

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

IGT and IGT CANADA SOLUTIONS ULC,

Plaintiffs,

vs.

ZYNGA INC.,

Defendant.

Case No. 6:21-cv-00331-ADA

**ZYNGA INC.'S REPLY CLAIM CONSTRUCTION BRIEF**

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**TABLE OF EXHIBITS****Exhibits to Opening Brief:**

<b>Exhibit</b>	<b>Title</b>
1.	Intentionally omitted
2.	U.S. Patent No. 7,168,089
3.	U.S. Patent No. 7,303,473
4.	U.S. Patent No. 8,266,212
5.	U.S. Patent No. 8,708,791
6.	U.S. Patent No. 9,159,189
7.	IGT Opp'n to Zynga's Substantive Mot. 3, Pat. Interf. No. 105,747 (RES), bearing Bates numbers ZYNGA00006355-ZYNGA00006386 [IGT Opp. 3]
8.	Declaration of Michael T. Goodrich PhD Regarding Claim Construction
9.	Excerpts from Microsoft Computer Dictionary (5th ed. 2002), bearing Bates numbers ZYNGA00006387-ZYNGA00006389
10.	IGT Substantive Mot. 1, Pat. Interf. No. 105,747 (RES), bearing Bates numbers ZYNGA00006207-ZYNGA00006266
11.	Excerpt from the Prosecution History of U.S. Patent No. 7,303,473, dated November 3, 2004 (Non-Final Rejection)
12.	Excerpt from the Prosecution History of U.S. Patent No. 7,303,473, dated February 3, 2005 (Response)
13.	Excerpt from the Prosecution History of U.S. Patent No. 7,303,473, dated July 15, 2005 (Non-Final Rejection)
14.	Excerpt from the Prosecution History of U.S. Patent No. 7,303,473, dated November 18, 2005 (Response)
15.	Excerpt from the Prosecution History of U.S. Patent No. 7,303,473, dated April 17, 2007 (Final Rejection)
16.	Excerpt from the Prosecution History of U.S. Patent No. 7,303,473, dated June 14, 2007 (Response)
17.	Excerpt from the Prosecution History of U.S. Patent No. 7,303,473, dated August 7, 2007 (Notice of Allowance)
18.	Excerpts from IEEE 100. The Authoritative Dictionary of IEEE Standards Terms (7th ed. 2000), bearing Bates numbers ZYNGA00006390-ZYNGA00006396
19.	Excerpts from Beginning Java Networking (2001), bearing Bates numbers ZYNGA00006435-ZYNGA00006438
20.	Excerpt from the Prosecution History of U.S. Patent No. 8,266,212, dated June 8, 2011 (Non-Final Rejection)
21.	Excerpt from the Prosecution History of U.S. Patent No. 8,266,212, dated October 3, 2011 (Response to Non-Final Rejection)
22.	Specification comparison of application number 10/120,635, the '212 patent's claimed parent application, and 11/842,147, the continuation-in-part application that issued as the '212 patent
23.	Excerpt from the Parent Prosecution History of U.S. Patent No. 8,266,212, dated December 17, 2004 (Amendment)
24.	Excerpt from the Parent Prosecution History of U.S. Patent No. 8,266,212, dated May 22, 2006 (Response to Comm. re 10/120,635 Application)
25.	Excerpt from the Prosecution History of U.S. Patent No. 8,266,212, dated May 2, 2012

<b>Exhibit</b>	<b>Title</b>
	(Final Rejection)
26.	Excerpts from Webster's New World Computer Dictionary (10 <sup>th</sup> Edition 2003), bearing Bates numbers ZYNGA00006405-ZYNGA00006412
27.	Excerpts from the Dictionary of Computer and Internet Terms (6th Edition 1998), bearing Bates numbers ZYNGA00006418-ZYNGA00006425
28.	Excerpts from Wiley Electrical and Electronics Engineering Dictionary (2004), bearing Bates numbers ZYNGA00006439-ZYNGA00006448
29.	Excerpts from Microsoft Computer Dictionary (4th ed. 1999), bearing Bates numbers ZYNGA00006426-ZYNGA00006434
30.	Excerpts from Bill Brogden, SOAP Programming with Java (2002), bearing Bates numbers ZYNGA00006397-ZYNGA00006404
31.	Excerpts from Mark Nadelson and Tom Hagan, C++ Objects for Making UNIX and WinNT Talk, (2000), bearing Bates numbers ZYNGA00006468-ZYNGA00006491

**Exhibits to Reply Brief:**

<b>Exhibit</b>	<b>Title</b>
32.	Amendment A in re Application of Nguyen, et al., dated May 25, 2006
33.	Second Declaration of Michael T. Goodrich, PhD Regarding Claim Construction dated December 3, 2021 (and Exhibits A-D thereto)
34.	U.S. Patent No. 6,409, 602
35.	Summary of 9/15 Interview, dated September 20, 2011

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