

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.,  
Petitioners

v.

ACCELERATION BAY, LLC,  
Patent Owner

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Case No. IPR2016-00726  
Patent 6,910,069

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**DECLARATION OF MICHAEL GOODRICH, Ph.D.**

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I, Michael Goodrich, Ph.D., declare and state as follows:

## **I. QUALIFICATIONS**

1. I make this Declaration based upon my own personal knowledge, information, and belief, and I would and could competently testify to the matters set forth herein if called upon to do so.

2. I received a Bachelor of Arts (“BA”) degree in Mathematics and Computer Science from Calvin College in 1983 and a PhD in Computer Sciences from Purdue University in 1987.

3. I am a Chancellor's Professor in the Department of Computer Science at the University of California, Irvine, where I have been a faculty member since 2001. The Chancellor's Professor title at University of California, Irvine is designed for persons who have earned the title of Professor and who have demonstrated unusual academic merit and whose continued promise for scholarly achievement is unusually high. In addition, I am technical director for the Center for Algorithms and Theory of Computation in the Donald Bren School of Information and Computer Sciences at University of California, Irvine. I was a professor in the Department of Computer Science at Johns Hopkins University from 1987-2001.

4. I have authored or coauthored over 300 publications, including several widely adopted books, such as *Introduction to Computer Security* and *Algorithm*

*Design and Applications.* My research includes contributions to data structures and algorithms, information security and privacy, networking, graph algorithms, computational geometry, distributed and parallel algorithms, and cloud security. My research is supported by grants from the Defense Advanced Research Projects Agency (DARPA) and the National Science Foundation (NSF).

5. In addition, I have consulting experience in matters involving algorithms, cryptography, machine learning, digital rights management, computer security, networking, software, and storage technologies.

6. I am an ACM Distinguished Scientist, a Fellow of the American Association for the Advancement of Science (AAAS), a Fulbright Scholar, a Fellow of the Institute of Electrical and Electronics Engineers (IEEE), and a Fellow of the Association for Computing Machinery (ACM). I am also a recipient of the IEEE Computer Society Technical Achievement Award and the Pond Award for Excellence in Undergraduate Teaching.

7. Attached hereto as Appendix A is a true and correct copy of my Curriculum Vitae (CV).

8. In developing my opinions below, I have considered the materials cited herein, including the subject Petition and all the exhibits cited therein and identified on Petitioner's Exhibit List. In addition, I have reviewed the documents

cited by Dr. David R. Karger in his declaration to the Petition (Dr. Karger's declaration hereinafter referred to as "Karger Decl").

9. To the extent that I am presented with new information concerning the subject matter of this declaration or affecting any assumptions made herein, I reserve the right to supplement this declaration accordingly.

## **II. SCOPE OF ASSIGNMENT AND APPROACH**

10. I have been retained as an expert on behalf of Patent Owner, Acceleration Bay LLC, ("Acceleration Bay"), to provide information and opinions to the Patent Trial and Appeal Board (hereinafter "the Board") to assist in the determination of whether or not the Board should institute *inter partes* review of one or more claims of Acceleration Bay's U.S. Patent No. 6,910,069 (the "'069 Patent"). Specifically, counsel for Acceleration Bay asked me to provide opinions regarding the validity of claims 1–17 of the '069 Patent in view of certain prior art references cited by Activision Blizzard, Inc., Electronic Arts Inc., Take-Two Interactive Software, Inc., 2K Sports, Inc., and Rockstar Games, Inc. (collectively, "Petitioner"). In my opinion, claims 1-17 of the '069 Patent are valid in light of the prior art and arguments presented in the Petition and the Karger Decl.

11. I have been informed by counsel and I understand that the analysis of whether a patent is anticipated or obvious is performed from the perspective of a person of ordinary skill in the art at the time of the patented inventions. The

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