

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

ACCELERATION BAY, LLC,  
Patent Owner

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Case IPR2015-01972<sup>1</sup>  
Patent 6,701,344

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**PATENT OWNER'S CONSOLIDATED REPLY IN SUPPORT OF PATENT  
OWNER'S CONTINGENT MOTION TO AMEND  
UNDER 37 C.F.R. § 42.121**

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

**PATENT OWNER'S EXHIBIT LIST**

|  | <b>Description</b>  |
|--|---|
| <b>Exhibit-2001</b>                          | Boeing Invention Disclosure Document (cover page and page 6)  |
| <b>Exhibit-2002<br/>to Exhibit-<br/>2004</b> | Reserved  |
| <b>Exhibit-2005</b>                          | CSE Technical Reports, available at<br><a href="http://csetechrep.ucsd.edu//dienst.html">http://csetechrep.ucsd.edu//dienst.html</a> (Little 6/2/16 Deposition<br>Ex. 4)                        |
| <b>Exhibit-2006<br/>to Exhibit-<br/>2021</b> | Reserved  |
| <b>Exhibit-2022</b>                          | Declaration of Michael Goodrich, Ph.D. in Support of Patent<br>Owner's Response with Appendix A ( <i>Curriculum Vitae</i> of<br>Michael Goodrich)<br>[CONFIDENTIAL - PROTECTIVE ORDER MATERIAL] |
| <b>Exhibit-2023</b>                          | Declaration of Dr. Harry Bims in Support of Patent Owner's<br>Response with Appendix A ( <i>Curriculum Vitae</i> of Dr. Harry<br>Bims)<br>[CONFIDENTIAL - PROTECTIVE ORDER MATERIAL]            |
| <b>Exhibit-2024</b>                          | Declaration of Dr. Fred B. Holt in Support of Patent Owner's<br>Response<br>[CONFIDENTIAL - PROTECTIVE ORDER MATERIAL]  |
| <b>Exhibit-2025</b>                          | Declaration of Virgil E. Bourassa in Support of Patent Owner's<br>Response<br>[CONFIDENTIAL - PROTECTIVE ORDER MATERIAL]  |
| <b>Exhibit-2026</b>                          | Declaration of Robert Abarbanel in Support of Patent Owner's<br>Response<br>[CONFIDENTIAL - PROTECTIVE ORDER MATERIAL]  |

Patent Owner's Reply in Support of Motion to Amend  
IPR2015-01972 (U.S. Patent No. 6,701,344)

|                     | <b>Description</b>  |
|---------------------|---|
| <b>Exhibit-2027</b> | Reserved  |
| <b>Exhibit-2028</b> | Boeing Invention Disclosure Form (19 pages)<br>[CONFIDENTIAL - PROTECTIVE ORDER MATERIAL]   |
| <b>Exhibit-2029</b> | Patent License Agreement between Boeing Management Company and Sony Computer Entertainment America Inc.<br>[CONFIDENTIAL - PROTECTIVE ORDER MATERIAL]   |
| <b>Exhibit-2030</b> | Reserved  |
| <b>Exhibit-2031</b> | Deposition Transcript of Peter Shoubridge, Ph.D. for Case Nos. IPR2015-01953, IPR2015-01972, and IPR2015-01996, taken on June 15, 2016  |
| <b>Exhibit-2032</b> | Deposition Transcript of Dr. David R. Karger for Case Nos. IPR2015-01964 and IPR2015-01996, taken on July 6, 2016<br>[CONFIDENTIAL - PROTECTIVE ORDER MATERIAL]   |
| <b>Exhibit-2033</b> | Deposition Transcript of Dr. David R. Karger for Case Nos. IPR2015-01970 and IPR2015-01972, taken on July 7, 2016<br>[CONFIDENTIAL - PROTECTIVE ORDER MATERIAL]   |
| <b>Exhibit-2034</b> | Deposition Transcript of Dr. David R. Karger for Case Nos. IPR2015-01951 and IPR2015-01953, taken on July 8, 2016<br>[CONFIDENTIAL - PROTECTIVE ORDER MATERIAL]   |
| <b>Exhibit-2035</b> | Nowell, Balakrishnan, and Karger, <i>Analysis of the Evolution of Peer-to-Peer Systems</i> , PODC '02 Proceedings of the twenty-first annual symposium on Principles of distributed computing (July 21, 2002) |
| <b>Exhibit-2036</b> | Stoica, Morris, Nowell, Karger, et al., <i>Chord: A Scalable Peer-to-Peer Lookup Protocol for Internet Applications</i> , IEEE/ACM Transactions on Networking, Vol. 11, No. 1 (Feb. 2003)                     |

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|                     | <b>Description</b>  |
|---------------------|---|
| <b>Exhibit-2037</b> | Vu and Risner, <i>Performance and Cost of Broadcast Routing Algorithms in the Strategic Defense System Terrestrial Network</i> , Military Communications Conference, 1991. MILCOM '91, IEEE, pages 29.2.1 to 29.2.5 (Nov. 4-7, 1991)  |
| <b>Exhibit-2038</b> | Schollmeier, <i>A Definition of Peer-to-Peer Networking for the Classification of Peer-to-Peer Architectures and Applications</i> , Proceedings of the First International Conference on Peer-to-Peer Computing, IEEE (Aug. 2002), available at <a href="https://www.computer.org/csdl/proceedings/p2p/2001/1503/00/15030101.pdf">https://www.computer.org/csdl/proceedings/p2p/2001/1503/00/15030101.pdf</a> |
| <b>Exhibit-2039</b> | Merriam-Webster online dictionary - Definition of "indication"  |
| <b>Exhibit-2040</b> | U.S. Patent No. 7,792,968 ("968 Patent")  |
| <b>Exhibit-2041</b> | U.S. Patent No. 8,396,984 ("984 Patent")  |
| <b>Exhibit-2042</b> | Reserved  |
| <b>Exhibit-2043</b> | Reserved  |
| <b>Exhibit-2044</b> | Webster's New World Computer Dictionary, Tenth Edition (2003) (Page 176)  |
| <b>Exhibit-2045</b> | The American Heritage Dictionary, Fourth Edition (2001) (Page 615)  |
| <b>Exhibit-2046</b> | Tanenbaum, <i>Computer Networks</i> , Third Edition (1996) (Page 17, 28-34, 37, 59-60, 339, 345-367)  |
| <b>Exhibit-2047</b> | Dr. Fred Holt's handwritten notes, dated March 27, 1997<br>[CONFIDENTIAL - PROTECTIVE ORDER MATERIAL]   |
| <b>Exhibit-2048</b> | Print-out of a source code C++ header file, dated April 22, 1997<br>[CONFIDENTIAL - PROTECTIVE ORDER MATERIAL]  |

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|                     | <b>Description</b>  |
|---------------------|---|
| <b>Exhibit-2049</b> | Printout of a source code C software module, dated June 8, 1999<br>[CONFIDENTIAL - PROTECTIVE ORDER MATERIAL]   |
| <b>Exhibit-2050</b> | Demonware presentation - Erlang Factory London 2011, Erlang and First-Person Shooters - 10s of millions of Call of Duty Black Ops fans loadtest Erlang by Malcolm Dowse   |
| <b>Exhibit-2051</b> | Gamespot webpage - Networks: Peer to Peer vs. Client Servers - System Wars, available at<br><a href="http://www.gamespot.com/forums/system-wars-314159282/networks-peer-to-peer-servers-vs-client-servers-26276019/">http://www.gamespot.com/forums/system-wars-314159282/networks-peer-to-peer-servers-vs-client-servers-26276019/</a>   |
| <b>Exhibit-2052</b> | Playstation webpage - Port Numbers, which do I need to open for the PlayStation and how do I do it? - available at<br><a href="http://community.eu.playstation.com/t5/PSN-Support/Port-Numbers-which-do-I-need-to-open-for-the-PlayStation-and-how/td-p/13390392">http://community.eu.playstation.com/t5/PSN-Support/Port-Numbers-which-do-I-need-to-open-for-the-PlayStation-and-how/td-p/13390392</a> |
| <b>Exhibit-2053</b> | Playstation webpage - Test Internet Connection, PlayStation 4 User's Guide - available at<br><a href="http://manuals.playstation.net/document/en/ps4/settings/nw_test.html">http://manuals.playstation.net/document/en/ps4/settings/nw_test.html</a>  |
| <b>Exhibit-2054</b> | Game Informer webpage - The Matchmaking Technology of Destiny- available at<br><a href="http://www.gameinformer.com/b/features/archive/2013/12/06/the-matchmaking-technology-of-destiny.aspx?PostPageIndex=1">http://www.gameinformer.com/b/features/archive/2013/12/06/the-matchmaking-technology-of-destiny.aspx?PostPageIndex=1</a>  |
| <b>Exhibit-2055</b> | Bungie presentation - Shared World Shooter - Destiny's Networked Mission Architecture   |
| <b>Exhibit-2056</b> | VGBOX webpage - Destiny full size box cover - available at<br><a href="http://vgboxart.com/viewfullsize/66658/Destiny/">http://vgboxart.com/viewfullsize/66658/Destiny/</a>   |
| <b>Exhibit-2057</b> | Bungie webpage - Voice Chat [Beta] in Destiny - available at<br><a href="https://www.bungie.net/en/News/Article/12376/7_voice-chat-beta-in-destiny">https://www.bungie.net/en/News/Article/12376/7_voice-chat-beta-in-destiny</a>   |

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