

I, David Marvit, make the following Declaration pursuant to 28 U.S.C. § 1746:

1. I currently reside at 815 24th Ave, SF CA 94121. I am providing this Declaration in connection with the pending *Inter Partes* review proceedings currently instituted against certain U.S. Patents owned by Worlds, Inc.
2. Unless otherwise stated, the facts presented in this Declaration are based on my personal knowledge.
3. In 1995, I served as the Vice President of Production at Knowledge Adventure Worlds.
4. From January 1995 until December 1995, I oversaw the team responsible for developing and maintaining the Worlds Chat program. This team included David Leahy, Judith Challinger, Mitra Ardon, and Bo Adler.
5. During January 1995, the Worlds Chat team was working on the problem of crowd control in the virtual world experience. At the time, servers and computers (clients) possessed significantly limited processing power and memory, and networks transferred data at slow rate. These limitations hindered the potential size of a virtual world, since too many avatars on a screen could bog down the system, either in the transmission of position/orientation updates from the server to the clients, or in graphics processing by the clients.

6. After Ron Britvich joined Worlds, Inc. on January 30, 1995, he occasionally traveled to San Francisco, CA to collaborate with the team developing the Worlds Chat program, and on occasion members of the Worlds Chat team traveled to his home in Carlsbad, CA, where Ron worked. These visits were to collaborate on the development of Worlds Chat and the ActiveWorlds customizable virtual world that Ron was developing.
7. On April 3, 1995, the *Wall Street Journal* published an article about Worlds Chat. The article was entitled, "Talking Blowfish to Enliven the Internet." This article accurately described the Worlds Chat experience at that time, and I specifically recall speaking with the article's author, Jared Sandberg, about Worlds Chat in an interview prior to the publication of that article. I also recall that a copy of Worlds Chat was provided to Mr. Sandberg for testing purposes prior to him writing the article. Attached as Exhibit 2022 is a true and accurate copy of Mr. Sandberg's Wall Street Journal article published on April 3, 1995.
8. This company's goal was to make Worlds Chat available for public release and download no later than April 1, 1995. The goal was to allow users to experience Worlds Chat from their homes. This date was important because it represented the Worlds company's one-year anniversary. The Worlds Chat team did not meet this deadline, however.

9. From April 11, 1995 until April 25, 1995, the Worlds Chat team worked on a daily basis, including weekends, to debug and improve the code for Worlds Chat. This included sending members of the Worlds Chat team to Seattle, where Mitra Ardon was located, to improve the Ace software engine on which Worlds Chat was built. Ace required this update in order to fully support the Worlds Chat client-server protocol that was written by the Worlds Chat programming team. Additionally, the team needed additional time to add features to Worlds Chat, including the “whisper” function that allowed one-to-one chat communications.
10. On April 23, 1995, Worlds Chat was made publicly available for download from an anonymous ftp site.
11. On or about April 23, 1995, Knowledge Adventure Worlds changed its name to Worlds, Inc.
12. On April 25, 1995, Worlds, Inc. publicly announced the availability of Worlds Chat for download from Worlds’ webpage (kaworlds.com). This announcement was made by press release through Business Wire.
13. Attached as Exhibit 2021 is a true and accurate copy of the Press Release issued by Worlds, Inc. on April 25, 1995.
14. To the best of my recollection, the statements in the Press Release were accurate at the time they were made.

15.I make this declaration of my own personal knowledge, and declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 15th day of March, 2016, at San Francisco, CA.



David Marvit