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BEFORE THE PATENT TRIAL AND APPEAL BOARD

Activision Blizzard, Inc., Electronic Arts Inc., Take-Two Interactive Software,
Inc., 2K Sports, Inc., and Rockstar Games, Inc.,
Petitioners

v.

Acceleration Bay, LLC,
Patent Owner

Case No. IPR2016-00726

**DECLARATION OF DAVID R. KARGER IN SUPPORT OF THE
PETITION FOR AN *INTER PARTES* REVIEW OF
UNITED STATES PATENT NOS. 6,732,147 AND 6,910,069**

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Submitted Electronically via the Patent Review Processing System



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LIST OF EXHIBITS

Exhibit	Description
Ex. 1001	U.S. Patent No. 6,732,147 (“the ’147 patent”)
Ex. 1002	U.S. Patent No. 6,732,147 File History
Ex. 1003	<i>This Exhibit</i> – Expert Declaration of David R. Karger (“Karger”)
Ex. 1004	Declaration of Scott Bennett, Ph.D
Ex. 1005	Peter J. Shoubridge & Arek Dadej, “Hybrid Routing in Dynamic Networks,” IEEE International Conference on Communications, Montreal, 1997 (“Shoubridge”)
Ex. 1006	Declaration of Steven Silvio Pietrobon attaching as Exhibit F Peter J. Shoubridge, “Adaptive Strategies for Routing in Dynamic Networks” (Ph.D. Thesis, University of South Australia, December 1996) (“Shoubridge Thesis”)
Ex. 1007	John M. McQuillan, <i>et al.</i> , “The New Routing Algorithm for the ARPANET,” IEEE Transactions Comms., Vol. 28, No. 5, 1980 (“McQuillan”)
Ex. 1008	Yogen Kantilal Dalal, “Broadcast Protocols in Packet Switched Computer Networks,” (Ph.D. Thesis, Stanford University 1977) (“Dalal”)
Ex. 1009	Katia Obraczka, <i>et al.</i> , “A Tool for Massively Replicating Internet Archives: Design, Implementation, and Experience,” Proceedings of the 16th International Conference on Distributed Computing Systems, 27-30 May 1996, Hong Kong (New York, NY: 1996), 657-664 (“Obraczka Paper”)
Ex. 1010	Katia Obraczka, “Massively Replicating Services In Wide-Area Internetworks,” (Ph.D. Thesis, University of Southern California December 1994) (“Obraczka”)
Ex. 1011	Jose Rufino, <i>et al.</i> , “A Study On The Inaccessibility Characteristics Of ISO 8802/4 Token-Bus LANs,” IEEE INFOCOM ’92: The Conference on Computer Communications. One World through Communications. Eleventh Annual Joint Conference of the IEEE Computer and Communication Societies, Florence, Italy, Vol. 2 (Picataway, NJ: IEEE Service Center, 1992), 0958-0967 (“Rufino”)
Ex. 1012	U.S. Patent No. 6,829,634 (“the ’634 patent”)
Ex. 1013	Kuo-Jui Raymond Lin, “Routing and Broadcasting in Two-dimensional Linear Congruential Graphs of Degree Four,” (Master’s Thesis, Concordia University, June 1994) (“Kuo-Jui Lin”)

Exhibit	Description
Ex. 1014	William S. Davis and David C. Yen, <u>The Information System Consultant's Handbook: Systems Analysis and Design</u> , CRC Press, 1998 ("Davis")
Ex. 1015	Topological Design Considerations in Computer Communication Networks, <u>Computer Communication Networks</u> (V.G. Cerf, D.D. Cown, R.C. Mullin), 1975 ("Cerf")
Ex. 1016	Stephen M. Grimes certification of English translation attaching English translation and original text of Tamás Dénes, "The 'Evolution' of Regular Graphs of Even Order by their Verticies," <u>Matematikai Lapok</u> , 27, 3-4 (1976/1979): 365-377 ("Denes")
Ex. 1017	English language translation from Exhibit 1016: Tamás Dénes, "The 'Evolution' of Regular Graphs of Even Order by their Verticies," <u>Matematikai Lapok</u> , 27, 3-4 (1976/1979): 365-377 ("Denes")
Ex. 1018	S. Toida, "Construction of Quartic Graphs," <u>Journal of Combinatorial Theory, Series B</u> , 16.2 (April 1974): 124-133 ("Toida")
Ex. 1019	T. Todd, "The Token Grid Network," <u>IEEE/ACM Transactions On Networking</u> , 2.3 (June 1994): 279-287 ("Todd")
Ex. 1020	Declaration of Peter John Shoubridge and, as Exhibit A, Peter J. Shoubridge, <u>Adaptive Strategies for Routing in Dynamic Networks</u> , Ph.D. Thesis (Univ. S. Austl., 1996) ("Shoubridge Thesis"), and as Exhibit B, Peter J. Shoubridge & Arek Dadej, <u>Hybrid Routing in Dynamic Networks</u> , in 3 <u>IEEE INT'L CONF. ON COMMC'NS CONF. REC.</u> 1381-86 (Montreal, 1997) ("Shoubridge").
Ex. 1021	U.S. Patent No. 5,802,285 to Hirviniemi ("Hirviniemi")
Ex. 1022	U.S. Patent No. 4,700,185 to Balph ("Balph")
Ex. 1023	U.S. Patent No. 6,603,742 to Steele <i>et al.</i> ("Steele")
Ex. 1024	U.S. Patent No. 6,732,147 File History Excerpt: November 5, 2003 Office Action
Ex. 1025	U.S. Patent No. 6,732,147 File History Excerpt: December 17, 2003 Amendment and Response
Ex. 1026	U.S. Patent No. 6,732,147 File History Excerpt: January 23, 2004 Notice of Allowance
Ex. 1027	L.G. Valiant, "Optimality of a Two-Phase Strategy for Routing in Interconnection Networks," <u>IEEE Transactions on Computers</u> , C-32.9 (September 1983): 861-863 ("Valiant")
Ex. 1028	U.S. Patent No. 6,490,247 to Gilbert <i>et al.</i> ("Gilbert")
Ex. 1029	U.S. Patent No. 6,122,277 to Garmire <i>et al.</i> ("Garmire")
Ex. 1030	U.S. Patent No. 5,181,017 to Frey <i>et al.</i> ("Frey")

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