

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTERACTIVE COMMUNICATIONS INTERNATIONAL, INC.,

Petitioner,

v.

BLACKHAWK NETWORK INC.,

Patent Owner.

Case No. IPR2024-00465

U.S. Patent No. 11,488,451

**PATENT OWNER'S DEMONSTRATIVE
EXHIBITS**

Interactive Communications Int'l., Inc. v. Blackhawk Network Inc.

IPR2024-00465

Patent Owner's Demonstratives

U.S. Patent No. 11,488,451

EX1001

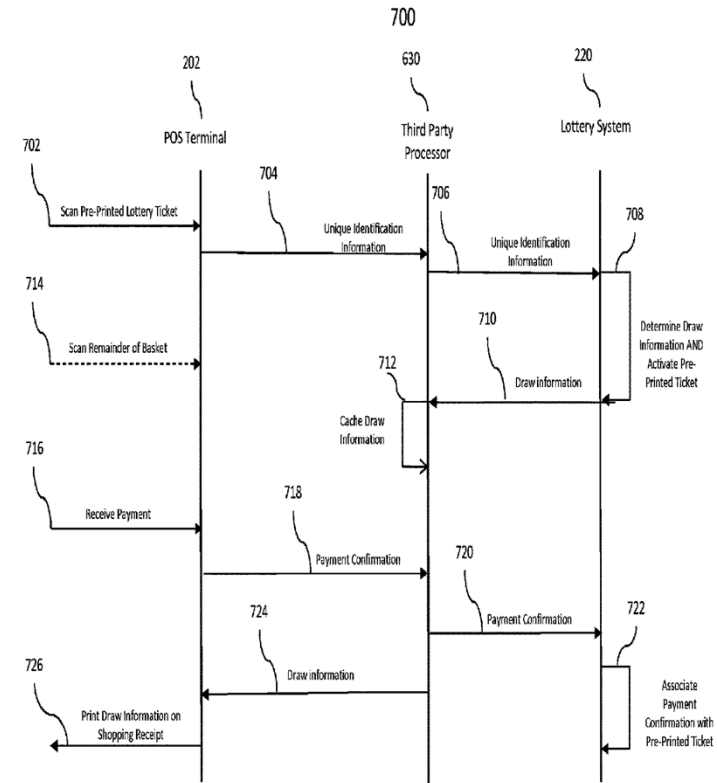
Claim 1

1. A method for providing a manufactured, pre-printed, random draw lottery ticket comprising:

(a) receiving, by a third-party transaction processor, a transaction request from a retailer point of sale (POS) to activate the manufactured, pre-printed, random draw lottery ticket, wherein the manufactured, pre-printed, random draw lottery ticket is selected by a customer prior to initiation of a check-out process and is presented by the customer for activation during the check-out process, wherein the third-party transaction processor receives transaction requests from a plurality of different retailers;

(b) providing, via a first secured communication, by the third-party transaction processor, to a lottery administration system unique identification information associated with pre-printed lottery ticket information received from the retailer POS without the use of lottery hardware; and

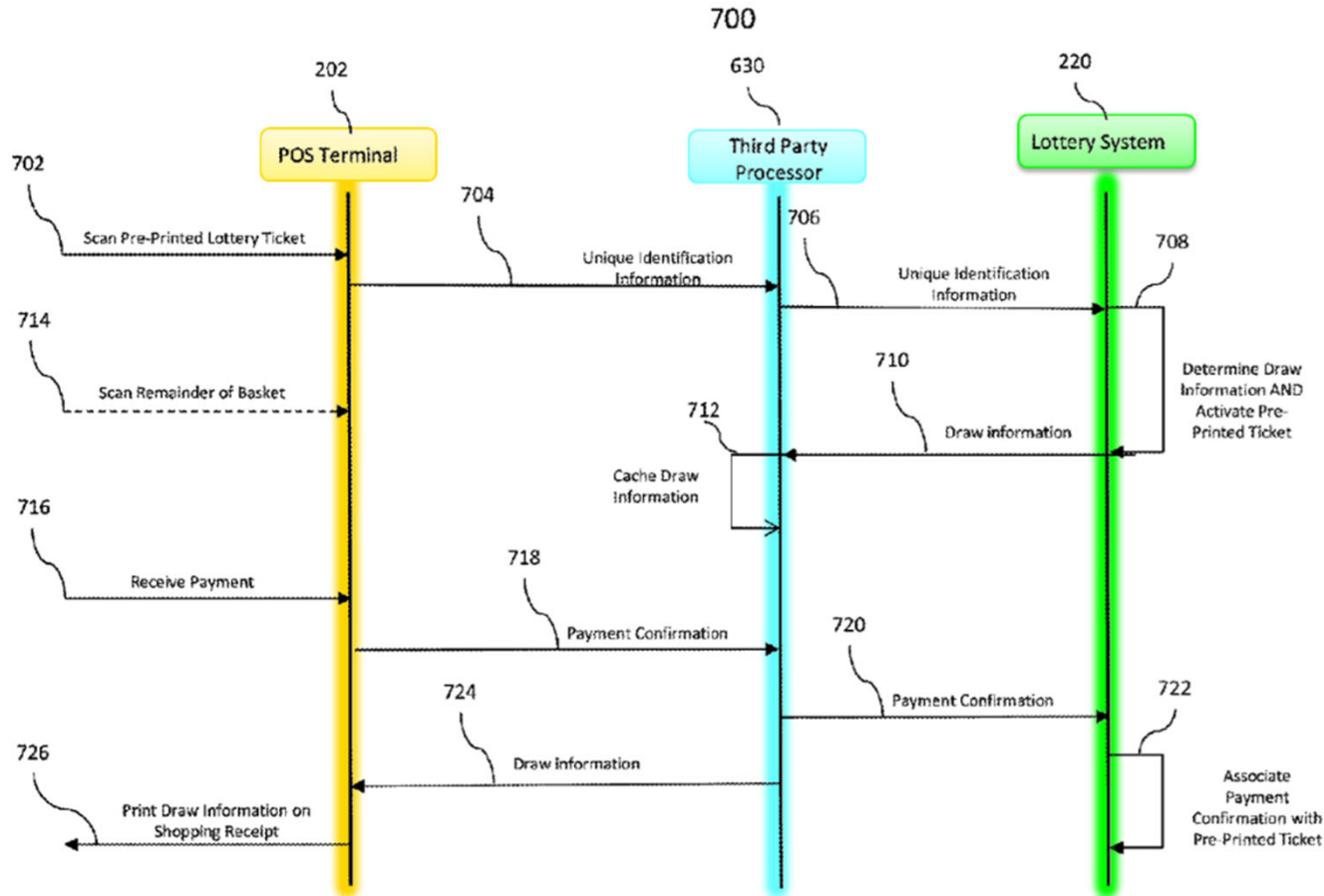
(c) receiving, via a second secured communication, by the third-party transaction processor, from the lottery administration system, indication that draw information has been associated with the manufactured, pre-printed, random draw lottery ticket.



POR at 4 ('451 Pat., FIG. 7).

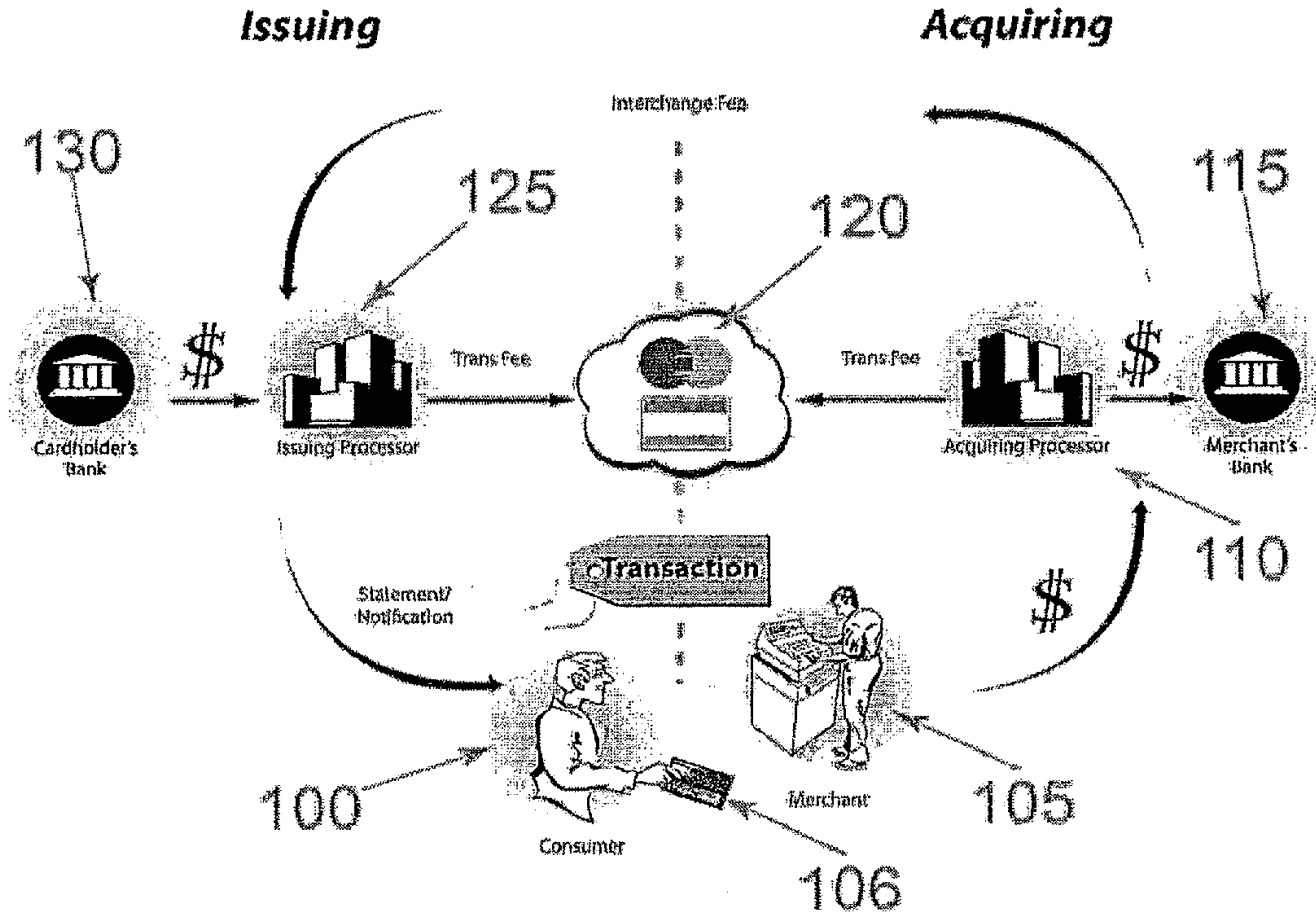
U.S. Patent No. 11,488,451

EX1001



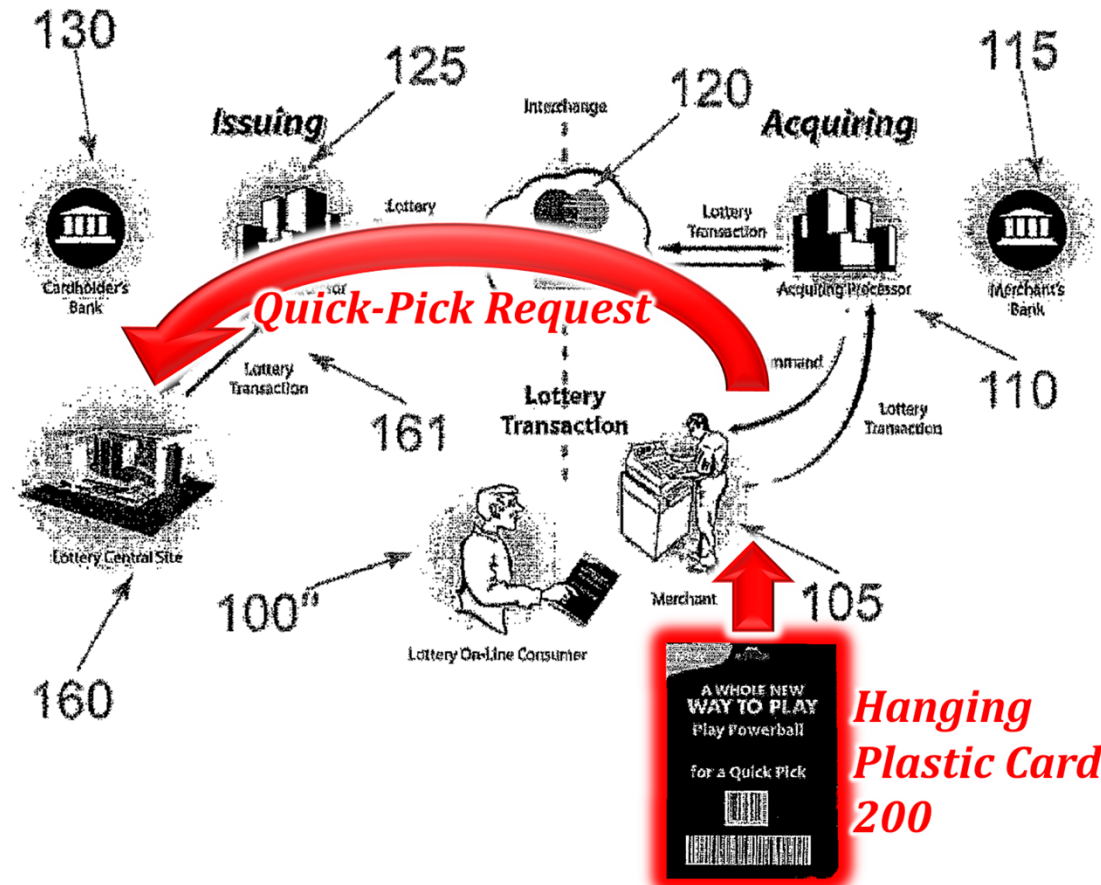
POR at 4 ('451 Pat., FIG. 7).

Irwin, U.S. Patent No. 9,405,984 EX1003



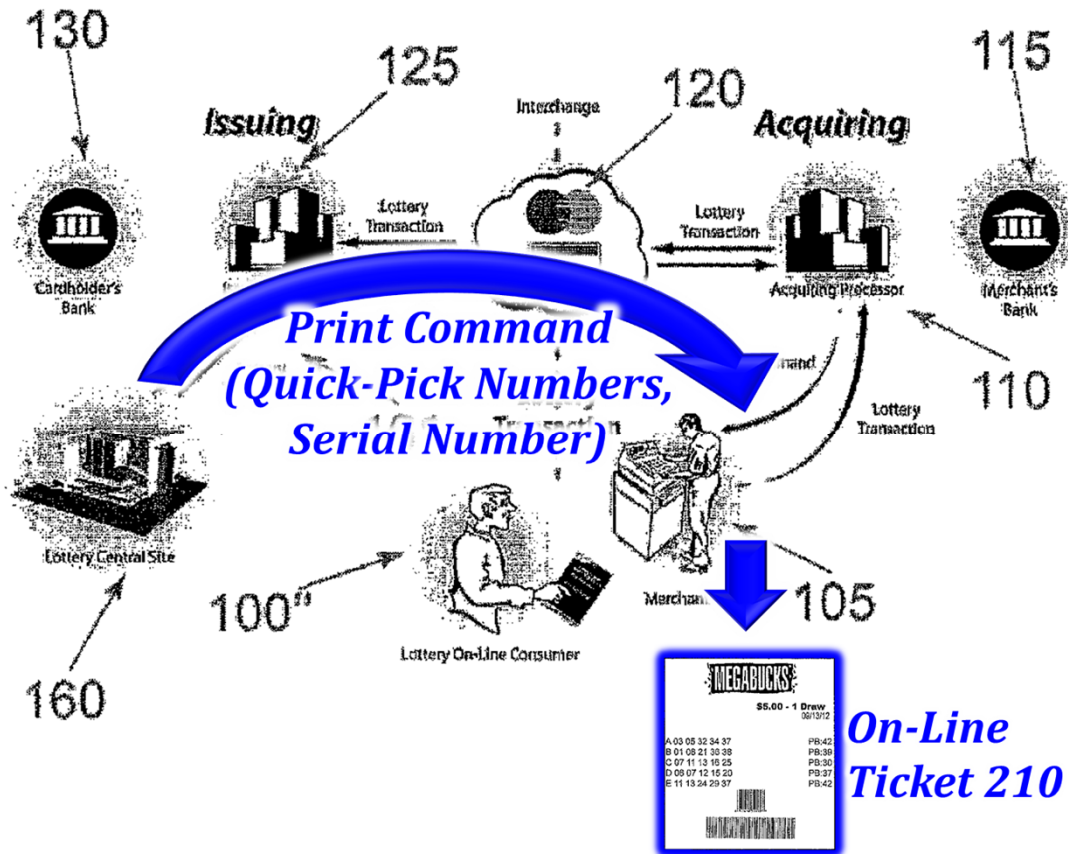
POR at 9 (Irwin FIG. 1).

Irwin, U.S. Patent No. 9,405,984 EX1003



POR at 29 (Irwin FIGS. 11, 12).

Irwin, U.S. Patent No. 9,405,984 EX1003



POR at 30 (Irwin FIGS. 11, 14).

Irwin, U.S. Patent No. 9,405,984 EX1003

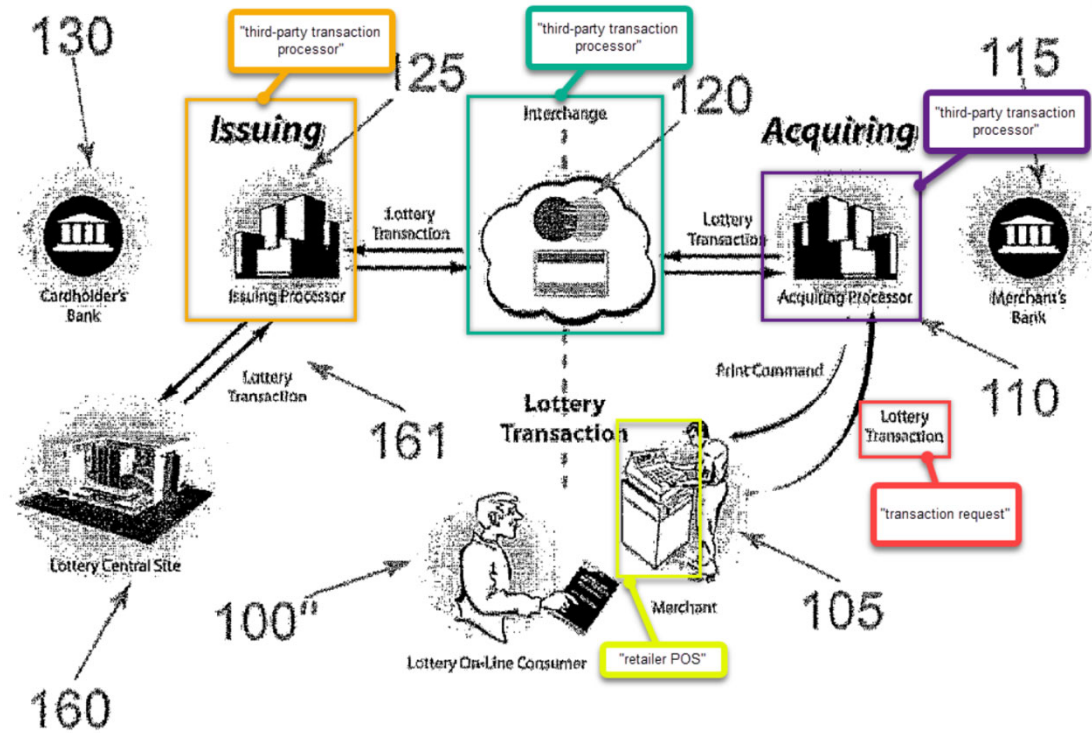


FIG 11

POR at 28 (Irwin FIG. 11).

Irwin, U.S. Patent No. 9,405,984 EX1003

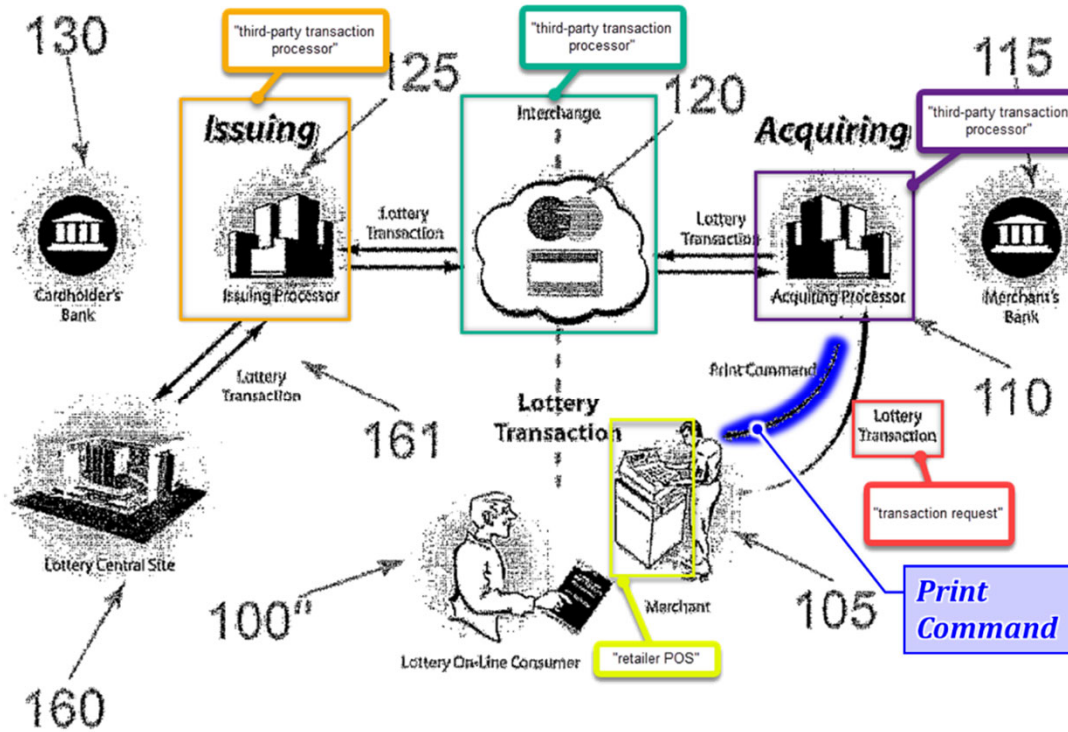
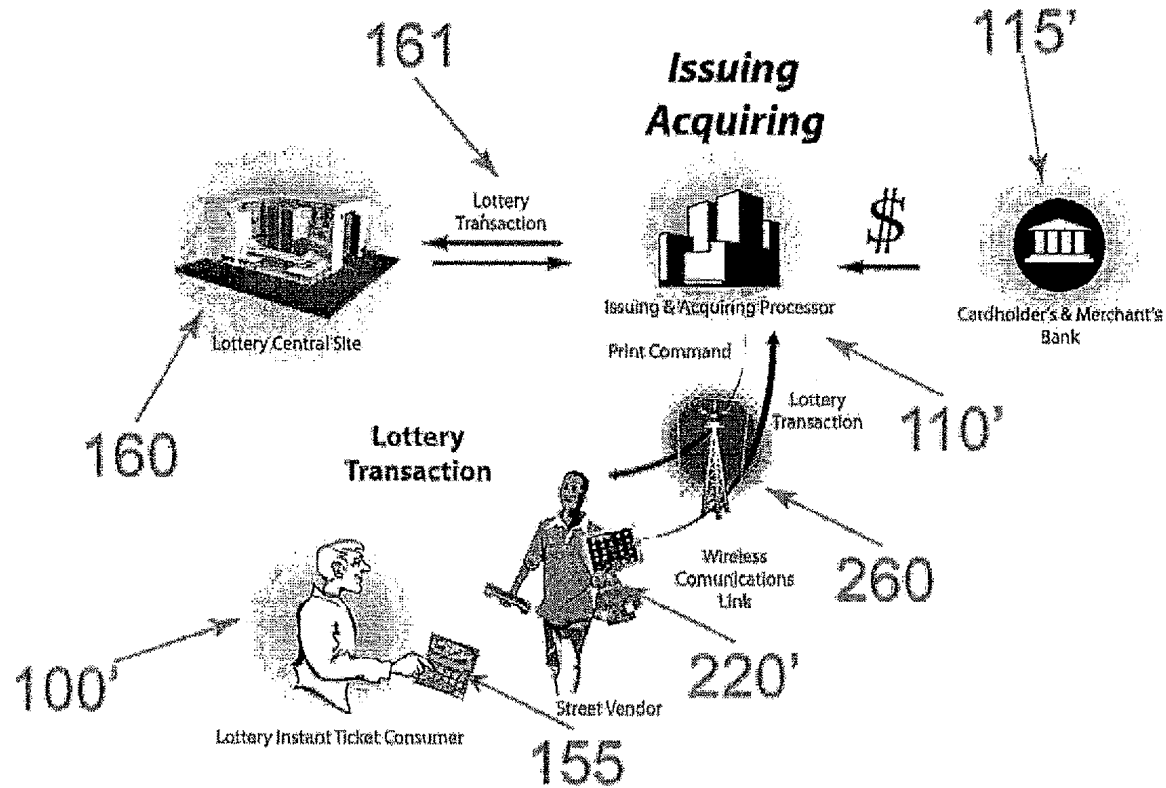


FIG 11

POR at 36 (Irwin FIG. 11).

Irwin, U.S. Patent No. 9,405,984 EX1003



POR at 12 (Irwin, FIG. 22).

Irwin, U.S. Patent No. 9,405,984

EX1003

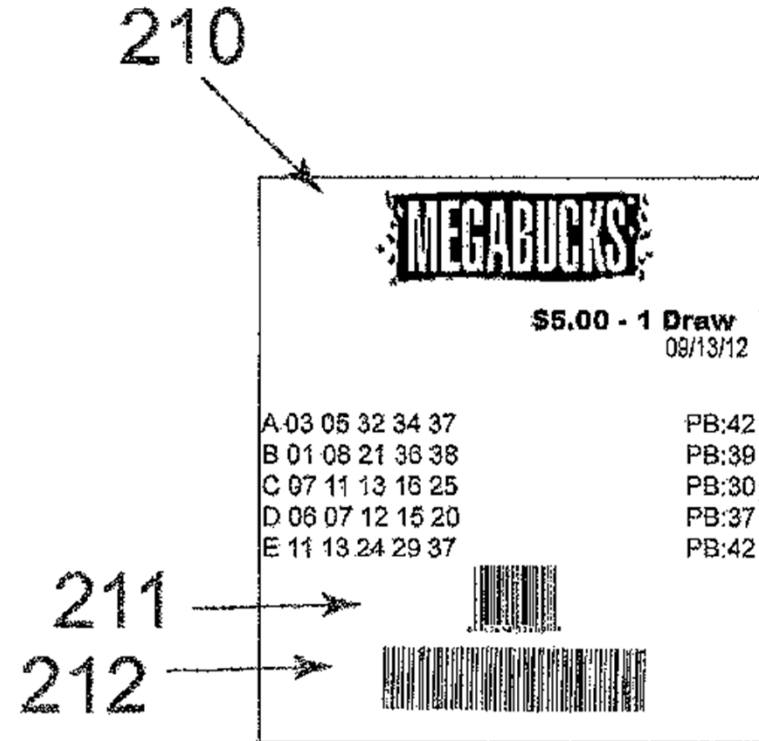
Plastic Hanging Card 200



FIG 12

POR at 10, 27 (Irwin, FIG. 12).

On-Line Game Ticket 210



POR at 10 (Irwin, FIG. 14).

Irwin, U.S. Patent No. 9,405,984

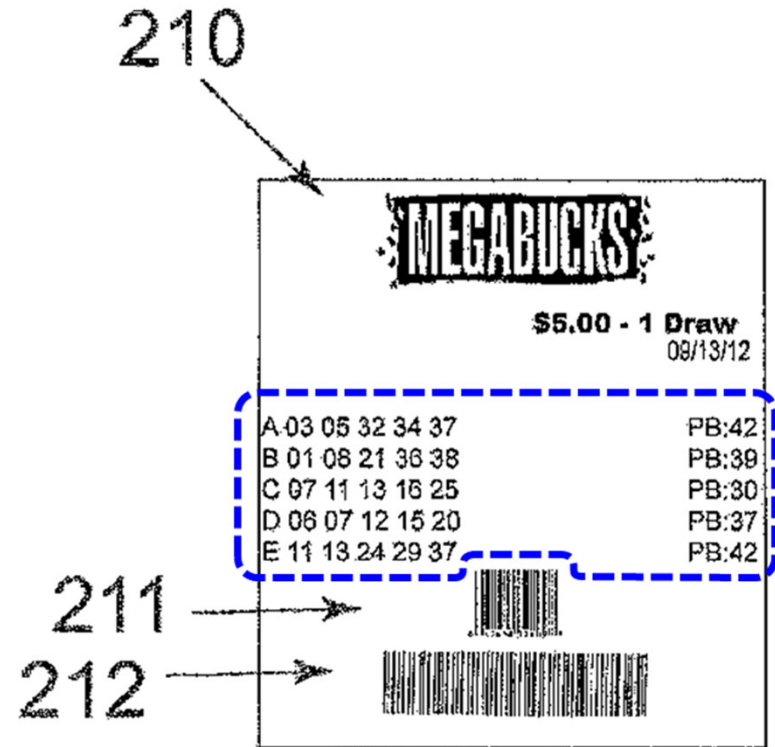
EX1003

Plastic Hanging Card 200



POR at 10, 27 (Irwin, FIG. 12).

On-Line Game Ticket 210



POR at 31 (Irwin, FIG. 14).

Irwin, U.S. Patent No. 9,405,984 EX1003

The Lottery Validation Card

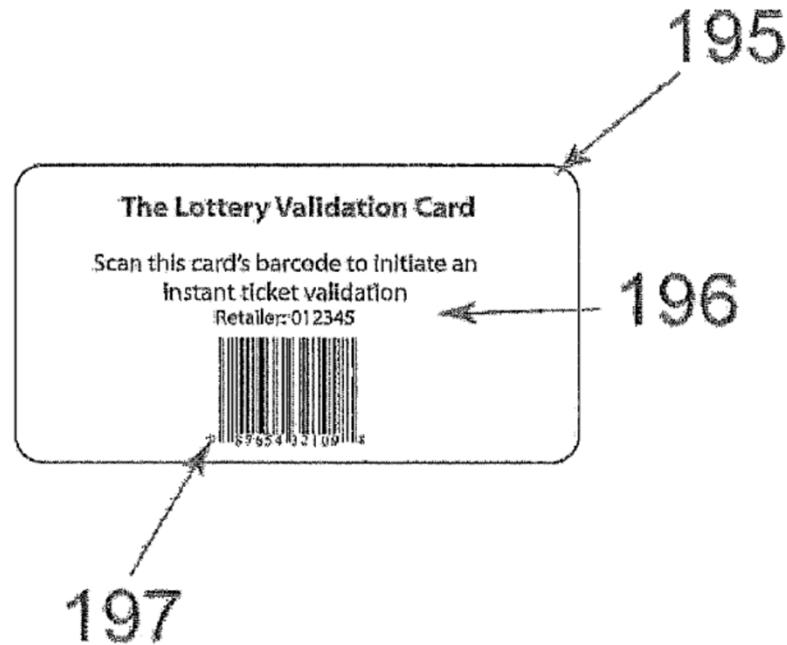
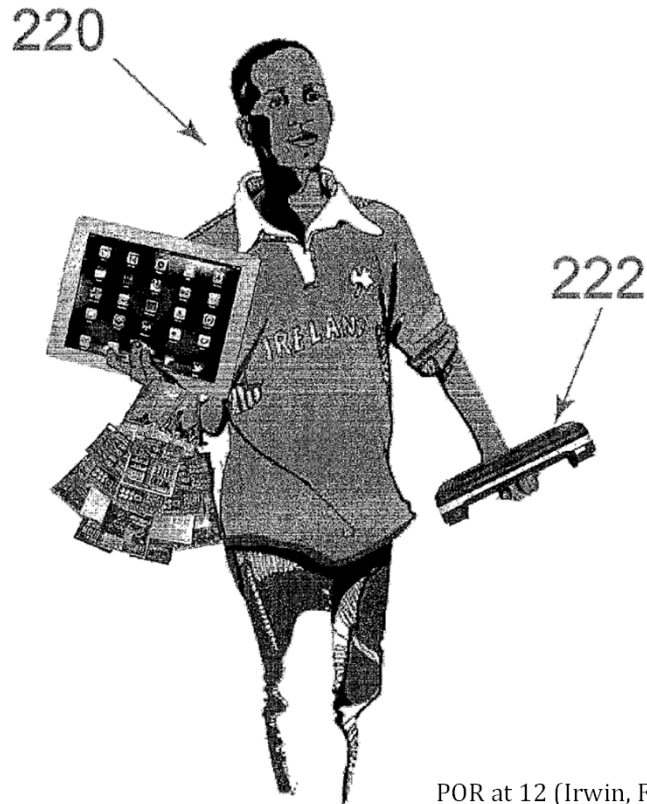


FIG 10

Sur-Reply at 11 (Irwin, FIG. 10).

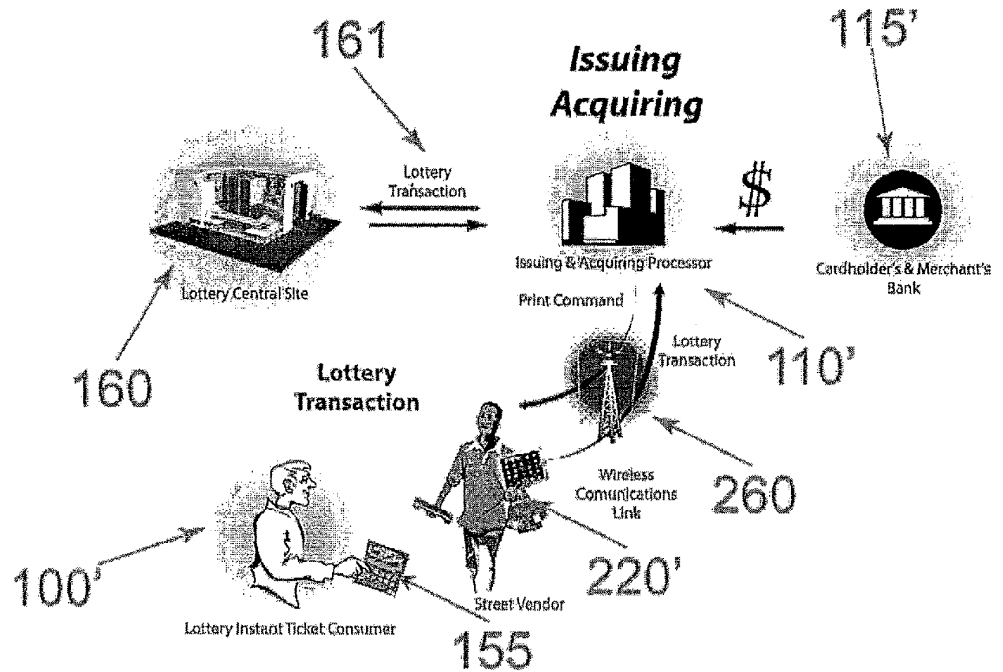
Irwin, U.S. Patent No. 9,405,984 EX1003

The Street Vendor



POR at 12 (Irwin, FIG. 16).

The Interchange Network

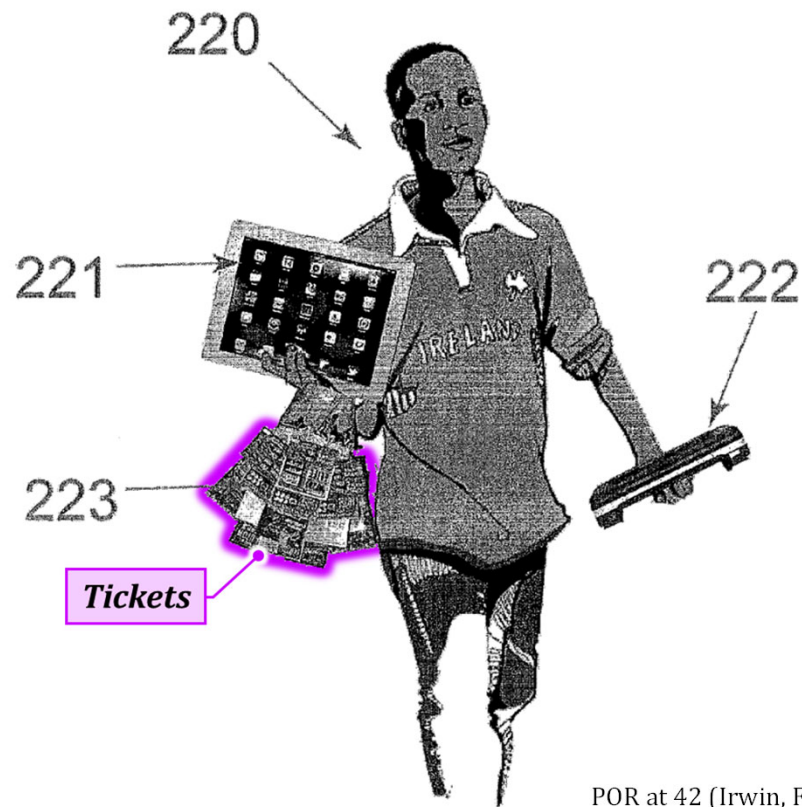


POR at 12 (Irwin, FIG. 21).

Irwin, U.S. Patent No. 9,405,984

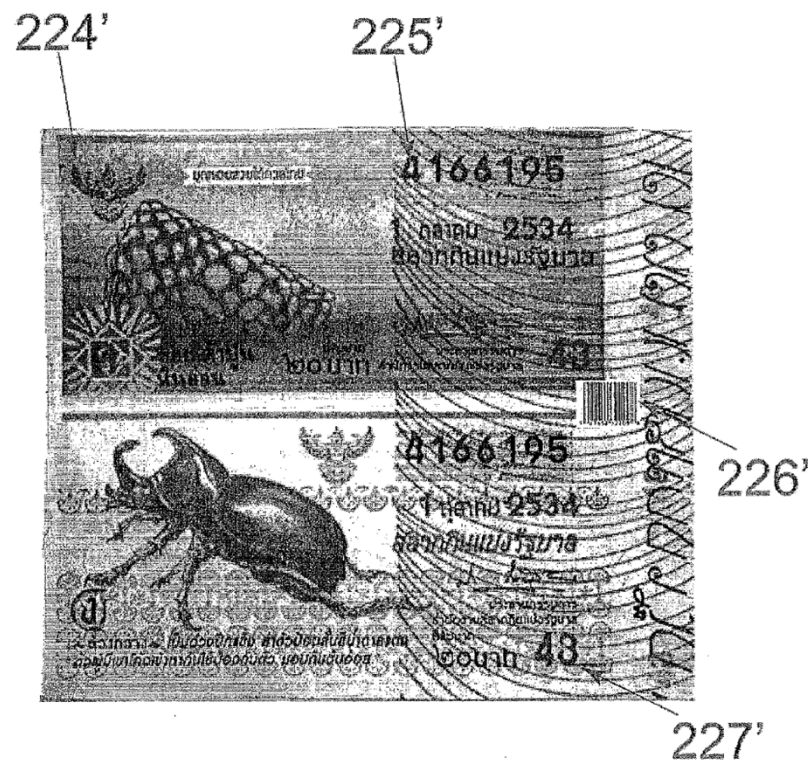
EX1003

The Street Vendor



POR at 42 (Irwin, FIG. 16).

The Passive Game Ticket

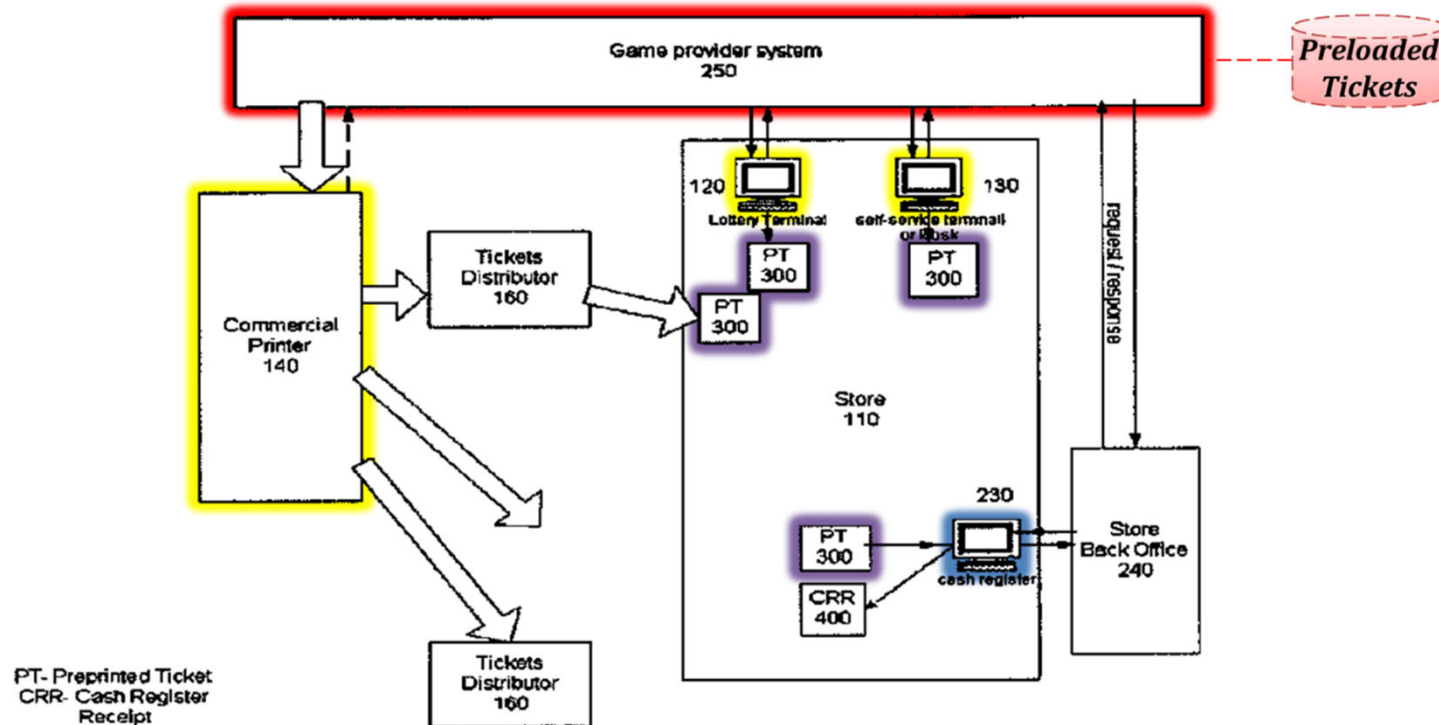


POR at 40 (Irwin, FIG. 21).

Szrek, U.S. Patent No. 7,627,497

EX1005

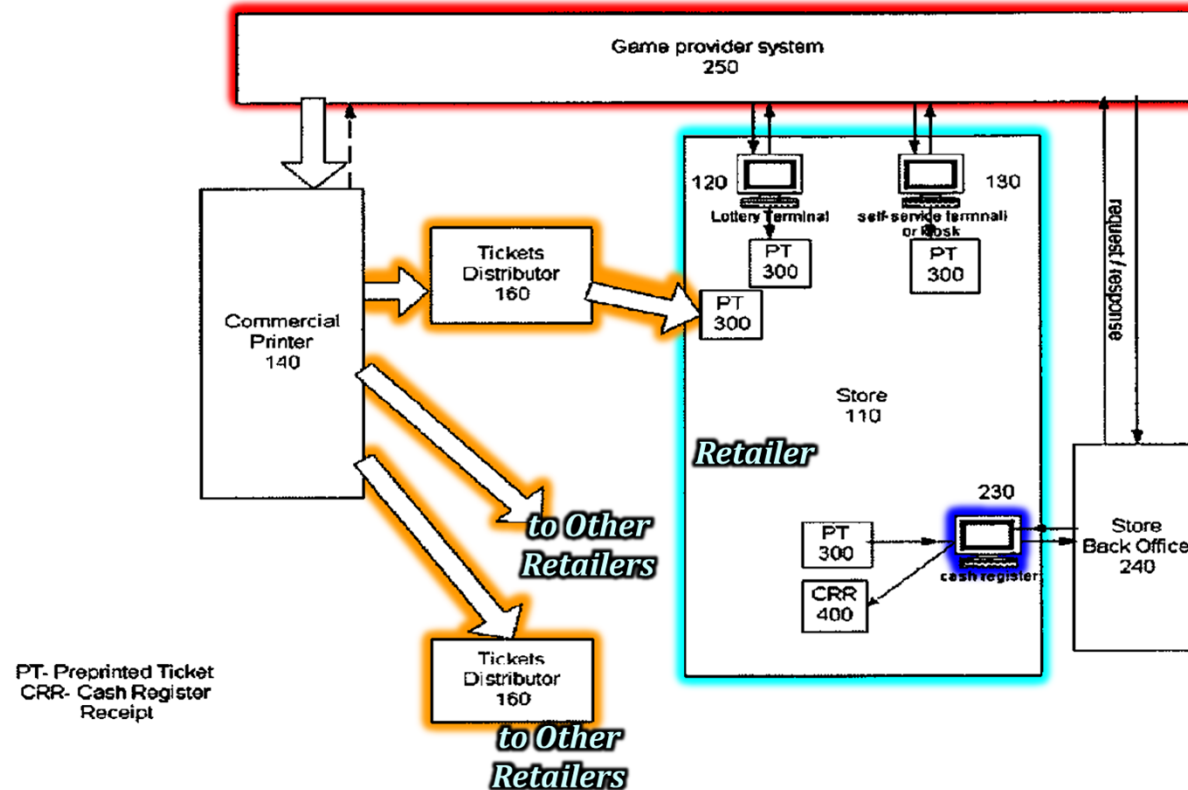
Figure 1 100



POR at 13 (Szrek, FIG. 1).

Szrek, U.S. Patent No. 7,627,497 EX1005

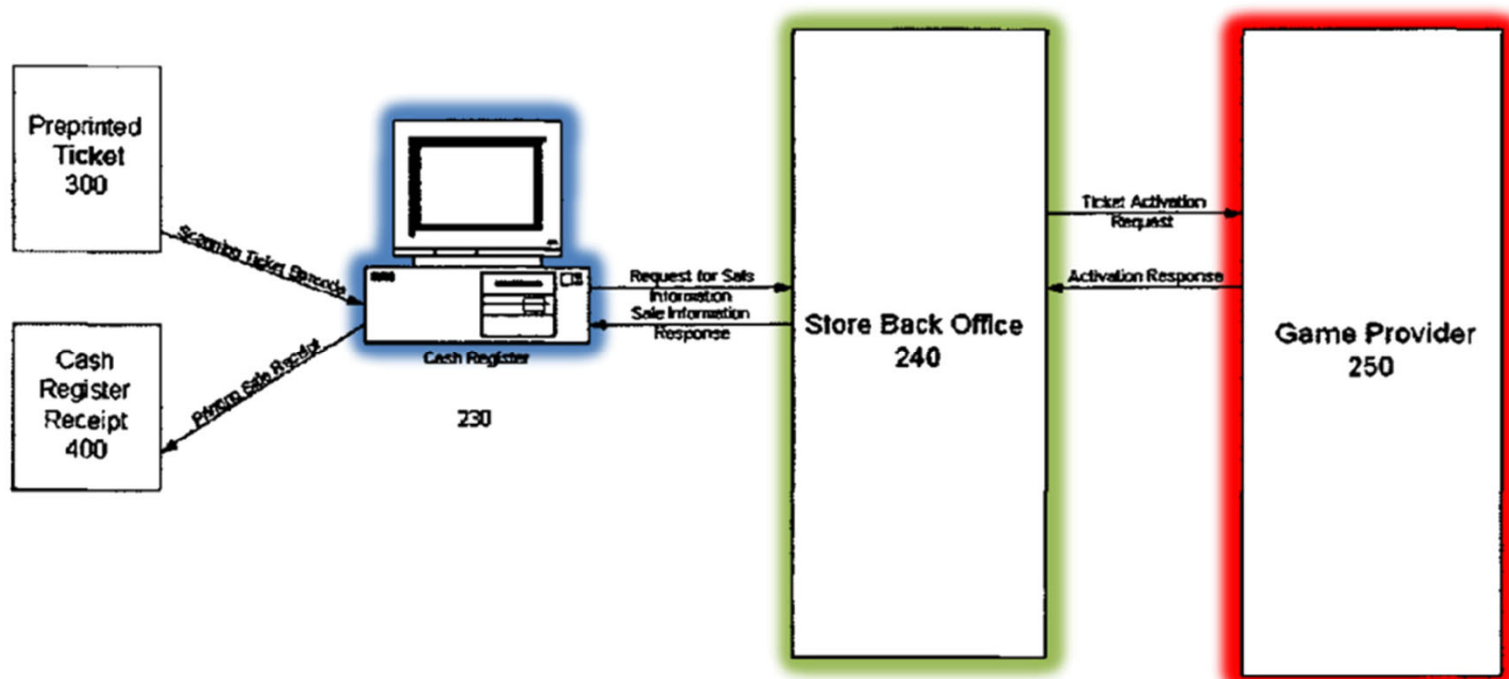
Figure 1 100



POR at 56 (Szrek, FIG. 1).

Szrek, U.S. Patent No. 7,627,497

EX1005

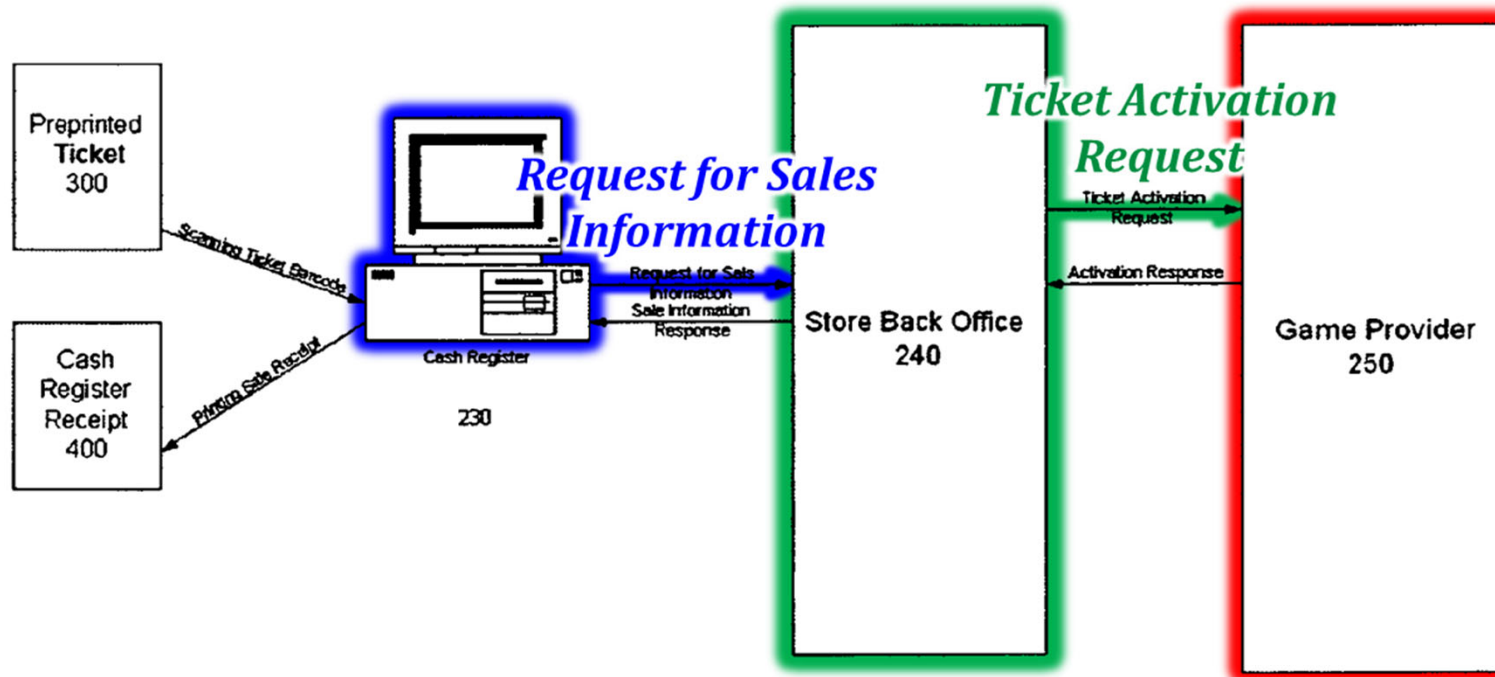


POR at 14 (Szrek, FIG. 2).

Szrek, U.S. Patent No. 7,627,497

EX1005

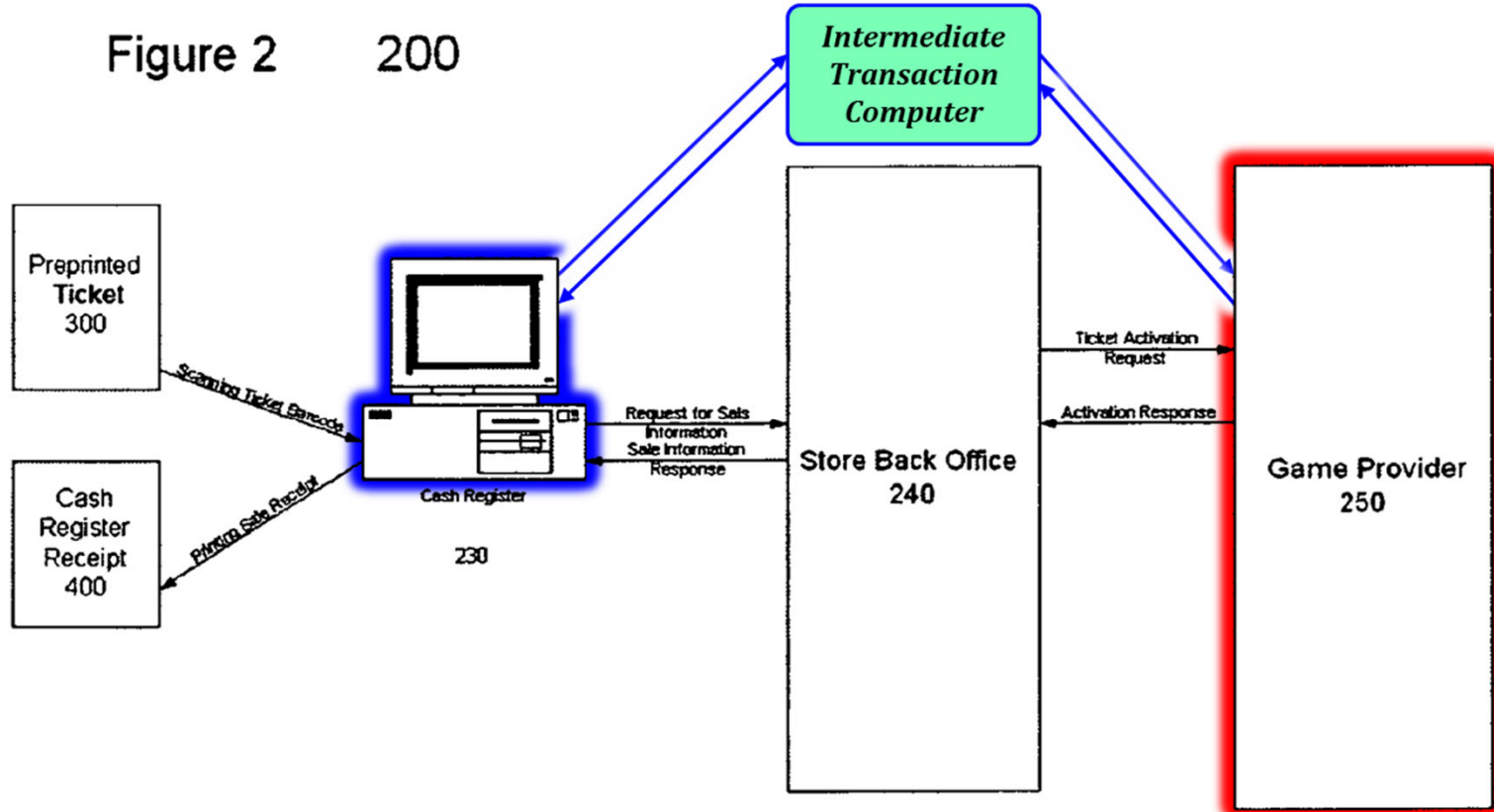
Figure 2 200



Sur_Reply at 23 (Szrek, FIG. 2).

Szrek, U.S. Patent No. 7,627,497

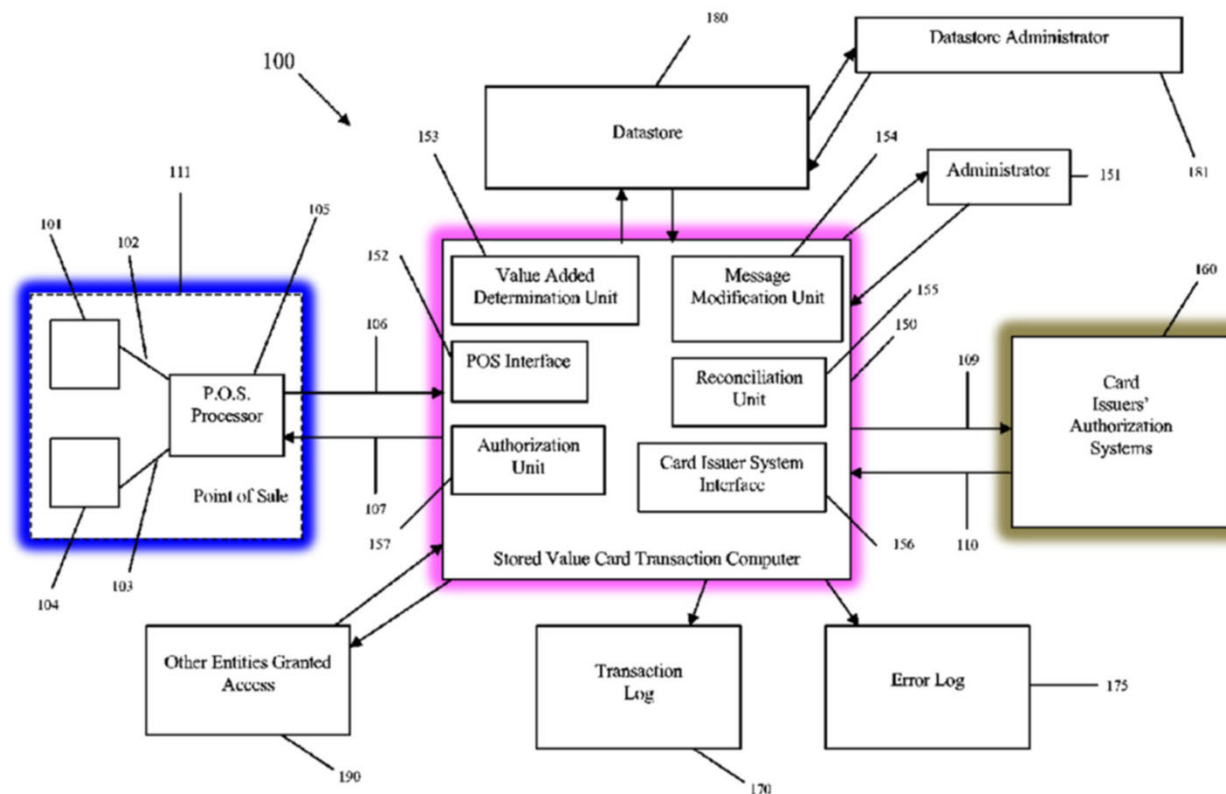
EX1005



POR at 52 (Szrek, FIG. 2).

Llach, U.S. Publ'n. No. 2013/0441768

EX1006



POR at 15 (EX1006, FIG. 1).

Llach, U.S. Publ'n. No. 2013/0441768

EX1006

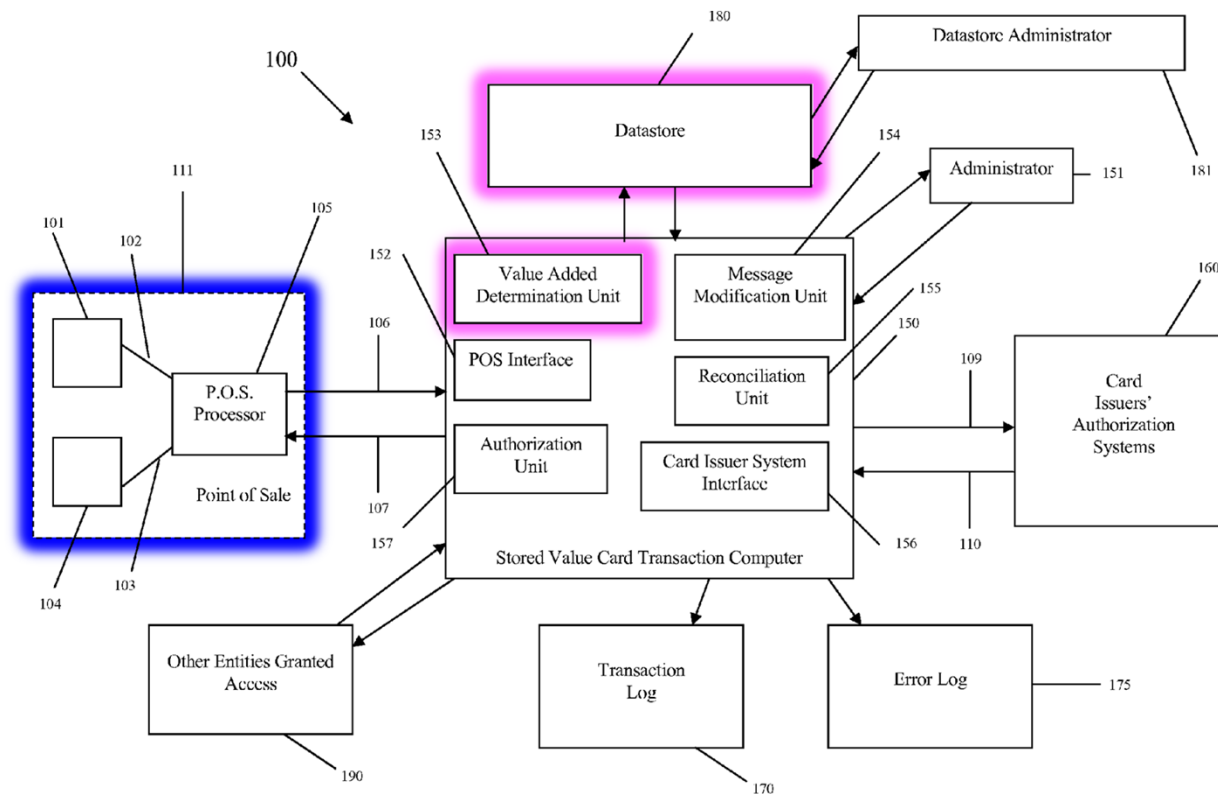
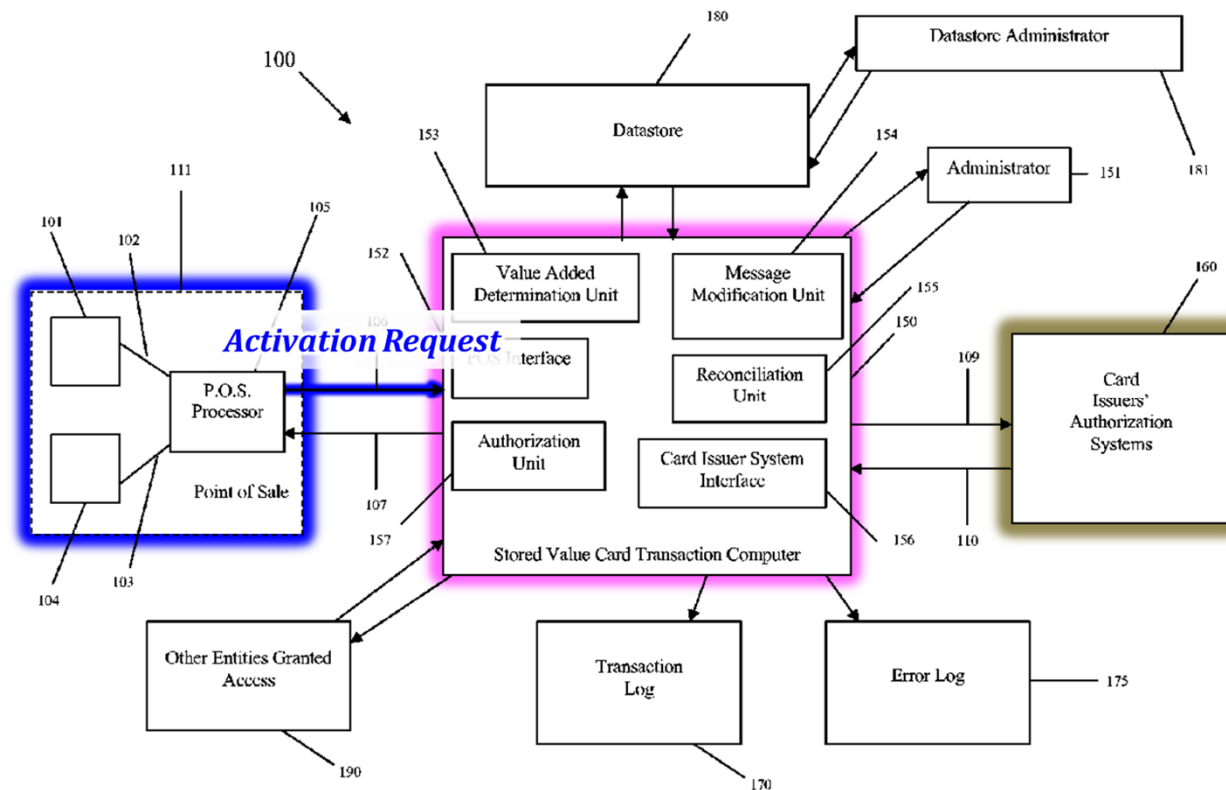


Figure 1

POR at 51 (EX1006, FIG. 1).

Llach, U.S. Publ'n. No. 2013/0441768

EX1006



Sur-Reply at 24 (EX1006, FIG. 1).

Petitioner's Expert

A Random Draw Lottery: EX1003

In a random draw lottery, a player purchases a ticket for a lottery draw event that takes place in the future. Ex. 1001. The player can either select his or her own draw numbers or the draw numbers can be randomly selected by the system. The numbers on the player's tickets are then compared to the numbers randomly selected during the draw event to determine if there is a match and thus a winning ticket.

EX1003 ¶ 64.

Lottery Ticket: EX1036

The plain meaning of lottery ticket is any substrate that is used to allow a customer to play and redeem a lottery game. Irwin's quick-pick card meets this definition. Irwin describes the card as a "quick-pick card," which is "a quickpick for a given on-line game," i.e. lottery games. Ex. 1030, 9:51-56.

EX1036 ¶ 22.

Petitioner's Expert

Lottery Ticket: EX2051

Q. I'm going to switch to [Irwin's] Figure 12.

Will you explain to me what is described here.

A. This is -- now, referring to the text, this is a preprinted substrate with some marketing information on the top and two Bar Codes on it.

Corrected EX2051 at 52:12-19.

Q. I'm going to switch the Zoom to Figure 14.

BY MR. HAILS:

Q. Do you see that?

A. I do.

Q. Okay. What does this -- what does -- what does Figure 14 show?

A. Figure 14 shows a printed lottery ticket with, you know, marketing logo at the top, the price, the draw date, some selections, and two Bar Codes.

Corrected EX2051 at 56:15-57:1.

Lottery Ticket: EX1036

The plain meaning of lottery ticket is any substrate that is used to allow a customer to play and redeem a lottery game. Irwin's quick-pick card meets this definition. Irwin describes the card as a "quick-pick card," which is "a quickpick for a given on-line game," i.e. lottery games. Ex. 1030, 9:51-56.

EX1036 ¶ 22.

Plastic Hanging Card 200



FIG 12

POR at 10, 27 (Irwin, FIG. 12).

Petitioner's Expert

Lottery Ticket: EX2051

Q. I'm going to switch to [Irwin's] Figure 12.

Will you explain to me what is described here.

A. This is -- now, referring to the text, this is a preprinted substrate with some marketing information on the top and two Bar Codes on it.

Corrected EX2051 at 52:12-19.

Q. I'm going to switch the Zoom to Figure 14.

BY MR. HAILS:

Q. Do you see that?

A. I do.

Q. Okay. What does this -- what does -- what does Figure 14 show?

A. Figure 14 shows a printed lottery ticket with, you know, marketing logo at the top, the price, the draw date, some selections, and two Bar Codes.

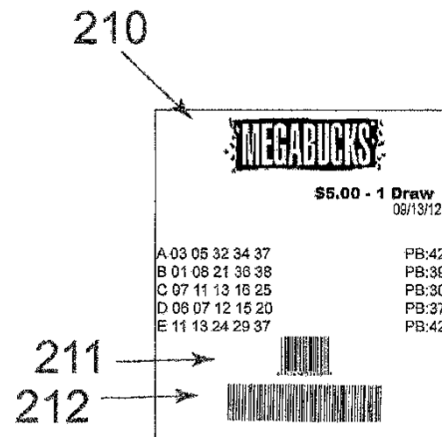
Corrected EX2051 at 56:15-57:1.

Lottery Ticket: EX1036

The plain meaning of lottery ticket is any substrate that is used to allow a customer to play and redeem a lottery game. Irwin's quick-pick card meets this definition. Irwin describes the card as a "quick-pick card," which is "a quickpick for a given on-line game," i.e. lottery games. Ex. 1030, 9:51-56.

EX1036 ¶ 22.

On-Line Game Ticket 210



POR at 10 (Irwin, FIG. 14).

Petitioner's Expert

A Random Draw Lottery: EX1003

In a random draw lottery, a player purchases a ticket for a lottery draw event that takes place in the future. Ex. 1001. The player can either select his or her own draw numbers or the draw numbers can be randomly selected by the system. The numbers on the player's tickets are then compared to the numbers randomly selected during the draw event to determine if there is a match and thus a winning ticket.

EX1003 ¶ 64.

A Random Draw Lottery: EX1036

In my opinion, a "random draw" game includes any random draw-based game, including both lotto-type games and passive games.

EX1036 ¶ 8.

A "random draw" game is a lottery game that involves a random draw. This would include "lotto-type" games that are common in the United States, such as Lotto or Powerball, where customers pick (or have a computer pick for them, i.e. "quick pick") a series of numbers, and the draw involves randomly selecting the winning numbers from the set of all possible numbers.

EX1036 ¶ 6.

There is another type of lottery game called a "passive" lottery game. This is where customers purchase tickets (which could have numbers on them), and a later draw randomly picks the numbered tickets that are winners, assigning them prizes. This is also known as a "raffle." Such games were more common in the past, though in some areas of the world, they are still very popular. One of the largest "passive" lottery games is Spain's National Lottery.

EX1036 ¶ 7.

Petitioner's Expert: The Passive Game Ticket

Q. What's your understanding of a "passive game ticket"?

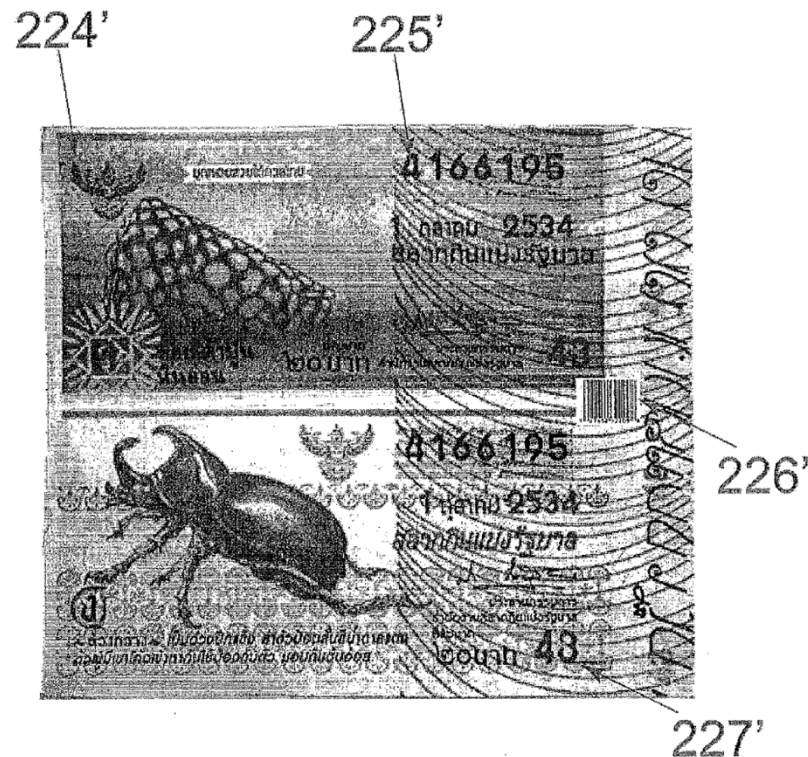
A. Are you familiar a raffle ticket?

Q. As a consumer?

A. Yes. A passive raffle ticket is a form of a passive game ticket. So a passive game ticket is essentially a -- a ticket that contains a -- some kind of unique number on it, most likely always shown, not hidden. There might be some hidden validation stuff somewhere.

But a passive game is essentially a game where the -- all the -- the tickets are preprinted and serialized. They're then sold. And, then, a drawing is held to determine which of those serial numbers is the winner, or -- or, you know, in cases of First, Second, Third prize, which of a number of tickets is the winner.

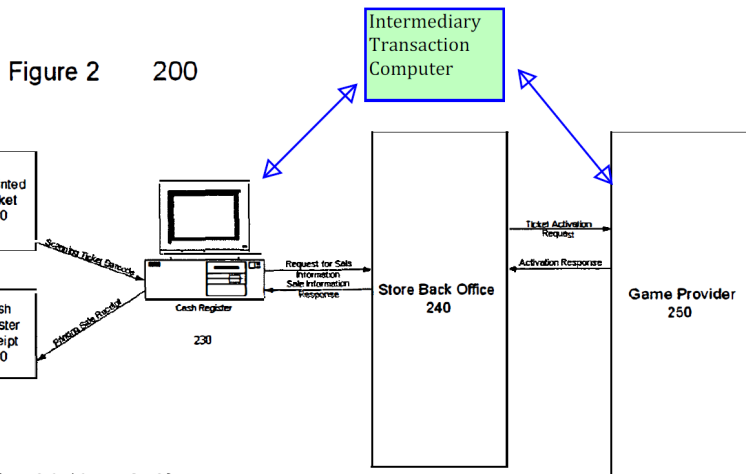
But it's passive in that there's no gener- -- everything is generated statically. The numbers are all on the tickets to start with, and you - - you know, you basically buy a ticket that has a serial number on it and if your serial number is picked, you win, so that's a passive game.



Corrected EX2051 at 69:20-70:22.

POR at 40 (Irwin, FIG. 21).

Petitioner's Expert: Testimony on Cross



POR at 23 (EX2050, FIG. 2).

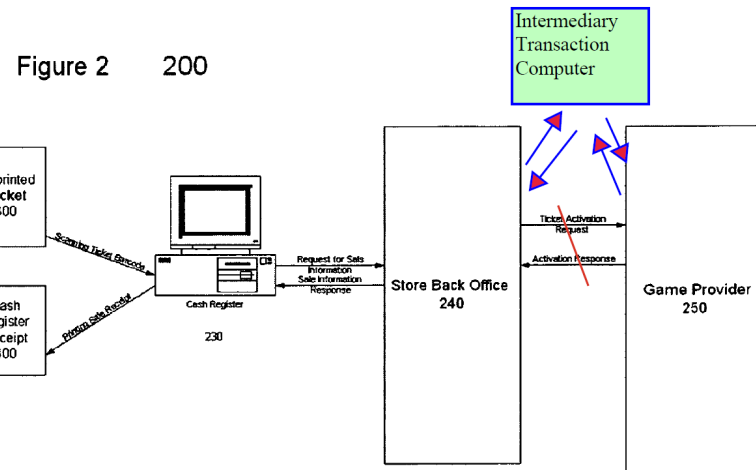
Q. So if I add a box, call it a transaction computer, and I put it with arrows connecting the cash register to the game provider, does that accurately represent the modification that would be performed to Szrek's system --

A. No.

Q. -- that's represented in paragraph 180?

A. No.

Corrected EX2051 at 103:24-104:12.



POR at 24 (EX2049, FIG. 2).

Q. How would you modify this drawing?

A. I would put the -- your new box in between the store back office and the game provider.

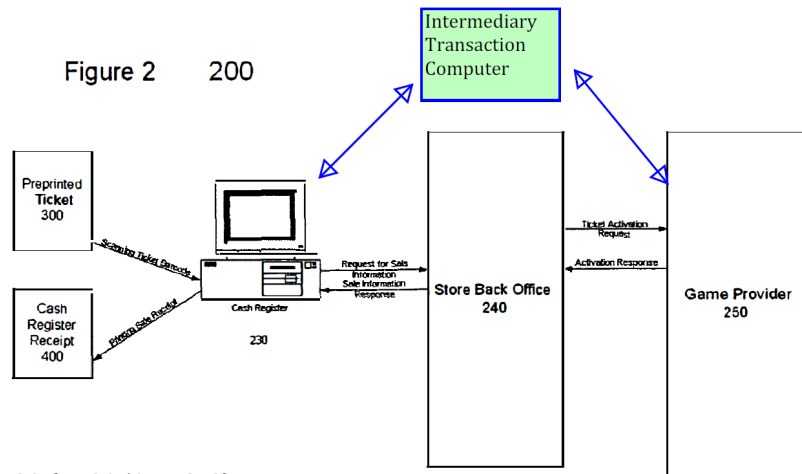
...

So is it appropriate to show arrows from the store back office to the intermediary transaction computer, and, then, further to the game provider?

A. Yes.

Corrected EX2051 at 104:14-105:6.

Petitioner's Expert: Testimony on Cross



POR at 23 (EX2050, FIG. 2).

Q. If you look at -- this is Page 74 of your declaration Exhibit-1003, and paragraph 180.

And this is your rationale to combine Szrek and Llach; do you see that?

A. Yes.

• • •

Q. In your opinion, [a POSITA] would have found it obvious to modify Szrek's system for activating lottery tickets to incorporate Llach's teachings of an intermediary transaction computer between Szrek's cash register and the game provider systems.

So I'd like to make sure I understand how that's going to work in the context of Figure 2.

• • •

Q. So if I add a box, call it a transaction computer, and I put it with arrows connecting the cash register to the game provider, does that accurately represent the modification that would be performed to Szrek's system --

A. No.

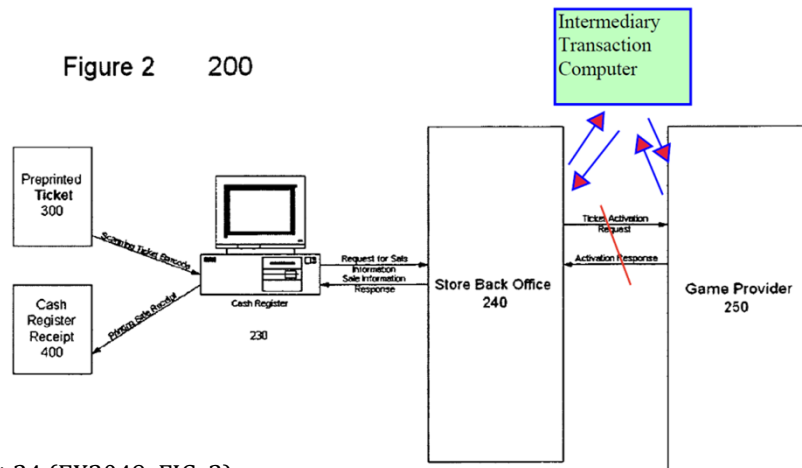
Q. -- that's represented in paragraph 180?

A. No.

Corrected EX2051 at 102:4-103:18.

Petitioner's Expert: Testimony on Cross

Figure 2 200



POR at 24 (EX2049, FIG. 2).

Q. Why don't you explain to me, then, how the -- the scan of the ticket would be accommodated in a modified Figure 2 diagram.

A. Okay. So, first of all, the ticket activation request an activation response. The existing ones would go away --

Q. Okay.

A. -- replaced by the two blue arrows, which would be -- should be labeled "Ticket Activation Request" and "Activation Request."

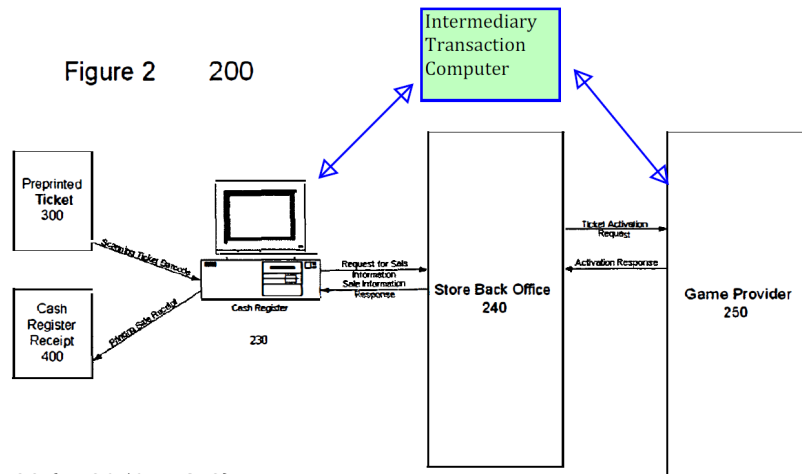
Q. All right.

So I've just drawn a red line through the existing arrow labeled "Activation Request" and "Activation Responses" because you said they go away; is that correct?

A. Right.

Corrected EX2051 at 105:18-106:11.

Petitioner's Expert: Testimony on Redirect



POR at 23 (EX2050, FIG. 2).

By Mr. Lu:

Q. Mr. Hutton, can you turn to the Szrek Patent at Column 3, starting on Line 14?

A. (Witness complies.)

Yes.

...

Q. So do you recall before the break testifying that it would be obvious to place Llach's transaction processor between Szrek's back office and the game provider?

A. I recall that, yes.

Q. Would it also be obvious to place a transaction processor in-between the cash register and the game provider?

A. Yes, it would.

EX2051 at 111:7-113:5.

Respectfully submitted,

Date: April 25, 2025

By: /Robert L. Hails/
Robert L. Hails
Reg. No. 39,702

Jason F. Hoffman (admitted *pro hac*
vice)

BAKER & HOSTETLER LLP
Washington Square, Suite 1100
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5304
Telephone: 202-861-1500
Facsimile: 202-861-1783

Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing Patent Owner's
Demonstrative Exhibits was served electronically via email on April 25, 2025, on
the following:

jimglass@quinnemanuel.com
quincylu@quinnemanuel.com

/Robert L. Hails/

Robert L. Hails

Reg. No. 39,702

Counsel for Patent Owner