

EXHIBIT A

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re :
: Chapter 11
:
ATARI, INC., *et al.*, :
: Case No. 13-10176 (JLG)
:
Reorganized Debtors.¹ : (Jointly Administered)
:

**NOTICE OF DEPOSITION OF ATARI S.A. PURSUANT TO RULE 30(b)(6)
OF THE FEDERAL RULES OF CIVIL PROCEDURE, AS
INCORPORATED IN THE BANKRUPTCY RULES**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure as incorporated in this contested matter by Rules 7030 and 9014 of the Federal Rules of Bankruptcy Procedure, movant Alden Global Value Recovery Master Fund, L.P., through its representative Alden Global Capital LLC ("Alden"), by and through its undersigned counsel,

¹ The Reorganized Debtors in these chapter 11 cases are Atari, Inc., Atari Interactive, Inc., Humongous, Inc., and California US Holdings, Inc.

will take the deposition upon oral examination of a witness or witnesses to be designated by Atari S.A. (“Atari”) as the most knowledgeable person(s) to testify regarding the matters set forth in Exhibit A hereto. Atari is required to designate one or more persons to testify on its behalf as to all information known or reasonably available to Atari in connection with those Subjects of Examination.

PLEASE TAKE FURTHER NOTICE that the deposition will be conducted on **February 18, 2016 at 9:30 a.m. (prevailing Eastern Time)** at the offices of DLA Piper LLP (US), 1251 Avenue of the Americas, 27th Floor, New York, New York 10020. The deposition will be taken before a notary public or other person duly authorized by the court to administer oaths and may be videotaped. The deposition will continue from day to day until completed.

Dated: New York, New York
February 4, 2016

DLA PIPER LLP (US)

By: /s/ John J. Clarke, Jr.
John J. Clarke, Jr.
Daniel G. Egan

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SUBJECTS OF EXAMINATION

1. Any and all facts concerning and/or supporting the assertion made by Atari Europe SAS and Atari S.A. at page 11, ¶ 36 of the Opposition of Atari, S.A., Atari Europe, SAS, and The Reorganized Debtors, dated January 21, 2016 [Doc. No. 590] (the “Atari Objection”), that “[i]n or about March 2015, Atari Europe discovered that the effective global rate (Taux Effectif Global (“TEG”)) provided in the Credit Agreement was stated incorrectly.”
2. Any and all facts concerning and/or supporting the statements made in the Declaration of Frédéric Chesnais in Support of Opposition of Atari, S.A., Atari Europe, SAS, and the Reorganized Debtors to Motion of Alden Global Value Recovery Master Fund, L.P. to Reopen these Chapter 11 Cases, Require Compliance with the Chapter 11 Plan and Confirmation Order, and Enjoin Further Violations by the Debtors and Affiliates [Doc. No. 591] (“Chesnais Declaration”).
3. The Transfer Agreement, dated as of February 5th, 2013, among The Bluebay Value Recovery Master Fund Limited, Alden Global Value Recovery Master Fund, L.P, Atari Europe SAS, and Atari S.A. (the “Transfer Agreement”), attached as Exhibit A to the Chesnais Declaration, including without limitation the representation therein by the Original Borrower and the Original Guarantor that .

[Atari Europe SAS] received all appropriate letter(s) (as updated or supplemented from time to time) required in connection with the indicative calculation of the effective global tax rate (taux effectif global), as per Article 10.5 (Effective Global Rate (Taux Effectif Global) of the Credit Facility Agreement, Section L 313-4 of the French Code monetaire et financier and Sections L 313-1 et seq. of the French Code de la consommation.

Transfer Agreement, § 4.3(iv).

4. The Debtors' Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code, dated September 20, 2013, as amended [Doc. No. 497-1] (the "Plan"), including without limitation section 12.9 (the "Plan Release"), section 12.6 (the "Exculpation Clause") and Article XIII ("Retention of Jurisdiction") thereof.
5. The Findings of Fact, Conclusions of Law and Order Confirming the Debtors' Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code, entered on December 5, 2013 [Doc. No. 497] (the "Confirmation Order"), including without limitation paragraphs 27-35 thereof.
6. Any and all facts concerning and/or supporting any claims that Atari Europe SAS and/or Atari S.A. may have against any party other than Alden concerning the calculation of the effective global rate (Taux Effectif Global ("TEG")) in connection with the Credit Agreement, dated April 26, 2006, for which Atari S.A. is a guarantor.