

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WARGAMING GROUP LIMITED
Petitioner

v.

GAME AND TECHNOLOGY CO., LTD.,
Patent Owner

Case IPR2017-01082
Patent 7,682,243

CORRECTED PATENT OWNER RESPONSE

In accordance with 37 C.F.R. § 42.120, Game and Technology Co., Ltd.
("Patent Owner") timely submits this Corrected Patent Owner Response.

TABLE OF CONTENTS

TABLE OF CONTENTS.....	i
I. INTRODUCTION	1
II. PETITION BARRED UNDER 35 U.S.C. § 315(b).....	1
A. Service on Wargaming by John Talbot	2
B. Exhibit A to John Talbot’s Witness Statement.....	4
C. Signed and Sealed Summons	5
D. Effective Service on Roman Zanin.....	7
E. Voluntary Dismissal.....	10
III. RELEVANT TECHNOLOGY.....	12
IV. THE ‘243 PATENT.....	13
V. CLAIM CONSTRUCTION	15
A. “pilot”.....	17
B. “unit associated with said pilot”	21
C. “ability”	29
D. “sync point information”	36
E. “level”.....	37
VI. INSTITUTED GROUND.....	38
VII. CITED ART.....	38
A. D&D and Role Playing Games.....	38
B. Levine.....	40
C. Roleplaying in D&D v. CRPG	40

VIII. CLAIMS 1-7 OF THE '243 PATENT ARE PATENTABLE OVER
LEVINE IN VIEW OF D&D42

 A. Pilot and Unit Relationship.....42

 1. Pilots in D&D.....42

 2. Familiars in D&D.....43

 3. Animal Companions in D&D.....45

 4. Paladin Mounts in D&D.....47

 B. D&D Has No Pilot-Unit Relationship48

 C. Sync Point Information50

 1. Abilities in D&D50

 2. Sync Ratios in D&D.....52

IX. CLAIM 2: SYNC POINT INFORMATION IS INCREASED WITH PILOT
LEVEL.....66

X. CONCLUSION.....76

EXHIBITS

Document	Exhibit No.
Witness Statement of Service in Civil Action No. 2:15-cv-01260 by John Frederick Talbot, dated December 13, 2015	2001
Witness Statement of Service in Civil Action No. 2:15-cv-01260 by John Frederick Talbot, dated December 13, 2015 (with Anexes)	2001 (Supplemental)
Certificate - Attestation by Superior Courts of England and Wales, Foreign Processing Section regarding service upon Wargaming.Net.LLP, dated January 6, 2016	2002
Certificate - Attestation by Superior Courts of England and Wales, Foreign Processing Section regarding service upon Wargaming.Net.LLP, dated January 6, 2016 (with Exhibits)	2002 (Supplemental)
Webster's Ninth New Collegiate Dictionary, Springfield, MA: Merriam-Webster, 1983 (1990) at 892 .	2003
Complicated Currents: Media Flows, Soft Power and East Asia, Ch. 11, Black et al.	2004
Video of MazingerZ emulation at http://www.playretrogames.com/3898-mazinger-z (accessed January 9, 2017)	2005
Master of Orion II: Battle at Antares, Instruction Manual	2006
Request for Legal Language Services	2007
Email from Legal Language Services	2008
Email correspondence with Central Authority	2009
Talbot Credit Card Statement December 2015	2010
Email correspondence to evasive scientist	2011
Proof of service of evasive scientist	2012
Scrap paper from Talbot file	2013
Joannou business card	2014
Email to Legal Language Solutions	2015
Kounnis webpage photo	2016
Kounnis webpage photo	2017
Declaration of John Talbot	2018
Service Documents from Legal Language Services	2019

...

PATENT OWNER RESPONSE

Case IPR2017-01082

Notice of Service filed in 2:16-cv-06554 BRO (SKx)	2020
Declaration of Joseph Zito	2021
Summons from Pacer	2022
Wargaming.net Documents	2023
Wargaming Group Documents	2024
Cyprus Service Requirements	2025
Summons for Wargaming	2026
Declaration of Joseph Zito	2027
Dungeons & Dragons, Dungeon Master's Guide (DMG)	2028
Dungeons & Dragons, Monster Manual (MM)	2029
RPG Status Markers blog	2030
Transcript of Deposition of Garry Kitchen	2031
Declaration of Mark Claypool	2032

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.