

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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BUNGIE, INC.,  
Petitioner

v.

WORLDS INC.,  
Patent Owner

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Case IPR2015-01319  
Patent 8,082,501

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**PATENT OWNER WORLDS INC.'S  
PRELIMINARY RESPONSE**

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## **LIST OF PATENT OWNER'S EXHIBITS**

<b><u>Exhibit</u></b>	<b><u>Description</u></b>
2001	Transcript of Conference Call of July 23, 2015
2002	“Exhibit 1” to Exhibit 2001 (Software Publishing and Development Agreement, dated April 16, 2010)
2003	Proof of Service in <i>Worlds Inc. v. Activision Blizzard, Inc., et al.</i> , Case No. 1:12-cv-10576 (D. Mass.)
2004	Letter dated November 13, 2014, from Worlds’ litigation counsel to Activision’s litigation counsel
2005	Patent Owner’s First [Proposed] Set of Requests for Production of Documents and Things to Petitioner (Nos. 1-6)
2006	Claim Construction Order dated June 26, 2015 in <i>Worlds Inc. v. Activision Blizzard, Inc., et al.</i> , Case No. 1:12-cv-10576 (D. Mass.)
2007	Complaint in <i>Worlds Inc. v. Activision Blizzard, Inc., et al.</i> , Case No. 1:12-cv-10576 (D. Mass.)
2008	Copilevitz, Todd, “Here’s a chat room worth talking about,” <i>The Dallas Morning News</i> , June 11, 1995
2009	Smith, Gina, “Whole new Worlds on-line,” <i>San Francisco Examiner</i> , May 14, 1995

## I. Introduction

Bungie, Inc. (“Bungie” or “Petitioner”) filed the current Petition (“Petition”) for *inter partes* review of claims 1-8, 10, 12, and 14-16 of U.S. Patent No. 8,082,501 (“the ‘501 patent” or “Leahy”) on June 1, 2015. In the Petition, Bungie challenges claims 1-6, 12, 14, and 15 of the ‘501 patent as allegedly anticipated by U.S. Patent No. 5,659,691 issued to Durward *et al.* (“Durward”) (Ex. 1008), and challenges claims 1-6, 12, 14, and 15 as allegedly obvious over “RING: A Client-Server System for Multi-User Virtual Environments” authored by Thomas A. Funkhouser (“Funkhouser”) (Ex. 1005), in view of U.S. Patent No. 4,521,014 to Sitrick (“Sitrick”) (Ex. 1013).

Bungie also challenges claims 7-8, 10, and 16 as allegedly obvious over Funkhouser in view of Sitrick, and Durward, each in view of separate secondary references including Thomas A. Funkhouser, Adaptive Display Algorithm for Interactive Frame Rates During Visualization of Complex Virtual Environments (“Funkhouser ‘93”) (Ex. 1017), U.S. Patent No. 5,021,976 to Wexelblat *et al.* (“Wexelblat”) (Ex. 1020), and U.S. Patent No. 5,777,621 to Schneider (“Schneider”) (Ex. 1019).

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