

IMAGINEAR, INC. and IMAGINE AR,
INC.,

Plaintiffs,

v.

NIANTIC, INC.

Defendant.

Pursuant to Fed. R. Civ. P. 33 Plaintiffs ImagineAR, Inc. and Imagine AR, Inc. (collectively “Plaintiffs” or “ImagineAR”) hereby object and respond to Defendant Niantic Inc.’s (“Defendant” or “Niantic”) First Set of Interrogatories (Nos. 1-8) as follows:

Plaintiffs generally object to Niantic's Interrogatories (Nos. 1-8). The assertion of similar or additional objections or the provision of partial responses does not waive any of the following General Objections. Plaintiffs specifically refer to and incorporate by reference the following General Objections into each of their Responses:

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2. Plaintiffs object to Niantic's Interrogatories to the extent that they: seek information beyond the scope of the Federal Rules of Civil Procedure; seek discovery that is unreasonably cumulative or duplicative; seek discovery that is publicly available or obtainable from other sources which are more convenient, less burdensome or less expensive; are unduly burdensome and oppressive; and may otherwise be construed to require responses beyond those required by the applicable Federal Rules of Civil Procedure.

3. Plaintiffs object to Niantic's Interrogatories as unduly burdensome and oppressive insofar as they seek information already in Niantic's knowledge, possession and/or control.

4. Plaintiffs object to Niantic's Interrogatories to the extent that they seek production of information and/or documents in the possession of a third party or otherwise outside of Plaintiffs' possession, custody or control.

5. Plaintiffs object to each of Niantic's Interrogatories as unduly burdensome, oppressive, and harassing insofar as any interrogatory is cumulative or duplicative of another interrogatory.

6. Plaintiffs object to Niantic's Interrogatories to the extent they seek disclosure of information protected by the attorney-client privilege, work-product doctrine or any other applicable privileges, and Plaintiffs will not disclose such privileged information. Plaintiffs agrees to provide responsive, non-privileged information in accordance with the Federal Rules of Civil Procedure, the applicable Local Rules of the United States District Court for the District of Delaware, and/or Order of this Court.

7. Plaintiffs object to Niantic's Interrogatories to the extent they call for Plaintiffs and/or their attorneys to categorize documents or require Plaintiffs and/or their attorneys to reveal their mental impressions as to whether information supports a particular claim.

8. Plaintiffs object to Niantic's Interrogatories to the extent that they improperly depend upon or seek legal conclusions or opinions of law that Plaintiffs are not qualified to provide.

9. Plaintiffs object to Niantic's Interrogatories to the extent that they request disclosure of Plaintiffs' trade secrets or other confidential or proprietary business information.

10. Plaintiffs objects to Niantic's Interrogatories to the extent that they seek information that Plaintiffs are under an obligation to one or more third parties not to disclose.

11. Plaintiffs object to Niantic's Interrogatories to the extent they seek information not relevant to the claims or defenses raised in this action and are not proportional to the needs of the case. Nothing herein shall be construed as an admission by Plaintiffs respecting the admissibility or relevance of any fact, or as an admission of the truth or accuracy of any characterization, description or definition of any kind contained in Niantic's Interrogatories.

12. Plaintiffs object to Niantic's Interrogatories to the extent they request disclosure of information concerning occurrences other than the occurrences at issue in this litigation on the following grounds: (1) Niantic's Interrogatories are overly broad; (2) the information sought therein is not relevant to the claims or defenses raised in this litigation; (3) the information sought would be unduly burdensome to disclose; and/or (4) the information sought is not proportional to the case.

13. Plaintiffs object to Niantic's Interrogatories on the grounds that they are vague, ambiguous, overly broad, unduly burdensome, vexatious and harassing, and oppressive and irrelevant.

14. Plaintiffs objects to Niantic's Interrogatories as overly broad and unduly burdensome to the extent they are not reasonably limited in time.

15. Plaintiffs objects to Niantic's Interrogatories to the extent that they include terms that have not been appropriately defined. The use of such terms renders these Interrogatories unduly vague, ambiguous, and not reasonably susceptible to responses.

16. Plaintiffs object to the definitions of "ImagineAR," "Plaintiffs," "You," and "Your" as they are vague, ambiguous, overly broad, unduly burdensome, and oppressive. Plaintiffs further object to the definitions of "ImagineAR," "Plaintiffs," "You," and "Your" to the extent that they purport to include entities and/or persons other than the named Plaintiffs. Plaintiffs also object to the definitions of "ImagineAR," "Plaintiffs," "You," and "Your" to the extent that they purport to include entities and/or persons not within the possession, custody or control of Plaintiffs. Plaintiffs' responses and objections to these Interrogatories are on behalf of ImagineAR only.

17. Plaintiffs object to Niantic's Interrogatories to the extent that they are premature. Plaintiffs will produce responsive, non-privileged information and documents at the appropriate time in accordance with the Court's Scheduling Order and the Local Rules of this Court.

18. Plaintiffs object to Niantic's Interrogatories as being premature and speculative to the extent that they request Plaintiffs to exhaustively produce facts supporting their present contentions and speculate as to future contentions prior to the completion of discovery.

19. Plaintiffs object to Niantic's Interrogatories as premature to the extent that they require the disclosure of expert testimony and/or expert analysis.

20. Plaintiffs object to Niantic's Interrogatories to the extent they are premature because the Court has yet to construe the claims of the Patents-in-Suit.

21. Plaintiffs object to Niantic's Interrogatories to the extent they call for ultimate conclusions as premature and limited by the present lack of discovery. Discovery responses will be supplemented as required by FED. R. CIV. P. 26(e).

22. Plaintiffs object to Niantic's Interrogatories to the extent they seek information that may be derived or ascertained from the documents produced by Plaintiffs or any other party and the burden of deriving or ascertaining the answer is substantially the same for Niantic. *See generally* Fed. R. Civ. P. 33(d).

23. Plaintiffs' responses herein are based upon present knowledge, information and belief following their diligent search and reasonable inquiry. Discovery and investigation are ongoing, and Plaintiffs reserve their right to amend, correct, supplement, or clarify their answers upon, among other things: further investigation; discovery of additional facts; discovery of persons with knowledge or relevant information; or developments in this action or any other proceeding. Plaintiffs reserve the right to rely on any facts, documents or other evidence that may develop or come to their attention during discovery in this action.

24. Plaintiffs give the following objections and responses without waiving their right to produce evidence at trial, or in any other proceeding in this action, of any subsequently-ascertained facts. Plaintiffs provide these objections and responses without admitting or waiving objections to the materiality, relevance, or admissibility in evidence of the matters set forth.

25. Plaintiffs' agreement to produce documents or information in response to any Interrogatory shall not be construed as an admission that such documents or information exist, but only that a reasonable search for such documents or information has or will be made. Moreover, Plaintiffs' agreement to produce documents or information in response to any Interrogatory shall not be construed as an admission by Plaintiffs with respect to the admissibility or relevance of such documents or information.

Subject to the above objections, and any and all other objections contained herein, Plaintiffs object and respond as follows:

INTERROGATORIES

INTERROGATORY NO. 1: Separately for each Asserted Claim, state the complete legal and factual basis for Your contention that the written description and enablement requirements of 35 U.S.C. § 112 have been met, including in your answer an Identification, on an element-by-element basis, the specific portions of the specification you contend demonstrate compliance with the written description and enablement requirements of 35 U.S.C. § 112, including citation to the column and line number and/or figure number.

RESPONSE: Plaintiffs specifically incorporate their general objections herein as if fully set forth in response to this Interrogatory. Plaintiffs object to this Interrogatory to the extent it seeks disclosure of information protected by the attorney-client privilege, work-product doctrine or any other applicable privileges, and Plaintiffs will not disclose such privileged information. Plaintiffs object to this Interrogatory as unduly burdensome and improper on the ground that the interrogatory contains numerous discrete subparts. Plaintiffs object to this Interrogatory as being vague, ambiguous, and/or indefinite. Plaintiffs further object to this Interrogatory to the extent it seeks information that may be derived or ascertained from the documents produced by Niantic or Plaintiffs and the burden of deriving or ascertaining the answer is substantially the same for Niantic. *See generally* Fed. R. Civ. P. 33(d). Plaintiffs object to this Interrogatory as unduly burdensome and oppressive insofar as it seeks information already in Niantic's knowledge, possession and/or control. Plaintiffs object to this Interrogatory to the extent that it improperly depends upon or seeks legal conclusions or opinions of law that Plaintiffs are not qualified to provide. Plaintiffs object to this Interrogatory to the extent it seeks disclosure of expert testimony and/or expert analysis. Plaintiffs object to this Interrogatory on the grounds that it is vague, ambiguous, overly broad, unduly burdensome, vexatious and harassing, and oppressive and irrelevant. Plaintiffs object to this Interrogatory to the extent it requires Plaintiffs and/or their attorneys to create and/or reveal privileged mental impressions. Plaintiffs object to this Interrogatory to the extent it improperly and incorrectly seeks to impose a burden on Plaintiffs to

prove that the valid and issued Asserted Claims are invalid when that burden falls solely on Niantic. Plaintiffs object to this Interrogatory to the extent it seeks information not relevant to the claims or defenses raised in this action and is not proportional to the needs of the case. Plaintiffs object to this Interrogatory to the extent it requires Plaintiffs and/or their attorneys to create and/or reveal privileged mental impressions as to whether information, documents, or Prior Art references support a particular claim or defense of Niantic.

Subject to the aforementioned general and specific objections, Plaintiffs respond as follows:

Plaintiffs incorporate the Patents-in-suit herein by reference in their entirety. Each of the Asserted Claims of the Patents-in-Suit were issued by the United States Patent and Trademark Office. Each of the Asserted Claims of the Patents-in-Suit have been deemed patentable, valid, novel, nonobvious, and adequately described and enabled by the United States Patent and Trademark Office. Each of the Asserted Claims of the Patents-in-Suit is presumed patentable, valid, novel, nonobvious, adequately described, and enabled. Plaintiffs have produced or will produce relevant, non-privileged documents from which the requested information can be determined as provided under FED. R. CIV. P. 33(d) and 34.

As discovery has just commenced, and Plaintiffs' investigation and analysis is on-going, Plaintiffs will supplement their response as further information is obtained.

FIRST SUPPLEMENTAL RESPONSE: Plaintiffs specifically incorporate their general and specific objections herein as if fully set forth in response to this Interrogatory. Plaintiffs further state as follows:

Plaintiffs further identify and incorporate by reference **Exhibit A** attached hereto which provides a response for any limitations and terms Defendant claimed lacked written description

support and were non-enabled in their preliminary invalidity contentions. Exhibit A includes representative examples only and Plaintiffs reserve the right to rely upon other documents, evidence, and expert testimony. To the extent Defendant offers any expert testimony on the subject matter covered by Interrogatory No. 1, Plaintiffs reserve the right to further supplement their response. Plaintiffs also incorporate by reference the petitions for *inter partes* review (“IPR”) filed by Defendant and any expert testimony offered by Defendant in the IPRs. Plaintiffs also incorporate by reference their expert reports relating to written description and enablement (not yet served) as if fully set forth herein.

INTERROGATORY NO. 2: Separately for each Asserted Claim, describe in detail all facts and circumstances relating to the first disclosure or manufacture of the claimed invention, the first use, the first public use, the first public disclosure, the first offer for sale, the first sale, and the first offer for sale for inclusion in a product to be sold in the United States, include all facts and circumstances of each such event, the date on which each such event occurred, the identity of each Person with knowledge of any of the foregoing, the price of any such offers for sale or sales, and identify all Documents by Bates number relating to any of the foregoing.

RESPONSE: Plaintiffs specifically incorporate their general objections herein as if fully set forth in response to this Interrogatory. Plaintiffs object to this Interrogatory to the extent it seeks disclosure of information protected by the attorney-client privilege, work-product doctrine or any other applicable privileges, and Plaintiffs will not disclose such privileged information. Plaintiffs object to this Interrogatory as unduly burdensome and improper on the ground that the interrogatory contains numerous discrete subparts. Plaintiffs object to this Interrogatory as being vague, ambiguous, and/or indefinite, particularly in its use of the terms “first disclosure,” “first public disclosure,” and “first offer for sale for inclusion in a product to be sold.” The use of such terms renders this Interrogatory unduly vague, ambiguous, and not reasonably susceptible to a response. Plaintiffs further object to this Interrogatory to the extent it seeks information that may be derived or ascertained from the documents produced by Niantic or Plaintiffs and the burden of deriving or ascertaining the answer is substantially the same for Niantic. *See generally* Fed. R.

Civ. P. 33(d). Plaintiffs object to this Interrogatory as unduly burdensome and oppressive insofar as it seeks information already in Niantic's knowledge, possession and/or control. Plaintiffs object to this Interrogatory to the extent that it improperly depends upon or seeks legal conclusions or opinions of law that Plaintiffs are not qualified to provide. Plaintiffs object to this Interrogatory to the extent that it seeks the production of information and/or documents in the possession of a third party or otherwise outside of Plaintiffs' possession, custody or control. Plaintiffs further object to this Interrogatory as seeking irrelevant information to the extent the Patents-in-Suit are subject to the America Invents Act ("AIA").

Subject to the aforementioned general and specific objections, Plaintiffs respond as follows:

To the extent they exist, Plaintiffs have produced or will produce relevant, non-privileged documents from which the requested information can be determined as provided under FED. R. CIV. P. 33(d) and 34.

As discovery has just commenced, and Plaintiffs' investigation and analysis are on-going, Plaintiffs will supplement their response as further information is obtained.

FIRST SUPPLEMENTAL RESPONSE: Plaintiffs specifically incorporate their general and specific objections herein as if fully set forth in response to this Interrogatory. Plaintiffs further state as follows:

Plaintiffs hereby incorporate by reference their Complaints, Initial Disclosures, and Paragraph 3 Disclosures. Plaintiffs also identify the named inventors of the Patents-in-Suit. Pursuant to Fed. R. Civ. P. 33(d), Plaintiffs further identify and incorporate by reference documents that were produced as **IAR1-IAR1676** (the prosecution histories of the applications that led to the Patents-in-Suit and any assignments and exclusive licenses). Plaintiffs further state

that Plaintiffs' investigation and analysis to date has not shown that Plaintiffs ImagineAR, Inc. and Imagine AR, Inc. made, used, offered to sell, sold, or imported any products or services that embody the claims of the Patents-in-Suit.

As discovery has just commenced, and Plaintiffs' investigation and analysis are on-going, Plaintiffs will supplement their response as further information is obtained in accordance with the deadlines set by the Federal Rules, Local Rules, and Scheduling Order of this Court.

SECOND SUPPLEMENTAL RESPONSE: Plaintiffs specifically incorporate their general and specific objections herein as if fully set forth in response to this Interrogatory. Plaintiffs further state as follows:

Plaintiffs ImagineAR, Inc. and Imagine AR, Inc. have no knowledge, information, and/or documents relating to whether any inventor or predecessor to the Patents-in-Suit made, used, offered to sell, sold, or imported any products or services that embody the claims of the Patents-in-Suit.

Plaintiffs' investigation and analysis are on-going and Plaintiffs will supplement their response as further information is obtained in accordance with the deadlines set by the Federal Rules, Local Rules, and Scheduling Order of this Court.

INTERROGATORY NO. 8: Describe with particularity the circumstances relating to Your purchase, acquisition, assignment, and/or license of the Asserted Patents, including any business risks, costs, or burdens associated with licensing or enforcing the Asserted Patents; Your reasons for entering into any agreement with XMG Studio, Inc. (or its predecessors/successors) related to the Asserted Patents; Your offer or acceptance of the purchase and/or license price or royalty for the Asserted Patents; and all meetings and oral and written communications with XMG Studio, Inc. or any other entities related to the Asserted Patents.

RESPONSE: Plaintiffs specifically incorporate their general objections herein as if fully set forth in response to this Interrogatory. Plaintiffs object to this Interrogatory to the extent it seeks disclosure of information protected by the attorney-client privilege, work-product doctrine, common legal interest privilege, or any other applicable privileges, and Plaintiffs will not disclose

such privileged information. Plaintiffs object to this Interrogatory as unduly burdensome and improper on the ground that the interrogatory contains numerous discrete subparts. Plaintiffs object to this Interrogatory as being vague, ambiguous, and/or indefinite, particularly in its use of the terms “circumstances,” “business risks,” “burdens,” and “reasons for entering into any agreement.” The use of such terms renders this Interrogatory unduly vague, ambiguous, and not reasonably susceptible to a response. Plaintiffs further object to this Interrogatory to the extent it seeks information that may be derived or ascertained from the documents produced by Niantic or Plaintiffs and the burden of deriving or ascertaining the answer is substantially the same for Niantic. *See generally* Fed. R. Civ. P. 33(d). Plaintiffs object to this Interrogatory as unduly burdensome and oppressive insofar as it seeks information already in Niantic’s knowledge, possession and/or control. Plaintiffs object to this Interrogatory to the extent that it improperly depends upon or seeks legal conclusions or opinions of law that Plaintiffs are not qualified to provide. Plaintiffs object to this Interrogatory to the extent it seeks disclosure of expert testimony and/or expert analysis.

Subject to the aforementioned general and specific objections, Plaintiffs respond as follows:

Plaintiffs have produced or will produce relevant, non-privileged documents from which the requested information can be derived as provided under Fed. R. Civ. P. 33(d) and 34.

FIRST SUPPLEMENTAL RESPONSE: Plaintiffs specifically incorporate their general and specific objections herein as if fully set forth in response to this Interrogatory. Plaintiffs further state as follows:

Plaintiffs hereby incorporate by reference their Complaints, Initial Disclosures, and Paragraph 3 Disclosures. Plaintiffs also identify Mr. Allen Alen Paul Silverstien – CEO of

ImagineAR.

Pursuant to Fed. R. Civ. P. 33(d), Plaintiffs further identify and incorporate by reference documents that were produced as **IAR1-IAR1676** (the prosecution histories of the applications that led to the Patents-in-Suit and any assignments and exclusive licenses). Once the Court enters a Protective Order, Plaintiffs will produce and identify additional agreements with information responsive to this Interrogatory.

SECOND SUPPLEMENTAL RESPONSE: Plaintiffs specifically incorporate their general and specific objections herein as if fully set forth in response to this Interrogatory. Plaintiffs further state as follows:

Pursuant to Fed. R. Civ. P. 33(d), Plaintiffs further identify and incorporate by reference documents that were produced as **IAR00005490-IAR0005654** (documents relating to the purchase of the rights to the Patents-in-Suit).

Dated: September 30, 2025

GREENBERG TRAURIG, LLP

Renée Mosley Delcollo (#6442)
Greenberg Traurig, LLP
222 Delaware Avenue, Suite 1600
Wilmington, DE 19801
T: 302.661.7000
renee.delcollo@gtlaw.com

/s/James J. Lukas, Jr.
James J. Lukas, Jr.
Matthew S. Levinstein
Sean Patchin, Jr.
Greenberg Traurig, LLP
77 West Wacker Drive, Ste. 3100
Chicago, IL 60601
T: 312.456.8400
Attorneys for Plaintiffs

Benjamin P. Gilford
Greenberg Traurig, LLP
90 South 7th St., Ste. 3500
Minneapolis, MN 55402
T: 612.259.9700

Erik M. Bokar
Greenberg Traurig, PA
450 S. Orange Avenue, Ste. 650
Orlando, FL 32801
T: 407.317.8560

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that all counsel of record are being served with a copy of this document via email delivery on September 30, 2025.

/s/ James J. Lukas, Jr.
James J. Lukas, Jr.

Exhibit A

Limitation	Support in the Intrinsic Record
“a virtual character with a virtual character statistic in which a player in a real world player geographic location interacts with the video game”	<u>Original Claims:</u> ‘284 patent, Claim 1; ‘797, Claim 31; ‘827 patent, Claim 31; ‘691 patent, Claim 31 <u>Specification:</u>¹ Abstract; FIGS. 1-4; 1:39-42; 2:17-25; 3:10-19; 3:49-51; 5:64-67; 6:7-14; 6:22-45; 7:2-6; 7:14-17; 7:36-41; 8:5-6; 8:20-27; 8:41-43; 10:51-55; 11:31-39; 12:57-64; 13:5-15; 14:59-15:3; 15:26-35
“player”	<u>Original Claims:</u> ‘284 patent, Claims 1, 7, 14, 16, 17, 21, 24, 27, 30; ‘797, Claims 31, 36, 43, 45, 46, 50, 52, 55, 57; ‘827 patent, Claims 31, 36, 43, 45, 46, 50, 52, 55, 57; ‘691 patent, Claims 31, 36, 43, 45, 46, 50, 52, 55, 57 <u>Specification:</u> Abstract; FIGS. 1, 2, 4; 1:36-47; 1:27-28; 1:50-60; 2:17-25; 2:26-30; 2:42-55; 3:1-5; 3:50-55; 4:1-5; 5:48-50; 5:61-67; 6:1-8; 6:22-41; 6:64-67; 7:1-10; 7:14-22; 7:20-25; 7:57-60; 8:35-39; 8:46-54; 8:55-66; 9:4-17; 9:27-34; 9:43-47; 10:4-18; 11:4-16; 11:27-34; 11:47-56; 11:60-12:9; 12:36-46; 13:5-15; 13:30-36; 13:56-57; 14:1-46; 14:59-15:3; 15:14-33; 15:53-57
“the player’s virtual character”	<u>Original Claims:</u> ‘284 patent, Claims 1, 4, 5, 9, 23; ‘797 patent; patent, Claims 31, 34, 35, 38, 52; ‘827 patent; patent, Claims 31, 34, 35, 38, 56; ‘691 patent; patent, Claims 31, 34, 35, 38, 56 <u>Specification:</u> Abstract; FIGS. 1, 4; 1:39-42; 2:17-25; 3:10-19; 3:49-51; 5:64-67; 6:7-14; 6:22-45; 7:2-6; 7:14-17; 7:36-41; 8:5-6; 8:20-27; 8:41-43; 10:51-55; 11:31-39; 12:57-64; 13:5-15; 14:59-15:3; 15:26-35
“local element script”	<u>Original Claims:</u> ‘284 patent, Claims 1-5, 8, 23, 24, 26, 27, 29, 30; ‘797 patent, Claims 31-35, 37, 51, 52, 54-

¹ Because the ‘284, ‘797, ‘827, and ‘691 patents are related and share a specification, citations to the specification refer to the ‘284 patent.

Limitation	Support in the Intrinsic Record
	57; ‘827 patent, Claims 31-35, 37, 51, 52, 54-57; ‘691 patent, Claims 31-35, 37, 51, 52, 54-57 <u>Specification:</u> Abstract; FIGS. 1-4; 2:12-16; 2:52-62; 3:10-19; 3:20-27; 3:31-35; 3:41-44; 6:14-16; 6:25-29; 8:40-43; 9:60-10:3; 10:14-26; 10:44-11:3; 11:17-30; 11:57-63; 14:67-15:3
“plot node”	<u>Original Claims:</u> ‘284 patent, Claims 1, 7; ‘797 patent, Claims 31, 36; ‘827 patent, Claims 31, 36; ‘691 patent, Claims 31, 36 <u>Specification:</u> Abstract; FIGS. 1-4; 2:31-38; 3:20-27; 6:42-49; 6:63-7:12; 11:4-16; 11:47-56; 12:47-67; 14:7-14; 14:23-37; 14:43-46
“operating context”	<u>Original Claims:</u> ‘284 patent, Claim 3; ‘797 patent, Claim 33; ‘827 patent, Claim 33; ‘691 patent, Claim 33 <u>Specification:</u> 2:63-3:9
“the storyline”	<u>Original Claims:</u> ‘284 patent, Claims 7-10, 26-27, 29-30; ‘797 patent, Claims 36-39, 51, 52, 54, 55; ‘827 patent, Claims 36-39, 51, 52, 54, 55; ‘691 patent, Claims 36-39, 51, 52, 54, 55 <u>Specification:</u> Abstract; FIGS. 1-4; 1:32-43; 1:51-61; 2:12-16; 2:22-25; 2:31-41; 2:48-50; 2:55-57; 3:20-27; 3:31-44; 3:49-55; 4:26-28; 6:22-29; 6:42-49; 6:58-62; 6:64-67; 7:2-7; 8:35-39; 8:55-62; 9:35-41; 11:27-30; 12:29-31; 12: 36-67; 13:36-40; 13:56-67; 14:7-14; 14:28-52; 15:14-20; 15:36-43; 15:61-16:2
“the local element script actuatable in the video game to modify one or more of the virtual character statistic and a plot node”	<u>Original Claims:</u> ‘284 patent, Claim 1; ‘797, Claim 31; ‘827 patent, Claim 31; ‘691 patent, Claim 31 <u>Specification:</u> Abstract; FIGS. 1-4; 2:12-16; 2:52-62; 3:10-19; 3:20-27; 3:31-35; 3:41-44; 6:14-16; 6:25-

Limitation	Support in the Intrinsic Record
	29; 8:40-43; 9:60-10:3; 10:14-26; 10:44-11:3; 11:17-30; 11:57-63; 14:67-15:3
“actuating the corresponding local element script in the video game while the player is interacting with the video game and the player’s real world player geographic location is not represented by another player and not actuating the corresponding local element script when the player’s real world player geographic location is represented by another player”	<u>Original Claims:</u> ‘284 patent, Claim 1; ‘797, Claim 31; ‘827 patent, Claim 31; ‘691 patent, Claim 31 <u>Specification:</u> Abstract; FIGS. 1-4; 2:12-16; 2:52-62; 3:10-19; 3:20-27; 3:31-35; 3:41-44; 6:14-16; 6:25-29; 8:40-43; 9:60-10:3; 10:14-26; 10:44-11:3; 11:17-30; 11:57-63; 14:67-15:3
“creating”	<u>Original Claims:</u> ‘284 patent, Claims 1-3; ‘797 patent, Claims 31-33; ‘827 patent, Claims 32-33; ‘691 patent, Claim 33 <u>Specification:</u> Abstract; FIGS. 1-4; 2:12-16; 2:52-62; 3:10-19; 3:20-27; 3:31-35; 3:41-44; 6:14-16; 6:25-29; 8:40-43; 9:60-10:3; 10:14-26; 10:44-11:3; 11:17-30; 11:57-63; 14:67-15:3; 15:36-43
“creating a second or further local element script” or “creation of the local element script”	<u>Original Claims:</u> ‘284 patent, Claims 2-3; ‘797 patent, Claims 32-33; ‘827 patent, Claims 32-33; ‘691 patent, Claim 33 <u>Specification:</u> Abstract; FIGS. 1-4; 2:12-16; 2:52-62; 3:10-19; 3:20-27; 3:31-35; 3:41-44; 6:14-16; 6:25-29; 8:40-43; 9:60-10:3; 10:14-26; 10:44-11:3; 11:17-30; 11:57-63; 14:67-15:3
“null location”	<u>Original Claims:</u> ‘284 patent, Claim 10; ‘797, Claim 39; ‘827 patent, Claim 39; ‘691 patent, Claim 39 <u>Specification:</u> 3:49-55
“new scene”	<u>Original Claims:</u> ‘284 patent, Claims 7-9; ‘797 patent, Claims 36-38; ‘827, Claims 36-38; ‘691 patent, Claims 36-38 <u>Specification:</u> 2:31-38; 3:20-27; 3:49-51
“the detected location”	<u>Original Claims:</u>

Limitation	Support in the Intrinsic Record
	‘284 patent, Claims 1, 2, 9, 10, 14, 16, 18-20; ‘797 patent, Claims 31, 32, 38, 39, 43, 45, 47-49; ‘827, Claims 31, 32, 38, 39, 43, 45, 47-49; ‘691 patent, Claims 31, 32, 38, 39, 43, 45, 47-49 <u>Specification:</u> Abstract; FIGS. 1-4; 2:45-62; 3:5-9; 3:49-55; 3:63-67; 4:1-9; 9:4-33; 9:60-10:3; 10:4-17; 12:13-28; 14:16-22