

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WARGAMING GROUP LIMITED and ACTIVISION BLIZZARD, INC.,
Petitioners,

v.

GAME AND TECHNOLOGY CO., LTD.,
Patent Owner

Case IPR2017-01082
U.S. Patent No. 7,682,243

PETITIONERS' REPLY

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PETITIONER'S UPDATED LIST OF EXHIBITS

Ex.	Description
1001	U.S. Patent No. 7,682,243 (“the ’243 Patent”)
1002	File History for U.S. Patent No. 7,682,243
1003	Declaration of Garry Kitchen
1004	U.S. Patent Application Publication No. 2003/0177187 A1 (“Levine”)
1005	Dungeons and Dragons Player’s Handbook Core Rulebook I v.3.5 (“D&D”)
1005-S	Dungeons and Dragons Player’s Handbook Core Rulebook I v.3.5 (“D&D”) (Text-Searchable Version)
1006	Patent Owner’s Claim Chart for Blizzard World of Warcraft
1007	Patent Owner’s Preliminary Response to Petition Under 37 C.F.R. § 42.107 in Case IPR2016-01918
1008	Declaration of Ted Beckstead
1009	Master of Orion II: Battle at Antares: The Official Strategy Guide (“MOO”)
1010	Declaration of John Possidente
1011	Declaration of Roman Zanin
1012	Declaration of Kenneth Apple
1013	Joint Stipulated Motion for Partial Dismissal without Prejudice and to Substitute Parties
1014	Patent Owner’s Claim Chart for World of Tanks
1015	Patent Owner’s Claim Chart for World of Planes
1016	Certified Copy of Master of Orion II: Battle at Antares: The Official Strategy Guide from Library of Congress
1017	Declaration of Costas A Joannou
1018	Deposition Notice for Deposition of John Frederick Talbot

Ex.	Description
1019	Picture of Office Lobby
1020	Picture of Kounnis Financial Group Pamphlet
1021	Kounnis Financial Group Pamphlet
1022	Mr. Joannou's Business Card for The Caj Group
1023	Mr. Joannou's Business Card for Kounnis and Partners
1024	Copy of Exhibit 2002 Supplemental Used at Mr. Talbot's Deposition
1025	Deposition of John Talbot
1026	Order Voluntarily Dismissing Wargaming.net LLP without Prejudice
1027	Email Agreement to Waive Service
1028	Declaration of Winslow Taub
1029	Email from Christopher Bezak
1030	Deposition of Dr. Mark Claypool

I. OVERVIEW

Patent Owner (“PO”) invites the Board to error. Rather than defend the claims as written, PO attempts to rewrite the claims using extrinsic evidence, inserting limitations that appear nowhere in the ’243 patent—not even in its embodiments. Worse still, PO applies extrinsic evidence in contradictory ways, shifting its positions for different claim terms. For “pilot” and “unit,” PO argues the ’243 patent is about *robot arcade* games (Mazinger Z), and should be limited on that basis. But for “ability,” PO argues the patent should be limited to the *fantasy role-playing game* Dungeons & Dragons (“D&D”). Both positions are improper under the law.

The Patent Owner Response relies on three improper constructions—for “pilot,” “unit,” and “ability”—which the Board has already rejected. *See* Paper[46], 6-7; Paper[14], 8-11; Paper[39] (“POR”).¹ Even under PO’s constructions, the combination of D&D and Levine render all challenged claims obvious.

¹ The POR does not address other claim elements, such as database elements. Nor does it address claims 3-5.

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