

**Exhibit A-4 - Preliminary Invalidity Contentions - U.S. Patent No. 10,518,177 to Suzuki
Based on U.S. Patent Application Publication No. 2013/0281173 to Gilson et al. (“Gilson”), or Gilson in combination
with U.S. Patent No. 7,905,769 to Harrison, Jr. (“Harrison”)**

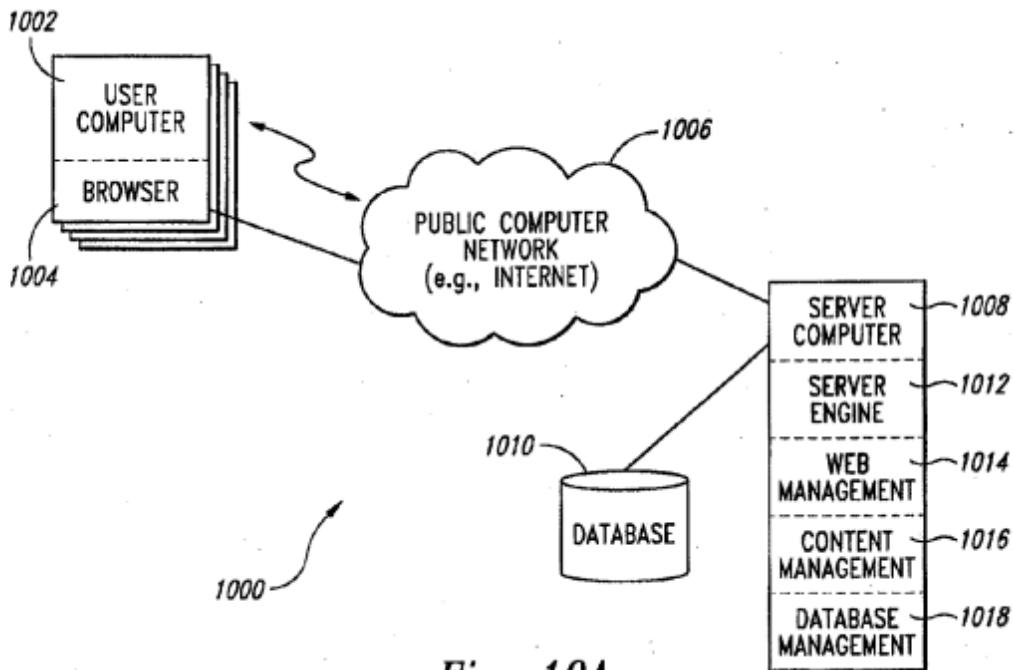
The following chart contains Supercell’s Invalidity Contentions demonstrating that Gilson anticipates Claims 1, 3, 5-8, 10, and 12-17 of U.S. Patent No. 10,518,177 under 35 U.S.C. § 102 or renders the same claims obvious alone or in view of other prior art under 35 U.S.C. § 103. Because the Court has yet to issue a claim construction in this case, fact discovery is ongoing, and the invalidity of the asserted claims will likely be the subject of expert discovery, these contentions are preliminary only and Supercell reserves the right to supplement or modify these contentions in accordance with the agreed patent-disclosure procedures and the Docket Control Order in this case. Additionally, and in further consideration of the preliminary stages of the case, Supercell notes that the pinpoint citations referenced in this chart are not exhaustive, and Supercell reserves the right to rely on additional citations within the reference. Furthermore, citations to any figure, table, or chart are meant to encompass the language describing the respective figure, table, or chart, and vice versa.

These charts also incorporate analysis based upon GREE’s apparent interpretation of the asserted claims, as reflected in GREE’s infringement contentions to date. Supercell does not agree with GREE’s incomplete, ambiguous, and inadequate application of the asserted claims in those contentions. However, as detailed below, such application (to the extent that it can be reasonably ascertained) further renders each asserted claim invalid. Supercell further reserves its right to supplement these contentions based on further discovery, including any supplemental infringement contentions or any interrogatory response purporting to rebut these invalidity contentions provided by GREE.

Additionally, Supercell notes that while certain potential obviousness arguments and combinations may be cited within these charts, such recitations are not exhaustive. As such, to the extent that any asserted claims are found not to be anticipated by Gilson, Supercell reserves the right to argue that such non-anticipated claims are obvious over Gilson alone, in view of any of the arguments raised within the charts, in view of any of the other prior art cited in Supercell’s cover pleading, or in view of prior art that may later become known to Supercell as part of the discovery process.

177 Patent Claim 1	Disclosure from Gilson
<p>[Element 1-Preamble]</p> <p>A non-transitory computer-readable recording medium storing instructions to be executed by one or a plurality of computers capable of being used by a player conducting a battle game, the instructions causing the one or a plurality of computers to execute steps of:</p>	<p>Gilson discloses a non-transitory computer-readable recording medium storing instructions to be executed by one or a plurality of computers capable of being used by a player conducting a battle game, the instructions causing the one or a plurality of computers to execute steps of:</p> <p>“FIG. 7 shows an example of four cards that are similar to the cards of FIG. 5, but which may be employed in an online or electronic version of a card game. Here, various different creature cards are shown, although various other cards may be employed, such as spell cards, or item cards.” ¶ [0040]</p> <p>“Game play under the example of FIGS. 5 through 7 generally involves combining two or more pentagonal “minion” cards together to make an “abomination” which players use to attack or block one another.” ¶ [0041]</p> <p>“Referring to FIG. 9, one embodiment of the invention employs a computer 900, such as a personal computer or workstation, having one or more processors 901 coupled to one or more user input devices 902 and data storage devices 904. The computer is also coupled to at least one output device such as a display device 906 and one or more optional additional output devices 908 (e.g., printer, plotter, speakers, tactile or olfactory output devices, etc.). The computer may be coupled to external computers, such as via an optional network connection 910, a wireless transceiver 912, or both.” ¶ [0098]</p>

177 Patent Claim 1	Disclosure from Gilson
	<p style="text-align: center;"><i>Fig. 9</i></p> <p>“Aspects of the invention may be practiced in a variety of other computing environments. For example, referring to FIG. 10A, a distributed computing environment with a web interface includes one or more user computers 1002 in a system 1000 are shown, each of which includes a browser program module 1004 that permits the computer to access and exchange data with the Internet 1006, including web sites within the World Wide Web portion of the Internet.” ¶ [0100]</p> <p>“At least one server computer 1008, coupled to the Internet or World Wide Web (“Web”) 1006, performs much or all of the functions for receiving, routing and storing of electronic messages, such as web pages, audio signals, and electronic images.” ¶ [0101]</p>

177 Patent Claim 1	Disclosure from Gilson
	 <p style="text-align: center;"><i>Fig. 10A</i></p> <p>“Aspects of the invention may be stored or distributed on computer-readable media, including magnetically or optically readable computer discs, hard-wired or preprogrammed chips (e.g., EEPROM semiconductor chips), nanotechnology memory, biological memory, or other data storage media. Indeed, computer implemented instructions, data structures, screen displays, and other data under aspects of the invention may be distributed over the Internet or over other networks (including wireless networks), on a propagated signal on a propagation medium (e.g., an electromagnetic wave(s), a sound wave, etc.) over a period of time, or they may be provided on any analog or digital network (packet switched, circuit switched, or other scheme). Those skilled in the relevant art will recognize that portions of the invention reside on a server computer, while corresponding portions reside on a client computer such as a mobile or portable device, and thus,</p>

177 Patent Claim 1	Disclosure from Gilson
	<p>while certain hardware platforms are described herein, aspects of the invention are equally applicable to nodes on a network.” ¶ [0106]</p> <p>To the extent this limitation is not explicitly disclosed, Supercell responds that it is inherent or obvious. Moreover, it would have been obvious to one of ordinary skill in the art to modify this reference so as to include this claim limitation in light of the knowledge possessed by one of ordinary skill in the art. Further, this claim limitation would have been obvious in light of numerous other U.S. patents, U.S. patent publications, articles, and products available at the time the asserted patent was filed, and it would have been obvious to combine these references to a person of ordinary skill in the art.</p>
<p>[Element 1-A] displaying, on a first field, a plurality of cards selected from a deck which is a stack of virtual cards;</p>	<p>Gilson, or alternatively, Gilson in combination with Harrison discloses displaying, on a first field, a plurality of cards selected from a deck which is a stack of virtual cards:</p> <p><u>Gilson</u></p> <p>“Then, during their turn, players can do the following in any order:</p> <p>Put a card from their hand into the mana zone, which can only be done once per turn</p> <p>Put a minion card from their hand into play, as described below</p> <p>Put an item card from their hand into play,</p> <p>Play a spell card, or</p> <p>Attack with one or more abominations.....” ¶¶ [0048]-[0053]</p>

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