

Appendix B
Infringement of U.S. Patent No. 10,650,635 (“635 Patent”) By Accused Products¹
Milestone Entertainment, LLC’s Infringement Contentions

Milestone Entertainment, LLC (“Milestone”) contends that Activision Blizzard, Inc. (“Activision”) infringes at least the following claims of the U.S. Patent No. 10,650,635: 1, 2, 4, 6, 8, 9, 10, 14-16, 17, 18, 21, 22, 23, 25, 27, 29.

Activision directly infringes at least claims 1, 2, 4, 6, 8, 9, 10, 14-16, 17, 18, 21, 22, 23, 25, 27, 29 under 35 U.S.C. § 271(a), as set forth in Milestone’s Infringement Contentions.

Activision induces direct infringement of at least claims 1, 2, 4, 6, 8, 9, 10, 14-16, 17, 18, 21, 22, 23, 25, 27, 29 under 35 U.S.C. § 271(b), as set forth in Milestone’s Infringement Contentions.

The following claim chart containing exemplary disclosures is based on the information presently available to Milestone. Milestone’s investigation of the case continues, and Milestone reserves the right to supplement this claim chart as appropriate.

¹ The “Accused Products are Defendant’s “Candy Crush” casual games, including “Candy Crush Saga,” “Candy Crush Friends Saga,” “Candy Crush Jelly Saga,” and “Candy Crush Soda Saga”. Milestone’s contentions concerning Candy Crush Saga are representative of infringement by all Candy Crush Accused Products, because each utilizes variable parameters to modify game odds or prizing so as to achieve a set of mandated parameters, and utilizes virtual currencies in a manner not different from Candy Crush Saga for purposes of infringement.

Claim Language	Infringement By Accused Products
1. A system for effecting user experience on a user communication device in a multi-level electronic game environment comprising:	Even if the preamble is limiting, it is met by the Accused Products for the reasons stated in connection with 279 Patent, Claim 1(pre) (Appendix A). Specifically, the Accused Products are multi-level games played by remote users on electronic communication devices including Android and iOS mobile phones and tablets. 
1(a) memory storing information on game play, the information including input received from the user, information relating to levels within the multi-level game and game display information for output to the user,	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 279 Patent, limitations 1(c), 1(d) (Appendix A).
1(b) a processor coupled to the memory	This limitation is satisfied by the Accused Products for the reasons stated in connection

Claim Language	Infringement By Accused Products
generating game play information,	with the 279 Patent, limitation 1(c) (Appendix A).
1(c) the game play information including game play with virtual money,	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 164 Patent, limitation 1(g) (Appendix C).
1(d) the virtual money being acquired through:	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 164 Patent, limitation 1(h) (Appendix C).
1(d)(1) game play and	This limitation is satisfied by the Accused Products. For example, “gold bars” used as currency in the game can be acquired by game play. 

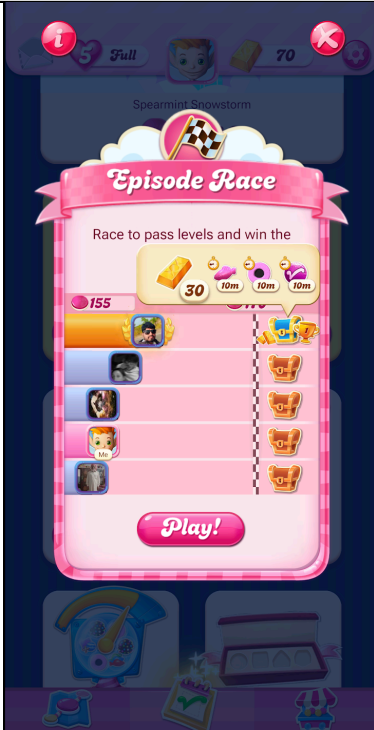
Claim Language	Infringement By Accused Products
1(d)(2) cash purchase,	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 164 Patent, limitation 1(h) (Appendix C).
1(e) the virtual money acquired by cash purchase being subject to a multiplier, conversion of the virtual money into a non-cash good comprising an image to permit advancement to another level within the game, and	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 164 Patent, limitation 1(i) (Appendix C). Moreover, the virtual money can be spent on bonus items that help the player to win their current level, thereby permitting advancement to another level.  The screenshot shows a game interface with a pink dialog box in the center. The dialog box has a red 'X' icon in the top right corner and a yellow 'Keep playing?' text. Below the text is a yellow button with a red '10' icon and the text 'Play on'. The background of the game shows a dark, rocky terrain with some colorful blocks and a small character in the top right corner.
1(f) memory storing account information which is increased and decreased through the user experience.	This limitation is satisfied by the Accused Products. For example, the Accused Products keep track of the user's number of "gold bars" used as currency in the game.

Claim Language	Infringement By Accused Products
	
2. The system for effecting user experience in a multi-level electronic game environment of claim 1 wherein the non-cash good is an image to permit advancement to another level within the game.	This limitation is satisfied by the Accused Products for the reasons stated in connection with limitation 1(e).
4. The system for effecting user experience in a multi-level electronic game environment of claim 1 wherein the virtual money is further acquired by non-cash purchase.	This limitation is satisfied by the Accused Products for the reasons stated in connection with limitation 1(d)(1).
6. The system for effecting user experience in a multi-level electronic game environment of claim 4 wherein	This limitation is satisfied by the Accused Products for the reasons stated in connection with limitation 1(d)(1).

Claim Language	Infringement By Accused Products
the non-cash purchase utilizes an inducement.	
8. The system for effecting user experience in a multi-level electronic game environment of claim 1 wherein the virtual money is used for advancement to another level in the game.	This limitation is satisfied by the Accused Products for the reasons stated in connection with limitation 1(e).
9. The system for effecting user experience in a multi-level electronic game environment of claim 1 wherein the multiplier is variable over time.	This limitation is satisfied by the Accused Products. For example, the Accused Products vary the multiplier for limited-time offers, or seasonal programs.

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10. The system for effecting user experience in a multi-level electronic game environment of claim 1 wherein the multiplier is variable based on player status.	This limitation is satisfied by the Accused Products. For example, the Accused Products vary the multiplier for presentation to users after a loss.

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14. The system for effecting user experience in a multi-level electronic game environment of claim 1 wherein the game play information further includes a leader board.	This limitation is satisfied by the Accused Products. For example, the Accused Products provide a leader board showing user ranking against other users.

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15. The system for effecting user experience in a multi-level electronic game environment of claim 1 further including a player registration system.	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 279 Patent, 1(d) (Appendix A).
16. The system for effecting user experience in a multi-level electronic game environment of claim 15 wherein the player registration is an on line registration system.	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 279 Patent, 1(d) (Appendix A).
17. The system for effecting user experience in a multi-level electronic	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 279 Patent, 1(i) (Appendix A).

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game environment of claim 1 further including a game play analysis system.	
18. The system for effecting user experience in a multi-level electronic game environment of claim 17 wherein the game play analysis system tracks user specific play.	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 279 Patent, 1(i), and Claim 23 (Appendix A).
21. The system for effecting user experience in a multi-level electronic game environment of claim 1 further including a game application to be downloaded to a communications device.	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 336 Patent, Claim 44 (Appendix D).
22. The system for effecting user experience in a multi-level electronic game environment of claim 21 wherein the communications device is a wireless device.	This limitation is satisfied by the Accused Products for the reasons stated in connection with Claim 21, above. Each of the devices for which the Android and iOS applications are made available have wireless communications capabilities.
23. The system for effecting user experience in a multi-level electronic game environment of claim 22 wherein the wireless device is a hand-held wireless device including a display.	This limitation is satisfied by the Accused Products for the reasons stated in connection with Claim 22, above. Each of the devices for which the Android and iOS applications are made available are handheld devices including a display.
25. The system for effecting user experience in a multi-level electronic game environment of claim 1 wherein the virtual money is not cashable.	This limitation is satisfied by the Accused Products for the reasons stated in connection with the 164 Patent, limitation 1(g) (Appendix C). The virtual money provided by the Accused Products is not cashable.
27. The system for effecting user experience in a multi-level electronic game environment of claim 1 wherein the virtual money is awarded as a bonus.	This limitation is satisfied by the Accused Products for the reasons stated in connection with limitation 1(d)(i).
29. The system for effecting user	This limitation is satisfied by the Accused Products for the reasons stated in connection

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experience in a multi-level electronic game environment of claim 1 wherein the virtual money is tracked.	with limitation 1(f).