

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Zynga, Inc.,

Petitioner,

v.

IGT,

Patent Owner

U.S. Patent No. 7,168,089

Case No.: IPR2022-00199

DECLARATION OF CRAIG WILLS, Ph.D

Exhibit 2031

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1. I, Craig Wills, declare as follows:

I. INTRODUCTION

2. I have been retained by Patent Owner, IGT (“Petitioner” or “IGT”), to investigate and opine on certain issues relating to Zynga Inc.’s Petition For Inter Partes Review of U.S. Patent No. 8,795,064 B2, Case No. IPR2022-00200, which challenges validity of claims 28-29, 31-33, 47-50, 84-86, 90-92, and 99-100 of U.S. Patent No. 7,168,089 (“the ’089 patent”).

3. I am being compensated at my usual consulting rate of \$400 per hour for my technical analysis in this matter. My compensation is not contingent upon the results of my work.

A. Qualifications

4. My teaching and research span many areas of computer science, including Internet application performance, distributed computing, networking, and Web privacy. My work has been published in refereed journals and presented at top research conferences. Network gaming has been part of my work on Internet performance and Web privacy. I am a named inventor on eight patents. My work has been cited in popular press venues such as the New York Times, Wall Street Journal, USA Today, Los Angeles Times, San Jose Mercury News, Atlanta Journal-Constitution, InformationWeek, and National Public Radio Science Friday.

5. I received my B.S. in computer science from University of Nebraska (1982) as well as my M.S. (1984) and Ph.D. (1988) in computer science from Purdue University. I am currently a Professor and the former Head of the Computer Science Department at Worcester Polytechnic Institute (“WPI”). Before my appointment at WPI, I worked at AT&T Bell Laboratories where my work focused on the design and development of an automation tool for network management applications. Since starting at WPI, I have had visiting positions with Cisco Systems, Inc., where I worked with the Network Management Technology Group, and at the School of Mathematical and Computing Sciences at Victoria University of Wellington.

6. My curriculum vitae, which is Ex. 2032, contains a more detailed description of my background.

B. Scope of Review

7. As indicated, I have been tasked to review a petition for inter partes review filed by Zynga, Inc. (“Petitioner” or “Zynga”) relating to the Challenged Claims of the ’089 Patent. I understand that the ’089 Patent is involved in litigation between IGT and Zynga. I have not undertaken a review of other claims from the ’089 Patent in developing this declaration.

8. I understand that, in this *inter partes* review, Zynga asserts that the Challenge Claims are invalid over prior art on the following Grounds:

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