

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., and  
BUNGIE, INC.,  
Petitioner,

v.

ACCELERATION BAY, LLC,  
Patent Owner.

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Case IPR2015-01996<sup>1</sup>  
U.S. Patent No. 6,829,634

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

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<sup>1</sup> Bungie, Inc., who filed a Petition in IPR2016-00964, has been joined as a petitioner in this proceeding.

Pursuant to the Board's October 25, 2016 Order (Paper 60), Patent Owner Acceleration Bay, LLC identifies the following portions of Petitioner's Reply that exceed the proper scope of reply:

1. Pg. 4, lines 11 – Pg. 5 line 3; Exs. 1136, 1141, 1140, 1138, 1137, 1126
2. Pg. 5, line 8; Exs. 1141, 1126
3. Pg. 7, lines 15 – 19; Exs. 1128, 1144, 1130
4. Pg. 9, lines 8 – 13; Ex. 1125 ¶¶ 136 – 138, 139
5. Pg. 11, lines 9 – 12; Ex. 1125 ¶ 145
6. Pg. 11, lines 16 – 19; Ex. 1125 ¶¶ 146 – 147
7. Pg. 12, lines 11 – 13; Ex. 1125 ¶ 149 (“TCP/IP is one of ‘a finite number of identified, predictable solutions.’”)
8. Pg. 13, lines 5 – 9; Ex. 1125 ¶ 151
9. Pg. 13, lines 13 – 15; Ex. 1139
10. Pg. 13, lines 16 – 19; Ex. 1125 ¶¶ 15, 155
11. Pg. 17, lines 4 – 6; Ex. 1129
12. Pg. 21, lines 4 – 7; Ex. 1125 ¶ 149
13. Pg. 21, lines 20 – 21; Exs. 1128, 1144, 1130
14. Pg. 22, lines 12 – pg. 23, line 5
15. Pg. 24, lines 9 – 13; Ex. 1125 ¶¶ 104, 107 – 108
16. Petitioner's exhibits 1126, 1128–1134, 1136–1139, 1141–1144, 1149–51

Identification of Arguments Exceeding Scope of Reply  
IPR2015-01996 (U.S. Patent No. 6,829,634)

Respectfully submitted,

Dated: October 28, 2016

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(Case No. IPR2015-01996)

*Attorneys for Patent Owner*

**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  
IPR2015-01996 (U.S. Patent No. 6,829,634)

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