

INFRINGEMENT OF U.S. PATENT NO. 11,117,056 BY PLR'S HOMESCAPES





Plaintiff Flip Phone Games Inc. (“FPG”) contends that PLR Worldwide Sales Limited (“PLR”) makes, uses, sells, and imports into the United States gaming systems, software, and/or methods for controlling devices and games including those which acts infringe claims 1 through 16 of U.S. Patent No. 11,117,056, as set forth below. The specific components, systems, and methods identified in this chart are for exemplary purposes only and FPG reserves all rights to supplement or amend these disclosures as components, systems, and constructs become known through discovery, as well as after PLR produces documents and sales materials that construes any terms from the claims of the ’056 patent. PLR induces infringement of the asserted claims by providing instructions for example on publicly available websites to explain how to use Homescapes in an infringing manner including, *inter alia*,

See e.g., <https://playrix.helpshift.com/hc/en/14-homescapes/>

PLR indirectly infringes the ’056 Patent by contributing to the direct infringement by end users by providing Homescapes software made for use on end-user devices in a manner that infringes and has no substantial non-infringing uses.

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[US 11,117,056](#) to Hartwell, Methods and Systems for Updating In-Game Content
Compared to: Homescapes

US 11,117,056	Homescapes by Playrix
[claim 1, preamble] A system for providing updated content associated with mobile video game to a mobile communication device, the system comprising:	<p>To the extent the preamble is limiting, Homescapes provides a system for updating content video game to a mobile communication device.</p> <p>https://playrix.helpshift.com/hc/en/14-homescapes/faq/11809-how-often-and-why-do-you (“We usually release our exciting new updates approximately every 2 months ”); https://playrix.helpshift.com/hc/en/14-homescapes/faq/11810-how-do-i-update-the-game don't have access to the update, don't worry. It will become available to you very soon!  are released on different platforms with small delays (sometimes up to several days)  The difference in the procedures for checking the update on different platforms. You may need the latest available version ”).</p> <p>Homescapes on the App Store (apple.com) (“Welcome to Homescapes, the most heartwarming Scapes™ series! Solve match-3 puzzles to restore a wonderful mansion on a verdant street. at the doorstep! Beat colorful match-3 levels to renovate and decorate rooms in the mansion, unlocking even exciting family story along the way! What are you waiting for? Make yourself at home! The game features:</p> <ul style="list-style-type: none">• Unique gameplay: help Austin renovate the house by swapping and matching pieces!• Interior design: you decide what the house will look like.• Exciting match-3 levels: tons of fun, featuring unique boosters and explosive combinations!• A huge, beautiful mansion: discover all the secrets it holds!• Fantastic characters: watch them live their lives and interact with each other in the in-game!• A cute pet: meet a naughty and fluffy cat.• Invite your Facebook friends to help you create your own cozy atmosphere in the house!
[1a] a storage medium for	Homescapes provides a storage medium for storing in-game video game content. For exam

storing in-game video game content;

frequently with updated game content from the server being stored in a storage medium. S user launches the Homescapes application on a mobile communication device.



[1b] a server in communication with the storage medium; and wherein the server is configured to: receive a request for updated content from the mobile communication device;

Homescapes is a mobile device game, which is in communication with a game server. <https://playrix.helpshift.com/hc/en/14-homescapes/faq/1062-system-requirements-162757> system requirements for the game are listed below. They may change in the future if progra introduced to the game. ➡ 1GB of RAM; ➡ 500 MB of free space; ➡ a stable internet Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review side source code or other internal documents and information for the Homescapes game, v available to FPG. As such, FPG reserves the right to supplement these contentions as disco Playrix produces source code and/or other internal documents and information relevant to

Each time the user logs into the game, and at various points throughout gameplay, the Hom the server and communicates with it to receive data. As a player progresses through the ga communicates with the server which is configured to receive requests for updated content

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	<p>The HTTPS traffic between the mobile device and the game server has been captured using Wireshark. The following screenshots detail the communications sent to/from the mobile device for iOS devices identified here as the Host (homescapes-cdn.playrix.com) is accessed with a URL request</p> <table><tr><th>#</th><th>Host</th><th>URL</th></tr><tr><td>2324</td><td>graph.facebook.com</td><td>https://graph.facebook.com/v14.0/200370150322559/aem_conversion_configs?advertiser_ids=%5B%5D&fields=&format=json&include_headers=false&sdk=ios</td></tr><tr><td>2338</td><td>graph.facebook.com</td><td>https://graph.facebook.com/v14.0/200370150322559/cloudbridge_settings?access_token=200370150322559%7C6e1846832bc4ce4e522cc4cadebaaa92&format=json&include_headers=false&sdk=ios</td></tr><tr><td>2339</td><td>graph.facebook.com</td><td>https://graph.facebook.com/v14.0/200370150322559/cloudbridge_settings?access_token=200370150322559%7C6e1846832bc4ce4e522cc4cadebaaa92&format=json&include_headers=false&sdk=ios</td></tr><tr><td>2112</td><td>homescapes-cdn.playrix.com</td><td>https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/manifest.xml?l=6592256</td></tr><tr><td>2175</td><td>homescapes-cdn.playrix.com</td><td>https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/d72597b70dccb2be36342c7fa80d7781cf0973/PlayableVSO_Playables_Pin_Toggle.zip?h=d72597b70dccb2be36342c7fa80d7781cf0973</td></tr><tr><td>2176</td><td>homescapes-cdn.playrix.com</td><td>https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/4a6147a93d2dabc292b3a23e5557f1e46f6e102/mortar_helmets_vso.zip?h=4a6147a93d2dabc292b3a23e5557f1e46f6e102</td></tr><tr><td>2177</td><td>homescapes-cdn.playrix.com</td><td>https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/ecc27a854c055f9032d15118f5f840bbc0acaa/clan_chest.zip?h=ecc27a854c055f9032d15118f5f840bbc0acaa</td></tr><tr><td>2178</td><td>homescapes-cdn.playrix.com</td><td>https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/e25c145b5f554d30ae06f85c9734f6db4efbb77/clan_chest_vso.zip?h=e25c145b5f554d30ae06f85c9734f6db4efbb77</td></tr><tr><td>2182</td><td>homescapes-cdn.playrix.com</td><td>https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/18d2fa390795aa4715d7566ec42a152dee807214/PlayableVSO_Plate.zip?h=18d2fa390795aa4715d7566ec42a152dee807214</td></tr><tr><td>2186</td><td>homescapes-cdn.playrix.com</td><td>https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/66e29948354bfabb21a11a0dcfd2e39153721973/PlayableVSO_Playables_Food.zip?h=66e29948354bfabb21a11a0dcfd2e39153721973</td></tr><tr><td>2187</td><td>homescapes-cdn.playrix.com</td><td>https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/4577956f9d59670da7c5f251d194c5789e15dfed/PlayableVSO_Forest.zip?h=4577956f9d59670da7c5f251d194c5789e15dfed</td></tr></table> <p>IOS Homescapes – Manifest then updates (Red Box)</p> <p>Each of these http communications represents a request portion and a response portion. They are located in an iOS directory. This indicates that there should also be an Android directory with different sizes. <i>See Exhibit D-1</i> where Gardenscapes operates in this manner.</p>	#	Host	URL	2324	graph.facebook.com	https://graph.facebook.com/v14.0/200370150322559/aem_conversion_configs?advertiser_ids=%5B%5D&fields=&format=json&include_headers=false&sdk=ios	2338	graph.facebook.com	https://graph.facebook.com/v14.0/200370150322559/cloudbridge_settings?access_token=200370150322559%7C6e1846832bc4ce4e522cc4cadebaaa92&format=json&include_headers=false&sdk=ios	2339	graph.facebook.com	https://graph.facebook.com/v14.0/200370150322559/cloudbridge_settings?access_token=200370150322559%7C6e1846832bc4ce4e522cc4cadebaaa92&format=json&include_headers=false&sdk=ios	2112	homescapes-cdn.playrix.com	https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/manifest.xml?l=6592256	2175	homescapes-cdn.playrix.com	https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/d72597b70dccb2be36342c7fa80d7781cf0973/PlayableVSO_Playables_Pin_Toggle.zip?h=d72597b70dccb2be36342c7fa80d7781cf0973	2176	homescapes-cdn.playrix.com	https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/4a6147a93d2dabc292b3a23e5557f1e46f6e102/mortar_helmets_vso.zip?h=4a6147a93d2dabc292b3a23e5557f1e46f6e102	2177	homescapes-cdn.playrix.com	https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/ecc27a854c055f9032d15118f5f840bbc0acaa/clan_chest.zip?h=ecc27a854c055f9032d15118f5f840bbc0acaa	2178	homescapes-cdn.playrix.com	https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/e25c145b5f554d30ae06f85c9734f6db4efbb77/clan_chest_vso.zip?h=e25c145b5f554d30ae06f85c9734f6db4efbb77	2182	homescapes-cdn.playrix.com	https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/18d2fa390795aa4715d7566ec42a152dee807214/PlayableVSO_Plate.zip?h=18d2fa390795aa4715d7566ec42a152dee807214	2186	homescapes-cdn.playrix.com	https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/66e29948354bfabb21a11a0dcfd2e39153721973/PlayableVSO_Playables_Food.zip?h=66e29948354bfabb21a11a0dcfd2e39153721973	2187	homescapes-cdn.playrix.com	https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/4577956f9d59670da7c5f251d194c5789e15dfed/PlayableVSO_Forest.zip?h=4577956f9d59670da7c5f251d194c5789e15dfed
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[1c] identify, in response to receiving the request, what in-game video game content to send;	<p>Homescapes identifies, in response to receiving a request, what in-game video game content progresses through Homescapes, the game communicates with the server based on which video game. The server receives the request from the client regarding what in-game content to send to the user is in Homescapes.</p> <p>Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires the production of source code and client side source code or other internal documents and information for the Homescapes game and after Playrix produces source code and/or other internal documents and information regarding the game element.</p>																																				
[1d] send a message relating to the in-game video game content to the mobile communication	<p>In response to receiving a request, the game server pre-selects a message in part based on the device it is. For example, on information and belief, the pre-selected message differs based on the mobile communication device. <i>See e.g.</i>, analysis of this claim element with respect to Gardenscapes.</p>																																				

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device in response to receiving the request, wherein the message is pre-selected by the server based on a model type associated with the mobile communication device, a service subscription associated with the mobile communication device, or a service provider for the service subscription associated with the mobile communication device; and	Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of server side and client side source code or other internal documents and information for the Homescapes game, which is publicly available to FPG. As such, FPG reserves the right to supplement these contentions as disclosed in the Discovery Order and after Playrix produces source code and/or other internal documents and information relevant to the element.
[1e] send the in-game video game content to the mobile communication device as the updated content for the mobile video game.	The in-game video game content is sent to the mobile device from the server. As one non-limiting example, when the user reaches a certain threshold in Homescapes the server sends in-game video game content to the mobile device. Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of server side source code or other internal documents and information for the Homescapes game, which is publicly available to FPG. As such, FPG reserves the right to supplement these contentions as disclosed in the Discovery Order and after Playrix produces source code and/or other internal documents and information relevant to the element.

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