

**Exhibit B-2 - Preliminary Invalidity Contentions - U.S. Patent No. 9,561,439 to Oono
Based on U.S. Patent Pub. No. 2011/0300926 to Englman et al. (“Englman”)**

The following chart contains Supercell’s Invalidity Contentions demonstrating that Englman anticipates Claims 1-7 of U.S. Patent No. 9,561,439 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 Englman, Supercell reserves the right to argue that such non-anticipated claims are obvious over Englman 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.

'439 Patent Claim 1	Disclosure from Englman
<p>[Preamble]</p> <p>A game control method carried out by a game control device for providing a game to a plurality of communication terminals respectively used by a plurality of users, the game control device communicating with the plurality of communication terminals over a communication network and having a storage unit for storing information for each of the plurality of users, the method comprising the steps of:</p>	<p>Englman discloses a game control method carried out by a game control device for providing a game to a plurality of communication terminals respectively used by a plurality of users, the game control device communicating with the plurality of communication terminals over a communication network and having a storage unit for storing information for each of the plurality of users.</p> <p>“In FIG. 1, a wagering game system (“system”) 100 includes a wagering game server 150 connected to one or more client devices, such as a wagering game machine 160 or a computer 137, via a communications network 122.” ¶ [0045]</p> <p>“The wagering game system architecture 200 can also include a wagering game server 250 configured to present wagering games and receive and transmit information to present group games and awards. The wagering game server 250 can include a content controller 251 configured to manage and control content for the presentation of content on a client device (“client”) 260... The wagering game server 250 can also include a content store 252 configured to contain content to present on the client 260.” ¶ [0049]</p> <p>“FIG. 9 is a conceptual diagram that illustrates an example of a wagering game machine architecture 900, according to some embodiments... The I/O bus 922 is connected to a payout mechanism 908, primary display 910, secondary display 912, value input device 914, player input device 916, information reader 918, and storage unit 930.” ¶ [0122]</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. For example, see at least the corresponding claim elements in the respective charts, which are</p>

'439 Patent Claim 1	Disclosure from Englman
	<p>incorporated by reference as if fully set forth herein: World of Warcraft, Warhammer Online, Guild Wars 2, Ronen, Qiang, Bethke, Kane, Kobayashi, Forsaken World.</p>
<p>[Element 1-A] (a) grouping the plurality of users into one or more groups;</p>	<p>Englman discloses (a) grouping the plurality of users into one or more groups.</p> <p>“The account server 270 can also include an account store 272 configured to store information, settings, preferences, etc. for a player's account, group scavenger hunt game membership, scavenger hunt game progress, collected scavenger hunt items, item exchanges, trophy possession rights, trophy benefits, etc.” ¶ [0048]</p> <p>“In FIG. 3, the flow 300 begins at processing block 302, where a wagering game system (“system”) registers a player account as a group member to compete in a group scavenger hunt game. The system can present a themed scavenger hunt game. The scavenger hunt game can be a group game, where a group of player accounts join together to form a scavenger hunt group. In some embodiments, the system can facilitate creating groups by connecting player accounts and presenting controls where players can form a group amongst their friends, family, or other social contacts listed in the player account.” ¶ [0060]</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. For example, see at least the corresponding claim elements in the respective charts, which are incorporated by reference as if fully set forth herein: World of Warcraft, Warhammer Online, Guild Wars 2, Ronen, Qiang, Bethke, Kane, Kobayashi, Forsaken World.</p>
<p>[Element 1-B]</p>	<p>Englman discloses (b) storing a correspondence between the plurality of users and the one or more groups in the storage unit.</p>

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<p>(b) storing a correspondence between the plurality of users and the one or more groups in the storage unit;</p>	<p>“The account server 270 can also include an account store 272 configured to store information, settings, preferences, etc. for a player's account, group scavenger hunt game membership, scavenger hunt game progress, collected scavenger hunt items, item exchanges, trophy possession rights, trophy benefits, etc.” ¶ [0048]</p> <p>“The CPU 926 is also connected to an input/output (“I/O”) bus 922, which can include any suitable bus technologies, such as an AGTL+ frontside bus and a PCI backside bus. The I/O bus 922 is connected to a payout mechanism 908, primary display 910, secondary display 912, value input device 914, player input device 916, information reader 918, and storage unit 930.” ¶ [0122]</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. For example, see at least the corresponding claim elements in the respective charts, which are incorporated by reference as if fully set forth herein: World of Warcraft, Warhammer Online, Guild Wars 2, Ronen, Qiang, Bethke, Kane, Kobayashi, Forsaken World.</p>
<p>[Element 1-C]</p> <p>(c) transmitting information over the communication network to initiate a group event in which a first plurality of users forming a first group cooperatively participate in the game;</p>	<p>Englman discloses (c) transmitting information over the communication network to initiate a group event in which a first plurality of users forming a first group cooperatively participate in the game.</p> <p>“The progress report 103 can also show any events that need to be accomplished for items not yet obtained (e.g., see FIG. 4 which describes details about a missing item—Frodo's missing painting 117). The progress report 103 can also present a game progress meter 105 that tracks the progress of the group scavenger hunt game. Multiple group scavenger hunt members can share the progress report 103. The system 100 can present group statistics 106 that relate to the group members' achievements. Each group member's achievements (e.g., obtaining an item) can contribute overall as</p>

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	<p>a group achievement in that everyone who shares the progress report 103 benefits from each member's achievements.</p> <p>The webpage 181 can include an online group-scavenger-hunt progress report (“progress report”) 103. The progress report 103 can be a themed presentation, which group members of the group scavenger hunt game, and others, can visit via the Internet. A purpose of the progress report 103 can be to show various items (e.g., fireplace tools 107, flute 108, and pipe 109) that group members have collected for the group scavenger hunt game. The system 100 can present the items in a specific order, en route to an overall prize, like a trophy. ¶ [0045]</p>

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