

CEO
Zynga Inc.
699 Eighth Street
San Francisco, CA 94103

Re: INFRINGEMENT NOTICE – SERVER-BASED GAMING (“SBG”) PATENTS

Dear Mr. Gibeau:

IGT, the global leader in gaming technology, has invested significant research and development resources addressing and solving numerous technological issues associated with server-based gaming. This work has led to the development of a sizable patent portfolio consisting of over 80 worldwide patents covering fundamental technology necessary for implementing a server-based gaming system that is reliable, efficient, and secure.

IGT attempted to discuss the value of its SBG patent portfolio in a friendly manner without putting Zynga on formal notice of patent infringement. IGT acceded to Zynga’s demands by providing a representative list of IGT’s SBG patents with the expectation that the parties would meet to discuss their value and applicability in good faith. Unfortunately, Zynga has rebuffed all attempts to discuss the SBG patents through delaying tactics and outright dismissal of IGT’s patents.

As we have been unable to engage Zynga in constructive dialog, IGT regretfully places Zynga on notice of infringing one or more claims of the following SBG patents:

1. US Patent No. 7,168,089 entitled *Secured virtual network in a gaming environment* is practiced by at least Zynga Poker.
2. US Patent No. 7,303,473 entitled *Network gaming system* is practiced by at least Zynga’s “Hit It Rich” slots.
3. US Patent No. 8,221,241 entitled *Gaming involving devices in multiple locations* is practiced by the Zynga Live feature found in Zynga Poker, as well as the Invite Neighbors feature found in Farmville 2.
4. US Patent No. 9,129,489 entitled *Remote gaming method where venue’s system suggests different games to remote player using a mobile gaming device* is practiced by the Loyalty Lounge feature found in Zynga’s Wizard of Oz slots.
5. US Patent No. 9,295,908 entitled *Systems and methods for remote gaming using game recommender* is practiced by at least Zynga’s Wizard of Oz slots.

International Game Technology PLC
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www.igt.com

IGT EXHIBIT 2023
Zynga v. IGT, IPR2022-00199

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Renato Ascoli
CEO, Global Gaming

cc:

IGT

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Zynga

Phuong Phillips, General Counsel (via email only)
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