

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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Inventors: Fred B. Holt, Virgil E. Bourassa	§ 109869-0003-654
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Issue Date: December 7, 2004	§
Filing Date: July 31, 2000	§ Petitioners: Activision Blizzard,
Former Group Art Unit: 2155	§ Inc.; Electronic Arts Inc.; Take-
Former Examiner: M. Won	§ Two Interactive Software, Inc.;
	§ 2K Sports, Inc.; and Rockstar
	§ Games, Inc.

For: BROADCASTING NETWORK

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**PETITION FOR *INTER PARTES* REVIEW OF
UNITED STATES PATENT NO. 6,829,634**

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LIST OF EXHIBITS

Exhibit	Description
Ex. 1101	U.S. Patent No. 6,829,634 to Fred B. Holt <i>et al.</i> (“’634 patent”).
Ex. 1102	Declaration of David K. Lin and the Certified File Wrapper for U.S. Patent No. 6,829,634.
Ex. 1103	Bradley Bargaen & Peter Donnelly, <i>INSIDE DIRECTX</i> , (Microsoft Press, 1998) (“DirectPlay”).
Ex. 1104	Declaration of Glenn Little and, as Exhibit B, Meng-Jang Lin, <i>et al.</i> , <i>Gossip versus Deterministic Flooding: Low Message Overhead and High Reliability for Broadcasting on Small Networks</i> , Technical Report No. CS1999-0637 (Univ. of Cal. San Diego, 1999) (“Lin”).
Ex. 1105	Peter J. Shoubridge & Arek Dadej, <i>Hybrid Routing in Dynamic Networks</i> , in 3 IEEE INT’L CONF. ON COMM’NS CONF. REC. 1381-86 (Montreal, 1997) (“Shoubridge”).
Ex. 1106	Declaration of Steven Silvio Pietrobon and, as Exhibit F, Peter J. Shoubridge, <i>Adaptive Strategies for Routing in Dynamic Networks</i> , Ph.D. Thesis (Univ. S. Austl., 1996) (“Shoubridge Thesis”)
Ex. 1107	John M. McQuillan, <i>et al.</i> , <i>The New Routing Algorithm for the ARPANET</i> , COM-28, No. 5 IEEE TRANSACTIONS ON COMM’NS, 711-19 (1980) (“McQuillan”).
Ex. 1108	Yogen Kantilal Dalal, <i>Broadcast Protocols in Packet Switched Computer Networks</i> (Ph.D. Thesis, Stanford University 1977) and supporting (“Dalal”)
Ex. 1109	S. Alagar, <i>et al.</i> , <i>Reliable Broadcast in Mobile Wireless Networks</i> , Military Communications Conference, 1 IEEE MILCOM ’95 CONF. REC., 236-40 (San Diego, Cal., 1995) (“Alagar”).
Ex. 1110	Certificate of Authenticity and a Press Release, <i>Microsoft Boosts Accessibility to Internet Gaming Zone with Latest Release</i> (Apr. 27, 1998) (PR Newswire) (“IGZ”).
Ex. 1111	Donald M. Topkis, <i>Concurrent Broadcast for Information Dissemination</i> , SE-11, No. 10 IEEE TRANSACTIONS ON SOFTWARE ENGINEERING, 1107-11 (1985) (“Topkis”).
Ex. 1112	Dimitri Bertsekas & Robert Gallager, <i>DATA NETWORKS</i> (Prentice Hall, 2d ed. 1992) (“Bertsekas”).
Ex. 1113	Kuo-Jui Raymond Lin, <i>Routing and Broadcasting in Two-dimensional Linear Congruential Graphs of Degree Four</i> , Master’s Thesis (Concordia Univ. Montreal, Canada, 1994) (“Kuo-Jui Lin”).

Ex. 1114	William S. Davis and David C. Yen, THE INFORMATION SYSTEM CONSULTANT'S HANDBOOK: SYSTEMS ANALYSIS AND DESIGN (CRC Press, 1998) ("Davis").
Ex. 1115	V. G. Cerf, <i>et al.</i> , Topological Design Considerations in Computer Commc'n Networks, COMPUTER COMMC'N NETWORKS (R. L. Grimsdale <i>et al.</i> eds., 1975) ("Cerf").
Ex. 1116	U.S. Patent No. 6,122,277 to Derrick Garmire <i>et al.</i> ("Garmire").
Ex. 1117	U.S. Patent No. 5,181,017 to Alexander H. Frey, Jr. <i>et al.</i> ("Frey").
Ex. 1118	Flaviu Cristian <i>et al.</i> , <i>Atomic Broadcast: From Simple Message Diffusion to Byzantine Agreement</i> , 118 INFORMATION AND COMPUTATION 158-79 (Albert R. Meyer ed., 1995) ("Cristian").
Ex. 1119	Expert Declaration of David R. Karger
Ex. 1120	Declaration of Peter John Shoubridge and, as Exhibit A, Peter J. Shoubridge, <i>Adaptive Strategies for Routing in Dynamic Networks</i> , Ph.D. Thesis (Univ. S. Austl., 1996) ("Shoubridge Thesis"), and as Exhibit B, Peter J. Shoubridge & Arek Dadej, <i>Hybrid Routing in Dynamic Networks</i> , in 3 IEEE INT'L CONF. ON COMMC'NS CONF. REC. 1381-86 (Montreal, 1997) ("Shoubridge").
Ex. 1121	SUPPORTING MICROSOFT WINDOWS 95, Vol. 1 (Microsoft Press 1995) ("Supporting Windows 95").
Ex. 1122	Declaration of Matthew R. Shapiro
Ex. 1123	Declaration of Julian D. Moore

Pursuant to 35 U.S.C. §§ 311-319 and 37 C.F.R. § 42, the undersigned, on behalf of and representing Activision Blizzard, Inc., Electronic Arts Inc., Take-Two Interactive Software, Inc., 2K Sports, Inc., and Rockstar Games, Inc. (collectively “Petitioners”), hereby petition for *inter partes* review of claims 1-18 of U.S. Patent No. 6,829,634 (“the ’634 patent”). The ’634 patent was issued to The Boeing Company and is purportedly assigned to Acceleration Bay LLC (“Patent Owner”). Petitioners assert there is a reasonable likelihood that at least one claim is unpatentable and respectfully request review of, and judgment against, claims 1-18 (“the Challenged Claims”) as unpatentable under 35 U.S.C. § 103 and/or § 102.

I. INTRODUCTION

The ’634 patent is directed to a computer network in which information is broadcast from one participant to every other participant. *See, e.g.*, Ex. 1101, Abstract. In particular, the ’634 patent claims the use of “flooding” to broadcast information in computer networks configured as non-complete, “*m*-regular graphs.” *Id.* at 1:29-31, 4:49-5:6; cl. 1. This purported invention, however, was disclosed in printed publications that pre-date its filing date of July 31, 2000.

“Flooding” refers to a simple, reliable technique for broadcasting information, in which the sender of a message transmits it to each of its neighbors, who in turn forward the message to each of their neighbors, who themselves forward it to each of their neighbors, and so on, until every participant has received the mes-

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