

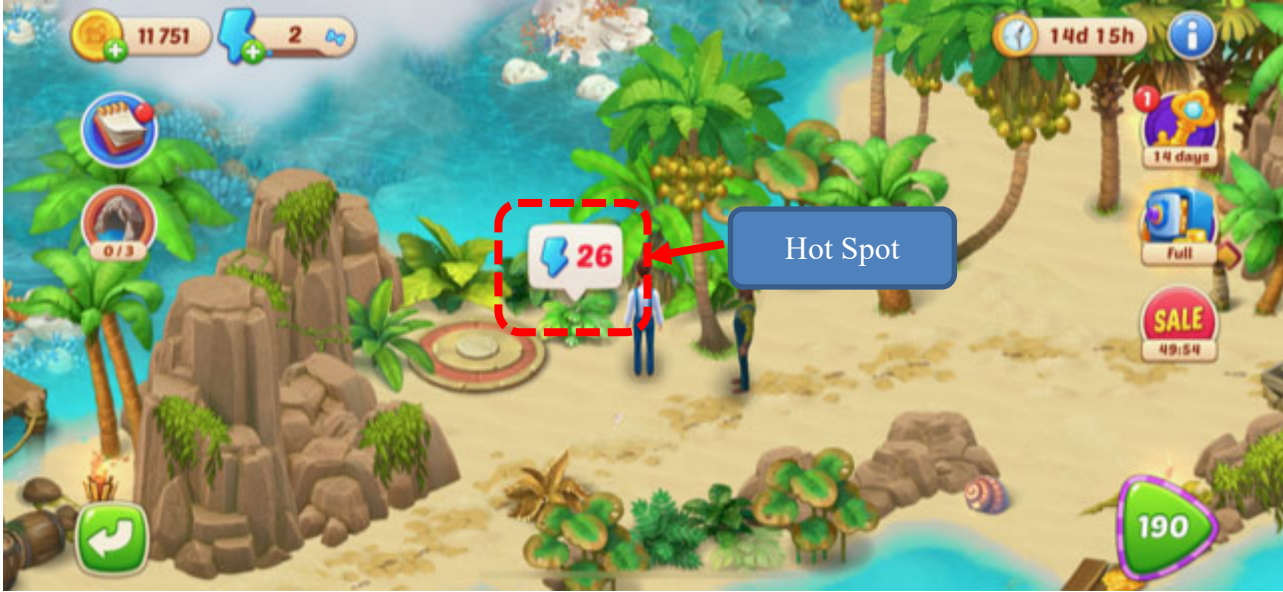
INFRINGEMENT OF U.S. PATENT NO. 8,688,089 BY PLR'S HOMESCAPES

Plaintiff Flip Phone Games Inc. (“FPG”) contends that PLR Worldwide Sales Limited (“PLR”) makes, uses, sells, offers for sale, and/or imports into the United States gaming systems, software, and/or methods for controlling devices and games including the Homescapes mobile game, which acts infringe claims 1 through 10 of U.S. Patent No. 8,688,089, as set forth below. The specific components, systems, and constructs identified in this chart are for exemplary purposes only and FPG reserves all rights to supplement or amend these disclosures as additional components, systems, and constructs become known through discovery, as well as after PLR produces documents and source code and/or the Court construes any terms from the claims of the ’089 patent. PLR induces infringement of the asserted claims by providing instructions or information, for example on publicly available websites to explain how to use Homescapes in an infringing manner including, *inter alia*, the PLR website. *See e.g.*, <https://playrix.helpshift.com/hc/en/14-homescapes/>

PLR indirectly infringes the ’089 Patent by contributing to the direct infringement by end users by providing Homescapes which is especially made for use on end-user devices in a manner that infringes and has no substantial non-infringing uses.

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[U.S. 8,688,089](#) to Hartwell, *Methods and Systems for Providing In-Game Hot Spots*
Compared to: Homescapes¹

U.S. 8,688,089	Homescapes by Playrix
<p>[claim 1, preamble] A method for providing a hot spot associated with a mobile video game, the mobile video game being operable on a mobile communication device, the method comprising the steps of:</p>	<p>To the extent the preamble is limiting, Homescapes includes a method for providing a hot spot associated with a mobile video game where the mobile video game is operable on a mobile communication device.</p>  <p>“Welcome to Homescapes, the most heartwarming game from Playrix's Scapes™ series! Solve match-3 puzzles to restore a wonderful mansion on a verdant street. Exciting adventures start at the doorstep! Beat colorful match-3 levels to renovate and decorate rooms in the mansion, unlocking ever more chapters in the exciting family story along the way! What are you waiting for? Make yourself at home! Homescapes on the App Store (apple.com) (June 22, 2022) The game features:</p>

¹ [Homescapes — Playrix](#)(“Help Austin the Butler bring warmth and comfort back to his family's wonderful mansion. Come on in — adventures await you in this Scapes™ sequel from the moment you step inside!.”)

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	<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 social network.• A cute pet: meet a naughty and fluffy cat.• Invite your Facebook friends to help you create your own cozy atmosphere in the house! <p>Homescapes is free to play, though some in-game items can also be purchased for real money. If you don't want to use this option, simply turn it off in your device's Restrictions menu.”</p>
[1a] storing hot spot information on a computer-readable medium;	<p>Homescapes stores hot spot information on a computer-readable medium.</p> <p>Homescapes is a mobile device game, which is in communication with a game server that, on information and belief, stores hot spot information in a computer-readable medium on the server. Each time the user logs into the game, and likely at various points throughout gameplay, the Homescapes game connects to the server and receives data. https://playrix.helpshift.com/hc/en/14-homescapes/faq/1057-i-lost-my-game-progress/ (“If your game progress has been lost, try the following: 1. Restart your device and reinstall the game  2. Connect the game to your previously used Facebook, Google, or Apple ID account. 3. Tap/click "Load game" 4. Type in CONFIRM and tap/click OK.”) Hot spot information is stored on a computer readable medium both on the mobile device and the game server.</p> <p>Homescapes provides hot spots as discussed further in the [1c-1e] elements.</p>
[1b] receiving a communication from a mobile communication device;	<p>Homescapes receives a communication from the mobile device. For example, when Homescapes is launched, the server receives information from the mobile device, including information related to hot spots within the game. The server then transmits communications and updates, including updated hot-spots, to the mobile device as discussed in further detail below.</p>



The HTTPS traffic between the mobile device and the game server has been captured using the program Fiddler Everywhere over a wireless (WiFi) network. When the game application is opened while the game is updating, the following screenshots detail the communications sent from the mobile device for iOS devices. The server, identified here as the Host (homescapes-cdn.playrix.com) is accessed with a URL request and the Get method. On information and belief, Homescapes operates in a same or similar manner on Android. Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of the server and client side source code or other internal documents and information for the Homescapes game, which is not publicly available to FPG. As such, FPG reserves the right to supplement these contentions as discovery progresses and after Playrix produces source code and/or other internal documents and information relevant to this claim element.

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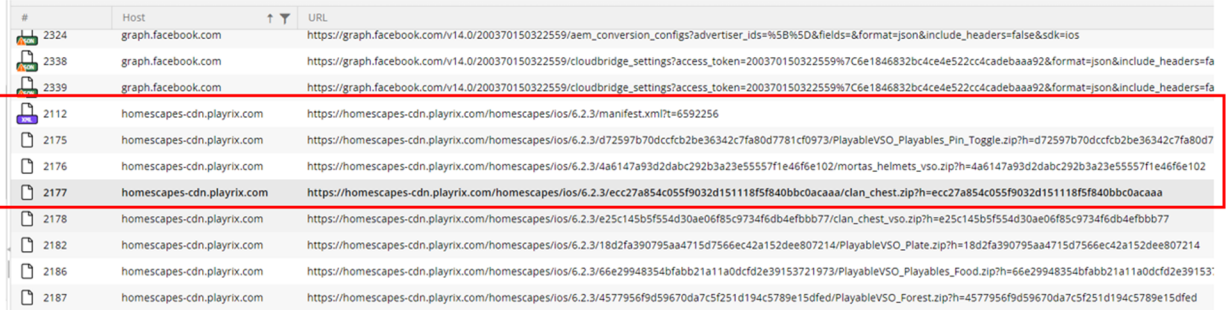
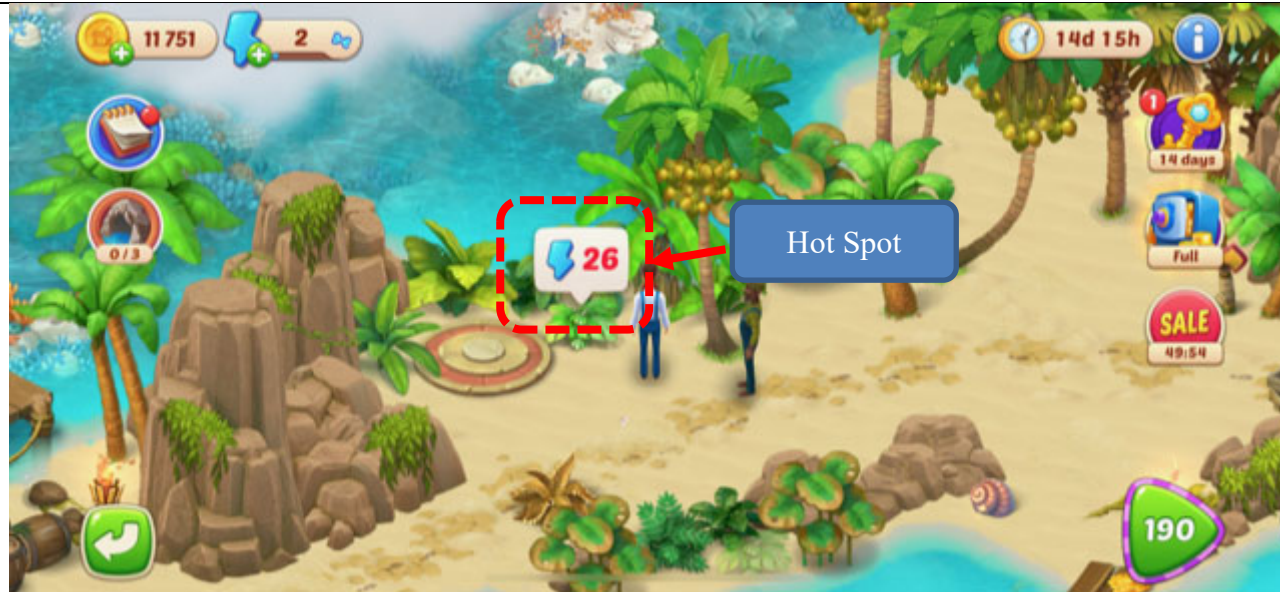
	 <p>iOS Homescapes – Manifest then updates (Red Box)</p> <p>Each of these http communications represents a request portion and a response portion.</p>
<p>[1c] determining the hot spot information to provide to the mobile device based upon the communication, the hot spot information comprising</p>	<p>On information and belief, Homescapes determines hot spot information to provide to the mobile device based upon the communication where the hot spot information comprises multiple features within Homescapes. Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of the server and client side source code or other internal documents and information for the Homescapes game, which is not publicly available to FPG. As such, FPG reserves the right to supplement these contentions as discovery progresses and after Playrix produces source code and/or other internal documents and information relevant to this claim element.</p>

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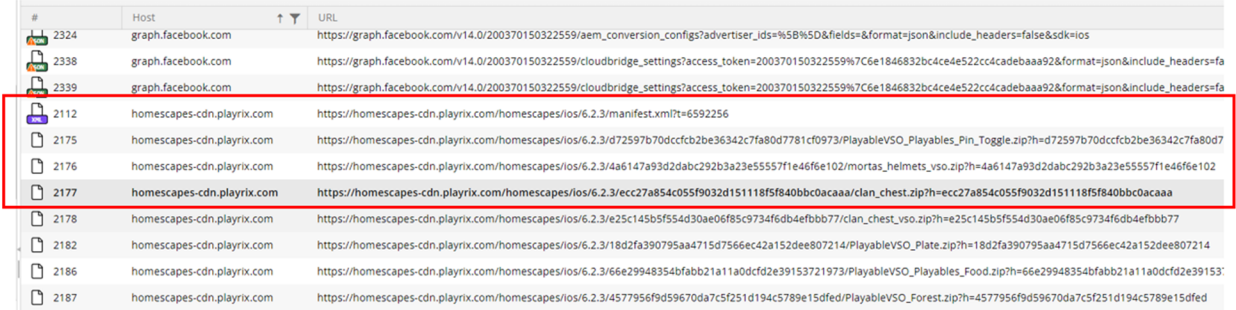
	 <p>iOS Homescapes – Manifest then updates (Red Box)</p> <p>Each of these http communications represents a request portion and a response portion.</p>
[1d] a location in-game associated with activating the hot spot, wherein the location in-game is represented by a non-promotional background object; and	<p>On information and belief, Homescapes contains a location in-game associated with activating the hot spot, wherein the location in-game is represented by a non-promotional background object. Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of the server and client side source code or other internal documents and information for the Homescapes game, which is not publicly available to FPG. As such, FPG reserves the right to supplement these contentions as discovery progresses and after Playrix produces source code and/or other internal documents and information relevant to this claim element.</p> <p>Hot spots are represented in various locations in Homescapes. When a user interacts with the activation element of the hot spot, hot spot information associated with that particular hot spot is displayed on the mobile device. The hot spot information that is displayed is based upon a prior communication between the game server and the mobile device. As a user plays Homescapes, the user frequently comes upon hotspots. As a non-limiting example, the plant below is a hotspot which is based upon the level the user is at with Homescapes and where within the game the user is located.</p>

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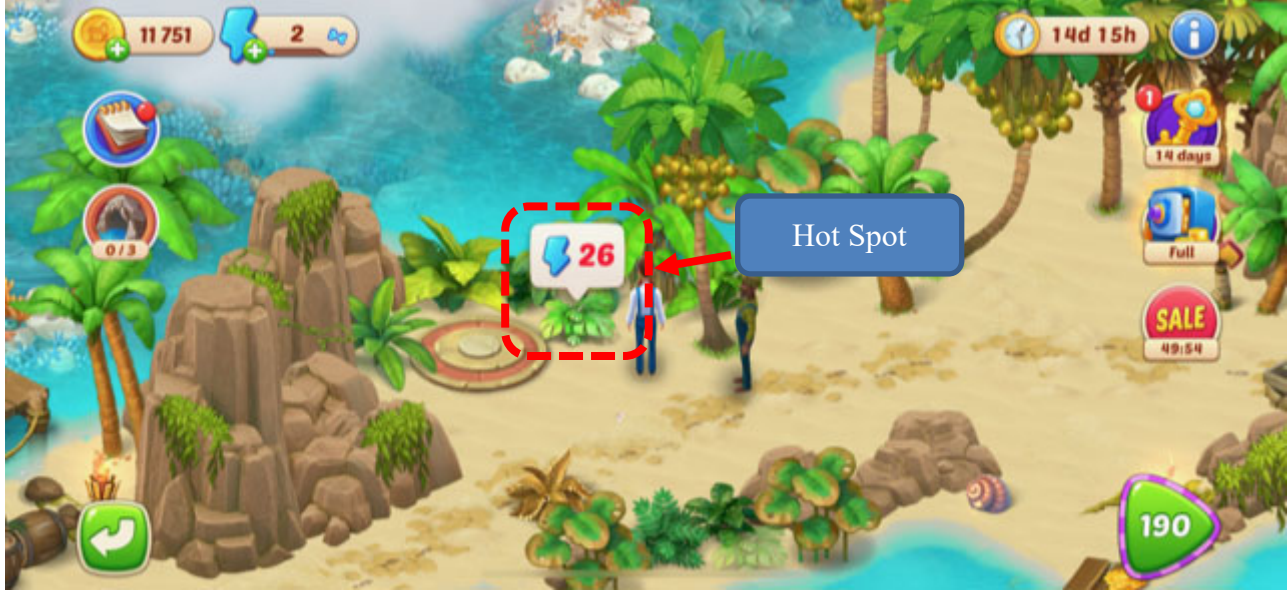
	
<p>[1e] hidden promotional content for presenting to the user, within a gaming environment of the mobile video game, when the hot spot is activated; and</p>	<p>Homescaping contains hidden promotional content for presenting to the user, within a gaming environment of the mobile video game, when the hot spot is activated. For example, subsequent to activating the hot spot, hidden promotional content such as the below are presented to the user. A user can purchase the energy points below with coins that it obtains by exchanging real currency to in-game currency or through gameplay.</p>

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<p>[1f] uploading the hot spot information to the mobile communication device.</p>	<p>On information and belief, Homescapes uploads the hot spot information to the mobile communication device. See, e.g., analysis of this claim element with respect to Gardenscapes.</p> <p>The HTTPS traffic between the mobile device and the game server has been captured using the program Fiddler Everywhere over a wireless (WiFi) network. When the game application is opened while the game is updating, the following screenshots detail the communications sent from the mobile device for iOS devices. The server, identified here as the Host (homescapes-cdn.playrix.com) is accessed with a URL request and the Get method. On information and belief, Homescapes operates in a same or similar manner on Android. Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of the server and client side source code or other internal documents and information for the Homescapes game, which is not publicly available to FPG. As such, FPG reserves the right to supplement these contentions as discovery progresses and after Playrix produces source code and/or other internal documents and information relevant to this claim element.</p> <p>iOS Homescapes – Manifest then updates (Red Box)</p> <p>The mobile device with the Homescapes game connects to the server to receive new game information and updates including promotional events. https://playrix.helpshift.com/hc/en/14-homescapes/faq/1057-i-lost-my-game-progress/ If your game progress has been lost, try the following:</p> <ol style="list-style-type: none"> 1. Restart your device and reinstall the game 2. Connect the game to your previously used Facebook, Google, or Apple ID account.
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3. Tap/click "Load game".
4. Type in CONFIRM and tap/click OK.)

These promotional events include new hot spot content elements, which are then uploaded to the mobile communication device. The hot spot information related to the activated hot spot is uploaded to the mobile communication device.

Further, as shown below, Homescapes cannot update when a device is not connected to the internet.



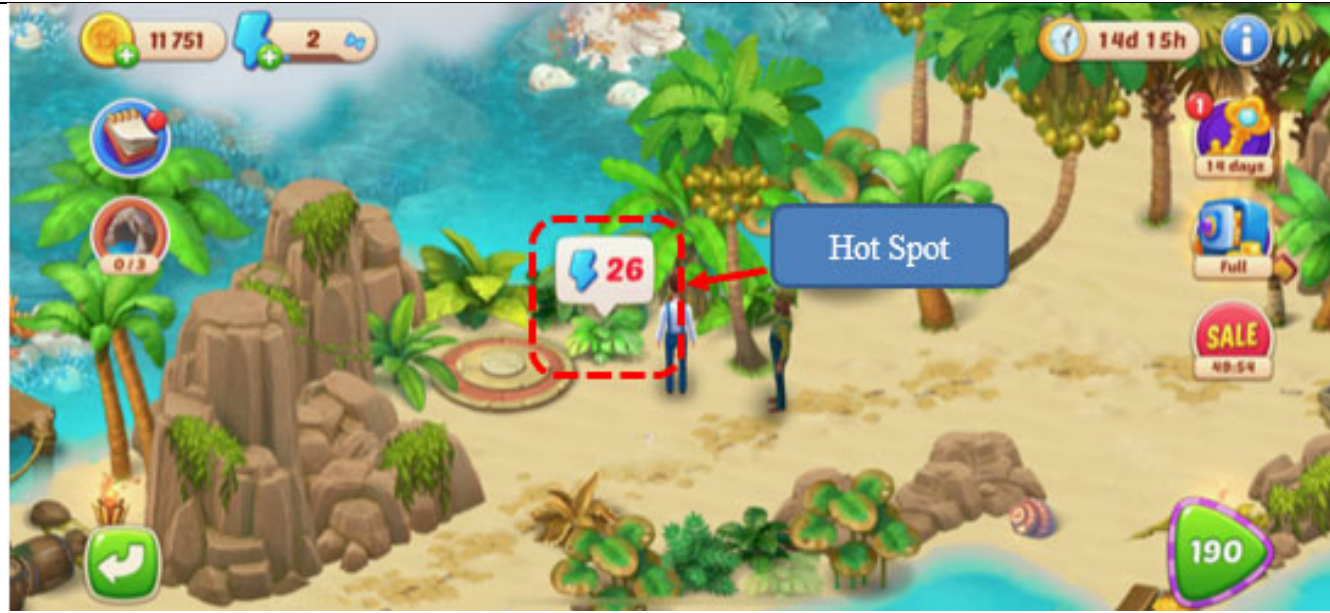
[Claim 2] The method of claim 1, wherein the location in-game is associated with activating the hot spot within the gaming

FPG incorporates by reference its analysis of Claim 1.

Homescapes provides a location in-game associated with activating the hot spots available to the user. As a non-limiting example, the location in-game presented by a plant below is the activation element associated with activating the hot spot within the gaming environment of Homescapes.

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environment of the
mobile video
game.



	
<p>[Claim 3] The method of claim 1, wherein the hidden promotional content is pre-selected based on the proximity of the mobile communication device to a physical location related to the hidden promotional content.</p>	<p>FPG incorporates by reference its analysis of Claim 1. Homescapes provides a method wherein the hidden promotional content is pre-selected based on the proximity of the mobile communication device to a physical location related to the hidden promotional content.</p> <p>Homescapes offers promotional content that is localized to the local language of the user's location. On information and belief, Homescapes is localized to default to the location of the mobile communication device and can then be changed manually. https://playrix.helpshift.com/hc/en/14-homescapes/faq/4117-changing-the-language-in-the-game/. Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of the server and client side source code or other internal documents and information for the Homescapes game, which is not publicly available to FPG. As such, FPG reserves the right to supplement these contentions as discovery progresses and after Playrix produces source code and/or other internal documents and information relevant to this claim element.</p>



Homescapes makes URL calls that include localization such as the URL <https://cdn.playrix.com/online-settings/Homescapes/production/ios/country/US.json>. This indicates that Homescapes localizes the game application to the content delivery network by country, such as the US, as seen in the following screenshot.

2155	cdn.playrix.com	https://cdn.playrix.com/online-settings/Homescapes/production/ios/country/US.json	23.61.191.97	0
2343	cdn.playrix.com	https://cdn.playrix.com/online-settings/Homescapes/production/ios/country/US.json	23.61.191.97	0
2243	cpanelmaildiscovery.cp...	https://cpanelmaildiscovery.cpanel.net/autodiscover/autodiscover.xml	208.74.121.152	1336
2106	graph.facebook.com	https://graph.facebook.com/v14.0	31.13.93.19	1126
2107	graph.facebook.com	https://graph.facebook.com/v14.0	31.13.93.19	604

IOS – Homescapes – Localized URL (Red Box)

On information and belief, Android devices operate in a similar manner to IOS devices and have URL calls to an android directory. See, e.g., analysis of this claim element with respect to Gardenscapes.

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<p>[Claim 4] The method of claim 1, further comprising the step of tracking the hot spot information that has been downloaded to the mobile communication device.</p>	<p>On information and belief, Homescapes provides a method for tracking the hot spot information that has been downloaded to the mobile communication device. Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of the server and client side source code or other internal documents and information for the Homescapes game, which is not publicly available to FPG. As such, FPG reserves the right to supplement these contentions as discovery progresses and after Playrix produces source code and/or other internal documents and information relevant to this claim element.</p> <p>Each time the user logs into the game, and at various points throughout gameplay, the Homescapes game connects to the server, tracks, and receives data. Further, as shown below, Homescapes cannot update when a device is not connected to the internet.</p> 
<p>[Claim 5] The method of claim 4, wherein the</p>	<p>FPG incorporates by reference its analysis of Claim 1 and 4.</p>

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tracked hot spot information is used for billing a third party associated with the hot spot information.	Homescapescapes includes the capability for some users to view in-game advertising to receive in-game rewards. This in-game advertising would be linked through a hot-spot and Playrix bills the third party for displaying the advertising. <i>See, e.g.</i> , https://playrix.helpshift.com/hc/en/14-homescapescapes/faq/4273-inappropriate-ads/?l=en (“In our games, players have the opportunity to receive in-game resources in exchange for watching video ads from our partners.”).
[Claim 6 - preamble] A system for providing a hot spot associated with a mobile video game, the system comprising:	<i>See</i> claim 1, preamble.
[6a] a storage medium for storing hot spot information for use in the mobile video game;	<i>See</i> claim 1[a].
[6b] a server in communication with the storage medium;	<p>Homescapescapes is a game played on a mobile device which is in communication with a game server. The mobile device with the Homescapescapes game connects to the server to receive new game information and updates including promotional events. https://playrix.helpshift.com/hc/en/14-homescapescapes/faq/1057-i-lost-my-game-progress/ If your game progress has been lost, try the following:</p> <ol style="list-style-type: none">1. Restart your device and reinstall the game 2. Connect the game to your previously used Facebook, Google, or Apple ID account.3. Tap/click "Load game".4. Type in CONFIRM and tap/click OK.) <p>Hot spot information in stored on a computer readable medium both on the mobile device and the game server.</p>

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The HTTPS traffic between the mobile device and the game server has been captured using the program Fiddler Everywhere over a wireless (WiFi) network. When the game application is opened while the game is updating, the following screenshots detail the communications sent from the mobile device for iOS devices. The server, identified here as the Host (homescapes-cdn.playrix.com) is accessed with a URL request and the Get method. On information and belief, Homescapes operates in a same or similar manner on Android. Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of the server and client side source code or other internal documents and information for the Homescapes game, which is not publicly available to FPG. As such, FPG reserves the right to supplement these contentions as discovery progresses and after Playrix produces source code and/or other internal documents and information relevant to this claim element.

#	Host	URL
2324	graph.facebook.com	https://graph.facebook.com/v14.0/200370150322559/aem_conversion_configs?advertiser_id=%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%7C6e1846832bc4ce4e522cc4c4adebaaa92&format=json&include_headers=fa
2339	graph.facebook.com	https://graph.facebook.com/v14.0/200370150322559/cloudbridge_settings?access_token=200370150322559%7C6e1846832bc4ce4e522cc4c4adebaaa92&format=json&include_headers=fa
2112	homescapes-cdn.playrix.com	https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/manifest.xml?it=6592256
2175	homescapes-cdn.playrix.com	https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/d72597b70dcccfc2be36342c7fa80d7781cf0973/PlayableVSO_Playables_Pin_Toggle.zip?h=d72597b70dcccfc2be36342c7fa80d7
2176	homescapes-cdn.playrix.com	https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/4a6147a93d2dabc292b3a23e55557f1e46f6e102/mortas_helmets_vso.zip?h=4a6147a93d2dabc292b3a23e55557f1e46f6e102
2177	homescapes-cdn.playrix.com	https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/ecc27a854c055f9032d151118f5f840bbc0acaaa/scan_chest.zip?h=ecc27a854c055f9032d151118f5f840bbc0acaaa
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/6.2.3/66e29948354fbabb21a11a0dcfd2e39153721973/PlayableVSO_Playables_Food.zip?h=66e29948354fbabb21a11a0dcfd2e39153
2187	homescapes-cdn.playrix.com	https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/4577956f9d59670da7c5f251d194c5789e15dfed/PlayableVSO_Forest.zip?h=4577956f9d59670da7c5f251d194c5789e15dfed

iOS Homescapes – Manifest then updates (Red Box)

Each of these http communications represents a request portion and a response portion.

[6c] an interface coupled to the server and a network, wherein the interface receives a request for hot spot information from

Homescapes provides an interface coupled to the server and a network, wherein the interface receives a request for hot spot information from the mobile communication device over the network. On information and belief, Homescapes uses AWS to “implement new features and processes.” https://aws.amazon.com/solutions/case-studies/playrix/?did=cr_card&trk=cr_card; *see also* <https://aws.amazon.com/solutions/case-studies/playrix-case-study/>. Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of the server and client side source code or other internal documents and information for the Homescapes game, which is not publicly available to FPG.

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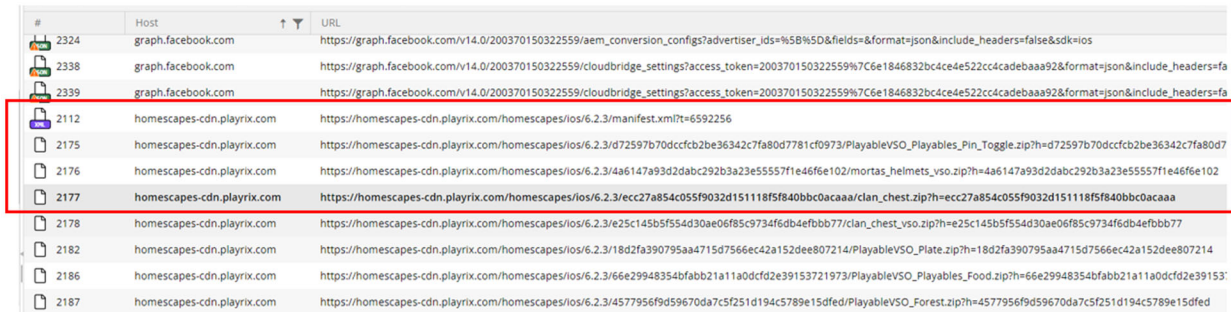
the mobile communication device over the network;	As such, FPG reserves the right to supplement these contentions as discovery progresses and after Playrix produces source code and/or other internal documents and information relevant to this claim element.																																				
[6d] wherein the server is operative to receive the request through the interface and utilize the request to determine the hot spot information for the mobile video game, and send the hot spot information to the mobile communication device, the hot spot information comprising:	<p>Homescapes provides an interface coupled to the server and a network, wherein the interface receives a request for hot spot information from the mobile communication device over the network. On information and belief, Homescapes uses AWS to “implement new features and processes.”</p> <p>https://aws.amazon.com/solutions/case-studies/playrix/?did=cr_card&trk=cr_card; <i>see also</i> https://aws.amazon.com/solutions/case-studies/playrix-case-study/. Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of the server and client side source code or other internal documents and information for the Homescapes game, which is not publicly available to FPG. As such, FPG reserves the right to supplement these contentions as discovery progresses and after Playrix produces source code and/or other internal documents and information relevant to this claim element.</p> <p>The HTTPS traffic between the mobile device and the game server has been captured using the program Fiddler Everywhere over a wireless (WiFi) network. When the game application is opened while the game is updating, the following screenshots detail the communications sent from the mobile device for iOS devices. The server, identified here as the Host (homescapes-cdn.playrix.com) is accessed with a URL request and the Get method. On information and belief, Homescapes operates in a same or similar manner on Android.</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_id=%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%7C6e1846832bc4ce4e522cc4cdeb92&format=json&include_headers=false</td></tr><tr><td>2339</td><td>graph.facebook.com</td><td>https://graph.facebook.com/v14.0/200370150322559/cloudbridge_settings?access_token=200370150322559%7C6e1846832bc4ce4e522cc4cdeb92&format=json&include_headers=false</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?it=6592256</td></tr><tr><td>2175</td><td>homescapes-cdn.playrix.com</td><td>https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/d72597b70dccc2be36342c7fa80d7781cf0973/PlayableVSO_Playables_Pin_Toggle.zip?h=d72597b70dccc2be36342c7fa80d7</td></tr><tr><td>2176</td><td>homescapes-cdn.playrix.com</td><td>https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/4a6147a93d2dabc292b3a23e5557f1e46f6e102/mortas_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/ecc27a854c055f9032d151118f5f840bbc0acaa/clan_chest.zip?h=ecc27a854c055f9032d151118f5f840bbc0acaa</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/6.2.3/66e29948354fbabb21a11a0dcfd2e39153721973/PlayableVSO_Playables_Food.zip?h=66e29948354fbabb21a11a0dcfd2e39153</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>	#	Host	URL	2324	graph.facebook.com	https://graph.facebook.com/v14.0/200370150322559/aem_conversion_configs?advertiser_id=%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%7C6e1846832bc4ce4e522cc4cdeb92&format=json&include_headers=false	2339	graph.facebook.com	https://graph.facebook.com/v14.0/200370150322559/cloudbridge_settings?access_token=200370150322559%7C6e1846832bc4ce4e522cc4cdeb92&format=json&include_headers=false	2112	homescapes-cdn.playrix.com	https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/manifest.xml?it=6592256	2175	homescapes-cdn.playrix.com	https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/d72597b70dccc2be36342c7fa80d7781cf0973/PlayableVSO_Playables_Pin_Toggle.zip?h=d72597b70dccc2be36342c7fa80d7	2176	homescapes-cdn.playrix.com	https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/4a6147a93d2dabc292b3a23e5557f1e46f6e102/mortas_helmets_vso.zip?h=4a6147a93d2dabc292b3a23e5557f1e46f6e102	2177	homescapes-cdn.playrix.com	https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/ecc27a854c055f9032d151118f5f840bbc0acaa/clan_chest.zip?h=ecc27a854c055f9032d151118f5f840bbc0acaa	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/6.2.3/66e29948354fbabb21a11a0dcfd2e39153721973/PlayableVSO_Playables_Food.zip?h=66e29948354fbabb21a11a0dcfd2e39153	2187	homescapes-cdn.playrix.com	https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/4577956f9d59670da7c5f251d194c5789e15dfed/PlayableVSO_Forest.zip?h=4577956f9d59670da7c5f251d194c5789e15dfed
#	Host	URL																																			
2324	graph.facebook.com	https://graph.facebook.com/v14.0/200370150322559/aem_conversion_configs?advertiser_id=%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%7C6e1846832bc4ce4e522cc4cdeb92&format=json&include_headers=false																																			
2339	graph.facebook.com	https://graph.facebook.com/v14.0/200370150322559/cloudbridge_settings?access_token=200370150322559%7C6e1846832bc4ce4e522cc4cdeb92&format=json&include_headers=false																																			
2112	homescapes-cdn.playrix.com	https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/manifest.xml?it=6592256																																			
2175	homescapes-cdn.playrix.com	https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/d72597b70dccc2be36342c7fa80d7781cf0973/PlayableVSO_Playables_Pin_Toggle.zip?h=d72597b70dccc2be36342c7fa80d7																																			
2176	homescapes-cdn.playrix.com	https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/4a6147a93d2dabc292b3a23e5557f1e46f6e102/mortas_helmets_vso.zip?h=4a6147a93d2dabc292b3a23e5557f1e46f6e102																																			
2177	homescapes-cdn.playrix.com	https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/ecc27a854c055f9032d151118f5f840bbc0acaa/clan_chest.zip?h=ecc27a854c055f9032d151118f5f840bbc0acaa																																			
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/6.2.3/66e29948354fbabb21a11a0dcfd2e39153721973/PlayableVSO_Playables_Food.zip?h=66e29948354fbabb21a11a0dcfd2e39153																																			
2187	homescapes-cdn.playrix.com	https://homescapes-cdn.playrix.com/homescapes/ios/6.2.3/4577956f9d59670da7c5f251d194c5789e15dfed/PlayableVSO_Forest.zip?h=4577956f9d59670da7c5f251d194c5789e15dfed																																			

EXHIBIT A-2
U.S. PATENT NO. 8,688,089

	Each of these HTTPS communications represents a Homescapes receiving the request and utilizing the request to determine the hot spot information and sending the hot spot information to the mobile communication device.
[6e] a location in-game associated with activating the hot spot, wherein the location in-game is represented by a non-promotional background object; and	<i>See claim 1[d].</i>
hidden promotional content for presenting to the user, within a gaming environment of the mobile video game, when the hot spot is activated.	<i>See claim 1[e].</i>
[Claim 7] The method of claim 6, wherein the hidden promotional content is pre-selected based on the proximity of	FPG incorporates by reference its analysis of Claim 6. <i>See claim 3.</i>

EXHIBIT A-2
U.S. PATENT NO. 8,688,089

the mobile communication device to a physical location related to the hidden promotional content.	
[Claim 8] The system of claim 6, wherein the hot spot information is pre-selected by the server based on a model type associated with the communications device, a service subscription associated with the communications device, or a service provider for the service subscription associated with the communications device.	On information and belief, Homescapes provides a system wherein the hot spot information is pre-selected by the server based on a model type associated with the communications device, a service subscription associated with the communications device, or a service provider for the service subscription associated with the communications device. Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of the server and client side source code or other internal documents and information for the Homescapes game, which is not publicly available to FPG. As such, FPG reserves the right to supplement these contentions as discovery progresses and after Playrix produces source code and/or other internal documents and information relevant to this claim element.
[Claim 9] The system of claim 6, wherein the server tracks what hot spot information	<i>See claim 4.</i>

EXHIBIT A-2
U.S. PATENT NO. 8,688,089

has been downloaded.	
[Claim 10] The method of claim 9, wherein the tracked hot spot information is used for billing a third party associated with the hot spot information.	<i>See claim 5.</i>

INFRINGEMENT OF U.S. PATENT NO. 8,688,089 BY PLR'S TOWNSHIP

Plaintiff Flip Phone Games Inc. (“FPG”) contends that PLR Worldwide Sales Limited (“PLR”) makes, uses, sells, offers for sale, and/or imports into the United States gaming systems, software, and/or methods for controlling devices and games including the Township mobile game, which acts infringe claims 1 through 10 of U.S. Patent No. 8,688,089, as set forth below. The specific components, systems, and constructs identified in this chart are for exemplary purposes only and FPG reserves all rights to supplement or amend these disclosures as additional components, systems, and constructs become known through discovery, as well as after PLR produces documents and source code and/or the Court construes any terms from the claims of the ’089 patent. PLR induces infringement of the asserted claims by providing instructions or information, for example on publicly available websites to explain how to use Township in an infringing manner including, *inter alia*, the PLR website.

See e.g., <https://playrix.helpshift.com/hc/en/3-township/>

PLR indirectly infringes the ’089 Patent by contributing to the direct infringement by end users by providing Township which is especially made for use on end-user devices in a manner that infringes and has no substantial non-infringing uses.

[U.S. 8,688,089](#) to Hartwell, *Methods and Systems for Providing In-Game Hot Spots*
Compared to: Township¹

U.S. 8,688,089	Township by Playrix
<p>[claim 1, preamble] A method for providing a hot spot associated with a mobile video game, the mobile video game being operable on a mobile communication device, the method comprising the steps of:</p>	<p>To the extent the preamble is limiting, Township includes a method for providing a hot spot associated with a mobile video game where the mobile video game is operable on a mobile communication device.</p>  <p>The image is a screenshot of the Township game interface. It shows a colorful, isometric view of a town with various buildings, roads, and a river. A red dashed box highlights a 'Map Hotspot' icon, which is a blue circle with a white location pin and a red 'X'. A blue callout box with the text 'Map Hotspot' points to this icon. The interface also displays various game elements like resource counters (e.g., 195/385, 32,828, 66, 79), a helicopter icon, and a bottom toolbar with icons for a person, a truck, a helicopter, a car, and a hard hat.</p>

¹ [Township — Playrix](#) (“Build your dream town! Develop your town's infrastructure, harvest crops, discover artifacts in the mines, and establish a trading system!.”)











<https://apps.apple.com/us/app/township/id638689075> ("Township is a unique blend of city building and farming! Build your dream town! Harvest crops, process them at your facilities, and sell goods to develop your town. Trade with distant islands. Open restaurants, cinemas and other community buildings to give life in your town special flavor. Explore the mine to get resources and find ancient artifacts. Run your own zoo and collect animals from around the world.

Are you ready to build your dream? Let's get started!

Township features:

- Different buildings and decorations you can use to create your dream town
- Various crops to grow and later process at your factories
- Fun, charismatic townspeople with orders you need to fill
- Your town's mine packed with ancient artifacts to discover and collect
- Exotic goods brought from the islands
- A zoo to build where you can even breed animals
- Famous landmarks you can use to decorate your town, like the Statue of Liberty, Big Ben, and many more!

	<ul style="list-style-type: none">● Play with your Facebook and Game Center friends or make new friends in the game community! Township is free to play, though some in-game items can also be purchased for real money. If you don't want to use this option, simply turn it off in your device's 'Restrictions' menu.”)
[1a] storing hot spot information on a computer-readable medium;	<p>Township stores hot spot information on a computer-readable medium.</p> <p>Township is a mobile device game, which is in communication with a game server that, on information and belief, stores hot spot information in a computer-readable medium on the server. Each time the user logs into the game, and likely at various points throughout gameplay, the Township game connects to the server and receives data. <i>See, e.g.,</i> https://playrix.helpshift.com/hc/en/3-township/faq/577-can-i-have-the-same-town-on-several-devices/ (“ Follow these steps to synchronize the game on your devices using Facebook: 1. Connect to Facebook in the in-game Settings menu or on the title screen. 2. Install the game from the App Store, Google Play, or the Amazon App Store on the new device. 3. Connect the downloaded game to the same Facebook account you used for the game on the first device. 4. A window telling you to download the saved game from our server will pop up. 5. Select Yes and type CONFIRM. Your game progress will be transferred.”); https://playrix.helpshift.com/hc/en/3-township/faq/9018-how-do-i-save-my-game-progress-1656549813/ (“Your game progress is saved automatically if your device is connected to the internet, so don’t worry, it won’t be lost even if you reinstall the game!”) Hot spot information is stored on a computer readable medium both on the mobile device and the game server.</p> <p>Township provides hot spots as discussed further in the [1c-1e] elements.</p>
[1b] receiving a communication from a mobile communication device;	<p>Township receives a communication from the mobile device. For example, when Township is launched, the server receives information from the mobile device, including information related to hot spots within the game. The server then transmits communications and updates, including updated hotspots, to the mobile device as discussed in further detail below.</p>



The HTTPS traffic between the mobile device and the game server has been captured using the program Fiddler Everywhere over a wireless (WiFi) network. When the game application is opened and up to the time in which the “Play” screen is available, the following screenshots detail the communications sent from the mobile device for iOS devices. The server, identified here as the Host (township-cdn.playrix.com) is accessed with a URL request.

#	Host	URL	Remote IP	Body Size
1798	stats.playrix.com	https://stats.playrix.com/api/1/v2.0/marketing	34.225.246.72	23
1898	stats.playrix.com	https://stats.playrix.com/api/1/v2.0/marketing	52.200.169.101	24
1752	township-cdn.playrix.com	https://township-cdn.playrix.com/township_ios/11.0.0/manifest.xml	23.61.191.97	7555
1767	township-cdn.playrix.com	https://township-cdn.playrix.com/township_ios/11.0.0/Expedition7_Data.zip	23.61.191.97	22654823
1864	township-cdn.playrix.com	https://township-cdn.playrix.com/township_ios/11.0.0/manifest.xml	23.61.191.97	7555
1748	township-ios.playrix.com	https://township-ios.playrix.com/404	52.86.11.187	0
1806	township-ios.playrix.com	https://township-ios.playrix.com/404	52.86.11.187	0

IOS – Township – URL calls made directly on opening (Red Box)

Each of these http communications represents a request portion and a response portion.

	<p>On information and belief, Township operates in a same or similar manner on Android. Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of the server and client side source code or other internal documents and information for the Township game, which is not publicly available to FPG. As such, FPG reserves the right to supplement these contentions as discovery progresses and after Playrix produces source code and/or other internal documents and information relevant to this claim element.</p>
<p>[1c] determining the hot spot information to provide to the mobile device based upon the communication, the hot spot information comprising</p>	<p>On information and belief, Township determines hot spot information to provide to the mobile device based upon the communication where the hot spot information comprises multiple features within Township. Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of the server and client side source code or other internal documents and information for the Township game, which is not publicly available to FPG. As such, FPG reserves the right to supplement these contentions as discovery progresses and after Playrix produces source code and/or other internal documents and information relevant to this claim element.</p>  <p>The screenshot displays the Township game interface. At the top, there are resource bars for coins (13), wood (195/385), and a score of 32,828. A blue callout box labeled 'Piggy Bank Hotspot' points to a piggy bank icon with a red dashed border and a '79' value. The bottom of the screen features a toolbar with icons for a character, a house, a helicopter, a car, and a hard hat. The game environment is a colorful, isometric view of a town with various buildings and structures.</p>









The HTTPS traffic between the mobile device and the game server has been captured using the program Fiddler Everywhere over a wireless (WiFi) network. When the game application is opened and up to the time in which the “Play” screen is available, the following screenshots detail the communications sent from the mobile device for iOS devices. The server, identified here as the Host (township-cdn.playrix.com) is accessed with a URL request.

#	Host	URL	Remote IP	Body Size
1798	stats.playrix.com	https://stats.playrix.com/api/1/v2.0/marketing	34.225.246.72	23
1898	stats.playrix.com	https://stats.playrix.com/api/1/v2.0/marketing	52.200.169.101	24
1752	township-cdn.playrix.com	https://township-cdn.playrix.com/township_ios/11.0.0/manifest.xml	23.61.191.97	7555
1767	township-cdn.playrix.com	https://township-cdn.playrix.com/township_ios/11.0.0/Expedition7_Data.zip	23.61.191.97	22654823
1864	township-cdn.playrix.com	https://township-cdn.playrix.com/township_ios/11.0.0/manifest.xml	23.61.191.97	7555
1748	township-ios.playrix.com	https://township-ios.playrix.com/404	52.86.11.187	0
1806	township-ios.playrix.com	https://township-ios.playrix.com/404	52.86.11.187	0

IOS – Township – URL calls made directly on opening (Red Box)

Each of these http communications represents a request portion and a response portion.

	<p>On information and belief, Township operates in a same or similar manner on Android. Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of the server and client side source code or other internal documents and information for the Township game, which is not publicly available to FPG. As such, FPG reserves the right to supplement these contentions as discovery progresses and after Playrix produces source code and/or other internal documents and information relevant to this claim element.</p>
<p>[1d] a location in-game associated with activating the hot spot, wherein the location in-game is represented by a non-promotional background object; and</p>	<p>On information and belief, Township contains a location in-game associated with activating the hot spot, wherein the location in-game is represented by a non-promotional background object. Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of the server and client side source code or other internal documents and information for the Township game, which is not publicly available to FPG. As such, FPG reserves the right to supplement these contentions as discovery progresses and after Playrix produces source code and/or other internal documents and information relevant to this claim element.</p> <p>Hot spots are represented in various locations in Township. When a user interacts with the activation element of the hot spot, hot spot information associated with that particular hot spot is displayed on the mobile device. The hot spot information that is displayed is based upon a prior communication between the game server and the mobile device. As a user plays Township, the user frequently comes upon hotspots. As a non-limiting example, the hat below is a hotspot with an in-game location represented by a non-promotional background object, which is based upon the level the user is at with Township and where within the game the user is located.</p>



Other examples of hotspots with an in-game location represented by a non-promotional background object, which are based upon the level the user is at with Township and where within the game the user is located are depicted below.

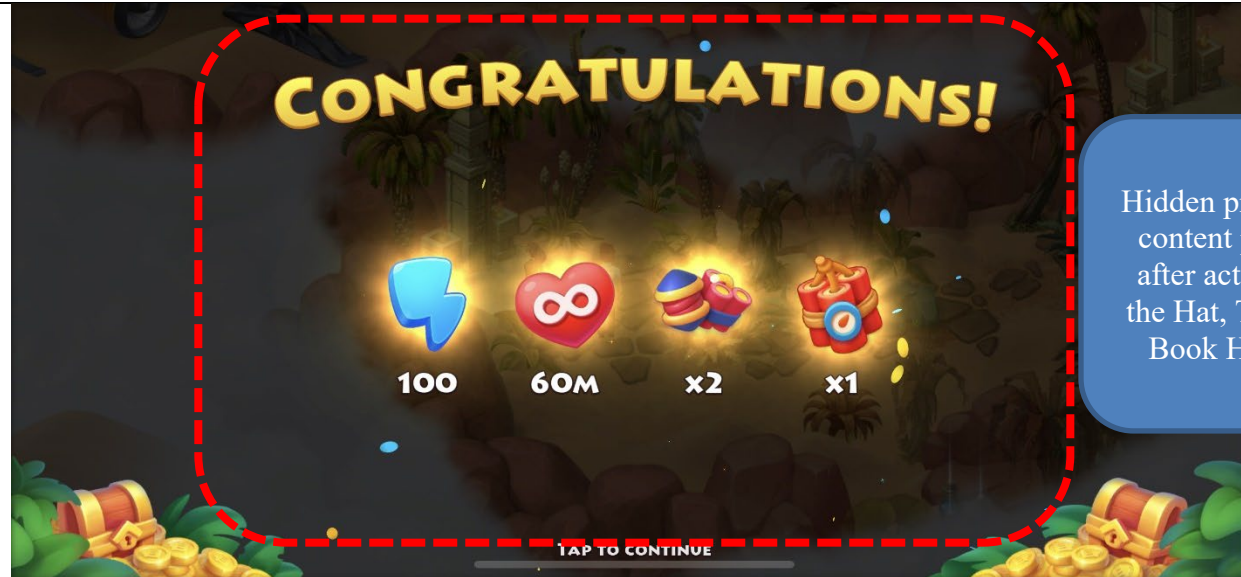








		
<p>[1e] hidden promotional content for presenting to the user, within a gaming environment of the mobile video game, when the hot spot is activated; and</p>	<p>Township contains hidden promotional content for presenting to the user, within a gaming environment of the mobile video game, when the hot spot is activated. For example, subsequent to activating the hot spot, hidden promotional content such as the depictions below are presented to the user. A user can purchase the energy points and other rewards shown below with coins, dollars, and golden tickets that it obtains by exchanging real currency to in-game currency or through gameplay.</p>	





Hidden promotional content presented after activation of the map hot spot







Hidden promotional content presented after activation of the dairy factory hot spot





Hidden promotional content presented after activation of the cowshed hot spot







[1f] uploading the hot spot information to the mobile communication device.

Township uploads the hot spot information to the mobile communication device.

The HTTP traffic between the mobile device and the game server has been captured using the program Fiddler Everywhere over a wireless (WiFi) network. When the game application is opened while the game is updating and up to the time in which the “Play” screen is available, the following screenshots detail the communications sent from the mobile device for an Iphone iOS device.

#	Host	URL	Remote IP	Body Size
1798	stats.playrix.com	https://stats.playrix.com/api/1/v2.0/marketing	34.225.246.72	23
1898	stats.playrix.com	https://stats.playrix.com/api/1/v2.0/marketing	52.200.169.101	24
1752	township-cdn.playrix.com	https://township-cdn.playrix.com/township_ios/11.0.0/manifest.xml	23.61.191.97	7555
1767	township-cdn.playrix.com	https://township-cdn.playrix.com/township_ios/11.0.0/Expedition7_Data.zip	23.61.191.97	22654823
1864	township-cdn.playrix.com	https://township-cdn.playrix.com/township_ios/11.0.0/manifest.xml	23.61.191.97	7555
1748	township-ios.playrix.com	https://township-ios.playrix.com/404	52.86.11.187	0
1806	township-ios.playrix.com	https://township-ios.playrix.com/404	52.86.11.187	0

IOS – Township – Update Expedition7_Data.zip (Red Box)

Each of these HTTPS communications represents a request portion and a response portion. On information and belief, Township operates in a same or similar manner on Android. Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of the server and client side

source code or other internal documents and information for the Township game, which is not publicly available to FPG. As such, FPG reserves the right to supplement these contentions as discovery progresses and after Playrix produces source code and/or other internal documents and information relevant to this claim element. *see, e.g.*, analysis of this claim element with respect to Gardenscapes.

The mobile device with the Township game connects to the server to receive new game information and updates including promotional events. *See, e.g.*, <https://playrix.helpshift.com/hc/en/3-township/faq/577-can-i-have-the-same-town-on-several-devices/> (“Follow these steps to synchronize the game on your devices using Facebook: 1. Connect to Facebook in the in-game Settings menu or on the title screen. 2. Install the game from the App Store, Google Play, or the Amazon App Store on the new device. 3. Connect the downloaded game to the same Facebook account you used for the game on the first device. 4. A window telling you to download the saved game from our server will pop up. 5. Select **Yes** and type **CONFIRM**. Your game progress will be transferred.”); <https://playrix.helpshift.com/hc/en/3-township/faq/9018-how-do-i-save-my-game-progress-1656549813/> (“Your game progress is saved automatically if your device is connected to the internet, so don’t worry, it won’t be lost even if you reinstall the game”).

Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of the server and client side source code or other internal documents and information for the Township game, which is not publicly available to FPG. As such, FPG reserves the right to supplement these contentions as discovery progresses and after Playrix produces source code and/or other internal documents and information relevant to this claim element.

Further, as shown below, Township cannot update when a device is not connected to the internet.

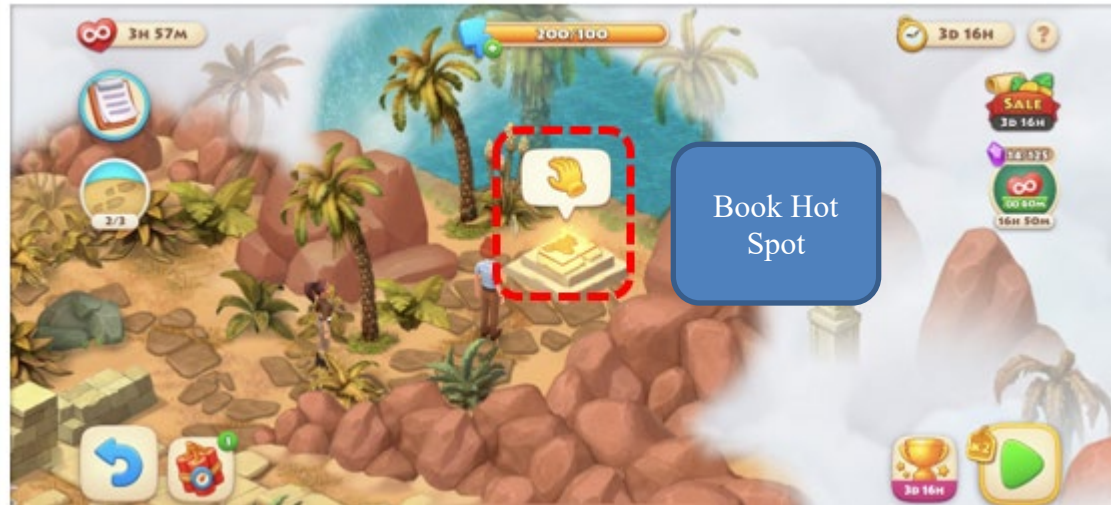
	 <p>The screenshot shows the Township game interface. At the top, the word 'TOWNSHIP' is written in large, stylized yellow letters on a blue banner. Below the banner, a white rectangular box contains the text 'No internet connection. Please check your internet settings.' and a blue button labeled 'Try again'. The background is a colorful, cartoonish farm scene with a purple house, a red barn, and various farm animals. In the foreground, there are several cardboard boxes and a small blue boat on a pond. At the bottom of the screen, a black bar contains the text 'CONNECTING...' and 'HAVE ANY QUESTIONS ABOUT THE GAME? VISIT HELP AND SUPPORT FOR USEFUL INFORMATION.'</p>
<p>[Claim 2] The method of claim 1, wherein the location in-game is associated with activating the hot spot within the gaming environment of the mobile video game.</p>	<p>FPG incorporates by reference its analysis of Claim 1.</p> <p>Township provides a location in-game associated with activating the hot spots available to the user. As a non-limiting example, the location in-game presented by the hat below is the activation element associated with activating the hot spot within the gaming environment of Township.</p>



Other examples are depicted below.









Hidden Content after
hot spot is activated







Hidden Content after
hot spot is activated





[Claim 3] The method of claim 1, wherein the hidden promotional content is pre-selected based on the proximity of the mobile communication device to a physical location related to the hidden promotional content.

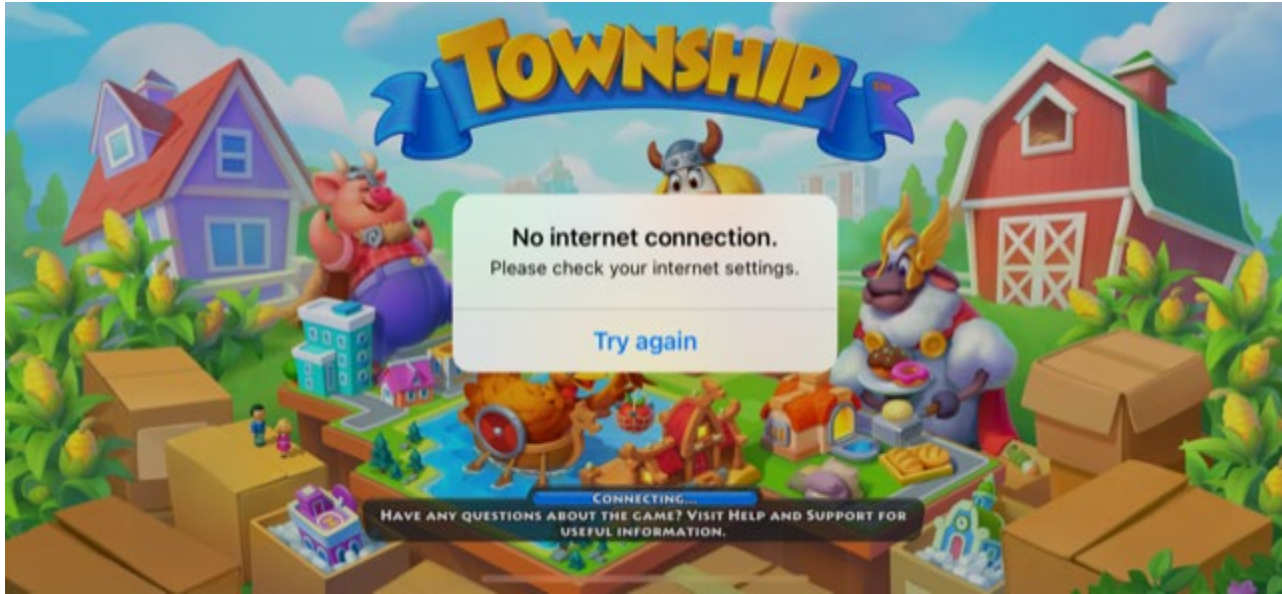
FPG incorporates by reference its analysis of Claim 1. Township provides a method wherein the hidden promotional content is pre-selected based on the proximity of the mobile communication device to a physical location related to the hidden promotional content.

Playrix distributes promotions “on a random and automatic basis, and they depend on many things such as your current game progress, *location* and so on.” <https://playrix.helpshift.com/hc/en/3-township/faq/5666-why-don-t-i-have-a-special-offer-but-my-friend-does/>

Township offers promotional content that is localized to the local language of the user’s location. On information and belief, Township is localized to default to the location of the mobile communication device and can then be changed manually. <https://playrix.helpshift.com/hc/en/3-township/faq/6981-how-do-i-change-the-language-in-the-game-1629735131/>

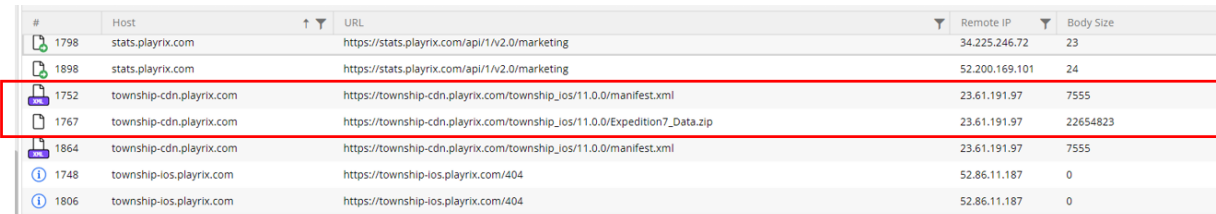


Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of the server and client side source code or other internal documents and information for the Township game, which is not publicly available to FPG. As such, FPG reserves the right to supplement these contentions as discovery

	<p>progresses and after Playrix produces source code and/or other internal documents and information relevant to this claim element.</p>
<p>[Claim 4] The method of claim 1, further comprising the step of tracking the hot spot information that has been downloaded to the mobile communication device.</p>	<p>On information and belief, Township provides a method for tracking the hot spot information that has been downloaded to the mobile communication device. Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of the server and client side source code or other internal documents and information for the Township game, which is not publicly available to FPG. As such, FPG reserves the right to supplement these contentions as discovery progresses and after Playrix produces source code and/or other internal documents and information relevant to this claim element.</p> <p>Each time the user logs into the game, and at various points throughout gameplay, the Township game connects to the server, tracks, and receives data. https://playrix.helpshift.com/hc/en/3-township/faq/3161-how-do-i-save-my-game-progress/ (“Your game progress is saved automatically if your device is connected to the internet. It won't be lost even if you reinstall the game.”) Further, as shown below, Township cannot update when a device is not connected to the internet.</p> 

Analysis of the URL calls that Township makes indicate that Township tracks the hot spot information that has been downloaded.

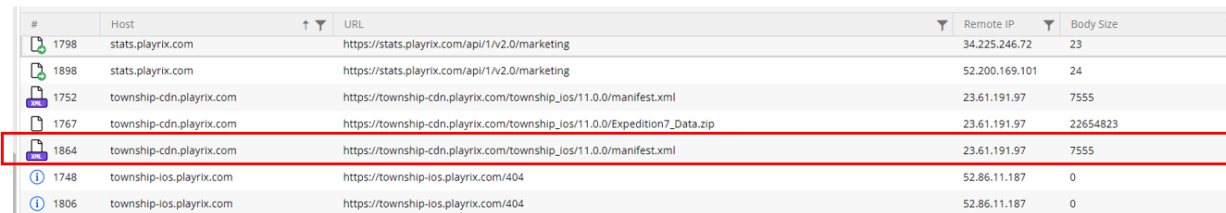
The following screenshot contains URL calls that occur while opening the game application. The manifest.xml (# 1752) call and the example subsequent update call, such as Expedition7_Data.zip (# 1767) occurred when opening the game application.



#	Host	URL	Remote IP	Body Size
1798	stats.playrix.com	https://stats.playrix.com/api/1/v2.0/marketing	34.225.246.72	23
1898	stats.playrix.com	https://stats.playrix.com/api/1/v2.0/marketing	52.200.169.101	24
1752	township-cdn.playrix.com	https://township-cdn.playrix.com/township_ios/11.0.0/manifest.xml	23.61.191.97	7555
1767	township-cdn.playrix.com	https://township-cdn.playrix.com/township_ios/11.0.0/Expedition7_Data.zip	23.61.191.97	22654823
1864	township-cdn.playrix.com	https://township-cdn.playrix.com/township_ios/11.0.0/manifest.xml	23.61.191.97	7555
1748	township-ios.playrix.com	https://township-ios.playrix.com/404	52.86.11.187	0
1806	township-ios.playrix.com	https://township-ios.playrix.com/404	52.86.11.187	0

IOS – Township – URL calls made directly on opening (Red Box)

The following screenshot contains URL calls that occur while force closing and reopening the game application. The manifest.xml (# 1864) call is made and no subsequent Expedition7_Data.zip call is made when opening the game application.

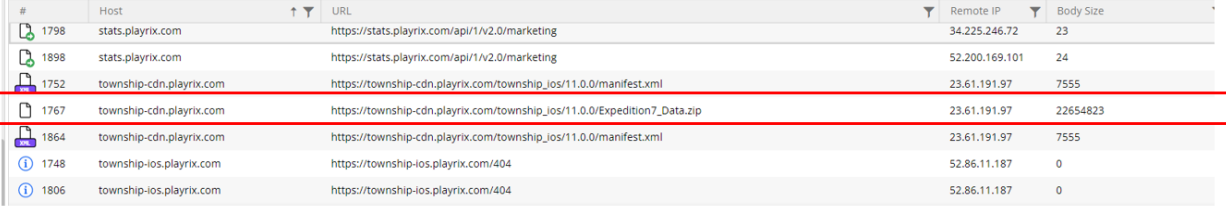


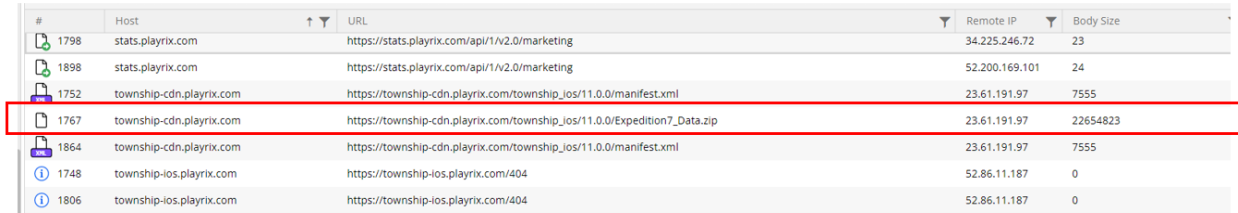
#	Host	URL	Remote IP	Body Size
1798	stats.playrix.com	https://stats.playrix.com/api/1/v2.0/marketing	34.225.246.72	23
1898	stats.playrix.com	https://stats.playrix.com/api/1/v2.0/marketing	52.200.169.101	24
1752	township-cdn.playrix.com	https://township-cdn.playrix.com/township_ios/11.0.0/manifest.xml	23.61.191.97	7555
1767	township-cdn.playrix.com	https://township-cdn.playrix.com/township_ios/11.0.0/Expedition7_Data.zip	23.61.191.97	22654823
1864	township-cdn.playrix.com	https://township-cdn.playrix.com/township_ios/11.0.0/manifest.xml	23.61.191.97	7555
1748	township-ios.playrix.com	https://township-ios.playrix.com/404	52.86.11.187	0
1806	township-ios.playrix.com	https://township-ios.playrix.com/404	52.86.11.187	0

IOS – Township – The Manifest call on reopening (Red Box)

The HTTP traffic between the mobile device and the game server has been captured using the program Fiddler Everywhere over a wireless (WiFi) network. When the game application is opened while the game is updating and up to the time in which the “Play” screen is available, the following screenshots detail the communications sent from the mobile device for iOS devices.

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U.S. PATENT NO. 8,688,089

	 <p>IOS – Township – Update Expedition7_Data.zip (Red Box)</p> <p>Each of these HTTPS communications represents a request portion and a response portion.</p> <p>On information and belief, Township operates in a same or similar manner on Android. Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of the server and client side source code or other internal documents and information for the Township game, which is not publicly available to FPG. As such, FPG reserves the right to supplement these contentions as discovery progresses and after Playrix produces source code and/or other internal documents and information relevant to this claim element.</p>
<p>[Claim 5] The method of claim 4, wherein the tracked hot spot information is used for billing a third party associated with the hot spot information.</p>	<p>FPG incorporates by reference its analysis of Claim 1 and 4.</p> <p>Township includes the capability for some users to view in-game advertising to receive in-game rewards. This in-game advertising would be linked through a hot-spot and Playrix bills the third party for displaying the advertising. <i>See, e.g.</i>, https://playrix.helpshift.com/hc/en/3-township/faq/4672-inappropriate-ads-1586534637/ (“In our games, players have the opportunity to receive in-game resources in exchange for watching video ads from our partners.”)</p>
<p>[Claim 6 -preamble] A system for providing a hot spot associated with a mobile video game, the system comprising:</p>	<p><i>See</i> claim 1, preamble.</p>
<p>[6a] a storage medium for storing</p>	<p><i>See</i> claim 1[a].</p>

hot spot information for use in the mobile video game;																																									
[6b] a server in communication with the storage medium;	<p>Township is a game played on a mobile device which is in communication with a game server. Each time the user logs into the game, and at various points throughout gameplay, the Township game connects to the server and receives data. https://playrix.helpshift.com/hc/en/3-township/faq/3161-how-do-i-save-my-game-progress/ (“Your game progress is saved automatically if your device is connected to the internet. It won't be lost even if you reinstall the game. You can also link your progress to the social network accounts you connect to the game. The current game version supports Facebook, Google Account (Android, iOS) and iCloud/Apple ID (Apple devices). All you have to do is connect to a social network to automatically associate your game progress with it.)</p> <p>The HTTPS traffic between the mobile device and the game server has been captured using the program Fiddler Everywhere over a wireless (WiFi) network. When the game application is opened while the game is updating and up to the time in which the “Play” screen is available, the following screenshots detail the communications sent to/from the mobile device for iOS devices.</p>  <table><tr><th>#</th><th>Host</th><th>URL</th><th>Remote IP</th><th>Body Size</th></tr><tr><td>1798</td><td>stats.playrix.com</td><td>https://stats.playrix.com/api/1/v2.0/marketing</td><td>34.225.246.72</td><td>23</td></tr><tr><td>1898</td><td>stats.playrix.com</td><td>https://stats.playrix.com/api/1/v2.0/marketing</td><td>52.200.169.101</td><td>24</td></tr><tr><td>1752</td><td>township-cdn.playrix.com</td><td>https://township-cdn.playrix.com/township_ios/11.0.0/manifest.xml</td><td>23.61.191.97</td><td>7555</td></tr><tr><td>1767</td><td>township-cdn.playrix.com</td><td>https://township-cdn.playrix.com/township_ios/11.0.0/Expedition7_Data.zip</td><td>23.61.191.97</td><td>22654823</td></tr><tr><td>1864</td><td>township-cdn.playrix.com</td><td>https://township-cdn.playrix.com/township_ios/11.0.0/manifest.xml</td><td>23.61.191.97</td><td>7555</td></tr><tr><td>1748</td><td>township-ios.playrix.com</td><td>https://township-ios.playrix.com/404</td><td>52.86.11.187</td><td>0</td></tr><tr><td>1806</td><td>township-ios.playrix.com</td><td>https://township-ios.playrix.com/404</td><td>52.86.11.187</td><td>0</td></tr></table> <p>IOS – Township – Update Expedition7_Data.zip (Red Box)</p> <p>Each of these HTTPS communications represents a request portion and a response portion.</p> <p>On information and belief, Township operates in a same or similar manner on Android. Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of the server and client side source code or other internal documents and information for the Township game, which is not publicly available</p>	#	Host	URL	Remote IP	Body Size	1798	stats.playrix.com	https://stats.playrix.com/api/1/v2.0/marketing	34.225.246.72	23	1898	stats.playrix.com	https://stats.playrix.com/api/1/v2.0/marketing	52.200.169.101	24	1752	township-cdn.playrix.com	https://township-cdn.playrix.com/township_ios/11.0.0/manifest.xml	23.61.191.97	7555	1767	township-cdn.playrix.com	https://township-cdn.playrix.com/township_ios/11.0.0/Expedition7_Data.zip	23.61.191.97	22654823	1864	township-cdn.playrix.com	https://township-cdn.playrix.com/township_ios/11.0.0/manifest.xml	23.61.191.97	7555	1748	township-ios.playrix.com	https://township-ios.playrix.com/404	52.86.11.187	0	1806	township-ios.playrix.com	https://township-ios.playrix.com/404	52.86.11.187	0
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1806	township-ios.playrix.com	https://township-ios.playrix.com/404	52.86.11.187	0																																					

	to FPG. As such, FPG reserves the right to supplement these contentions as discovery progresses and after Playrix produces source code and/or other internal documents and information relevant to this claim element.
[6c] an interface coupled to the server and a network, wherein the interface receives a request for hot spot information from the mobile communication device over the network;	Township provides an interface coupled to the server and a network, wherein the interface receives a request for hot spot information from the mobile communication device over the network. On information and belief, Township uses AWS to “implement new features and processes.” https://aws.amazon.com/solutions/case-studies/playrix/?did=cr_card&trk=cr_card ; see also https://aws.amazon.com/solutions/case-studies/playrix-case-study/ . Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of the server and client side source code or other internal documents and information for the Township game, which is not publicly available to FPG. As such, FPG reserves the right to supplement these contentions as discovery progresses and after Playrix produces source code and/or other internal documents and information relevant to this claim element
[6d] wherein the server is operative to receive the request through the interface and utilize the request to determine the hot spot information for the mobile video game, and send the hot spot information to the mobile communication device, the hot spot information comprising:	<p>Township provides a server that is operative to receive the request through the interface and utilize the request to determine the hot spot information for the mobile video game, and send the hot spot information to the mobile communication device. On information and belief, Township uses AWS to “implement new features and processes.” https://aws.amazon.com/solutions/case-studies/playrix/?did=cr_card&trk=cr_card; see also https://aws.amazon.com/solutions/case-studies/playrix-case-study/. Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of the server and client side source code or other internal documents and information for the Township game, which is not publicly available to FPG. As such, FPG reserves the right to supplement these contentions as discovery progresses and after Playrix produces source code and/or other internal documents and information relevant to this claim element.</p> <p>The HTTPS traffic between the mobile device and the game server has been captured using the program Fiddler Everywhere over a wireless (WiFi) network. When the game application is opened while the game is updating and up to the time in which the “Play” screen is available, the following screenshots detail the communications sent to/from the mobile device for iOS devices.</p>

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1898	stats.playrix.com	https://stats.playrix.com/api/1/v2.0/marketing	52.200.169.101	24
1752	township-cdn.playrix.com	https://township-cdn.playrix.com/township_ios/11.0.0/manifest.xml	23.61.191.97	7555
1767	township-cdn.playrix.com	https://township-cdn.playrix.com/township_ios/11.0.0/Expedition7_Data.zip	23.61.191.97	22654823
1864	township-cdn.playrix.com	https://township-cdn.playrix.com/township_ios/11.0.0/manifest.xml	23.61.191.97	7555
1748	township-ios.playrix.com	https://township-ios.playrix.com/404	52.86.11.187	0
1806	township-ios.playrix.com	https://township-ios.playrix.com/404	52.86.11.187	0

IOS – Township – Update Expedition7_Data.zip (Red Box)

Each of these HTTPS communications represents a request portion and a response portion.

Each of these http communications represents a Township server receiving the request and utilizing the request to determine the hot spot information and sending the hot spot information to the mobile communication device.

On information and belief, Township operates in a same or similar manner on Android. Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of the server and client side source code or other internal documents and information for the Township game, which is not publicly available to FPG. As such, FPG reserves the right to supplement these contentions as discovery progresses and after Playrix produces source code and/or other internal documents and information relevant to this claim element.

[6e] a location in-game associated with activating the hot spot, wherein the location in-game is represented by a non-promotional background object; and

See claim 1[d].

[6f] hidden promotional content for presenting to the user, within a gaming environment

See claim 1[e].

of the mobile video game, when the hot spot is activated.	
[Claim 7] The method of claim 6, wherein the hidden promotional content is pre-selected based on the proximity of the mobile communication device to a physical location related to the hidden promotional content.	FPG incorporates by reference its analysis of Claim 6. <i>See claim 3.</i>
[Claim 8] The system of claim 6, wherein the hot spot information is pre-selected by the server based on a model type associated with the communications device, a service subscription associated with the communications device, or a service provider for the service subscription associated with the communications device, a service subscription associated with the communications device, or a service provider for the service subscription associated with the	<p>Township provides a system wherein the hot spot information is pre-selected by the server based on a model type associated with the communications device, a service subscription associated with the communications device, or a service provider for the service subscription associated with the communications device. In Township, gameplay is predetermined for all users such that every user progresses through the game in a similar or same fashion. Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of the server and client side source code or other internal documents and information for the Township game, which is not publicly available to FPG. As such, FPG reserves the right to supplement these contentions as discovery progresses and after Playrix produces source code and/or other internal documents and information relevant to this claim element.</p> <p>The HTTPS traffic between the mobile device and the game server has been captured using the program Fiddler Everywhere over a wireless (WiFi) network. When the game application is opened while the game is updating and up to the time in which the “Play” screen is available, the following screenshots detail the communications sent to/from the mobile device for iOS devices.</p>

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communications device.	<table><tr><th>#</th><th>Host</th><th>URL</th><th>Remote IP</th><th>Body Size</th></tr><tr><td>1798</td><td>stats.playrix.com</td><td>https://stats.playrix.com/api/1/v2.0/marketing</td><td>34.225.246.72</td><td>23</td></tr><tr><td>1898</td><td>stats.playrix.com</td><td>https://stats.playrix.com/api/1/v2.0/marketing</td><td>52.200.169.101</td><td>24</td></tr><tr><td>1752</td><td>township-cdn.playrix.com</td><td>https://township-cdn.playrix.com/township_ios/11.0.0/manifest.xml</td><td>23.61.191.97</td><td>7555</td></tr><tr><td>1767</td><td>township-cdn.playrix.com</td><td>https://township-cdn.playrix.com/township_ios/11.0.0/Expedition7_Data.zip</td><td>23.61.191.97</td><td>22654823</td></tr><tr><td>1864</td><td>township-cdn.playrix.com</td><td>https://township-cdn.playrix.com/township_ios/11.0.0/manifest.xml</td><td>23.61.191.97</td><td>7555</td></tr><tr><td>1748</td><td>township-ios.playrix.com</td><td>https://township-ios.playrix.com/404</td><td>52.86.11.187</td><td>0</td></tr><tr><td>1806</td><td>township-ios.playrix.com</td><td>https://township-ios.playrix.com/404</td><td>52.86.11.187</td><td>0</td></tr></table> <p>IOS – Township – Update Expedition7_Data.zip (Red Box)</p> <p>Each of these HTTPS communications represents a request portion and a response portion.</p> <p>On information and belief, Township operates in a same or similar manner on Android. Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of the server and client side source code or other internal documents and information for the Township game, which is not publicly available to FPG. As such, FPG reserves the right to supplement these contentions as discovery progresses and after Playrix produces source code and/or other internal documents and information relevant to this claim element.</p>	#	Host	URL	Remote IP	Body Size	1798	stats.playrix.com	https://stats.playrix.com/api/1/v2.0/marketing	34.225.246.72	23	1898	stats.playrix.com	https://stats.playrix.com/api/1/v2.0/marketing	52.200.169.101	24	1752	township-cdn.playrix.com	https://township-cdn.playrix.com/township_ios/11.0.0/manifest.xml	23.61.191.97	7555	1767	township-cdn.playrix.com	https://township-cdn.playrix.com/township_ios/11.0.0/Expedition7_Data.zip	23.61.191.97	22654823	1864	township-cdn.playrix.com	https://township-cdn.playrix.com/township_ios/11.0.0/manifest.xml	23.61.191.97	7555	1748	township-ios.playrix.com	https://township-ios.playrix.com/404	52.86.11.187	0	1806	township-ios.playrix.com	https://township-ios.playrix.com/404	52.86.11.187	0
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1748	township-ios.playrix.com	https://township-ios.playrix.com/404	52.86.11.187	0																																					
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[Claim 9] The system of claim 6, wherein the server tracks what hot spot information has been downloaded.	See claim 4.																																								
[Claim 10] The method of claim 9, wherein the tracked hot spot information is used for billing a third party associated with the hot spot information.	See claim 5.																																								