JONES DAY
HAROLD K. GORDON, ESQ.
(Admitted *Pro Hac Vice*)
hkgordon@jonesday.com
250 Vesey Street
New York, New York 10281
Telephone: (212) 326-3939

JONES DAY
RYAN K. WALSH
(Admitted *Pro Hac Vice*)
rkwalsh@jonesday.com
1221 Peachtree Street N.E., Suite 400
Atlanta, Georgia 30361
Telephone: (404) 521-3939

JONES DAY
JENNIFER D. BENNETT, ESQ.
(Admitted *Pro Hac Vice*)
jenniferbennett@jonesday.com
555 California Street, 26th Floor
San Francisco, California 94104
Telephone: (415) 626-3939

JONES DAY
RANDALL E. KAY, ESQ.
(Admitted *Pro Hac Vice*)
rekay@jonesday.com
4655 Executive Drive, Suite 1500
San Diego, California 92121
Telephone: (858) 314-1139

CAMPBELL & WILLIAMS
PHILIP R. ERWIN, ESQ. (11563)
pre@cwlawlv.com
710 South Seventh Street, Suite A
Las Vegas, Nevada 89101
Telephone: (702) 382-5222

Attorneys for Defendants
Light & Wonder, Inc. and LNW Gaming, Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

EVOLUTION MALTA LIMITED, EVOLUTION GAMING MALTA LIMITED, EVOLUTION GAMING LIMITED and SIA EVOLUTION LATVIA,

Plaintiffs,

vs.

LIGHT & WONDER, INC. f/k/a SCIENTIFIC GAMES CORP. and LNW GAMING, INC. f/k/a SG GAMING, INC.,

Defendants,

CASE NO.: 2:24-cv-00993-CDS-EJY

DEFENDANTS' RESPONSES AND OBJECTIONS TO PLAINTIFFS' FIRST SET OF INTERROGATORIES

CONTAINS CONFIDENTIAL INFORMATION PURSUANT TO THE PROTECTIVE ORDER

CAMPBELL & WILLIAMS
ATTORNEYS AT LAW
710 SOUTH SEVENTH STREET, SUITE A, LAS VEGAS, NEVADA 89101
Phone: 702.382.5222 • Fax: 702.382.0540
www.campbellandwilliams.com

CAMPBELL & WILLIAMS
ATTORNEYS AT LAW
710 SOUTH SEVENTH STREET, SUITE A, LAS VEGAS, NEVADA 89101
Phone: 702.382.5222 • Fax: 702.382.0540
www.campbellandwilliams.com

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendants Light & Wonder, Inc. and LNW Gaming, Inc. (collectively, "L&W") hereby set forth L&W's responses and objections to Plaintiffs Evolution Malta Limited, Evolution Gaming Malta Limited, Evolution Gaming Limited, and SIA Evolution Latvia's (collectively, "Evolution") First Set of Interrogatories. By serving these responses, L&W is not waiving any rights or its arguments that discovery should be stayed pending resolution of L&W's Motion to Dismiss or that the trade secret claims should be arbitrated. Rather, L&W specifically reserves all rights. These objections and responses are based on L&W's investigation to date, and L&W may supplement or amend these objections and responses to the extent necessary and permitted by the Federal Rules of Civil Procedure and the Local Rules of this Court.

OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS

1. L&W objects to these Interrogatories, as well as the "Definitions" and "Instructions" set forth in the Interrogatories, to the extent they purport to impose greater obligations on L&W than those contemplated by the Federal Rules of Civil Procedure, the Local Rules of this Court, or any other applicable rules, laws, orders, or stipulations.

2. L&W objects to the definitions of "Defendants," "You," and "Your" on the grounds that they are overly broad, unduly burdensome, and not likely to lead to the discovery of admissible evidence to the extent they seek information from non-parties to this action. L&W objects to these definitions to the extent that Evolution's interrogatories seek the discovery of information outside L&W's knowledge, or information outside L&W's custody, control, and/or possession. L&W will respond on behalf of themselves as parties to this action pursuant to L&W's obligations under the applicable rules to produce responsive, non-privileged documents or provide responsive, non-privileged information in their possession, custody, and/or control.

3. L&W objects to the definition of "Math Files" on the grounds that it is vague, ambiguous, overly broad, unduly burdensome to the extent that Evolution's Interrogatories seek information relating to math files apart from those that Evolution sent by e-mail to L&W on March 11, 2021.

4. L&W objects to the definition of "Document" and "documents" to the extent

Patent Owner Evolution, EX2013, p. 1
Light & Wonder, Inc. v. Evolution Malta Ltd.
IPR2025-01073

such definitions suggest a greater or different requirement in responding to these Interrogatories than the requirements of the Federal Rules of Civil Procedure and the Local Rules of this Court. L&W further objects to the definitions to the extent they include e-mail and to the extent they call for a document search broader than the search protocols to be agreed upon by the parties, including agreed-upon search terms and custodians. L&W will produce e-mail communications pursuant to the parties' agreed upon Order for Discovery of Electronically Stored Information ("ESI").

SPECIFIC RESPONSES AND OBJECTIONS

INTERROGATORY NO. 1:

Separately for each of the Asserted Patents, state the date on which You first became aware of that patent, the application that led to that patent, its Related Patents, and/or its Related Applications, and state in detail the complete basis for Your answer, including the facts and circumstances supporting Your answer, all Documents reflecting such facts and circumstances, and the person(s) most knowledgeable of such facts and circumstances.

RESPONSE TO INTERROGATORY NO. 1:

L&W objects to this Interrogatory to the extent it seeks information protected by the attorney-client, work-product, or other applicable privilege or doctrine. L&W further objects to this Interrogatory as vague, ambiguous, overly broad, unduly burdensome, and not likely to lead to the discovery of admissible evidence to the extent it seeks information relating to "the complete basis for Your answer, including the facts and circumstances supporting Your answer, all Documents reflecting such facts and circumstances," and seeks information relating to patents and applications that are not asserted in this case. L&W further objects to this Interrogatory as consisting of multiple discrete interrogatories.

Subject to and without waiving the foregoing general and specific objections, L&W responds as follows: L&W became aware of the '024 patent on or about August 26, 2020. L&W became aware of pending application No. 16/852,049 that led to the '014 patent on or before March 8, 2021, when it was identified by Evolution in Exhibit A during negotiation of the Heads of Terms between the parties. Additionally, L&W became aware of the '371 patent on or about

CAMPBELL & WILLIAMS
ATTORNEYS AT LAW
710 SOUTH SEVENTH STREET, SUITE A, LAS VEGAS, NEVADA 89101
Phone: 702.382.5222 • Fax: 702.382.0540
www.campbellandwilliams.com

Patent Owner Evolution, EX2013, p. 2
Light & Wonder, Inc. v. Evolution Malta Ltd.
IPR2025-01073

April 24, 2024, in a letter dated April 24, 2024 from Jesper von Bahr of Evolution to Mr. Michael Blankstein of L&W. L&W also responds that the person most knowledgeable about these facts is Michael Blankstein. L&W's investigation remains ongoing and L&W expressly reserves the right to supplement and/or amend as a result of its ongoing investigation.

INTERROGATORY NO. 2:

Identify by name, model, number, version, or code-name each Accused Product imported to, exported out of, or manufactured, used, sold, or offered for sale in the United States, and for each Accused Product, provide (i) the date of its first use in the United States; (ii) the date of its first manufacture in the United States; (iii) the first date of its importation into the United States; (iv) the date of its first sale or offer for sale in the United States; (v) the time period during which it has been imported into the United States and/or made, used, sold, and/or offered for sale in the United States; and (vi) the names of the entity or entities importing into and/or exporting out of the United States the Accused Product and/or making, using, selling, and/or offering for sale the Accused Product in the United States.

RESPONSE TO INTERROGATORY NO. 2:

L&W objects to this Interrogatory as disproportionate to the needs of the case, vague, ambiguous, overly broad, and unduly burdensome to the extent it seeks information relating to the identification of products and information relating to the same beyond the scope of the Accused Products identified in Evolution's Disclosure of Asserted Claims and Infringement Contentions served on September 18, 2024 ("Infringement Contentions"). L&W will limit its response to Accused Products identified in Evolution's Infringement Contentions. L&W further objects to this Interrogatory to the extent it seeks discovery regarding claims not specifically identified in Evolution's Infringement Contentions. L&W further objects to this Interrogatory as consisting of multiple discrete interrogatories to the extent it seeks information relating to dates of first use, manufacture, importation, sale or offer for sale in the United States, the time period, and the names of the entities involved. L&W also objects to this request as the terms "version," "number," and "code name" are vague and ambiguous. L&W further objects to this Interrogatory on the grounds that it seeks legal conclusions. L&W further objects to this

CAMPBELL & WILLIAMS
ATTORNEYS AT LAW
710 SOUTH SEVENTH STREET, SUITE A, LAS VEGAS, NEVADA 89101
Phone: 702.382.5222 • Fax: 702.382.0540
www.campbellandwilliams.com

Patent Owner Evolution, EX2013, p. 3
Light & Wonder, Inc. v. Evolution Malta Ltd.
IPR2025-01073

DATED this 7th day of October, 2024.

CAMPBELL & WILLIAMS

By: */s/ Philip R. Erwin*
PHILIP R. ERWIN, ESQ. (11563)
710 South Seventh Street
Las Vegas, Nevada 89101

JONES DAY

HAROLD K. GORDON, ESQ.
(*Pro Hac Vice*)
RYAN K. WALSH, ESQ.
(*Pro Hac Vice*)
JENNIFER D. BENNETT, ESQ.
(*Pro Hac Vice*)
RANDALL E. KAY, ESQ.
(*Pro Hac Vice*)

Attorneys for Defendants Light & Wonder, Inc and LNW Gaming, Inc.

CAMPBELL & WILLIAMS
ATTORNEYS AT LAW
710 SOUTH SEVENTH STREET, SUITE A, LAS VEGAS, NEVADA 89101
Phone: 702.382.5222 • Fax: 702.382.0540
www.campbellandwilliams.com

Patent Owner Evolution, EX2013, p. 7
Light & Wonder, Inc. v. Evolution Malta Ltd.
IPR2025-01073

VERIFICATION

On behalf of Light & Wonder, Inc. and LNW Gaming, Inc. ("L&W"), I, Victor Blanco, have read **DEFENDANTS' RESPONSES AND OBJECTIONS TO PLAINTIFFS' FIRST SET OF INTERROGATORIES**. While no one person at L&W is in possession of the knowledge necessary to verify the responses to each of these Interrogatories and although I do not have personal knowledge about the facts set forth in each of these Responses, after making a reasonable inquiry and based on the information available to me, I believe that these Responses are true and accurate.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on October 4, 2024, in Las Vegas, Nevada.

Victor Blanco

CAMPBELL & WILLIAMS
ATTORNEYS AT LAW
710 South Seventh Street, Suite A, Las Vegas, Nevada 89101
Phone: 702.382.5222 • Fax: 702.382.0540
www.campbellandwilliams.com

Patent Owner Evolution, EX2013, p. 8
Light & Wonder, Inc. v. Evolution Malta Ltd.
IPR2025-01073

CAMPBELL & WILLIAMS
ATTORNEYS AT LAW
710 SOUTH SEVENTH STREET, SUITE A, LAS VEGAS, NEVADA 89101
Phone: 702.382.5222 • Fax: 702.382.0540
www.campbellandwilliams.com

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of October, 2024, a true and correct copy of the foregoing **DEFENDANTS' RESPONSES AND OBJECTIONS TO PLAINTIFFS' FIRST SET OF INTERROGATORIES** was served electronically via electronic mail to the addresses of the following counsel of record:

NICHOLAS J. SANTORO
(Nevada Bar No. 532)
JASON D. SMITH
(Nevada Bar No. 9691)
HOLLEY DRIGGS
300 South 4th Street, Suite 1600
Las Vegas, Nevada 89101
Tel: (702) 791-0308
Email: nsantoro@nevadafirm.com
jsmith@nevadafirm.com

CHING-LEE FUKUDA
(*admitted pro hac vice*)
SHARON LEE
(*admitted pro hac vice*)
SIDLEY AUSTIN LLP
787 Seventh Avenue
New York, New York 10019
Tel: (212) 839-5300
Email: clfukuda@sidley.com
sharon.lee@sidley.com

JOSHUA J. FOUGERE
(*admitted pro hac vice*)
1501 K Street, N.W., Suite 600
Washington, DC 20005
Tel: (202) 736-8000
Email: jfougere@sidley.com

/s/ *Philip R. Erwin*
An employee of Campbell & Williams

Patent Owner Evolution, EX2013, p. 9
Light & Wonder, Inc. v. Evolution Malta Ltd.
IPR2025-01073