

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 DAVID CRANE

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I, David Crane, declare as follows:

I. INTRODUCTION

1. I have been retained by Zynga Inc. (“Zynga”) as an independent expert consultant in this proceeding before the United States Patent and Trademark Office (“PTO”). I am not an employee of Zynga or any affiliate or subsidiary of Zynga.

2. I have been asked to consider whether certain references teach or suggest the features recited in certain claims of U.S. Patent No. 7,168,089, which I refer to herein as the ’089 patent.

3. My opinions and the bases for my opinions are set forth below.

4. I am being compensated at my ordinary and customary rate of \$500 per hour for my work, plus reimbursement for any reasonable expenses. My compensation is based solely on the amount of time that I devote to activity related to this case and is in no way contingent on the nature of my findings, the presentation of my findings in testimony, or the outcome of this or any other proceeding. I have no other financial interest in this proceeding.

II. EDUCATION BACKGROUND, PROFESSIONAL EXPERIENCE, AND OTHER QUALIFICATIONS

5. My curriculum vitae (“CV”) is attached hereto as Attachment A and provides an accurate identification of my background and experience.

6. I am a world-renowned video game designer and game industry pioneer. I received a Bachelor of Science in Electronic Engineering Technology in

1975 from DeVry Institute of Technology, Phoenix, Arizona. This degree course of study included grounding in all areas of electronic circuitry and computer programming.

7. I have an engineering, gaming, and programming background going back more than 40 years. I built my first computer—an unbeatable Tic-Tac-Toe computer—at the age of 14 and graduated high school able to program IBM mainframe computers in 3 languages.

8. I began my professional engineering career at National Semiconductor in 1975 developing integrated circuits and working with early analog-to-digital and digital-to-analog converters. I brought microprocessor automation techniques to the IC development and testing processes.

9. In 1977, I joined Nolan Bushnell's Atari Inc., developing games for the Atari Video Computer System. In a period of one year, my games generated approximately \$15 million in sales revenues for the company. While at Atari I developed a number of programming techniques incorporated in dozens, if not hundreds of video games. I developed for publication several game products while at Atari, including an electronic Slot Machine game program in 1978.

10. In 1979, I co-founded Activision, Inc., the first third-party publisher of video game cartridges. Activision grew to over \$300 million in value in three years

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