

### Fri, 08 January 2016 - 1:14pm PST by Yael P

## Online ports to improve your NHL 15 connection

If you have trouble connecting online in NHL 15, try opening or forwarding these ports to improve your connection.

## Opening or forwarding ports often improves connection issues

If you experience connectivity issues with any of our online games, and you have exhausted all basic connection troubleshooting such as clearing the cache, adjusting privacy settings, or disabling firewalls, you may need to add a port to your network connection.

Follow the instructions to open TCP or UDP ports for connection issues article and use the corresponding platform ports below:

## Pick your platform and use the designated ports

PLATFORM	UDP	ТСР	
Xbox One	3659; 6000; 10000-10150	80; 443; 10000-10150; 42127	
Xbox 360	3074	3074	
PlayStation 4	3659; 6000; 10000-10150	80; 443; 10000-10150; 42127	
PlayStation 3	3659; 6000; 10000-10150	80; 443; 10000-10150; 42127	



#### **Related Articles**

NHL 15 game update information

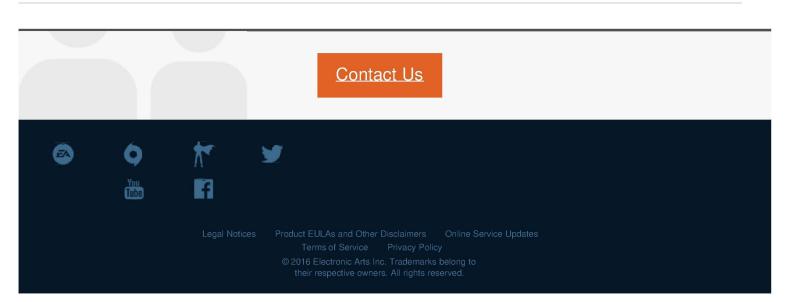
The latest patch notes are now available.

#### Hockey Ultimate Team Q&A for NHL 15

Answering some of your common questions about Hockey Ultimate Team in NHL 15. Where can I find out about NHL 15 HUT? Here is what you can expect to see when you jump into HUT in NHL 15.

#### NHL 15 announcement and features info

Read about what's coming to NHL 15 on Gen 3 and Gen 4.



Plants vs. Zombies Garden Warfare - Online ports to improve your PvZ Garden Warfare connection Case 1:16-cv-00454-RGA Document 452-1 Filed 04/04/18 Page 5 of 58 PageID #: 37053

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<u>Take Survey</u>	<u>No. Thanks</u>
lelp	0 0
ants vs. Zombies Garden Warfare	
Tue, 19 January 2016 - 11:18am PST by Yael P	

## Online ports to improve your PvZ Garden Warfare connection

If you have trouble connecting online in PvZ Garden Warfare, try opening or forwarding these ports to improve your connection.

## Opening or forwarding ports often improves connection issues

If you experience connectivity issues with any of our online games, and you have exhausted all basic connection troubleshooting such as clearing the cache, adjusting privacy settings, or disabling firewalls, you may need to add a port to your network connection.

Follow the instructions to open TCP or UDP ports for connection issues article and use the corresponding platform ports below.

## Use the designated ports

PLATFORM	UDP
PC	3659, 49152-65535



#### **Related Articles**

PvZ Garden Warfare is monitored by FairFight

Plants vs. Zombies Garden Warfare uses FairFight to protect our players from unfair practices in online play.

#### Plants vs. Zombies Garden Warfare is experiencing...

We think that the zombies are up to something, or Chomper got to the cables... we've received reports that some players are having difficulty connecting to EA's PvZ servers and are receiving the error, "Unable to connect to EA servers at this time. Please check your network connection and try again later." Our team is working to resolve this as soon as possible. Please stay tuned for updates on this issue.

Plants vs. Zombies Garden Warfare - Online ports to improve your PvZ Garden Warfare connection Case 1:16-cv-00454-RGA Document 452-1 Filed 04/04/18 Page 6 of 58 PageID #: 37054

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Port Forwarding the 2wire 3600HGV Router for Plants vs Zombies - Garden Warfare Case 1:16-cv-00454-RGA Document 452-1 Filed 04/04/18 Page 8 of 58 PageID #: 37056



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## **Port Forwarding the 2wire 3600HGV Router for Plants vs Zombies - Garden** Warfare

### What is Port Forwarding?

If you don't know what Port Forwarding is yet, you might want to start by reading our What is Port Forwarding guide.

## View 2wire 3600HGV Router Screenshots from our Database

You might also be interested in our huge collection of Router Screenshots where you can see every page of every router that we know of.

[an error occurred while processing this directive]

## Login to the 2wire 3600HGV Router

Now we need to know your routers IP address. You can find it a variety of ways.

### How To Find Your 2wire 3600HGV Router IP Address

It's ok if you don't know your 2wire 3600HGV router's **internal IP address**. You can find it by doing one of the following:

- Either find your router IP address using this guide: **How To Find Your Routers IP Address**
- Or you can use our Free Software to find your router IP address. PF Static IP Address and PF Router Detector are both free software applications that will help you find your router IP address.

### Login To The 2wire 3600HGV Router Using Your Web Browser

Open a web browser like Internet Explorer or Firefox. Enter the **internal IP address** of your router in the address bar of your browser.

File	Edit	View	Favorites	Tools Help		
<b>4=</b> 8a	d, 💌	⇒ •	884	<b>Q</b> Search	Favorites	History
Address		http://1	92,168,1.1	7.anaile	.0.000	

In the picture above the address bar has http://www.google.com in it. Just replace all of that with the internal IP address of your 2wire 3600HGV router. By default the IP address should be set to 192.168.1.254.

### Home

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How To Port Forward the PS4 How To Port Forward the PS3 Game Walkthroughs

#### Guides

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### Support

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### Forum

## How to Port Forward Plants vs Zombies -Garden Warfare on the 2wire 3600HGV

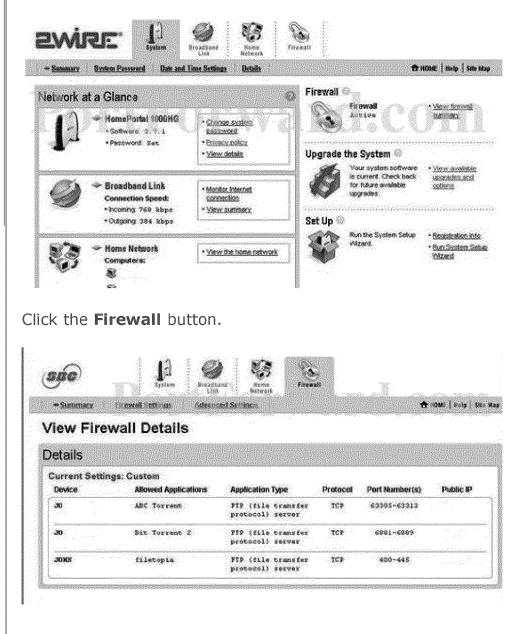
### Having trouble forwarding ports on the 2wire 3600HGV?

If you are having trouble with this guide, then perhaps **PFConfig** may be your solution. **PFConfig** is a software tool that will automatically forward ports for your router to save you time and hassle.

### 2wire 3600HGV Router Port Forwarding Screenshots

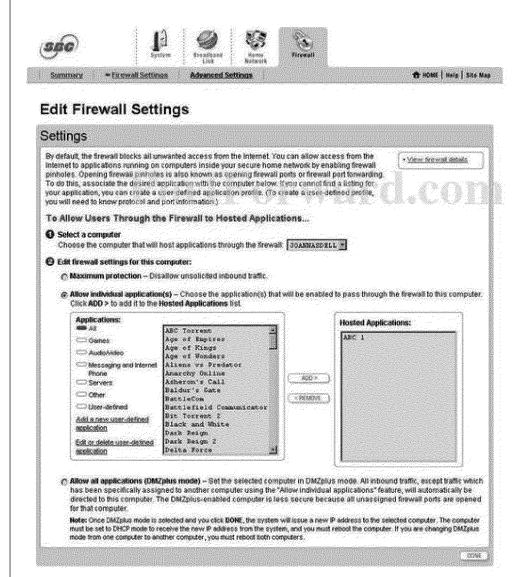
Now that you are logged in to your 2wire 3600HGV router you should see the following:

Look for your password on the bottom of your router or in the paperwork that came with your router.



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Click the Firewall Settings button.



Use the **Select a computer** box to choose a device to forward ports to. This box contains a list of device names that are visible on your network.

Click the Add a new user-defined application link.

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soll-an-photomatical customatic documentation and the second se	ewall Settings Advanced Settings	者 HOME   Help   Sile
Edit Applica	ation	
Settings		
Profile Name Enter a name for the a	pplication profile that you are creating.	
Application Name:		
need to add multiple d Note: In some rore instan changes in addition to sim	utilipile parts or both TCP and UDP parts, you will identifians. sees, certain application types require specialized feewed aple part forwarding. If the application you are adding (type neru: below, it is recommended that you select it	
Protocol: Port (or Range):	© TCP C UDP From: To	
Protocol Timeout (s	econds): TCP default = 86400 UCP default = 800	
	Definial + the same port as	
Map to Host Port:	defined above.	

### Forward Ports 49152–65535 on the 2wire 3600HGV

We will list a series of lines here that will show you exactly how to forward the ports you need to forward. Plants vs Zombies - Garden Warfare requires you to forward the 3659,49152–65535 ports. Go ahead and enter the settings shown above into the **Edit Application** menu and then click **Add Definition**.

## **Edit Application**

<b>Profile Name</b> Enter a name for the appli	cation profile that you are creating.
Application Name:	Name1
Definition	
	ter the port(s) for this application, then click
application requires multip	e definition to the Definition List. If the ole ports or both TCP and UDP ports, you will itions.
application requires multip need to add multiple defin <b>Note: i</b> n some rare instances, changes in addition to simple p	ble ports or both TCP and UDP ports, you will
application requires multip need to add multiple defin <b>Note: i</b> n some rare instances, changes in addition to simple p	ole ports or both TCP and UDP ports, you will itions. , certain application types require specialized firewa port forwarding. If the application you are adding

#### Port Forwarding the 2wire 3600HGV Router for Plants vs Zombies - Garden Warfare Case 1:16-cv-00454-RGA Document 452-1 Filed 04/04/18 Page 12 of 58 PageID #: 37060 Protocol Timeout (seconds): TCP default=86400 UDP default=600

(seconds):	UDP default=600
Map to Host Port:	Default= the same port as defined above
Application Type:	None (Default)
	(ADD DEFINITION )
	United Brands
	<b>BACK</b>

### Forward Ports 3659 on the 2wire 3600HGV

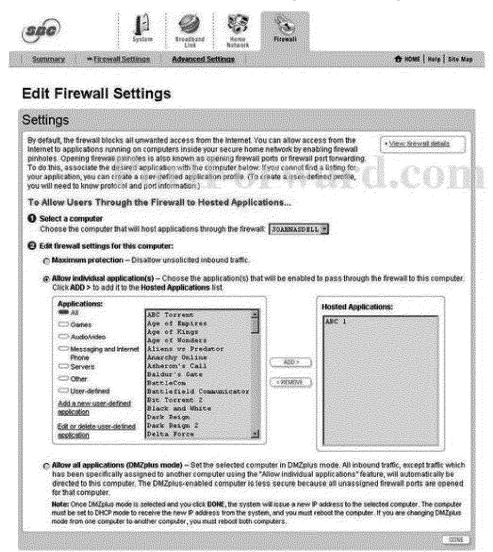
You should see another page of settings that need to be entered into one of the blank lines on your routers **Edit Application** page. Go ahead and enter those settings and then click **Add Definition**.

## **Edit Application**

Profile Name		
Enter a name for the appl	ication profile th	at you are creating.
Application Name:	Name2	
Definition		
need to add multiple defir <b>lote:</b> In some rare instances	iitions. , certain applicatio	n TCP and UDP ports, you will on types require specialized firewa f the application you are adding
appears in the application typ	사람은 승규는 아들은 물건이 가슴을 다 가지 않는다.	s recommended that you select it.
appears in the application typ Protocol:	사람은 승규는 아들은 물건이 가슴을 다 가지 않는다.	사람이라 사람 동안 전 방법을 즐기면 전쟁을 위한 가장을 가지 않는 것 같아요. 귀 한 것 같아요.
	ie menu below, it i	s recommended that you select it.
Protocol:	otto otto	s recommended that you select it.
Protocol: Port (or Range):	otto otto	s recommended that you select it. OUDP 59 To: 3659
Protocol: Port (or Range): Protocol Timeout	otto otto	s recommended that you select it. OUDP 59 To: 3659 TCP default=86400
Protocol: Port (or Range): Protocol Timeout (seconds):	otto otto	s recommended that you select it. OUDP 59 TO: 3659 TCP default=86400 UDP default=600 Pefault= the same port a defined above
Protocol: Port (or Range): Protocol Timeout (seconds): Map to Host Port:	orcp From: 36	s recommended that you select it. OUDP 59 TO: 3659 TCP default=86400 UDP default=600 Pefault= the same port a defined above

Click the **Back** button.

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Select the applications you just created in the **Applications** list, then click the **Add** button to move them to the **Hosted Applications** box.

When you are finished, click the **Done** button at the bottom of your screen.

And that is it! You are done!

## Test if Your Ports are Open

Now that you have forwarded ports for Plants vs Zombies -Garden Warfare on the 2wire 3600HGV you should test to see if your ports are forwarded correctly.

To test if your port has been properly forwarded, you can use our **Open Port Check** tool. Our **Open Port Check** tool is the only online port checking tool with **Guaranteed Results**.

## **2wire 3600HGV Router Screenshot**

Port Forwarding the 2wire 3600HGV Router for Plants vs Zombies - Garden Warfare Case 1:16-cv-00454-RGA Document 452-1 Filed 04/04/18 Page 14 of 58 PageID #: 37062

## Database

Didn't find the screenshot you were looking for? Check our our **2wire 3600HGV Router Screenshots**. We have the Internets largest collection of **Router Screenshots**.

Electronic Arts Port Forwarding Ports List Case 1:16-cv-00454-RGA Document 452-1 Filed 04/04/18 Page 16 of 58 PageID #: 37064

Home > Publishers > Electronic Arts

External IP: 12.250.146.50

## HOIT FOR VIN

## Electronic Arts Port Forwarding Ports List

The ports listed here are for port forwarding. These are organized by application. You can also search for them by publisher here.

For more information about port forwarding, click here.



Do you want your port forwarded right now?

Our software makes it easy.

Get It Now

Created and Supported by Portforward.com

### Your external IP is 12.250.146.50

Application	TCP Ports	UDP Ports
Army of Two - The Devils Cartel PS3	5223, 3659, 8001, 10000-10100, 25100- 25110, 25200-25210, 42120-42130	5223, 3478-3479, 3658-3659, 10000- 10100, 25100-25110, 25200-25210, 42120- 42130
- The Devils	1000, 3074, 8001, 10000-10100, 25100- 25110, 25200-25210, 42120-42130	1000, 3074, 8001, 10000-10100, 25100- 25110, 25200-25210, 42120-42130
Battlefield 3	80, 443, 9988, 17502, 20000-20100, 22990, 42127	3659, 14000-14016, 22990-23006, 25200- 25300
Battlefield 3 Beta		3659
Battlefield 3 PS3	80, 443, 9988, 10000- 10100, 17502, 42127	3659, 14000-14016

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#### Games

How to Port Forward Games Setup a Static IP Address How To Port Forward the Xbox One How To Port Forward the Xbox 360

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How To Port Forward the PS4	Battlefield 3 Xbox 360	3074	3074
How To Port Forward the PS3 Game Walkthroughs <b>Guides</b> How To Setup Android Devices How To Setup Your Router Setup a Static IP Address General Networking	Battlefield 4	80, 443, 9988, 17502, 20000-20100, 22990, 42127	3659, 14000-14016, 22990-23006, 25200- 25300
	Battlefield 4 - PlayStation 4	80, 443, 1935, 3478- 3480	3478-3479
	Battlefield 4 - Xbox One	53, 80, 3074	53, 88, 500, 3074, 3544, 4500
	Battlefield 4 PS3	80, 443, 9988, 10000- 10100, 17502, 42127	3659, 14000-14016
Port Forwarding Double Router	Battlefield 4 Xbox 360	3074	3074
Forwarding Firewall Setup WiFi Network Setup Port Forward Minecraft	Battlefield Bad Company 2 PS3	80, 13505, 18121, 18126	10000, 18126
Utorrent Help Windows 8 Overview Support	Battlefield Hardline	80, 443, 9988, 17502, 20000-20100, 22990, 42127	3659, 14000-14016, 22990-23006, 25200- 25300
How To Add A New Router PFConfig Support Contact Us	Battlefield Hardline - PlayStation 3	5223, 9988, 10000- 10100, 17502, 42127	5223, 3478-3479, 3658-3659, 14000- 14016
Forum	Battlefield Hardline - PlayStation 4	80, 443, 1935, 3478- 3480	3478-3479
	Battlefield Hardline - Xbox 360	3074	3074
	Battlefield Hardline - Xbox One	53, 80, 3074	53, 88, 500, 3074, 3544, 4500
	Battlefield Heroes	80, 443, 18051, 18055, 18061, 18065, 18270, 18275	
	Bulletstorm	53, 80, 3074	53, 80, 3074
	Bulletstorm PS3	80, 433, 8675-8676	3959, 6000
	Bulletstorm Xbox 360	3074	3074
	Burnout Paradise PS3	5223	5223, 3478-3479, 3658
	Burnout Paradise Xbox 360	3074	3074
,	Command		

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and Conquer 3 Tiberian Wars	28910, 29900-29901	13139, 27900, 65000
Crysis	80, 443, 6667, 28910, 29900-29901	27900-27901, 29910, 64087
Crysis 2	80, 2891, 2990, 6667, 29900, 64100	27900-27901, 64100
Crysis 2 Demo		64100
Crysis 2 PS3	5223	3478-3479, 3658
Crysis 2 Xbox 360	3074	3074
Crysis 3	1024-1124, 3074, 9946, 9960-9969, 13000- 13100, 18000, 18120, 18060, 27900, 28910, 29900, 42100	1024-1124, 3074, 3659, 6000, 18000, 29900
Crysis 3 PS3	3659, 6000	9946, 42100, 13000- 13100
Crysis 3 Xbox 360	3074	3074
Crysis Wars	80, 443, 6667, 28910, 29900-29901	27900-27901, 29910, 64087
Dead Space 2	28910, 29900-29901	8088-28088
Dead Space 2 PS3	5223	5223, 3478, 3479, 3658
Dead Space 2 Xbox 360	3074	3074
Dead Space 3	1024-1124, 9960-9969, 18000, 18120, 18060, 27900, 28910, 29900	1024-1124, 18000, 29900
Dead Space 3 PS3	5223, 3074	88, 5223, 3074, 3478-3479, 3658
Dead Space 3 Xbox 360	3074	3074
Dragon Age	80, 8000, 12025, 15101- 15325, 18081, 42127	80, 1900, 5355, 8001
Dragon Age 11 PS3	5223	5223, 3478, 3479, 3658
Dragon Age II Xbox 360	3074	3074
Dragon Age: Inquisition	9988, 17502, 20000- 20100, 22990, 42127	3659, 14000-14016, 22990-23006, 25200- 25300
Dragon Age: Inquisition -	80, 443, 1935, 3478-	3478-3479

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Xbox One	53, 80, 3074	53, 88, 500, 3074, 3544, 4500
Dragon Age: Inquisition Xbox 360	3074	3074
EA Origin	80, 443, 1024-1124, 9960-9969, 18000, 18120, 18060, 27900, 28910, 29900	1024-1124, 18000, 29900
FIFA 11 Xbox 360	3074	3074
FIFA 12 Xbox 360	3074	3074
FIFA 13	3569, 9946, 9988, 42124, 10000-20000	3659, 9000-9999
FIFA 13 PS3	3659, 5223, 10000- 10099, 42127	3074, 3478-3479, 3658-3659, 5223, 6000
FIFA 13 Xbox 360	3074, 3659	3074, 3659
FIFA 14	3569, 9946, 9988, 10000-20000, 42124	3659, 9000-9999
FIFA 14 - PlayStation 4	80, 443, 1935, 3478- 3480, 3659, 10000- 10099, 42127	3074, 3478-3479, 3659, 6000
FIFA 14 - Xbox One	53, 80, 3074, 3659	53, 88, 500, 3074, 3544, 3659, 4500
FIFA 14 PS3	80, 443, 3659, 5223, 10000-10099, 42127	3074, 3478-3479, 3658-3659, 5223, 6000
FIFA 14 Xbox 360	53, 80, 3074, 3659	53, 88, 3074, 3659
FI FA Manager 12	9946, 15450-15499, 17500-17599, 42124	3659, 6000, 17500- 17599
Fuse PS3	5223, 9988, 10000- 10099, 42124	3074, 3478-3479, 3658-3659, 5223, 6000
Fuse Xbox 360	3074, 3659	3074, 3659
Kingdoms of Amalur - Reckoning PS3	5223	5223, 3478-3479, 3658
Kingdoms of Amalur - Reckoning	3074	3074

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Xbox 360	2-1 Filed 04/04/18 Page 20	0 of 58 PageID #: 37068
Madden NFL 11 PS3	5223	5223, 3478, 3479, 3658
Madden NFL 15 - PlayStation 4	80, 443, 465, 983, 1935, 3478-3480, 5223, 10070-10080	3478-3479, 3658, 10070
Madden NFL 25 - PlayStation 4	80, 443, 465, 983, 1935, 3478-3480, 5223, 10070-10080	3478-3479, 3658, 10070
Mass Effect 2 Xbox 360	3074	3074
Mass Effect 3		5659, 6000
	5223, 9946, 42100, 13000-13100	3478-3479, 3658- 3659, 5223, 5659, 6000
Mass Effect 3 Xbox 360	3074	3074
Medal of Honor 2010	9946, 12000-16000, 17502, 42100	
	5223, 9946, 42100, 14310-14328, 15310- 15328	5223, 3478-3479, 3658-3659, 6000, 9570, 17502
Medal of Honor 2010 Xbox 360	3074	3074
NBA Live 10 PS3	5223	5223, 3478, 3479, 3658
NBA Live 10 Xbox 360	3074	3074
NBA Live 14 - PlayStation 4	80, 443, 1935, 3478- 3480	3478-3479
NBA Live 14 - Xbox One	53, 80, 3074	53, 88, 500, 3074, 3544, 4500
NBA Live 15 - PlayStation 4	80, 443, 1935, 3478- 3480	3478-3479
NBA Live 15 - Xbox One	53, 80, 3074	53, 88, 500, 3074, 3544, 4500
Need for Speed (2015) - PlayStation 4	80, 443, 1935, 3478- 3480	3478-3479
Need for Speed	53, 80, 3074	53, 88, 500, 3074,

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	(2015) - Xbox One		3544, 4500
	Need for Speed - Porsche		9442
	Need for Speed - Rivals - PlayStation 4	80, 443, 1935, 3478- 3480	3478-3479
	Need for Speed - Rivals - Xbox One	53, 80, 3074	53, 88, 500, 3074, 3544, 4500
	Need for Speed - The Run	11050-11053, 11060- 11063	23600-23800, 33600- 33800
	Need for Speed - The Run PS3	5223, 11090-11093, 11100-11103	5223, 3478-3479, 3658, 23600-23800, 33600-33800
	Need for Speed - The Run Xbox 360	3074, 16260-16263, 16270-16273	3074, 23600-23800, 33600-33800
	Need for Speed 3	1030	1030
	Origin	80, 443, 1024-1124, 9960-9969, 18000, 18120, 18060, 27900, 28910, 29900	1024-1124, 18000, 29900
	Peggle 2 - PlayStation 4	80, 443, 1935, 3478- 3480	3478-3479
	Peggle 2 - Xbox One	53, 80, 3074	53, 88, 500, 3074, 3544, 4500
	Plants vs. Zombies: Garden Warfare	3659, 49152-65535	3659, 49152-65535
	Plants vs. Zombies: Garden Warfare - PlayStation 3	5223	5223, 3478-3479, 3658
	Plants vs. Zombies: Garden Warfare - PlayStation 4	80, 443, 1935, 3478- 3480	3478-3479

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Plants vs. Zombies: Garden Warfare - Xbox 360	3074	3074
Plants vs. Zombies: Garden Warfare - Xbox One	53, 80, 3074	53, 88, 500, 3074, 3544, 4500
Plants vs. Zombies: Garden Warfare 2	3659, 49152-65535	3659, 49152-65535
Plants vs. Zombies: Garden Warfare 2 - PlayStation 4	80, 443, 1935, 3478- 3480	3478-3479
Plants vs. Zombies: Garden Warfare 2 - Xbox One	53, 80, 3074	53, 88, 500, 3074, 3544, 4500
Shank 2 PS3	5223	5223, 3478-3479, 3658
Shank 2 Xbox 360	3074	3074
Shank PS3	5223	5223, 3478-3479, 3658
Shank Xbox 360	3074	3074
Star Wars - The Old Republic	8995, 12000-12999, 20000-30000	
Star Wars Battlefront (2015) - PlayStation 4	80, 443, 1935, 3478- 3480	3478-3479
Star Wars Battlefront (2015) - Xbox One	53, 80, 3074	53, 88, 500, 3074, 3544, 4500
Syndicate		3659
Syndicate PS3	5223	5223, 3478-3479, 3658-3659
Syndicate	3074	1000, 3074

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Xbox 360		
The Secret World	80, 7000-7999, 6881- 6889	6881-6889
Tiger Woods PGA Tour 11 PS3	5223	5223, 3478, 3479, 3658
Titanfall	25000-25099, 30000- 30099	8125, 25000-25099, 30000-30099
Titanfall - Xbox One	53, 80, 3074	53, 88, 500, 3074, 3544, 4500
Titanfall Xbox 360	3074	3074
Ultima Online	5001-5010, 7775-7777, 7875, 8800-8900, 9999	

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## THIS EXHIBIT HAS BEEN REDACTED IN ITS ENTIRETY

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## THIS EXHIBIT HAS BEEN REDACTED IN ITS ENTIRETY

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## THIS EXHIBIT HAS BEEN REDACTED IN ITS ENTIRETY

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## THIS EXHIBIT HAS BEEN REDACTED IN ITS ENTIRETY

### IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS TYLER DIVISION

UNILOC USA, INC., ET AL.,	
Plaintiffs,	
V.	
ELECTRONIC ARTS, INC.,	
Defendant.	

CAUSE NO. 6:13-CV-259

### **VERDICT FORM**

\$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$ \$\$

In answering these questions, you are to follow all of the instructions I have given you in the Court's Charge.

1. Did Uniloc prove by a preponderance of the evidence that Origin Entitlements infringes claim 19 of the '216 patent?

Yes \_\_\_\_ (proved) No \_\_\_\_ (not proved)

Please continue to Question 2.

Casease 6.13-20456285 AEDODUCENTER 31 Filed 12/05/14 Page 2412 Fagence # #607082

2. Did Uniloc prove by a preponderance of the evidence that it marked substantially all of the products it made, offered for sale, or sold under the '216 patent, and that Uniloc made reasonable efforts to ensure that all of its licensees who made, offered for sale, or sold products under the '216 patent marked the products?

Yes \_\_\_\_ (proved) No \_\_\_\_ (not proved)

If you have answered "Yes" to Questions 1 and 2, then you should answer Question 3 for infringement, if any, between August 8, 2012 and September 21, 2013 when the patent expired.

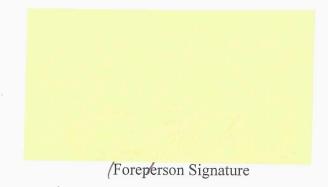
If you have answered "Yes" to Question 1 and "No" to Question 2, then you should answer Question 3 for infringement, if any, between March 21, 2013 and September 21, 2013 when the patent expired.

If you have answered "No" to Question 1, please do not answer Question 3.

3. What sum of money, if paid now in cash, do you find from a preponderance of the evidence would fairly and reasonably compensate Uniloc for infringement of claim 19 of the '216 patent by EA?

\$4,863,925,00

12/5/2014 Date



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## THIS EXHIBIT HAS BEEN REDACTED IN ITS ENTIRETY

11/8/2017

Here's who won each console war | GamesBeat



### GAMES

### Here's who won each console war

MIKE MINOTTI @TOLKOTO AUGUST 20, 2014 7:30 AM



Above: The Nintendo Entertainment System, Sega Genesis, Sony PlayStation, and Xbox 360. Image Credit: GamesBeat

War. War never changes. Especially console wars.

Ever since the Sega Genesis took on the Super Nintendo, gamers have taken sides and voted with their wallets as companies competed for the industry's top spot. Of course, we could subjectively debate about which systems were the best for their times, but we also have sales figures that undisputedly tell us which consoles won their respective wars, at least in terms of market share.

We got these worldwide sales figures straight from the manufactures whenever possible (via



https://venturebeat.com/2014/08/20/heres-who-won-each-console-war/

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when a number comes from a different source. Together, these give us an insight into the heated battles of console wars past.

Also, we start with the Super Nintendo/Sega Genesis era for a few reasons. First off, the Nintendo Entertainment System dominated during its run, so we don't really have a war to speak of. Before that, in the Atari/Intellivision/Colecovision days, it's hard to find precise numbers and the console lifespans were a bit more erratic, so you can't line up "generations" quite as neatly.

## Super Nintendo vs. Sega Genesis

Winner: Super Nintendo (49.10 million)



Above: The Super Nintendo competed against the Sega Genesis in an intense console war. Image Credit: Nintendo

This was actually a close race. The Sega Genesis sold about \$40 million units worldwide according to former Sega executive Joe Miller, but rival Nintendo managed to do a little better with its Nintendo Entertainment System successor.

The first of the modern console wars might have been the nastiest. Sega in particular was fond of going straight after Nintendo in commercials, like in the one below. However, Nintendo was able to hold its ground thanks to high-profile exclusives like The Legend of Zelda: A Link to the Past and Donkey Kong Country. Sega, meanwhile, would overcrowd and confuse the market



https://venturebeat.com/2014/08/20/heres-who-won-each-console-war/



### Sega Saturn vs. Nintendo 64 vs. Sony PlayStation

Winner: Sony PlayStation (102.49 million)



Above: Sony's first system, the PlayStation. Image Credit: Sony

While the previous console war was close, this one was a massacre. Sony entered the hardware business and dominated with the PlayStation. The Nintendo 64 could only move 32.93 million units, almost a third of what Sony accomplished. The Sega Saturn, however, was a disaster. It only sold 9.5 million.

The PlayStation succeeded thanks as much to its competitors failures as it was its own successes. Sega marketed the Saturn poorly, and it entered the market \$100 more expensive than Sony's system. The Nintendo 64 featured an odd controller and used cartridges instead of CDs, which were becoming the industry standard. This was also the first time Nintendo received its stigma of not having enough third-party games, with Sony hosting mega franchises



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### Nintendo GameCube vs. PlayStation 2 vs. Xbox vs. Sega Dreamcast

Winner: PlayStation 2 (150 million)



Above: The PlayStation 2 is the most successful game system ever. Image Credit: Sony

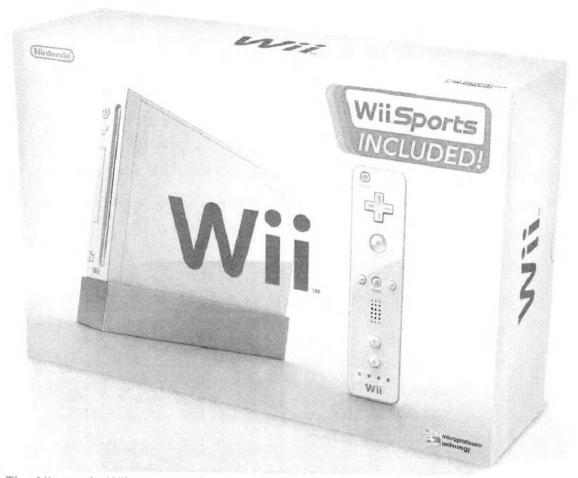
The PlayStation 2 not only won its console race, but it's also the best-selling gaming system of all time with around 150 million. We don't have a more precise figure because Sony stopped releasing individual console sales in its financial reports in 2012, although the PlayStation 2 was already pretty old at that point. Microsoft's first system, the Xbox, sold about 24 million units, while the GameCube lagged behind with 21.74 million. The Dreamcast would be Sega's last console, and it ended production before it even had a chance to compete with the Xbox and the GameCube.

The PlayStation 2 continued where the original left off. It dominated the market with exclusives, including the Grand Theft Auto games and Gran Turismo. Sony had become the undisputed king of the industry.



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Winner: Wii (101.15 million)



Above: The Nintendo Wii came packaged with Wii Sports. Image Credit: Pixels for Breakfast

After losing more of the market each console generation, Nintendo finally retook the industry's throne with the Wii. Xbox 360 made a huge improvement over its predecessor by selling 84 million units, while the PlayStation 3 sold about 80 million as of Nov. 2013.

The Wii was able to tap into a casual market that had previously ignored gaming thanks to its simplistic and easy-to-understand motion controls. Games like Wii Sports and Wii Fit received national attention. Sony, however, practically surrendered the first place spot with a disastrous launch of the PlayStation 3. The system was originally \$600 (the Wii was \$250), and Sony constantly gave off an arrogant vibe when marketing the new machine that lead to gamers turning the company into something of meme-attracting punching bag. The PlayStation 3 eventually rebounded, but it never quite caught up to the Wii. The Xbox 360, however, became a haven for hardcore gamers thanks to its extensive online support and catalog of shooters

https://venturebeat.com/2014/08/20/heres-who-won-each-console-war/



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## THIS EXHIBIT HAS BEEN REDACTED IN ITS ENTIRETY

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## THIS EXHIBIT HAS BEEN REDACTED IN ITS ENTIRETY

### IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

ACCELERATION BAY LLC,	)
Plaintiff,	) )
V.	) C.A. No. 16-454 (RGA)
ELECTRONIC ARTS INC.,	)
Defendant.	)

### DEFENDANT'S RULE 26(a) AUGUST 2, 2017 SUPPLEMENTAL INITIAL DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(a)(1), Defendant Electronic Arts Inc. ("Electronic Arts") provides the following August 2, 2017 Supplemental Initial Disclosures. Electronic Arts reserves the right to amend or supplement these Initial Disclosures pursuant to Fed. R. Civ. P. 26(e).

Electronic Arts' disclosures herein are made without waiving (1) the right to object on the grounds of competency, privilege, relevancy, hearsay, or any other proper ground, or the right to object to the use of any information disclosed herein for any purpose, in whole or in part, in any subsequent proceeding in this action or in any other action, and (2) the right to object on any proper grounds to any other discovery request or proceeding involving or relating to the subject matter of these disclosures consistent with the Federal Rules of Civil Procedure and the Local Rules of this Court.

#### **DISCLOSURES**

#### A. Persons With Knowledge

Based upon information reasonably available to Electronic Arts at the present time, Electronic Arts identifies the following individuals likely to have discoverable information that Electronic Arts may use to support its defenses or counterclaims, unless solely for impeachment. In making these disclosures, Electronic Arts does not waive its right to object, pursuant to any applicable Federal Rule of Civil Procedure or Local Rule, to the deposition or trial testimony of any of the individuals listed below:

Name and Last Known Address	Subject Matter
Fred B. Holt	Matters related to the Patents-in-Suit and related patents, including, without limitation, compliance with 35 U.S.C. §§ 101-103, and 112, claim construction, conception, diligence, and reduction to practice; prior art and related issues; prosecution of the Patent-in-Suit and related issues; The Boeing Company; ownership and/or assignment of rights; licensing; products developed and/or sold related to the Patents-in-Suit.
Virgil E. Bourassa	Matters related to the Patents-in-Suit and related patents, including, without limitation, compliance with 35 U.S.C. §§ 101-103, and 112, claim construction, conception, diligence, and reduction to practice; prior art and related issues; prosecution of the Patent-in-Suit and related issues; The Boeing Company; ownership and/or assignment of rights; licensing; products developed and/or sold related to the Patents-in-Suit.
Attorneys or agents involved in the prosecution of the Patents-In-Suit, including: Perkins Coie LLP.	Matters related to the preparation and prosecution of the applications that matured into the patents-in-suit, including without limitation preparation and prosecution of the patent applications from which the patents-in- suit issued or relied on for priority, inventorship, compliance with 35 U.S.C. §§ 101-103, and 112, claim construction, diligence, and reduction to practice; prior art and related issues.

Name and Last Known Address	Subject Matter
Acceleration Bay, LLC witnesses	Matters related to the formation, ownership, control, and structure of Acceleration Bay, LLC; the acquisition of the patents-in-suit; prosecution histories; prior art; and the alleged validity, enforceability and infringement of the patents-in-suit.
The Boeing Company witnesses	Matters related to the acquisition of the patents-in-suit, as well as attempts to license, sell, value and exploit the patents-in-suit; prosecution histories; prior art; and the alleged validity, enforceability and infringement of the patents-in-suit.
Hamilton Capital XII LLC	Matters related to valuation, ownership of or interests in the patents-in-suit.
Former employees of Panthesis, Inc.	Matters related to past attempts to license, value and exploit the patents-in-suit.
Patent brokers and others involved in efforts to sell, license or otherwise monetize the patents- in-suit, including Acorn Technologies, Inc.	Matters related to attempts to license, sell, value and exploit the patents-in-suit; the alleged validity, enforceability and infringement of the patents-in-suit.
Matt Price, Senior Software Engineer Florida, U.S.A. Contact through counsel.	Matters related to the operation of Tiger Woods PGA Tour 14 and Rory McIlroy PGA Tour.
Nick Channon, Senior Director of Business Development Canada Contact through counsel	Matters related to the sales, marketing, and promotion of the accused games generally and FIFA 15 and FIFA 16 specifically; general knowledge of Electronic Arts and its business including Electronic Arts' corporate history and video game development practices.
David O'Neill, Senior Director, Software Engineering Canada Contact through counsel.	Matters related to the operation of certain networking features of the accused games.

Name and Last Known Address	Subject Matter
Alan Poon, Senior Software Engineering Canada Contact through counsel.	Matters related to the operation of FIFA 15 and FIFA 16.
Ling Lo, Senior Software Engineering Canada Contact through counsel.	Matters related to the operation of Plants v. Zombies: Garden Warfare 1 and Plants v. Zombies: Garden Warfare 2.
Mike Smith, Senior Software Engineering Canada Contact through counsel.	Matters related to the operation of NHL 15 and NHL 16.
Martin Clouarte, Senior Software Engineering Canada	Matters related to the operation of certain networking features of the accused games.
Contact through counsel Scott Smith	Former Boeing employee knowledgeable about development, conception, and reduction to practice of the claimed inventions, the diligence exercised in reducing these inventions to practice, the state of the art at the time of the invention, and generally the validity of the Asserted Patents.
Robert Abarbanel	Former Boeing employee knowledgeable about development, conception, and reduction to practice of the claimed inventions, the diligence exercised in reducing these inventions to practice, the state of the art at the time of the invention, and generally the validity of the Asserted Patents.
Albert Erismann	Former Boeing employee knowledgeable about development, conception, and reduction to practice of the claimed inventions, the diligence exercised in reducing these inventions to practice, the state of the art at the time of the invention, and generally the validity of the Asserted Patents. Also, knowledgeable about efforts by Boeing to monetize the Asserted Patents.

Name and Last Known Address	Subject Matter
Dan Kegel Contact through counsel	Matters related to peer-to-peer networking, Network Address Translators, and other networking literature, art, and systems publicly available or known in the 1990s.
Contact through counser	available of known in the 1990s.
Colin Macrae, Senior Director Global Campaign Management Canada Contact through counsel	Matters related to the marketing of the accused products.
Charles Wood, Director Finance – Strategy and Corporate Functions California, U.S.A. Contact through counsel	Matters related to financial information about the accused products.
Glen Van Datta, Senior Systems Architect Canada Contact through counsel	Matters related to the status of technology in the video gaming industry in the 2000s.
Mark Terrano Contact through counsel	Matters related to Age of Empires 1 and 2, including peer-to-peer networking, Network Address Translators, and other networking literature, art, and systems publicly available or known in the 1990s.
Sony corporate representative	Matters related to manufacture of disks for the PlayStation consoles and sale of digital content for PlayStation consoles.
EA's expert witnesses	EA's expert witnesses will be disclosed and will provide expert reports in connection with this litigation at the appropriate time.
Any expert witness that Plaintiff retains	TBD
Any person and/or entity deposed in this case	TBD
Any person or entity identified in Plaintiff's Initial Disclosures and/or disclosed through discovery response or documents produced in this matter	TBD
As of yet unknown representatives of third parties.	TBD

Electronic Arts does not consent to or authorize communication by Plaintiff Acceleration Bay LLC ("Acceleration Bay") with Electronic Arts' employees; any such communications should be initiated through counsel for Electronic Arts.

Because discovery, investigation, and analysis of this matter is ongoing, Electronic Arts reserves the right to supplement this information if additional information later becomes known and to designate and/or call further witnesses at trial. Electronic Arts also reserves the right to seek discovery from, and relating to, other persons that may subsequently become known as persons likely to have discoverable information relevant to the disputed facts.

#### **B.** Relevant Documents and Tangible Things

Based upon information reasonably available to Electronic Arts at the present time, Electronic Arts expects that it may use the following categories of documents, data compilations, and tangible things that are in its possession, custody or control to support its defenses or counterclaims, unless solely for impeachment. These disclosures do not constitute admissions as to the relevance or admissibility of the identified materials or a waiver of any attorney-client privilege, work product protection or other applicable protection or immunity.

The following documents, data compilations, and tangible things are within Electronic Arts' possession, custody, or control and may be used to support its defenses or counterclaims.

- 1. Documents relating to the Patents-in-Suit, including the file histories and cited references.
- 2. Documents reflecting that Electronic Arts does not infringe the Patents-in-Suit.
- 3. Documents reflecting that the Patents-in-Suit are invalid.
- 4. Documents reflecting that some or all of the relief Acceleration Bay seeks should be barred under the equitable doctrines of estoppel, disclaimer, and/or waiver.

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5. Documents reflecting the proper construction of terms used in the Patents-in-Suit.

Electronic Arts expressly reserves the right to supplement or amend the above list of categories if such additional documents and information becomes known. In support of its claims, Electronic Arts may also rely on documents produced by Acceleration Bay pursuant to Federal Rule of Civil Procedure 34 and/or documents produced by non-parties pursuant to Federal Rule of Civil Procedure 45.

#### C. Damages

Pursuant to Rule 26(a)(1)(A)(iii), Electronic Arts states as follows: Electronic Arts does not infringe any valid claim of the Patents-in-Suit and Acceleration Bay is not entitled to any relief. Electronic Arts seeks attorneys' fees and costs and such other relief as is deemed appropriate. The amount of fees and costs is not ascertainable at this time, nor is the amount of any other relief that may be deemed appropriate. Electronic Arts reserves the right to supplement, modify, or add to this disclosure as discovery and Electronic Art's investigation proceed.

#### **D.** Insurance Agreements

Electronic Arts is not presently aware of any insurance agreement under which any person carrying on an insurance business may be liable to Electronic Arts to satisfy any part of, or indemnify or reimburse Electronic Arts for payments made to satisfy, a judgment that may be entered in this action. Case 1:16-cv-00454-RGA Document 452-1 Filed 04/04/18 Page 57 of 58 PageID #: 37105

August 2, 2017

/s/ Michael Tomasulo\_\_\_\_\_

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Attorneys for Defendants

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#### **CERTIFICATE OF SERVICE**

I hereby certify that on August 2, 2017, copies of the foregoing were caused to be

served upon the following in the manner indicated:

VIA ELECTRONIC MAIL

Philip A. Rovner, Esquire Jonathan A. Choa, Esquire POTTER ANDERSON & CORROON LLP 1313 North Market Street, 6<sup>th</sup> Floor Wilmington, DE 19801 *Attorneys for Plaintiff* 

VIA ELECTRONIC MAIL

Paul J. Andre, Esquire Lisa Kobialka, Esquire James R. Hannah, Esquire KRAMER LEVIN NAFTALIS & FRANKEL LLP 990 Marsh Road Menlo Park, CA 94025 *Attorneys for Plaintiff* 

/s/ Joe Netikosol