IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

WORLDS, INC.,

Plaintiff,

v.

ACTIVISION BLIZZARD, INC., BLIZZARD ENTERTAINMENT, INC., and ACTIVISION PUBLISHING, INC.,

Defendants.

Civil Action No. 1:12-CV-10576 (DJC)

JURY TRIAL DEMANDED

DEFENDANTS' NOTICE OF NARROWED ELECTION OF PRIOR ART

Defendants Activision Blizzard, Inc., Blizzard Entertainment, Inc., and Activision Publishing, Inc. (collectively, "Defendants") hereby provide notice that, pursuant to the Court's scheduling order (Dkt. 307), Defendants have served on Plaintiff Worlds, Inc. ("Plaintiff") their narrowed election of invalidating prior art under 35 U.S.C. §§ 102 and 103 in response to Plaintiff's narrowed election of asserted claims (Dkt. 336)—a copy of which is attached hereto as Exhibit A.

Respectfully submitted,

Dated: March 11, 2021

By: <u>/s/ Sonal N. Mehta</u> Sonal N. Mehta (*pro hac vice*) Sonal.Mehta@wilmerhale.com WILMER CUTLER PICKERING HALE AND DORR LLP 2600 El Camino Real Suite 400 Palo Alto, CA 94306 Tel.: (650) 858-6000 Fax: (650) 858-6100 Kevin S. Prussia (BBO# 666813) Kevin.Prussia@wilmerhale.com Claire M. Specht (BBO# 687952) Claire.Specht@wilmerhale.com Scott Bertulli (BBO# 690958) Scott.Bertulli@wilmerhale.com WILMER CUTLER PICKERING HALE AND DORR LLP 60 State Street Boston, MA 02109 Tel.: (617) 526-6000 Fax: (617) 526-5000

Attorneys for Defendants Activision Blizzard, Inc., Blizzard Entertainment, Inc., and Activision Publishing, Inc.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) this 11th day of March, 2021.

> By: <u>/s/ Sonal N. Mehta</u> Sonal N. Mehta

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EXHIBIT A

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WORLDS, INC.,)
Plaintiff,)
V.)
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Defendants.)

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Civil Action No. 1:12-CV-10576 (DJC)

JURY TRIAL DEMANDED

NOTICE OF DEFENDANTS' NARROWED LIST OF PRIOR ART

Pursuant to the Court's scheduling order (Dkt. 307), Defendants Activision Blizzard, Inc., Blizzard Entertainment, Inc., and Activision Publishing, Inc. (collectively, "Defendants" or "Activision") hereby provide their narrowing of invalidating prior art under 35 U.S.C. §§ 102 and 103 in view of Plaintiff Worlds, Inc.'s ("Plaintiff" or "Worlds") narrowing of asserted claims (Dkt. 336):

U.S. Patent No. 7,181,690	
1.	Air Warrior Game by Kesmai (1986)
2.	Michael Benedikt, "Cyberspace: Some Proposals," Cyberspace: First Steps (1991)
3.	DOOM Game by id Software (1993)
4.	Durward et al., U.S. Patent No. 5,659,691, titled "Virtual Reality Network with Selective Distribution and Updating of Data to Reduce Bandwidth Requirements," issued Aug. 19, 1997 (filed Sept. 23, 1993)
5.	Thomas A. Funkhouser, "RING: A Client-Server System for Multi-User Virtual Environments," 1995 IEEE Symposium on Interactive 3D Graphics, pp. 85-92, 209 (Apr. 9-12, 1995)
6.	Habitat System by Lucasfilm (1986) (e.g., Habitat, Club Caribe)

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