**

AO 88B (Rev. 06/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action

UNITED STATES DISTRICT COURT

for the

Western District of Tennessee

Games Workshop Limited	)	
<i>Plaintiff</i>	)	
v.	)	Civil Action No. 1:10-cv-08103
Chapterhouse Studios LLC and Jon Paulson d/b/a	)	
Paulson Games	)	(If the action is pending in another district, state where:
<i>Defendant</i>	)	Northern District of Illinois )

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: Games Workshop Retail Inc.

**Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

See Attachment A

Place: Winston & Strawn LLP 1700 K Street, N.W. Washington, D.C. 20006-3817	Date and Time:  01/13/2012 10:00 am
---	---

**Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
--------	----------------

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date: 02/17/2012

CLERK OF COURT

OR

<i>Signature of Clerk or Deputy Clerk</i>	<i>/s/ K. Joon Oh</i> <i>Attorney's signature</i>
---	--

The name, address, e-mail, and telephone number of the attorney representing (name of party) Chapterhouse Studios LLC, who issues or requests this subpoena, are:

K. Joon Oh, 101 California Street, San Francisco CA 94111  
koh@winston.com, (415) 591-1564

AO 88B (Rev. 06/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. 1:10-cv-08103

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

This subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_.

I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I returned the subpoena unexecuted because: \_\_\_\_\_  
\_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0.00.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_  
\_\_\_\_\_ *Server's signature*

\_\_\_\_\_ *Printed name and title*

\_\_\_\_\_ *Server's address*

Additional information regarding attempted service, etc:

**Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)****(c) Protecting a Person Subject to a Subpoena.**

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

**(A) Appearance Not Required.** A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

**(B) Objections.** A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

**(i)** At any time, on notice to the commanded person, the serving party may move the issuing court for an order compelling production or inspection.

**(ii)** These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

**(A) When Required.** On timely motion, the issuing court must quash or modify a subpoena that:

**(i)** fails to allow a reasonable time to comply;

**(ii)** requires a person who is neither a party nor a party's officer to travel more than 100 miles from where that person resides, is employed, or regularly transacts business in person — except that, subject to Rule 45(c)(3)(B)(iii), the person may be commanded to attend a trial by traveling from any such place within the state where the trial is held;

**(iii)** requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

**(iv)** subjects a person to undue burden.

**(B) When Permitted.** To protect a person subject to or affected by a subpoena, the issuing court may, on motion, quash or modify the subpoena if it requires:

**(i)** disclosing a trade secret or other confidential research, development, or commercial information;

**(ii)** disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party; or

**(iii)** a person who is neither a party nor a party's officer to incur substantial expense to travel more than 100 miles to attend trial.

**(C) Specifying Conditions as an Alternative.** In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

**(i)** shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

**(ii)** ensures that the subpoenaed person will be reasonably compensated.

**(d) Duties in Responding to a Subpoena.**

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

**(A) Documents.** A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

**(B) Form for Producing Electronically Stored Information Not Specified.** If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

**(C) Electronically Stored Information Produced in Only One Form.** The person responding need not produce the same electronically stored information in more than one form.

**(D) Inaccessible Electronically Stored Information.** The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**

**(A) Information Withheld.** A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

**(i)** expressly make the claim; and

**(ii)** describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

**(B) Information Produced.** If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(e) Contempt.** The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty's failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(i).

**ATTACHMENT A**

**Document Subpoena – Games Workshop Retail Inc.**

For the purpose of this subpoena for production of documents and things, the following instructions shall apply and the following terms will have the meaning indicated:

**DEFINITIONS**

The terms “YOU” and “YOUR” mean you and any persons controlled by you or acting on your behalf, including any parent, subsidiary, sister, related, or predecessor companies and expressly including, without limitation, Games Workshop, Inc.; Games Workshop Maryland, Inc.; Games Workshop America, Inc.; and GW USA Manufacturing, LLC.

The terms “Plaintiff” and “Games Workshop Ltd.” refer to Plaintiff Games Workshop Limited and include any persons controlled by or acting on behalf of that entity, including without limitation all past and present officers, directors, agents, employees, contractors, agents, licensees, attorneys, predecessors, subsidiaries, parent companies (including without limitation Games Workshop Group PLC), sister companies, related companies, or affiliated companies, persons or entities acting in joint venture or partnership relationships with Games Workshop Ltd. and any others acting on their behalf and/or pursuant to their authority or control.

The term “Chapterhouse” refers to Defendant Chapterhouse Studios LLC as well as any officers, directors, employees, and authorized representatives.

The terms “this Action” and “this Litigation” refer to *Games Workshop Ltd., v. Chapterhouse Studios LLC et al.*, Case No. 10-cv-8103 in the Northern District of Illinois.

The term “Plaintiff’s Exhibit A” means Exhibit A to Plaintiff’s Response to Chapterhouse Studios’ First Set of Interrogatories, which is attached hereto as Exhibit 1.

The term "document" is synonymous in meaning and equal in scope to the usage of this term in Federal Rule of Civil Procedure 34 and its interpretation by the courts, including originals, copies, drafts or other productions of any written, graphic or otherwise recorded matter, however produced or reproduced, whether inscribed by hand, by computer or by mechanical, electronic, or photographic means.

The terms "work" or "works" refer to literary, pictorial, graphic, sculptural, or other works, as well as characters.

The term "concerning" means relating to, referring to, describing, reflecting, evidencing, constituting, or comprising.

The terms "any," "all," and "each" shall be construed to include any, all, and each.

The term "and" shall be construed to include "or" and vice versa.

The use of the singular form of any word also includes the plural and vice versa.

#### **INSTRUCTIONS**

1. If you contend that any information, document, or thing otherwise called for by any request is excluded from production or discovery, answer so much of the discovery request as is not subject to the claimed objection and, for each document or thing:

a. State whether the item shall not be produced because:

- 1) It is claimed to be privileged; or
- 2) It once existed but can no longer be located; or
- 3) It has been lost; or
- 4) It has been destroyed; and

b. For any information that is withheld on claim of privilege or other legal protection, state the basis for the claim, and without revealing information itself

privileged or protected, describe the nature of the information sufficiently to enable Chapterhouse to assess the applicability of the claim. Include the identity of each person whom you believe has knowledge of such information.

2. In producing these documents and things, identify and produce for inspection and copying not only those documents and things in your custody, but all documents and things in the custody of your attorneys, consultants, agents, other representatives, and other persons or entities subject to your control.

3. Complete production is to be made on the date and at the time indicated on the accompanying subpoena. The inspection and copying will begin at that time and will continue from day to day thereafter until completed.

4. Produce the original and all copies of each requested document and thing, as well as the file in which they are kept, including all copies which bear any additional file stamps, marginal notes, or other additional markings or writings that do not appear on the original.

5. Produce electronically stored information in TIFF format, with a load file indicating document breaks and document families such as emails and their attachments, and with metadata. Metadata here includes original filename, filetype, name of author, date created, and date last modified, for all documents for which such data is available. In addition, for email files, metadata includes the date and time of sending and/or receiving, the subject line of the email, the names of the author and all recipients in the to, from, cc, and bcc fields, to the extent known, and indications of the filenames and file-sizes of any attachments. When TIFF format would not be reasonably usable to Chapterhouse, Chapterhouse may insist on production of native form.

6. Affix a Bates number to each thing produced and to each document page produced, whether the page is in paper, TIFF, or other format.

**DOCUMENTS TO BE PRODUCED**

1. All documents concerning Chapterhouse or its products.
2. All documents concerning the design, creation, or authorship of any of the works Plaintiff claims in this Action, including without limitation as set forth in Plaintiff's Exhibit A.
3. All documents concerning ownership or chain of title of any of the works Plaintiff claims in this Action, including without limitation as set forth in Plaintiff's Exhibit A.
4. All documents constituting or concerning any statement of company policy concerning copyright or trademark rights issued or referred to by YOU, Games Workshop Ltd., or any of its affiliates, including without limitation any such statements issued to YOUR employees, agents, or contractors.
5. All documents concerning design guidelines, concept art, or references given to any artist, designer, writer, model painter, sculptor, or other author or creator for use in creating works relating to Warhammer or Warhammer 40,000.
6. All documents concerning the first publication (as publication is defined under United States copyright law at 17 U.S.C. § 101) of any of the sculptural works Plaintiff claims in this Action, including without limitation as set forth in Plaintiff's Exhibit A.
7. All documents concerning the first printing and first publication (as publication is defined under United States copyright law at 17 U.S.C. § 101) of any of the printed works Plaintiff claims in this Action, including without limitation the works identified in Plaintiff's Exhibit A and the following works:
  - Warhammer 40,000 rule book (editions 1 through 5);
  - Space Marine Collectors' Guide (editions 1 and 2);
  - Warhammer 40,000 Tyranids (editions 1 through 5);
  - Warhammer 40,000 Space Marines (editions 1 through 4);
  - Warhammer 40,000 Dark Angels (editions 1 through 3);
  - Warhammer 40,000 Chaos Space Marines (editions 1 through 4);

- Index Astartes;
- Index Astartes II;
- Index Astartes III;
- Index Astartes IV;
- The Horus Heresy Collected Visions;
- The Art of Warhammer 40,000;
- White Dwarf Magazine 249;
- How to Paint Space Marines;
- Soul Drinker;
- The Soul Drinkers Omnibus;
- Brothers of the Snake;
- Games Workshop Complete Catalog & Hobby Reference 2006-2007.

8. Documents sufficient to show YOUR annual gross revenues for each of the works Plaintiff claims in this Action, including without limitation the works identified in Plaintiff's Exhibit A, for each of the past 5 years.

9. Documents sufficient to show YOUR annual net revenues for each of the works Plaintiff claims in this Action, including without limitation the works identified in Plaintiff's Exhibit A, for each of the past 5 years.

10. Documents sufficient to show expenses claimed in calculating YOUR annual net revenues for each of the works Plaintiff claims in this Action, including without limitation the works identified in Plaintiff's Exhibit A, for each of the past 5 years.

11. All documents concerning submissions to YOU of material incorporated into any of the works Plaintiff claims in this Action, including without limitation the works identified in Plaintiff's Exhibit A.

12. All documents concerning release schedules for products created, manufactured, or distributed by or for Games Workshop Ltd., including without limitation any of the works Plaintiff claims in this Action, as set forth in Plaintiff's Exhibit A.

13. All documents constituting organization charts of Games Workshop Ltd., its subsidiaries, parent companies, sister companies, related companies, and affiliated companies, including without limitation documents listing officers, directors, or employees of YOU or any of those entities.

14. All documents reflecting communications between YOU and Games Workshop Ltd. concerning intellectual property rights belonging to or claimed by YOU or Games Workshop Ltd. relating to the works Plaintiff claims in this Action, including without limitation agreements concerning authorship, moral rights, ownership, sale, assignment, or license of intellectual property rights.

15. All documents concerning actual or threatened legal action by or against YOU or Games Workshop Ltd. concerning copyright, trademark, unfair competition, or antitrust laws, including without limitation documents concerning cease and desist letters and takedown notices to websites, with respect to any of the works Plaintiff claims in this Action, including without limitation the works identified in Plaintiff's Exhibit A.

16. All documents concerning allegations that YOU or Games Workshop Ltd. falsely claimed copyright rights or exclusivity of copyright rights.

17. Any documents concerning allegations that YOU or Games Workshop Ltd. falsely claimed trademark rights or exclusivity of trademark rights.

18. All document concerning challenges to rights claimed by any Games Workshop entity in any of the intellectual property Plaintiff claims in this Action, including without limitation the works identified in Plaintiff's Exhibit A.

19. All documents concerning the Jon Paulson that Games Workshop Ltd. sued in the Northern District of Illinois, including without limitation documents concerning Paulson Games or its products.

20. All documents concerning the litigation Games Workshop Ltd. filed against Jon Paulson.

21. All documents concerning any of Chapterhouse's independent contractors, including without limitation communications with David Sondered, Jae Chi Lee, Jeffery Nagy, Nick Villacci, Pedro Navarro, Sam Terry, Simon Summers, Tomas Fiertek, Wyatt Traina, and Zac Soden.

22. All documents concerning litigation involving YOU or Games Workshop Ltd., including without limitation the ongoing litigation between Games Workshop Ltd. and Chapterhouse Studios.

23. All documents concerning any third party's ownership or claimed ownership of any trademarks or copyrights Plaintiff claims in this Action, including without limitation the works identified in Plaintiff's Exhibit A.

24. All documents concerning any Games Workshop entity's licensing of any portion of the material Plaintiff claims in this Action, including without limitation the works identified in Plaintiff's Exhibit A.

25. All documents concerning or reflecting communications between YOU and Games Workshop Ltd., or any of its parents, affiliates, subsidiaries, sister companies, related companies, agents, or employees, concerning this document subpoena.

**Exhibit 1**

to

Games Workshop Retail, Inc. document subpoena Attachment A

(Plaintiff's Response to Chapterhouse Studios' First Set of Interrogatories and Exhibit A thereto)

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

**PLAINTIFF'S RESPONSES TO CHAPTERHOUSE STUDIOS'  
FIRST SET OF INTERROGATORIES**

Pursuant to Fed. R. Civ. P. Rule 26 (a)(1), Pursuant to Fed.R.Civ.P. Rule 33, plaintiff Games Workshop Limited ("Games Workshop") responds as follows to the First Set of Interrogatories of Defendant Chapterhouse Studios LLC ("Chapterhouse"), served by email on April 1, 2011.

**INTERROGATORIES**

**INTERROGATORY NO. 1:**

Identify each infringement of your copyrights for which you claim Chapterhouse is liable, by identifying (a) the copyright infringed; (b) the allegedly infringing product or products; (c) the exclusive right or rights of the copyright owner, as set forth in 17 U.S.C. Section 106, that you claim has been infringed; and (d) the specific conduct that constitutes the infringement.

**RESPONSE**

Games Workshop objects that this interrogatory is a premature contention request and that, as set forth in the complaint herein, calls for production of information in the possession of

defendant. Games Workshop's characters and story-lines for its Warhammer and Warhammer 40,000 series of works are present in a vast number of works authored by Games Workshop, and only defendant knows which of the foregoing works (including the twenty works identified in the complaint) defendant accessed and consulted as inspiration for his 106 works in issue.

Without prejudice to or waiver of the foregoing objections, (a) Games Workshop has identified the following as works to which it believes Chapterhouse likely had access: Warhammer 40,000 rule book (editions one through five); Space Marine Collectors' Guide (editions one and two); Warhammer 40,000 Tyrannids (editions one through five); Warhammer 40,000 Space Marines (editions one through four); Warhammer 40,000 Dark Angels (editions one through three); Warhammer 40,000 Chaos Space Marines (editions one through four); Index Astartes II, January 2002; Index Astartes III, February 2004; Index Astartes IV, June 2005; The Horus Heresy Collected Visions, June 2007; The Art of Warhammer 40,000, January 2006; White Dwarf Magazine 249, September 2000; How to Paint Space Marines, April 2005; Soul Drinkers, September 2002; Games Workshop Complete Catalog & Hobby Reference 2006-2007; (b) Games Workshop believes all 106 of Chapterhouse's products incorporate and its entire website collecting and presenting the same incorporate elements copied from Games Workshop's copyrighted works; (c) Games Workshop contends that Chapterhouse has, without limitation, reproduced copies of the copyrighted works, has prepare derivative works based upon the copyrighted works and has distribute copies thereof to the public by sale or other transfer of ownership; and (d) Games Workshop contends that Chapterhouse has infringed its copyright by copying, producing, manufacturing and selling the subject goods.

Attached hereto as Exhibit A is a summary of Games Workshop's current understanding of at least some of the likely sources of Chapterhouse's works in issue.

INTERROGATORY NO. 2:

For each of the one hundred and six Chapterhouse products that you allege infringes your copyrights, identify (a) each of your copyrights that you allege the product infringes; (b) the exclusive right or rights of the copyright owner, as set forth in 17 U.S.C. Section 106, that you claim has been infringed; and (c) the specific conduct that constitutes the infringement.

RESPONSE

Games Workshop objects that this interrogatory is needlessly cumulative and repetitive of Interrogatory 1.

Without prejudice to or waiver of the foregoing objections, Games Workshop incorporates by reference herein its responses to the foregoing Interrogatory No. 1.

Dated: May 4, 2011

Respectfully submitted,

By:   
Scott R. Kaspar

Scott R. Kaspar (IL Bar No. 6284921)  
Aaron J. Weinzierl (IL Bar No. 6294055)  
FOLEY & LARDNER LLP  
321 North Clark Street, Suite 2800  
Chicago, Illinois 60654  
Telephone: (312) 832-4500  
Facsimile: (312) 832-4700  
Email: skaspar@foley.com; aweinzierl@foley.com

Jonathan E. Moskin (*pro hac vice*)  
FOLEY & LARDNER LLP  
90 Park Avenue  
New York, New York 10016  
Telephone: (212) 682-7474  
Facsimile: (212) 687-5229  
Email: jmoskin@foley.com

*Attorneys for Plaintiff Games Workshop Limited*

**CERTIFICATE OF SERVICE**

I, Scott R. Kaspar, an attorney, hereby certify that on May 4, 2011, I caused a copy of the foregoing **PLAINTIFF'S RESPONSES TO CHAPTERHOUSE STUDIOS' FIRST SET OF INTERROGATORIES** to be served on the interested parties by causing copies of this document to be served *via* United States Mail in a sealed envelope with the postage prepaid to the following:

Jennifer A. Golinveaux, Esq.  
Thomas J. Kearney, Esq.  
J. Caleb Donaldson, Esq.  
WINSTON & STRAWN LLP  
101 California Street  
San Francisco, CA 94111  
jgolinveaux@winston.com  
tkearney@winston.com  
jcdonaldson@winston.com

Catherine B. Diggins, Esq.  
Eric J. Mersmann, Esq.  
WINSTON & STRAWN LLP  
35 West Wacker Drive  
Chicago, IL 60601  
cdiggins@winston.com  
emersmann@winston.com

Mr. Jon Paulson  
d/b/a Paulson Games  
2232 College Road  
Downers Grove, IL 60516

  
\_\_\_\_\_  
Scott R. Kaspar

**EXHIBIT A**

No.	Chapterhouse Product	Games Workshop
1	Eagle Thunder Hammer for Space Marine	Games Workshop sells Thunder Hammers, a power weapon used by Space Marines. <i>See, e.g.</i> , Space Marine Collector's Guide 2003, page 14.  High Elf and Empire are both Warhammer fantasy armies.
2	Shoulder Pad w/ Shield & Studs for Space Marine – Tactical	Forge World sell Mark V Heresy Space Marines Chaos Space Marines are a Warhammer 40,000 army. The Black Templars are a Space Marine Chapter. Their Chapter colours are black and white. The Chapter's icon is a black cross with a skull at its centre. <i>See, e.g.</i> , Index Astartes II 2003, page 45; Warhammer 40,000 Space Marine Land Speeder 1998, page 5.
3	Skull or Chaplain Head Bit for Space Marines	Chaplains are a rank within the Space Marines army. Their iconography heavily features skulls. <i>See, e.g.</i> , Space Marine Chaplain with skull helmet available on the Games Workshop website.
4	Shoulder Pads for Blood Eagle – Tactical	The Blood Ravens are a Space Marine Chapter for the Dawn of War computer game (produced under licence from Games Workshop). <i>See, e.g.</i> , The Art of Warhammer 40,000 2006, page 71.  Forge World sells a Blood Raven decal/transfer sheet on its website - Decals are used to decorate Space Marines, including shoulder pads.  The Blood Angels are a Space Marine Chapter. Their iconography includes blood drops. <i>See, e.g.</i> , Index Astartes II 2002, page 31.
5	Shoulder Pads for Blood Eagle – Terminator	The Blood Ravens are a Space Marine Chapter for the Dawn of War computer game (produced under licence from Games Workshop). <i>See, e.g.</i> , The Art of Warhammer 40,000 2006, page 71.  Terminator refers to a type of Space Marine armour. Games Workshop sells Space Marines in Terminator armour.
6	Celestial Lions Left Arm Shoulder Pad Bit - Tactical	The Celestial Lions is a Space Marine Chapter. <i>See, e.g.</i> , White Dwarf magazine issue 249, page 33.  The Celestial Lions Chapter symbol is the head of a Lion on a blue or black background.
7	Celestial Lions Right Arm Shoulder Pad Bit - Tactical	Celestial Lions/Lions Rampant – See product 6

## EXHIBIT A

No.	Chapterhouse Product	Games Workshop
8	Shoulder Pads for Deathwatch or Dark Angels - Tactical	<p>The Dark Angels is a Space Marine Chapter. <i>See</i> Index Astartes I 2002, page 19.</p> <p>The Death Watch is a Space Marine Chapter. <i>See</i> Index Astartes II 2002, page 42.</p> <p>The Inquisition is a Warhammer 40,000 army.</p>
9	Shoulder Pads for Deathwatch or Dark Angels - Terminator	<p>Image shows 3 arches: middle arch contains a Long Sword; right arch contains an angel wing - these are Dark Angel icons. It looks like the left arch contains a storm bolter (a type of Space Marine gun).</p> <p>The Dark Angels Chapter colours are bone white and green. Their iconography includes images of angel wings, broadswords and figures in hooded cassocks. Triptychs (three panelled artwork) also form a part of their iconography.</p> <p>Triptychs are shown on the central character's belt and also the gun being fired at the bottom of the artwork.</p> <p>Death Watch and Inquisition – <i>see</i> product 8</p>
10	Power Armour Pad for Exorcist	<p>Games Workshop's Space Marine Chapter is called Exorcists in the plural. Their icon is a skull with horns curving downwards. <i>See</i> White Dwarf magazine issue 249, page 33.</p> <p>Librarian is a rank in the Space Marine army.</p>
11	Terminator pad for Exorcist Space Marine	Exorcists & Librarians - <i>see</i> product 10
12	Sawblade Shoulder Pad & Jewel	<p>The Flesh Tearers are a Space Marine Chapter. Their icon is a circular saw blade with a blood drop in the centre. The Chapter's colours are black and red. <i>See</i> Index Astartes II, page 49.</p> <p>Games Workshop sells Flesh Tearers shoulder pads.</p>
13	Terminator Shoulder Pad for Flesh Tearers	Flesh Tearers - <i>see</i> product 12.

## EXHIBIT A

No.	Chapterhouse Product	Games Workshop
		Terminator – <i>see</i> product 5.
14	Howling Griffon Shoulder Pads for Space Marines	<p>The Howling Griffons are a Space Marine Chapter. Their icon is a griffon and their Chapter colours are red and yellow.</p> <p><i>See</i> The Art of Warhammer 40,000 2006, page 71.</p>
15	Shoulder Pads for Imperial Fist – Tactical Marines	<p>Loyalist refers to the Space Marine Chapters that fight for the Imperium of Mankind. The Imperial Fists are a Space Marines Chapter. Their icon is a clenched hand. The hand is always shown in a gauntlet (armoured glove). Their Chapter colour is yellow. <i>See</i> Index Astartes II 2002, page 13.</p> <p>Games Workshop sells Imperial Fists shoulder pads.</p> <p>The Crimson Fists are a Space Marines Chapter. Their icon is also a clenched hand in a gauntlet. Their Chapter colours are red and blue. <i>See</i> Index Astartes IV 2004, page 39.</p> <p>Games Workshop sells Crimson Fists shoulder pads The Second Founding is when the Space Marine Legions (First Founding) were first split down into Chapters (Second Founding).</p> <p>Tactical - <i>see</i> product 54.</p>
16	Shoulder Pad for Imperial Fist – Terminator Marine	<p>Loyalist – <i>see</i> product 15.</p> <p>Imperial Fist – <i>see</i> product 15.</p> <p>Crimson Fist – <i>see</i> product 15.</p> <p>Second Founding – <i>see</i> product 15.</p> <p>Terminator – <i>see</i> product 5.</p>
17	Shoulder Pads for Serpent or Iron Snakes - Tactical	<p>The Iron Snakes are a Space Marine Chapter used in the Games Workshop Black Library novels. <i>See</i> The Art of Warhammer 40,000 2006, page 70.</p> <p>The Iron Snakes icon is a snake facing left with its mouth open and its body</p>

## EXHIBIT A

No.	Chapter/House/Product	Games Workshop
		arched.
18	Shoulder Pads for Serpent or Iron Snakes - Terminator	Iron Snakes – <i>see</i> product 17. Terminator – <i>see</i> product 5.
19	Shoulder Pad w/ Studs and Skull for Space Marine - Tactical	The shoulder pad shown is based on Mk V Heresy armour – <i>see</i> product 2. Loyalist – <i>see</i> product 15. Chaos Space Marine – <i>see</i> product 2. The Legion of the Damned is a Space Marine Chapter. \\ <i>See</i> How to paint Space Marines 2004, page 85. They use the skull emblem on their shoulderpads. Games Workshop sells Legion of the Damned models on its website. Tactical – <i>see</i> product 54.
20	Shoulder Pad w/ Skull and Flames for Space Marines - Tactical .	Space Marines show their Chapter icon on their left shoulder. <i>See</i> Warhammer 40,000 Chaos Space Marines 2007, page 21. The Sanctified is a Chaos Space Marine Legion. It has a flaming skull as its icon. Loyalist – <i>see</i> product 15. Chaos Space Marine – <i>see</i> product 2. Legion of the Damned - <i>see</i> product 19. Tactical – <i>see</i> product 54.
21	Shoulder Pad Star Fox / Luna Wolves Tactical	The Star Fox is a fan created Space Marine Chapter. The Luna Wolves are a Space Marine Legion. Their Legion icon incorporates a black wolf's head shown face on. <i>See</i> Index

## EXHIBIT A

No.	Chapterhouse Product	Games Workshop
		Astartes IV, 2004, page 3.  Tactical – <i>see</i> product 54.
22	Shoulder Pad Star Fox / Luna Wolves Terminator	Star Fox/Luna Wolves – <i>see</i> product 21. Terminator – <i>see</i> product 5.
23	Shoulder Pads for Chalice or Soul Drinker - Tactical	The Soul Drinkers are a Space Marine Chapter used in the Games Workshop Black Library novels. <i>See</i> Soul Drinkers 2002, front cover.  The Soul Drinkers Chapter colour is purple and their icon is a gold chalice with spikes rising up from the bowl of the cup.  Tactical – <i>see</i> product 54.
24	Shoulder Pads for Chalice or Soul Drinker - Terminator	Soul Drinkers – <i>see</i> product 23.  Terminator – <i>see</i> product 5.
25	Dragon or Salamander Icon Shoulder Pad Bit - Tactical	The Salamanders are a Space Marine Chapter. Their iconography is a crested lizard head and they use scales as armour decoration. The Chapter's colours are green and black. <i>See</i> Index Astartes IV, 2004, page 19.  Tactical – <i>see</i> product 54.
26	Dragon or Salamander Icon Shoulder Pad - Terminator	Salamanders – <i>see</i> product 25.  Terminator – <i>see</i> product 5.
27	Dragon or Salamander Power Fist	Salamanders – <i>see</i> product 25. A power fist is a Space Marine weapon. Forge World sells a power fist A lightning claw is a Space Marine weapon. Games Workshop sells lightning claws. Terminator – <i>see</i> product 5. Power armour – <i>see</i> product 3.
28	Dragon or Salamander Storm Shield Diamond Scales	Salamanders – <i>see</i> product 25.  Space Marines use Storm Shields. Games Workshop sells these on its website - High Elf – <i>see</i> product 1. Power armour – <i>see</i> product 3.  Terminator – <i>see</i> product 5.
29	Dragon or Salamander Storm Shield - Smooth no skull	Storm shield – <i>see</i> product 28.

## EXHIBIT A

No.	Chapterhouse Product	Games Workshop
		<p>Index Astartes IV 2004, page 19.</p> <p>Example of scales shown on Salamanders Space Marines.</p> <p>High Elf – <i>see</i> product 1.</p> <p>Power armour – <i>see</i> product 3.</p> <p>Terminator – <i>see</i> product 5.</p>
30	Dragon or Salamander Storm Shield - Smooth w/ skull	<p>Salamanders – <i>see</i> product 25.</p> <p>Storm shield – <i>see</i> product 28.</p> <p>High Elf – <i>see</i> product 1.</p> <p>Power armour – <i>see</i> product 3.</p> <p>Terminator – <i>see</i> product 5.</p>
31	Dragon or Salamander Thunder Hammer	<p>Thunder hammer – <i>see</i> product 1.</p> <p>Power weapon – <i>see</i> product 1.</p> <p>Salamanders – <i>see</i> product 25.</p> <p>High Elf and Empire – <i>see</i> product 1.</p>
32	Salamander, Alpha Legion or Dragon Conversion Kit for Land Raider	<p>The Land Raider is a Space Marine vehicle. Games Workshop sells Land Raiders on its website.</p> <p>Salamanders – <i>see</i> product 25.</p> <p>Forge World sells a Salamanders conversion kit for the Land Raider on its website.</p> <p>The Alpha Legion is a Space Marine Legion. Its icon is a creature that has the body of a snake and three horned dragon heads. The colour of the icon is bright green.</p> <p>Index Astartes IV, 2004, page 31.</p>

## EXHIBIT A

No.	Chapterhouse Product	Games Workshop
33	Vehicle Icons for Flesh Tearers	<p>Forge World sells an Alpha Legion Land Raider conversion kit on its website. Heavy bolter and Assault cannon are Space Marine weapons.</p> <p>Flesh Tearers – <i>see</i> product 12.</p> <p>Rhinos, Land Raiders, Drop pods and Land Speeders are Space Marine vehicles.</p> <p>A Dreadnought is a type of Space Marine. Games Workshop sells Dreadnoughts.</p>
34	Combi Weapon Magnetic Kit	<p>Each of the weapons is a GW weapon by name and look.</p> <p>A combi weapon is a weapon such as a rifle or pistol which can have a second weapon mounted on to it.</p> <p>A melta gun fires a wave of energy that heats up the target, causing it to explode. A plasma gun fires a ball of super heated energy.</p> <p>In the Warhammer 40,000 background, Space Marines can use combi-weapons. In the game's rules this is represented by the Space Marine player having the option of arming his models with one of three types of combi-weapon: melta, plasma or flamer. The rules also provide the option of attaching a grenade launcher to the Space Marine's combi-weapon. <i>See</i> Warhammer 40,000 Space Marines, page 97.</p>
35	Farseer Jetbike Seer Council Kit	<p>A Farseer is a character from the Eldar army. Games Workshop sells Eldar Farseers on its website - Oval shaped gems are frequently used on Eldar clothing, weapons and vehicles.</p> <p>A jetbike is an Eldar army vehicle. Games Workshop sells Eldar jetbikes on its website.</p> <p>The Seer Council are a unit in the Eldar army. Games Workshop sells the Seer Council on its website.</p>
36	Warlock Jetbike Seer Council Kit	<p>Jetbike – <i>see</i> product 35.</p> <p>Seer Council – <i>see</i> product 35.</p> <p>The Warlock is a character from the Eldar army. Games Workshop sells Warlocks on its website.</p>

## EXHIBIT A

No.	Chaparral Products	Games Workshop
37	Conversion kit for Tyranid Tervigon	Tyranids are a Warhammer 40,000 army. The Tervigon is a type of Tyranid creature. <i>See</i> Warhammer 40,000 Tyranids 2009, page 52. The Termagants and Trygon are also creatures from the Tyranid army.
38	Lashwhips - Tyrant Size	The Tyrant is a Tyranid creature – <i>see</i> product 37.  The lashwhip is a weapon used by Tyranid creatures, including the Tyrant. The lashwhip forms part of the creature's arm rather than it being held in its hand.  Games Workshop sells the Tyrant on its website.
39	Lashwhips - Warrior Size	Tyranids – <i>see</i> product 37.  Lashwhip – <i>see</i> product 38.  A Warrior is a type of Tyranid creature. Games Workshop sells Tyranid Warriors.
40	Tyrant Bonesword Arms for Tyranids	A bonesword is a weapon used by Tyranid creatures. It forms part of the creature's arm rather than being held in its hand. <i>See</i> Codex Tyranids 2009, page 66.  A Swarmlord is a Tyranid creature. See the 'Guide to the Warhammer 40,000 Universe'. Warhammer 40,000 Tyranids 2009, page 56.
41	Warrior Bonesword Arms for Tyranids	Bonesword – <i>see</i> product 40.  Warrior – <i>see</i> product 39.
42	Ymgarl Heads for Tyranid Genestealers - Set	Genestealers are creatures in the Tyranid army. The Ymgarl is a variant of a Genestealer.  As part of the Tyranid Genestealer boxed set, Games Workshop included a head component which can convert a Genestealer model into a Genestealer Ymgarl. The components are © Games Workshop 2004. Warhammer 40,000 Tyranids 2010, page 61.
43	SXV-141 Super-Heavy Assault Walker SAW	The Tau refers to the Tau Empire, a Warhammer 40,000 army. The Tau Empire use rail guns as weapons on their vehicles. The Tau decorate their clothing, weapons and vehicles with the Tau Empire symbol. <i>See</i> Tau

## EXHIBIT A

No.	Chapterhouse Product	Games Workshop
		<p>Empire decal sheet, 2001.</p> <p>An Imperial Titan is a large walking weapons platform used by Imperial forces such as the Space Marines or Imperial Guard.</p>
44	Assault Shoulder Pad for Space Marine with number 7	<p>Assault is a type of Space Marine squad. An Assault squad will have an 'X' symbol and their squad number shown on their right shoulder pads. The squad number will be between 1-10.</p> <p>Games Workshop sells assault squad shoulder pads.</p> <p>Power armour – <i>see</i> product 10.</p> <p>Tactical – <i>see</i> product 54.</p>
45	Assault Shoulder Pad for Space Marine with number 8	<p>Assault – <i>see</i> product 46.</p> <p>Power armour – <i>see</i> product 10.</p> <p>Tactical – <i>see</i> product 54.</p>
46	Assault Squad Shoulder Pad for Space Marine - Plain	<p>Assault – <i>see</i> product 44.</p> <p>Power armour – <i>see</i> product 10.</p> <p>Tactical – <i>see</i> product 54.</p>
47	Crested Pad for Space Marine	<p>Space Marine Captain has a crested shoulderpad with 'rivets' along the edge where the crest attaches to the pad</p> <p>Loyalist – <i>see</i> product 16.</p> <p>Chaos Space Marine – <i>see</i> product 2.</p> <p>Tactical – <i>see</i> product 54.</p>
48	Devastator Shoulder Pad for Space Marine - Plain	<p>Devastator is a type of Space Marine squad. A Devastator squad has an inverted 'V' symbol on their right shoulder pads. <i>See</i> Warhammer 40,000 Space Marines 2004, page 70.</p> <p>A Devastator squad member will have their squad number shown on their right shoulder pads. The squad number will be between 1-10. The colors on the shoulder pad refer to a Chapter colour, <i>i.e.</i>, blue and gold are the colours of the Ultramarines Space Marine Chapter. <i>See</i> Index Astartes III 2003, page 23</p> <p>Power armour – <i>see</i> product 3.</p>

## EXHIBIT A

No.	Chapmanhouse Product	Games Workshop
49	Devastator Shoulder Pad for Space Marine with number 9.	Devastator – <i>see</i> product 48.  Tactical – <i>see</i> product 54.
50	Devastator Shoulder Pad for Space Marine with number 10.	Devastator – <i>see</i> product 48.  Tactical – <i>see</i> product 54.
51	First Squad or 1 Shoulder Pads - tactical.	Loyalist – <i>see</i> product 15.  Tactical – <i>see</i> product 54.
52	Generic Power Armour Shoulder Pad for Space Marine - Plain	Games Workshop's Sci-Fi Shoulder pad has the unique characteristics of <ul style="list-style-type: none"> <li>o Covering from start of shoulder to above the elbow</li> <li>o Large border around outer edge</li> <li>o Left shoulder pad – squad markings</li> <li>o Right shoulder pad – Chapter symbol</li> </ul>
53	Smooth Shoulder Pad for Space Marine - no raised areas	<i>See</i> 52 above.
54	Tactical Shoulder Pad for Space Marine	Tactical is a type of Space Marine squad. A Tactical squad will have an upward pointing arrow symbol on their right shoulder pad. A Tactical squad member will have their squad number shown on their right shoulder pads. The squad number will be between 1-10. The colours on the shoulder pad refer to a Chapter colour, <i>i.e.</i> , red and gold are the colours of the Blood Angels Space Marine Chapter. <i>See</i> product 4. Games Workshop sells Tactical shoulder pads.
55	Tactical Shoulder Pad for Space Marine with number 1.	Tactical – <i>see</i> product 54.
56	Tactical Shoulder Pad for Space Marine with number 2	Tactical – <i>see</i> product 54.
57	Tactical Shoulder Pad for Space Marine with Number 3	Tactical – <i>see</i> product 54.
58	Tactical Shoulder Pad for Space Marine with Number 4.	Tactical – <i>see</i> product 54.
59	Tactical Shoulder Pad for Space Marine with number 5	Tactical – <i>see</i> product 54.
60	Tactical Shoulder Pad for Space Marine with number 6	Tactical – <i>see</i> product 54.

## EXHIBIT A

No.	Chapterhouse Product	Games Workshop
61	Salamanders or Dragon Drop Pod Armor or door panel	A drop pod is a Space Marine vehicle. Games Workshop sells drop pods on its website –The icon on the Chapterhouse door is based on the Salamanders Chapter icon – <i>see</i> product 25.
62	Salamander Dragon Skull Shoulder Pad Bit –Tactical	The icon on the Chapterhouse pad is based on the Salamanders Chapter icon – <i>see</i> product 25.
63	Salamander Dragon Skull Shoulder Pad - Terminator	The icon on the Chapterhouse pad is based on the Salamanders Chapter icon – <i>see</i> product 25.  Tactical – <i>see</i> product 54.  Terminator – <i>see</i> product 5.
64	Salamander Dragon Thunder Hammer - Smooth	The icon on the left side of the head on the far left hammer is based on the Salamanders Chapter icon – <i>see</i> product 25.  Power weapon and thunder hammer – <i>see</i> product 1.  Terminator – <i>see</i> product 5.  High Elf and Empire – <i>see</i> product 1.
65	Dragon Salamander Head Bit Space Marine	Salamanders – <i>see</i> product 25.  This is based on a Space Marine Mk 7 helmet. <i>See</i> Warhammer 40,000 Space Marines 2008, page 71.  Noted characteristics: <ul style="list-style-type: none"> <li>• Rectangular open vent on top of helmet</li> <li>• Shape of eyes</li> <li>• Two tubes entering the jawline on each side</li> <li>• Box shape covering ear section</li> </ul>
67	Cog Shoulder Pad - Power Armor	Iron Hands – <i>see</i> product 68.  The Adeptus Mechanicus are an organisation in the Warhammer 40,000 background. Their icon is a skull within a cog. The Art of Warhammer 40,000 2006, page 201. Techmarines are a rank within the Space Marines army. They are the mechanics of the army and are strongly associated with the Adeptus Mechanicus and

## EXHIBIT A

No.	Chapterhouse Product	Games Workshop
		technology.
68	Shield for Iron Hands	<p>The Iron Hands are a Space Marine Chapter. Index Astartes 2003, page 3.</p> <p>The Iron Hands Chapter icon is a gauntleted left hand, shown palm downwards. Index Astartes III 2003, page 3.</p> <p>The Chapter is strongly associated with technology - cogs and power cables feature on their armour and vehicles.</p> <p>Index Astartes III 2003, page 3.</p> <p>Power armour – <i>see</i> product 3.</p> <p>Terminator – <i>see</i> product 5.</p>
69	Shoulder Pad for Iron Hands Power Armor	Iron Hands – <i>see</i> product 68.
70	Shoulder Pad for Iron Hands Terminator armor	<p>Power armour – <i>see</i> product 3.</p> <p>Iron Hands – <i>see</i> product 68.</p> <p>Terminator – <i>see</i> product 5.</p>
71	Banded Armor Terminator Pad	<p>This is Mk1 Space Marine Armour – <i>see</i> 66 above.</p> <p>Iron Hands – <i>see</i> product 68.</p> <p>Terminator – <i>see</i> product 5.</p>
72	Banded Power Armour Shoulder Pads	<p>This is Mk1 Space Marine Armour – <i>see</i> 66 above.</p> <p>Power armour – <i>see</i> product 3.</p> <p>Iron Hands – <i>see</i> product 68.</p>
73	Studded Rimmed Shoulder Pad MKV	<p>Mk V armour – <i>see</i> product 2.</p> <p>Loyalist – <i>see</i> product 15.</p> <p>Chaos Space Marines – <i>see</i> product 2.</p>

## EXHIBIT A

No.	Chapter/Books/ Product	Games Workshop
		Tactical – <i>see</i> product 54.
74	Five (5) Heresy Era Jump Packs for Space Marines	Space Marines use jump packs. Heresy refers to the type of jump pack used during the Horus Heresy. <i>See</i> The Horus Heresy – Collected Visions 2007, page 284.
75	Masked Heresy Heads for Space Marines – 4	Heresy refers to Mk V Heresy armour – <i>see</i> product 2.
76	MK I Heresy Era for Space Marine “Thunder Armor” Shoulder Pad	Thunder armour is the alternative name for Mk I Space Marine armour. <i>See</i> product 68.  Loyalist – <i>see</i> product 15.  Chaos Space Marines – <i>see</i> product 2.  Tactical – <i>see</i> product 54.
77	Spikey Heresy Heads for Space Marines	Heresy refers to Mk V Heresy armour – <i>see</i> product 2.
78	Studded Power Armor Pad for MK 5	Mk V armour – <i>see</i> product 2.  Power armour – <i>see</i> product 3.

## EXHIBIT A

No	Chapterhouse Product	Games Workshop
79	Rhino Conversion Kit for Space Wolves	<p>A Rhino is a Space Marine vehicle used by the Space Wolves Chapter. <i>See</i> Codex Space Wolves 2000, page 19.</p> <p>The Space Wolves Chapter's iconography includes wolf skulls, wolf tails and fangs.</p> <p>Space Marine Collector's Guide 2003, page 32.</p> <p>Forge World sells a Space Wolves conversion pack for the Rhino.</p>
80	Storm Combat Space Tech Shield for Wolves	<p>Space Wolves are a Space Marine Chapter. <i>Index Astartes II</i> 2002, page 3.</p> <p>Sons of Russ is a reference to Leman Russ, the Space Wolves founder (Primarch).</p> <p>Storm shields and combat shields are used by Space Marines.</p> <p><i>See</i> 79 above for further information about Space Wolves.</p>
81	Generic Hammer 2	<p>Thunder hammers – <i>see</i> product 1.</p> <p>Empire – <i>see</i> product 1.</p>
82	Imperial or Eagle Storm Shield	<p>High Elf and Empire – <i>see</i> product 1.</p> <p>Storm shields – <i>see</i> product 28.</p> <p>Power armour – <i>see</i> product 1.</p>

EXHIBIT A

No.	Chapterhouse Products	Games Workshop
83	"Heresy" Armoured Drop Pod Door	<p>Terminators – <i>see</i> product 5.</p> <p>Drop pod – <i>see</i> product 63.</p> <p>Heresy is a reference to Mk V Space Marine armour – <i>see</i> product 2. <i>See also</i> Mk 1 Space Marine armour.</p>
84	Armoured Rhino for Space Marine Tank Door & Armor Kit	<p>The pattern on these components is Mk 1 type Space Marine armour – <i>see</i> product 66.</p> <p>Rhino – <i>see</i> product 79.</p> <p>Heresy – <i>see</i> product 2.</p>
85	Rhino Tank Conversion Kit for Space Marine Dragon or Salamander	<p>Rhino – <i>see</i> product 79.</p> <p>Salamanders – <i>see</i> product 25.</p> <p>Two pieces have the Salamanders Space Marine Chapter icon on them. Two others join together to make a Salamanders icon.</p> <p>Index Astartes IV, 2004, page 19.</p>
86	Mycetic Spore for Tyranids	<p>Tyranids and Carnifex – <i>see</i> product 37.</p> <p>A Mycetic spore is a Tyranid creature. It is used to transport other Tyranid creatures from vessels in orbit onto a planet. Warhammer 40,000 Tyranids 2009, page 54.</p> <p>Gaunts are a type of Tyranid creature.</p> <p>The two Tyranid miniatures in Chapterhouse's image are a Carnifex (with Chapterhouse's Tervigon components attached) and a Games Workshop Termagaunt.</p>
87	Pre-Heresy Scarab Shoulder Pads for Thousand Sons Marines – Term	<p>The Thousand Sons are a Chaos Space Marine Legion.</p> <p>Index Astartes 2003, page 41.</p> <p>Scarabs were featured on their armour prior to and during the Horus Heresy. The Horus Heresy – Collected Visions 2007, page 90.</p>

## EXHIBIT A

No.	Chapter House/Product	Games Workshop
88	Scarab Shoulder Pad for Thousand Sons - Power Armor	Thousand Sons - <i>see</i> product 87.
89	Starburst Shoulder Pad for Thousand Sons Marines - Power Armor	The Thousand Sons Chapter icon was originally a circle with eight points. The Horus Heresy – Collected Visions 2007, page 48.
90	Shoulder Pad for Mantis Warriors Marines - Power Armor (1)	The Mantis Warriors are a Space Marine Chapter. White Dwarf 101 1988, page 72.
91		
92	Shoulder Pad for Blood Ravens Marines - Terminator	Blood Raven/Blood Angles – <i>see</i> product 4.
93	Shoulder Pad for Blood Ravens Marines - Power Armor	Blood Raven/Blood Angles – <i>see</i> product 4.
94	Dragon or Salamander Variant Rhino Door Kit	Space Wolves – <i>see</i> product 79. Rhino – <i>see</i> product 79. Alpha Legion – <i>see</i> product 32. The side door components are decorated with Salamanders Chapter icons – <i>see</i> product 25.
95	Rhino Conversion #2 kit For Space Wolves	Space Wolves - <i>see</i> product 79. The Space Wolves Chapter decorates its vehicles with wolf's heads shown face on. <i>See</i> Warhammer 40,000 Space Wolves 2009, page 78.
96	Tactical Rhino Doors with Skulls Kit	Games Workshop sells products decorated with piles of skulls.
97	Rhino Tank Conversion Kit for Iron Snakes	The three components on the top row have Iron Snakes icons. <i>See</i> product 17.

## EXHIBIT A

CERTIFICATE OF SERVICE

I hereby certify that on February 17, 2012, I provided service of

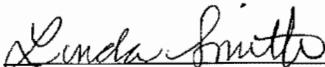
**RE-NOTICE AND SUBPOENA TO GAMES WORKSHOP RETAIL, INC.**

**RE-NOTICE OF DEPOSITION OF JOHN BLANCHE**

to the person or persons listed below by the following means: First Class Mail and email.

Scott R. Kaspar  
Aaron J. Weinzierl  
FOLEY & LARDNER LLP  
321 North Clark Street, Suite 2800  
Chicago, IL 60654-5313  
Telephone: 312.832.4500  
Facsimile: 312.832.4700  
Email: [skaspar@foley.com](mailto:skaspar@foley.com)  
[aweinzierl@foley.com](mailto:aweinzierl@foley.com)

Jonathan E. Moskin  
FOLEY & LARDNER LLP  
90 Park Avenue  
New York, New York 10016  
Telephone: (212) 682-7474  
Facsimile: (212) 687-3229  
Email: [jmoskin@foley.com](mailto:jmoskin@foley.com)

Signature: 

Date: February 17, 2012

Name: Linda Smith