

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

GREE, INC.,

Plaintiff,

v.

SUPERCELL OY,

Defendant.

§ The Honorable Rodney Gilstrap  
§  
§  
§ Civil Action No. 2:19-cv-00310-JRG-RSP  
§ 2:19-cv-00311-JRG-RSP  
§  
§  
§ JURY TRIAL DEMANDED  
§  
§

**DEFENDANT SUPERCELL OY'S NOTICE OF  
RULE 30(B)(6) DEPOSITION OF PLAINTIFF GREE, INC.**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Defendant Supercell Oy ("Supercell"), by and through its attorneys, will take the deposition of Plaintiff GREE, Inc. by oral examination. The deposition will be taken on September 4, 2020, or at such other time as otherwise agreed to by counsel for the parties, and at a place as agreed to by counsel for the parties or by virtual deposition.

Supercell reserves the right to record the deposition either via stenographic means by a court reporter certified to record depositions, or a digital reporter utilizing state-of-the-art digital recording equipment. Both the court reporter and digital reporter are authorized to administer the oath and serve as the deposition officer. Supercell further reserves the right to record the deposition utilizing audio or video technology. Supercell also reserves the right to utilize Exhibit Capture (picture-in picture) technology in which any exhibit reviewed by the deponent during the deposition can be captured visually.

Should the deposition be recorded in either video format, Supercell reserves the right to utilize at trial any portion of the audio or video recording of the proceeding. In the event

Supercell utilizes the stenographic reporting method, Supercell reserves the right to utilize instant visual display such that the reporter's writing of the proceeding will be available to all who are a part to this proceeding to request and receive in RealTime.

NOTICE IS FURTHER GIVEN that Supercell reserves the right to conduct this deposition utilizing a paperless exhibit display process called "Exhibit Share," provided and supported by Veritext Legal Solutions. The parties are advised that one paper set of exhibits will be utilized at the deposition for the court reporter's purposes of compiling, exhibit stamping, and ultimate production of the final certified transcript. However, no other paper copies will be provided as they will be available for visual display using Exhibit Share.

Please contact the noticing attorney prior to the deposition to advise that it is your desire to be set up for Exhibit Share access so that the necessary credentials, testing, and information, if necessary, can be provided to you prior to the proceedings. For information and available tutorial videos demonstrative Exhibit Share, please utilize this link to access additional information: <http://www.veritext.com/services/exhibitshare/>.

NOTICE IS FURTHER GIVEN that Supercell reserves the right to conduct this deposition utilizing the secure web-based deposition option afforded by Veritext or, in the alternative, video teleconferencing (VTC) services or telephonically only to provide remote/virtual access for those parties wishing to participate in the deposition via the internet and/or telephone. Also take notice that the court reporter may be remote via one of the options above for the purposes of reporting the proceeding and may or may not be in the presence of the deponent. Please contact the noticing attorney prior to the deposition to advise that it is your desire to appear via this remote participating means so that the necessary credentials, call-in numbers, testing, and information, if necessary, can be provided to you prior to the proceedings.

Supercell reserves the right to utilize instant visual display technology such that the court report's writing of the proceeding will be displayed simultaneous to their writing of same on one's laptop, iPad, tablet, or other type of display device connected to the court reporter.

In accordance with Fed. R. Civ. P. 30(b)(6), GREE is advised of its duty to designate one or more of its officers, directors or other persons to testify on its behalf with respect to the matters identified in the Schedule of Topics. So that Supercell may comply with the U.S. Embassy Tokyo rules for taking depositions, at least three weeks before the deposition, GREE is requested to identify to undersigned counsel the witnesses for each topic and to produce any documents, which have not previously been produced and which are in GREE's (or the designated person's or persons') possession, custody, or control referring or relating to the topics.

Dated: August 7, 2020

Respectfully submitted,

/s/ Jessica M. Kaempf

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## ATTACHMENT A

### DEFINITIONS

1. **“Plaintiff,” “you,” “your,” or “GREE”** means Plaintiff GREE, Inc., and shall include all divisions, parents, subsidiaries identified as part of GREE Group in GREE’s annual reports, including but not limited to GREE International, Inc., GREE International Entertainment, Inc., Wright Flyer Studios, Inc. (“WFS”), Wright Flyer Live Entertainment, Inc., Pokelabo, OpenFeint Inc., Funzio, Inc., Epic Voyage, Inc., and funplex, Inc., and further including but not limited to affiliates, predecessor or successor entities and their respective divisions, parents, subsidiaries, affiliates, predecessor or successor entities, if any, and present and former officers, directors, trustees, employees, staff members, agents or other representatives, other persons acting or purporting to act on behalf of any of the same, including counsel and patent agents, in any country, and any other entity from which they have obtained or are able to obtain any part of the discovery sought herein.
2. **“Defendant” or “Supercell”** shall refer to Defendant Supercell Oy.
3. **“This Action” or “These Actions”** shall refer to *GREE, Inc. v. Supercell Oy*, filed in the United States District Court, Eastern District of Texas, case Nos. 2:19-cv-00310-JRG-RSP and 2:19-cv-00311-JRG-RSP.
4. **“708 Patent”** means U.S. Patent No. 10,076,708.
5. **“832 Patent”** means U.S. Patent No. 10,413,832.
6. **“107 Patent”** means U.S. Patent No. 9,079,107.
7. **“439 Patent”** means U.S. Patent No. 9,561,439.
8. **“Patents-In-Suit”** means U.S. Patent Nos. 10,076,708; 10,413,832; 9,079,107; and 9,561,439, collectively.
9. The term **“Named Inventors”** shall mean the inventors named on the Patents-In-Suit.
10. The term **“related patents/applications”** as used herein in connection with the Patents-In-Suit means any and all patents, patent applications and/or patent publications

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