

Filed on behalf of Patent Owner John H. Stephenson

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UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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GAME SHOW NETWORK, LLC AND WORLDWINNER.COM

Petitioners

v.

JOHN H. STEPHENSON

Patent Owner

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Case IPR2013-00289

Patent 6,174,237

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**DECLARATION OF STACY AARON FRIEDMAN IN SUPPORT OF**

**PATENT OWNER'S RESPONSE**

Stephenson Ex. 2007 Game Show Network et al. v. Stephenson Trial IPR2013-00289
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1. I, Stacy A. Friedman, have been retained by Merchant & Gould P.C., counsel for patent owner, John Stephenson (“Stephenson”). I understand that the Game Show Network, LLC and WorldWinner.com, Inc. (Collectively “GSN”) petitioned for *inter partes* review of U.S. Patent No. 6174,237 (“the ‘237 Patent”) asking the that the United States Patent and Trademark Office cancel claims 1-19 of the ‘237 patent as unpatentable. The following discussion and analysis responds to GSN’s expert, its petition for IPR and the Board’s Decision (Paper No. 8) instituting trial.

I. **BACKGROUND AND QUALIFICATIONS, PREVIOUS TESTIMONY AND COMPENSATION**

A. **Background And Qualifications.**

2. As a professional game designer and mathematician, I am intimately familiar with the issues and technology relating to computer-implemented games. As shown below, I have personally designed, implemented, tested, and analyzed many games, including dozens of single- and multi-player wagering games for both Internet and land-based casinos. I am qualified by my background and experience to provide expert testimony on matters involving networked gaming systems and technologies.

3. I am the President of Olympian Gaming, LLC in Beaverton, Oregon, a position that I have held for over ten years. In that capacity, I have consulted in the gaming industry regarding, among other things, game design and development, slot

machine and table game mathematics, gaming software development, and gaming patent infringement and validity. I have over a dozen years of professional experience developing regulated casino games, over fifteen years of experience in gaming math, and over fifteen years of professional software design expertise.

4. In 1996, I earned my Bachelor of Arts Degree in Computer Science, *magna cum laude*, from Harvard College, Harvard University, Cambridge, Massachusetts.

5. From 1998 to 2000, I designed casino wagering games, worked on gameplay, and performed mathematical analyses for new slot machines at the pioneering video slot developer Silicon Gaming, Inc., Palo Alto, California, before it was acquired by International Game Technology (“IGT”). Silicon Gaming designed and developed interactive slot machines. Its products were used in casinos and other gaming establishments, and combined advanced multimedia platforms with software-based games. Silicon Gaming’s product line included networked multimedia gaming platforms, hardware, and software. While there, I worked on the designs of video slot games, video keno games, and video poker games; helped produce dozens of innovative new games for the Odyssey™ platform; and engaged regulatory agencies to achieve regulatory approval for the mathematics used in the games.

6. In 2001, I started an independent casino game design and analysis consultancy, Olympian Gaming. Based on my experience designing, developing, and placing dozens of games in Las Vegas, Reno, and Atlantic City casinos, I advise Internet casino software vendors, new game inventors, and casino game manufacturers in the fields of wagering gameplay design, mathematical analysis, and statistical verification. Especially relevant to the present matter, I have been engaged in the design of both stand-alone and networked gaming systems for over twelve years. I have also testified as an expert in many matters related to networked gaming systems, including twice at the request of counsel on behalf of Multimedia Games in patent infringement matters related to its system for operating the central determinant network for the New York State Lottery.

7. In 2011, I was engaged by Double Down Interactive, a social (Internet) casino game developer whose products are available via Facebook and mobile platforms, to improve its casino game designs. These designs included multi-player blackjack and roulette games, as well as slot machines and slot machine tournaments. I consulted with Double Down for approximately one year until it was acquired by IGT in early 2012. IGT is the largest U.S. slot machine manufacturer. IGT retained my services as a Strategy Specialist for Double Down in March of 2012 through mid-2013. I am currently engaged as a consultant to

several Internet-based social gaming companies whose products include online slot machines and online bingo games.

8. I have invented and applied for patents on over two dozen gaming methods and systems and, together with my patent attorney and frequent co-inventor, control a patent portfolio of approximately fifty issued and/or pending patents across several categories of the gaming industry. The following table lists a sampling of the issued patents in this portfolio:

<b>U.S. Patent Number, Issue Date, Category</b>	<b>Title, Brief Description</b>
7,686,668 (3/30/10) Networked gaming management systems	<p><b>Method, apparatus, and computer readable storage to determine and/or update slot machine configurations using historical, and/or current, and/or predicted future data</b></p> <p>A casino floor management system that captures and analyzes gaming data from throughout the casino network and automatically adjusts gaming machine settings appropriately.</p>
7,727,067 (6/1/10) Electronic gaming machines	<p><b>Wagering Game Allowing Player to Wager on Iterative Simultaneous Independent Wagers with Different Variances</b></p> <p>A wagering game allowing players to allocate their wager among different propositions with different variances, and that awards aggregate performance.</p>
8,308,544 (11/13/12); 8,113,938 (2/14/12); 8,075,383 (12/13/11); 7,682,239 (3/23/10)	<p><b>Video Games Adapted for Wagering</b></p> <p>Methods for converting traditional video games into wagering propositions, including methods to wager on driving or racing games, first-person shooters, and top-down scrolling games. This is the ultimate future of electronic wagering games once the market moves past</p>

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