Filed on behalf of Game Show Network, LLC and WorldWinner.com, Inc.

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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, Inc.,

Petitioners,

v.

Patent Owner of

U.S. Patent 6,174,237 to Stephenson

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Case IPR TBD

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DECLARATION OF E. JAMES WHITEHEAD, Jr., Ph.D.,

IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF

U.S. PATENT NO. 6,174,237

Declaration of E. James Whitehead, Jr., Ph.D., in Support of
Game Show Network Petition - IPR of U.S. Pat. No. 6,174,237

1.   I, E. James Whitehead, Jr., Ph.D., have been retained by Knobbe, Martens, Olson & Bear, LLP, counsel for Game Show Network, LLC and WorldWinner.com, Inc. (collectively "GSN"). I understand that GSN has petitioned for *inter partes* review of U.S. Patent No. 6,174,237 ("the '237 Patent") and requests that the United States Patent and Trademark Office cancel Claims 1-19 of the '237 Patent as unpatentable. The following discussion and analyses address the bases for GSN's petition.

I.   BACKGROUND AND QUALIFICATIONS, PREVIOUS TESTIMONY, AND COMPENSATION

A.   Background and Qualifications

2.   For more than 25 years, I have been developing professional and academic experience in the field of computer software engineering, including an emphasis in computer game design. I received a Bachelor of Science degree in Electrical Engineering from the Rensselaer Polytechnic Institute in May 1989, a Master of Science degree in Information and Computer Science from the University of California, Irvine in December 1994, and a Doctor of Philosophy in Information and Computer Science from the University of California, Irvine in September 2000.

3.   From 1989 to 1992, I was an engineer in the Raytheon Equipment Division. At Raytheon, I developed software for an air traffic control system, a vessel traffic control system, and a prototype microwave airplane landing system.

4.   From July 2000 until the present, I have been a professor of Computer Science at the University of California, Santa Cruz ("UCSC"). In that capacity, I have taught undergraduate and graduate courses in computer software engineering and computer game design, and I have conducted research in the areas of software engineering of computer games, design of social network computer games, level design in computer games, procedural content generation for computer games, and Internet protocol design.

5.   My research has resulted in the publication of at least 12 scientific articles in peer-reviewed journals and 64 peer-reviewed conference papers. In addition, I have served as a thesis advisor and graduated 8 doctoral candidates.

6.   I have authored or co-authored several publications that are directly related to computer game design. These publications include:

- Gillian Smith, Jim Whitehead, Michael Mateas, "Tanagra: Reactive Planning and Constraint Solving for Mixed-Initiative

Level Design." *IEEE Transactions on Computational Intelligence and Artificial Intelligence in Games (TCIAIG)*, vol. 3, no. 3, September 2011, pp. 201-205.

- Chris Lewis, Jim Whitehead, "Repairing Games at Runtime or, How We Learned to Stop Worrying and Love Emergence" *IEEE Software*, Vol. 28, No. 5, September/October 2011, pp. 53-59.

- Gillian Smith, Jim Whitehead, Michael Mateas, Mike Treanor, Jameka March, Mee Cha, "Launchpad: A Rhythm-Based Level Generator for 2-D Platformers" *IEEE Transactions on Computational Intelligence and AI in Games* (*TCIAIG*), Vol. 3, No. 1, March 2011.

- Gillian Smith, Alexei Othenin-Girard, Jim Whitehead, Noah Wardrip-Fruin. "PCG-Based Game Design: Creating Endless Web." *Proceedings of the 2012 Foundations of Digital Games Conference* (*FDG 2012*), Raleigh, NC, USA, May 30 - June 1, 2012.

- Chris Lewis, Noah Wardrip-Fruin, Jim Whitehead. "Motivational Game Design Patterns of 'Ville Games." *Proceedings of the 2012 Foundations of Digital Games Conference* (*FDG 2012*), Raleigh, NC, USA, May 30 - June 1, 2012.

- Gabriel Rivera, Kenneth Hullett, Jim Whitehead, "Enemy NPC Design Patterns in Shooter Games." *Proceedings of the Workshop on Design Patterns in Games* (*DPG 2012*), held with FDG 2012, Raleigh, NC, USA, May 30 - June 1, 2012.

- Robert Giusti, Kenneth Hullett, Jim Whitehead, "Weapon Design Patterns in Shooter Games." *Proceedings of the Workshop on Design Patterns in Games* (*DPG 2012*), held with FDG 2012, Raleigh, NC, USA, May 30 - June 1, 2012.

- Gillian Smith, Ryan Anderson, Brian Kopleck, Zach Lindblad, Lauren Scott, Adam Wardell, Jim Whitehead, Michael Mateas, "Situating Quests: Design Patterns for Quest and Level Design in Role-Playing Games." *Fourth International Conference on Interactive Digital Storytelling* (*ICIDS 2011*), Vancouver, Canada, November 28-December 1, 2011. Lecture Notes in Computer Science 7069 Springer, pp. 326-329.

- Chris Lewis, Jim Whitehead, "The Whats and Whys of Games and Software Engineering", in *Proceedings of the Games and Software Engineering workshop* (*GAS 2011*), co-located with the 2011 Int'l Conference on Software Engineering (ICSE 2011), Honolulu, Hawaii, USA, May 21, 2011.

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