

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ACTIVISION BLIZZARD, INC.,
ELECTRONIC ARTS INC.,
TAKE-TWO INTERACTIVE SOFTWARE, INC.,
2K SPORTS, INC.,
ROCKSTAR GAMES, INC., and
BUNGIE, INC.,
Petitioner,

v.

ACCELERATION BAY, LLC,
Patent Owner.

Case IPR2015-01972¹
U.S. Patent No. 6,701,344

**PATENT OWNER'S IDENTIFICATION OF ARGUMENTS EXCEEDING
THE PROPER SCOPE OF REPLY**

¹ Bungie, Inc., who filed a Petition in IPR2016-00934, has been joined as a petitioner in this proceeding.

Pursuant to the Board's October 25, 2016 Order (Paper 63), Patent Owner Acceleration Bay, LLC identifies the following portions of Petitioner's Reply that exceed the proper scope of reply:

1. Pg. 4, line 16–Pg. 5, line 5; Exs. 1136, 1141, 1140, 1138, 1137, 1126
2. Pg. 4, lines 19–23 and Pg. 5, lines 17–19; Ex. 1136
3. Pg. 5, line 10, Exs. 1141, 1126
4. Pg. 8, line 16–Pg. 9, line 3, Exs. 1128, 1144, 1130
5. Pg. 13, lines 9–13; Ex. 1125, ¶¶ 96–107
6. Pg. 15, lines 10–12, Ex. 1129
7. Pg. 17, lines 11–12
8. Pg. 17, line 13–Pg. 18, line 2, Ex. 1125, ¶¶ 153–64
9. Pg. 18, line 18–Pg. 19, line 1, Ex. 1125, ¶¶ 153–64
10. Pg. 19, lines 7–10, Ex. 1125
11. Pg. 20, lines 6–9
12. Pg. 20, lines 14–20, Ex. 1125, ¶¶ 165–70
13. Pg. 21, line 17–Pg. 22, line 11
14. Petitioner's exhibits 1126, 1128-1134, 1136-1139, 1141, 1444, 1149–51

Identification of Arguments Exceeding Scope of Reply
IPR2015-01972 (U.S. Patent No. 6,701,344)

Respectfully submitted,

Dated: October 28, 2016

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(Case No. IPR2015-01972)

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that a true and correct copy of the foregoing Patent Owner's Identification of Arguments Exceeding the Proper Scope of Reply was served on October 28, 2016, by filing this document through the Patent Review Processing System as well as delivering via electronic mail upon the following counsel of record for Petitioner:

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Identification of Arguments Exceeding Scope of Reply
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