

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES
CORPORATION,

Plaintiff,

v.

ZYNGA INC. and CHARTBOOST, INC,

Defendants.

Civil Action No. 1:22-cv-00590-GBW-SRF

JURY TRIAL DEMANDED

IBM'S FINAL INFRINGEMENT CONTENTIONS

Pursuant to the Court's February 22, 2023, Amended Scheduling Order (D.I. 89), Plaintiff International Business Machines Corporation ("IBM") hereby provides its Final Infringement Contentions, including the charts attached as Exhibits A–D to Defendants Zynga Inc. and Chartboost, Inc. (collectively "Zynga" or "Defendants").

IBM contends that Zynga, either alone or in conjunction with others, has infringed, and continue to infringe, literally and/or under the doctrine of equivalents, claims 1–22, and 25 of United States Patent No. 7,072,849 (the "'849 patent"), claims 1–8 and 10–14 of United States Patent No. 7,631,346 (the "'346 patent"), and claims 1–2, 12, and 26 of United States Patent No. 7,702,719 (the "'719 patent") (collectively the "Patents-in-Suit"), by making, using, selling, and/or offering for sale in the United States and/or importing into the United States current and prior versions of its games (including all games identified by IBM in its Preliminary Identification of Accused Products, served September 21, 2022 and Preliminary Identification of Asserted Claims, served February 1, 2023) and its mobile and web-based applications, such as applications for Google's Android Operating Systems, Apple's iOS Operating Systems, Facebook Gaming, Snapchat Gaming, Kindle, websites (*e.g.*, www.zynga.com, www.zyngagames.com,

Respectfully submitted,

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By: /s/ Sumeet Dang

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CERTIFICATE OF SERVICE

I, Sumeet Dang, hereby certify that on November 13, 2023, true and correct copies of the within document were served on the following counsel of record at the addresses and in the manner indicated:

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