

INFRINGEMENT OF U.S. PATENT NO. 11,117,056 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 16 of U.S. Patent No. 11,117,056, 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 ’056 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 ’056 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.

[US 11,117,056](#) to Hartwell, Methods and Systems for Updating In-Game Content
Compared to: Homescapes

US 11,117,056	Homescapes by Playrix
[claim 1, preamble] A system for providing updated content associated with mobile video game to a mobile communication device, the system comprising:	To the extent the preamble is limiting, Homescapes provides a system for updating content associated with the mobile video game to a mobile communication device. https://playrix.helpshift.com/hc/en/14-homescapes/faq/11809-how-often-and-why-do-you-need-to-update-the-game/ (“We usually release our exciting new updates approximately every 2 months ”); https://playrix.helpshift.com/hc/en/14-homescapes/faq/11810-how-do-i-update-the-game-1670546975/ (“If you still don't have access to the update, don't worry. It will become available to you very soon!  New versions of the game are released on different platforms with small delays (sometimes up to several days)  That happens due to a difference in the procedures for checking the update on different platforms. You may need to reinstall the game to get the latest available version ”). Homescapes on the App Store (apple.com) (“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! The game features: ● 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!”)
[1a] a storage medium for	Homescapes provides a storage medium for storing in-game video game content. For example, the game is updated

storing in-game video game content;	frequently with updated game content from the server being stored in a storage medium. Such updates occur when a user launches the Homescapes application on a mobile communication device. 
[1b] a server in communication with the storage medium; and wherein the server is configured to: receive a request for updated content from the mobile communication device;	Homescapes is a mobile device game, which is in communication with a game server. https://playrix.helpshift.com/hc/en/14-homescapes/faq/1062-system-requirements-1627577130/ (“The minimum system requirements for the game are listed below. They may change in the future if program modifications are introduced to the game. ➡ 1GB of RAM; ➡ 500 MB of free space; ➡ a stable internet connection.”). 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. Each time the user logs into the game, and at various points throughout gameplay, the Homescapes game connects to the server and communicates with it to receive data. As a player progresses through the game, Homescapes communicates with the server which is configured to receive requests for updated content from the mobile device.

	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 to/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. IOS Homescapes – Manifest then updates (Red Box) Each of these http communications represents a request portion and a response portion. The URLs also indicate that they are located in an iOS directory. This indicates that there should also be an Android directory which should be different sizes. <i>See Exhibit D-1</i> where Gardenscapes operates in this manner.
[1c] identify, in response to receiving the request, what in-game video game content to send;	Homescapes identifies, in response to receiving a request, what in-game video game content to send. As a user progresses through Homescapes, the game communicates with the server based on which juncture the user is at in the game. The server receives the request from the client regarding what in-game content to send based on where the user is in 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.
[1d] send a message relating to the in-game video game content to the mobile communication	In response to receiving a request, the game server pre-selects a message in part based on the model type of mobile device it is. For example, on information and belief, the pre-selected message differs based on the model type of the mobile communication device. <i>See e.g.</i>, analysis of this claim element with respect to Gardenscapes.

device in response to receiving the request, wherein the message is pre-selected by the server based on a model type associated with the mobile communication device, a service subscription associated with the mobile communication device, or a service provider for the service subscription associated with the mobile communication device; and	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.
[1e] send the in-game video game content to the mobile communication device as the updated content for the mobile video game.	The in-game video game content is sent to the mobile device from the server. As one non-limiting example below, when the user reaches a certain threshold in Homescapes the server sends in-game video game content. 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.

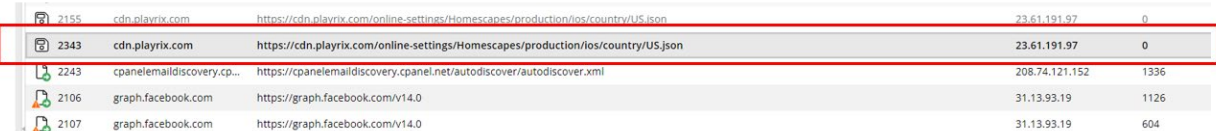
	 The screenshot displays a vibrant, cartoonish park environment. At the top, several UI elements are visible: a gold coin icon with '19 703', a blue key icon with '351', a progress bar showing '111 / 400' with a '12h 04m' timer, and a purple infinity symbol with '30m'. On the right, there's a clock icon with '8d 12h' and a blue 'i' icon. Below these, a 'Full' button and a 'SALE' banner with '23h 04m' are shown. A red dashed box highlights the 'SALE' banner, with a red arrow pointing to it from a blue callout box labeled 'In-game video game content'. In the bottom right corner, a green shield icon contains the number '131'. The park scene includes a carousel, a statue, a bicycle rack, and various decorative elements like balloons and flowers.
[Claim 2] The system of claim 1, wherein the updated content comprises promotional content.	FPG incorporates by reference its analysis of Claim 1. The server provides updated content comprising of promotional content.

	
[Claim 3] The system of claim 2, wherein the promotional content comprises localized promotional content based on a location of the mobile communication device.	FPG incorporates by reference its analysis of Claims 1 and 2. Homescapescapes provides a system wherein the promotional content comprises localized promotional content based on a location of 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 Homescapescapes 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. Homescapescapes offers promotional content that is localized to the local language of the user's location. On information and belief, Homescapescapes 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-homescapescapes/faq/4117-changing-the-language-in-the-game/.



Homescapes 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/14-homescapes/faq/5657-why-don-t-i-have-a-special-offer-but-my-friend-does/?l=en>.

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.

	 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. <i>See e.g.</i>, analysis of this claim element with respect to Gardenscapes.
[Claim 4] The system of claim 1, wherein identifying what in-game video game content to send is based on a model type associated with the mobile communication device, a service subscription associated with the mobile communications device, a service provider for the service subscription associated with the mobile communication device, or a location of the mobile communications device.	FPG incorporates by reference its analysis of Claim 1. Homescapes identifies what in-game video game content to send based on a model type associated with the mobile communication device. <i>See e.g.</i>, analysis of this claim element with respect to Gardenscapes. 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 5] The system of claim 1, wherein the server is further configured to send information to the mobile communication device regarding the in-game placement location of the in-game video game content.	FPG incorporates by reference its analysis of Claim 1. On information and belief, Homescapes’s server is configured to send information to the mobile communication device regarding the in-game placement location of the in-game videogame content. For example, when a user reaches a certain juncture in Homescapes, Homescapes communicates with its server to provide an in-game placement location (ie. the billboard, below) where a user may travel to in-game within the Homescapes universe to obtain the video game content.





[Claim 6] The system of claim 1, wherein the server is further configured to check whether the mobile communication device should receive the updated content before sending the updated content to the mobile communication device.

FPG incorporates by reference its analysis of Claim 1.

On information and belief, Homescapes is configured to check whether the mobile communication device should receive the updated content before sending the updated content to the mobile communication device. 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 7] The system of claim 1, wherein the server is further configured to track the distribution of updated content.

FPG incorporates by reference its analysis of Claim 1.

On information and belief, the Homescapes server tracks the distribution of updated content. 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 8] The system of claim 1, wherein the server is further configured to check for availability of bandwidth before sending the updated content to the mobile communication device.	FPG incorporates by reference its analysis of Claim 1. On information and belief, Homescapes checks for availability of bandwidth before sending the updated content 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.
[Claim 9 -preamble] A method for providing updated content associated with a mobile video game to a mobile communication device, the method comprising:	<i>See Preamble Claim 1.</i>
[9a] storing, on a storage medium, pre-selected in-game video game content for use in a video game;	Homescapes provides a storage medium for storing in-game video game content. 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.
[9b] receiving, at a server, a request from the mobile communication device for updated content from the mobile communication device;	<i>See Claim 1b.</i>
[9c] identifying, by the server in response to receiving the request, what	<i>See Claim 1c.</i>

pre-selected in-game video game content to send;	
[9d] sending a message relating to the in-game video game content from the server to the mobile communication device in response to receiving the request, wherein the message is pre-selected by the server based on a model type associated with the mobile communication device, a service subscription associated with the mobile communication device, or a service provider for the service subscription associated with the mobile communication device; and	<i>See Claim 1d.</i>
[9e] sending, from the server, the pre-selected in-game video game content to the mobile communication device as the updated content for the mobile video game.	<i>See Claim 1e.</i>
[Claim 10] The method of claim 9, wherein the updated content is promotional content.	<i>See Claim 2.</i>
[Claim 11] The method of	FPG incorporates by reference its analysis of Claims 9 and 10.

claim 10, wherein the promotional content is localized promotional content based on a location of the mobile communication device.

Homescapescapes provides a method wherein the promotional content is localized promotional content based on a location of 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 Homescapescapes 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.

Homescapescapes offers promotional content that is localized to the local language of the user's location. On information and belief, Homescapescapes 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-homescapescapes/faq/4117-changing-the-language-in-the-game/>.

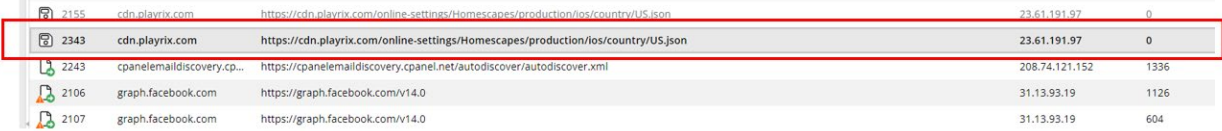


	Homescapes distributes promotions “on a random and automatic basis, and they depend on many things such as your current game progress, location and so on.” https://playrix.helpshift.com/hc/en/14-homescapes/faq/5657-why-don-t-i-have-a-special-offer-but-my-friend-does/?l=en. Homescapes makes URL calls 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. <table><tr><th>ID</th><th>Host</th><th>URL</th><th>IP</th><th>Size</th></tr><tr><td>2155</td><td>cdn.playrix.com</td><td>https://cdn.playrix.com/online-settings/Homescapes/production/ios/country/US.json</td><td>23.61.191.97</td><td>0</td></tr><tr><td>2343</td><td>cdn.playrix.com</td><td>https://cdn.playrix.com/online-settings/Homescapes/production/ios/country/US.json</td><td>23.61.191.97</td><td>0</td></tr><tr><td>2243</td><td>cpanelmaildiscovery.cp...</td><td>https://cpanelmaildiscovery.cpanel.net/autodiscover/autodiscover.xml</td><td>208.74.121.152</td><td>1336</td></tr><tr><td>2106</td><td>graph.facebook.com</td><td>https://graph.facebook.com/v14.0</td><td>31.13.93.19</td><td>1126</td></tr><tr><td>2107</td><td>graph.facebook.com</td><td>https://graph.facebook.com/v14.0</td><td>31.13.93.19</td><td>604</td></tr></table> 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. <i>See e.g.</i>, analysis of this claim element with respect to Gardenscapes.	ID	Host	URL	IP	Size	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
ID	Host	URL	IP	Size																											
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																											
[Claim 12] The method of claim 9, wherein identifying what in-game video game content to send is based on a model type associated with the mobile communication device, a service subscription associated with the mobile communications device, a service provider for the service subscription associated with the mobile communication device, or a location of the mobile communications device.	Homescapes provides a method to identify what in-game video game content to send based on a model type associated with the mobile communication device and a location of the mobile communications device. On information and belief, in response to receiving a request, the game server pre-selects a message in part based on the model type of mobile device it is. 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. 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/.																														



Homescapes 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/14-homescapes/faq/5657-why-don-t-i-have-a-special-offer-but-my-friend-does/?l=en>.

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.

	 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. <i>See e.g.</i>, analysis of this claim element with respect to Gardenscapes.
[Claim 13] The method of claim 9, further comprising sending information from the server to the mobile communication device regarding the in-game placement location of in-game video game content.	FPG incorporates by reference its analysis of Claim 9. On information and belief, Homescapes’s comprises a method for sending information from the server to the mobile communication device regarding the in-game placement location of in-game video game content. For example, when a user reaches a certain juncture in Homescapes, Homescapes communicates with its server to provide an in-game placement location (ie. the billboard, below) where a user may travel to in-game within the Homescapes universe to obtain the video game content. 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 14] The method of claim 9, further comprising checking whether the mobile communication device should receive the updated content before sending the updated content to the mobile communication device.

FPG incorporates by reference its analysis of Claim 9.

On information and belief, Homescapes further comprises checking whether the mobile communication device should receive the updated content before sending the updated content 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.

[Claim 15] The method of claim 9, further comprising tracking the distribution of updated content at the server.

FPG incorporates by reference its analysis of Claim 9.

On information and belief, Homescapes further comprises tracking the distribution of updated content at the server. 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 16] The method of claim 9, wherein the server checks for availability of bandwidth before sending the updated content to the mobile communication device.	FPG incorporates by reference its analysis of Claim 9. On information and belief, Homescapes further comprises tracking the distribution of updated content at the server. 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.

INFRINGEMENT OF U.S. PATENT NO. 11,117,056 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 16 of U.S. Patent No. 11,117,056, 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 ’056 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 ’056 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. 11,117,056](#) to Hartwell, *Methods and Systems for Updating In-Game Content*
Compared to: Township¹

U.S. 11,117,056	Township by Playrix
[claim 1, preamble] A system for providing updated content associated with mobile video game to a mobile communication device, the system comprising:	To the extent the preamble is limiting, Township provides a system for updating content associated with the mobile video game to a mobile communication device. 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! ● 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] a storage medium for storing in-game video game content;	Township provides a storage medium for storing in-game video game content. For example, the game is updated frequently with updated game content from the server being stored in a storage medium. Such updates occur when a user launches the Township application on a mobile communication device.

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



[1b] a server in communication with the storage medium; and wherein the server is configured to:
receive a request for updated content from the mobile communication device;

Township is a mobile device game, which is in communication with a game server. *See, e.g.,* <https://playrix.helpshift.com/hc/en/3-township/faq/19-progress-transfer/> (You can transfer your game progress from your old device to your new one by connecting the new game to the same Facebook account you used for the first device: 1. Install the game from the App Store, Google Play, or the Amazon App Store on the new device. 2. Connect the newly installed game to the same Facebook account you used for the old device. 3. A window telling you to download the saved game from our server will pop up. 4. Select **Yes** and type **CONFIRM**. Your game progress will be transferred. If you're playing on iOS or macOS, you can now save your game progress not only via Facebook but also using your Apple ID. This feature is only available on devices running on iOS 13+ and macOS Catalina (10.15+). You can use your iCloud as well.”); <https://playrix.helpshift.com/hc/en/3-township/faq/3163-system-requirements/> (“The minimum system requirements for the game are listed below. Please bear in mind that you might need more RAM and free space if you play on higher levels. - 1GB of RAM. - iOS 10.0, Android OS 4.4.x and later. - 500 MB of free space. - stable internet connection.”).

Each time the user logs into the game, and at various points throughout gameplay, the Township game connects to the server and communicates with it to receive data. As a player progresses through the game, Township

communicates with the server which is configured to receive requests for updated content from the mobile device.

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.

#	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.

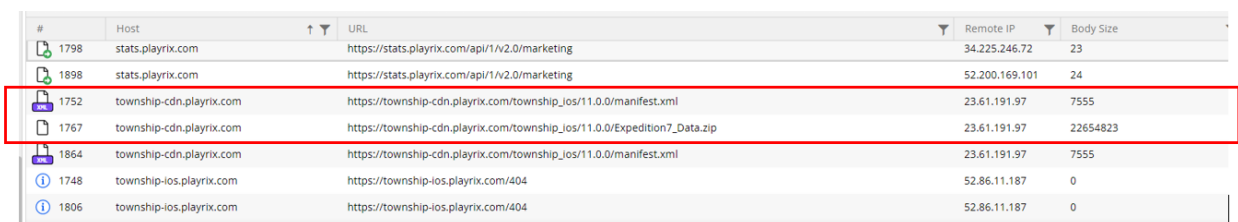
On information and belief, Township operates in a same or similar manner on Android. Pursuant to Paragraph 3(a)(i) of the Discovery Order, further verification of this feature requires review of the server and client side source code or other internal documents and information for the Township game, 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.

[1c] identify, in response to receiving the request, what in-game video game content to send;

Township identifies, in response to receiving a request, what in-game video game content to send. As a user progresses through Township, the game communicates with the server based on which juncture the user is at in the game. The server receives the request from the client regarding what in-game content to send based on where the user is in 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 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. .
[1d] send a message relating to the in-game video game content to the mobile communication device in response to receiving the request, wherein the message is pre-selected by the server based on a model type associated with the mobile communication device, a service subscription associated with the mobile communication device, or a service provider for the service subscription associated with the mobile communication device; and	FPG incorporates by reference its analysis of Claim 1 and 4. On information and belief, Township sends a message that is preselected by the server based on a model type associated with the mobile communication device, a service subscription associated with the mobile communication device, or a service provider for the service subscription associated with 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. <i>see, e.g.</i>, analysis of this claim element with respect to Gardenscapes.
[1e] send the in-game video game content to the mobile communication	The in-game video game content is sent to the mobile device from the server. As in the below example, when the user reaches a certain threshold in Township, the server sends in-game video game content (i.e. here the Chicken Coop) to the communication device as an update to Township.

device as the updated content for the mobile video 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. 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. <table><thead><tr><th>#</th><th>Host</th><th>URL</th><th>Remote IP</th><th>Body Size</th></tr></thead><tbody><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></tbody></table> IOS – Township – URL calls made directly on opening (Red Box) Each of these http communications represents a request portion and a response portion.	#	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																																					
[Claim 2] The system of claim 1, wherein the updated content comprises promotional content.	FPG incorporates by reference its analysis of Claim 1. The server provides updated content comprising of promotional content.																																								

	
[Claim 3] The system of claim 2, wherein the promotional content comprises localized promotional content based on a location of the mobile communication device.	FPG incorporates by reference its analysis of Claims 1 and 2. Township provides a system wherein the promotional content comprises localized promotional content based on a location of the mobile communication device. Township offers promotional content that is localized to the local language of the user's location. Playrix distributes promotions "on a random and automatic basis, and they depend on many things such as your current game progress, <i>location</i> 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/>



Township also offers localized promotion content in the form of events based on local holidays including, *inter alia*, Lunar New Year. <https://township.fandom.com/wiki/Events>

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.

[Claim 4] The system of claim 1, wherein identifying what in-game video game content to send is

FPG incorporates by reference its analysis of Claim 1.

On information and belief, Township identifies what in-game video game content to send based on a model type associated with the mobile communication device, a service subscription associated with the mobile communications device, a service provider for the service subscription associated with the mobile

based on a model type associated with the mobile communication device, a service subscription associated with the mobile communications device, a service provider for the service subscription associated with the mobile communication device, or a location of the mobile communications device.	communication device, or a location of the mobile 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 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. <i>see, e.g.</i> , analysis of this claim element with respect to Gardenscapes.
[Claim 5] The system of claim 1, wherein the server is further configured to send information to the mobile communication device regarding the in-game placement location of the in-game video game content.	FPG incorporates by reference its analysis of Claim 1. On information and belief, the Township server is configured to send information to the mobile communication device regarding the in-game placement location of the in-game videogame content. For example, when a user reaches a certain juncture in Township, Township communicates with its server to provide an in-game placement location (i.e. the Chicken Coop, below) where a user may travel to in-game within the Township universe to obtain the video game content. 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.



	
[Claim 6] The system of claim 1, wherein the server is further configured to check whether the mobile communication device should receive the updated content before sending the updated content to the mobile communication device.	FPG incorporates by reference its analysis of Claim 1. On information and belief, Township is configured to check whether the mobile communication device should receive the updated content before sending the updated content 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.
[Claim 7] The system of claim 1, wherein	FPG incorporates by reference its analysis of Claim 1.

the server is further configured to track the distribution of updated content.	On information and belief, the Township server tracks the distribution of updated content. 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.
[Claim 8] The system of claim 1, wherein the server is further configured to check for availability of bandwidth before sending the updated content to the mobile communication device.	FPG incorporates by reference its analysis of Claim 1. On information and belief, Township checks for availability of bandwidth before sending the updated content 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.
[Claim 9 -preamble] A method for providing updated content associated with a mobile video game to a mobile communication device, the method comprising:	<i>See Preamble Claim 1.</i>
[9a] storing, on a storage medium, pre-selected in-game video game content for use in a video game;	Township provides a storage medium for storing in-game video game content. For example, the game is updated frequently and is currently up to version 11.1.0 with updated game content from the server being stored in a storage medium. Some updates are bug fixes, while other updates include in-game video game content such as update 11.1.0 shown below. https://apps.apple.com/us/app/township/id638689075 Update 11.1.0 includes “2 new town expansions” and an event called “Botanical Bonanza” with new items that invites users to “set up an ecological park in town” and “[m]erge new items in the mini-game and complete tasks to win amazing rewards”.

	What's New Get ready for a new update! It's sizzling summer in Township! BOTANICAL BONANZA * A new merge event with green vibes! Help Stanley and Sophie set up an ecological park in town! * Merge new items in the mini-game and complete tasks to win amazing rewards! The main prize of the event is a new upgradable decoration! MYSTERIES OF ATLANTIS * Follow an old map to an island full of secrets to solve the mystery of Atlantis with Richard and Ellen! * Complete tasks and collect artifacts as you explore the island to recreate a part of Atlantis in your town! DETECTIVE STORIES * It's elementary! Enjoy the themed content in the new season adventure to feel like a real detective! * Get into an investigative mood with the Surveillance Airship, Detective Agency, and Sleuth Sheep! ALSO * Give your townspeople more styling choices with the new Bag Factory! * Enjoy 2 new town expansions. 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.
[9b] receiving, at a server, a request from the mobile communication	<i>See Claim 1b.</i>

device for updated content from the mobile communication device;	
[9c] identifying, by the server in response to receiving the request, what pre-selected in-game video game content to send;	<i>See Claim 1c.</i>
[9d] sending a message relating to the in-game video game content from the server to the mobile communication device in response to receiving the request, wherein the message is pre-selected by the server based on a model type associated with the mobile communication device, a service subscription associated with the mobile communication	<i>See Claim 1d.</i>

device, or a service provider for the service subscription associated with the mobile communication device; and	
[9e] sending, from the server, the pre-selected in-game video game content to the mobile communication device as the updated content for the mobile video game.	See Claim 1e.
[Claim 10] The method of claim 9, wherein the updated content is promotional content.	See Claim 2.
[Claim 11] The method of claim 10, wherein the promotional content is localized promotional content based on a location of the mobile communication device.	FPG incorporates by reference its analysis of Claims 9 and 10. 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/



Township also offers localized promotion content in the form of events based on local holidays including, *inter alia*, Lunar New Year. <https://township.fandom.com/wiki/Events>

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.

[Claim 12] The method of claim 9, wherein identifying what in-game video game content to send is based on a model type associated with the mobile

Township provides a method to identify what in-game video game content to send based on a model type associated with the mobile communication device.

On information and belief, in response to receiving a request, the game server pre-selects a message in part based on the model type of mobile device it is. 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

communication device, a service subscription associated with the mobile communications device, a service provider for the service subscription associated with the mobile communication device, or a location of the mobile communications device.

internal documents and information relevant to this claim element. *see, e.g.*, analysis of this claim element with respect to Gardenscapes.

Further, on information and belief, Township provides a method wherein identifying what in-game video game content to send is based on a location of the mobile communications device.

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/>



	Township also offers localized promotion content in the form of events based on local holidays including, <i>inter alia</i>, Lunar New Year. https://township.fandom.com/wiki/Events 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. <i>see, e.g.</i>, analysis of this claim element with respect to Gardenscapes.
[Claim 13] The method of claim 9, further comprising sending information from the server to the mobile communication device regarding the in-game placement location of in-game video game content.	FPG incorporates by reference its analysis of Claim 9. Township's server is configured to send information from the server to the mobile communication device regarding the in-game placement location of the in-game videogame content. For example, when a user reaches a certain juncture in Township, Township communicates with its server to provide an in-game placement location (ie. the Chicken Coop, below) where a user may travel to in-game within the Township universe to obtain the video game content.



[Claim 14] The method of claim 9, further comprising checking whether the mobile communication device should receive the updated content before sending the updated content to the mobile communication device.	FPG incorporates by reference its analysis of Claim 9. On information and belief, Township further comprises checking whether the mobile communication device should receive the updated content before sending the updated content 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.
[Claim 15] The method of claim 9, further comprising tracking the distribution of updated content at the server.	FPG incorporates by reference its analysis of Claim 9. On information and belief, Township further comprises tracking the distribution of updated content at the server. 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.
[Claim 16] The method of claim 9, wherein the server checks for availability of bandwidth before sending the updated content to the mobile communication device.	FPG incorporates by reference its analysis of Claim 9. Township provides a method for checking for availability of bandwidth before sending the updated content 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.