

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ELECTRONIC ARTS INC.
Petitioner,

v.

WHITE KNUCKLE GAMING, LLC
Patent Owner.

U.S. Patent No. 8,540,575 to Athanasios Angelopoulos
Issue Date: September 24, 2013
Title: Method And System For Increased Realism In Video Games

Inter Partes Review No.: Unassigned

DECLARATION OF RYAN FERWERDA

I, Ryan Ferwerda, hereby declare:

1. My name is Ryan Ferwerda. I am currently a Producer on PGA Tour for Electronic Arts Inc. ("EA"), a petitioner for *inter partes* review before the Patent Trial and Appeal Board. I have held numerous other positions at EA, including QA Tester, QA Project Lead, Designer, and Development Manager on various EA products including Madden NFL.

2. I have been employed by EA since May 1999. In my various roles at EA, I am aware of and knowledgeable about EA's products and offerings in the United States, which pertain to videogames.

3. I am over the age of eighteen (18) and otherwise competent to make this declaration. The statements made in this declaration are to the best of my knowledge and recollection. I have personal knowledge of the facts set forth in this Declaration, and, for facts stated on information and belief, I have been provided with information by a person having personal knowledge of such facts. If called as a witness, I could and would testify competently under oath to the facts stated in this declaration. By making this declaration, it is not my intent, nor the intent of EA, to waive the attorney-client privilege, attorney work product doctrine, or any other applicable privilege.

4. As part of my employment at EA, I participate in and am otherwise familiar with the products and offerings of EA and specifically the

Madden NFL franchise of videogames that it has developed, marketed, distributed and/or published since May 1999. I am also knowledgeable regarding the instructional materials made available to customers who purchase these games.

5. Exhibit EA-1018 is a true and correct copy of the user manual for *Madden NFL 2000*, a videogame published and developed by EA and first released on August 31, 1999 for the Personal Computer ("PC"). The user manual contained at EA-1018 was distributed and otherwise made publicly available by EA as it was enclosed with each copy of the *Madden NFL 2000* videogame sold.

6. Exhibit EA-1017 is a true and correct copy of the reference card for the *Madden NFL 2000* videogame. The reference card contained at EA-1017 was distributed and otherwise made publicly available by EA as it was enclosed with each copy of the *Madden NFL 2000* videogame sold.

7. I am knowledgeable regarding the website http://www.easports.com/99/madden2000/downloads_pc.cfm (hereinafter "Madden 2000 Updates website"), and the server from which various zip files could be downloaded at the Madden 2000 Updates website.

8. The Madden 2000 Updates website, and the links thereon, were publicly available. The various zip files were, and continue to be, publicly available on the Madden 2000 Updates website.

- <ftp://ftp.ea.com/pub/easports/patches/madden2000/EASWeek15.zip>
- <ftp://ftp.ea.com/pub/easports/patches/madden2000/EASWeek16.zip>

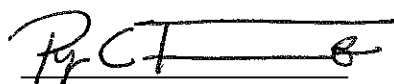
11. I can confirm that the date that each of the respective URL addresses identified in paragraph 10 above was made publicly accessible on the server is as follows:

- January 6, 2000
- January 20, 2000
- January 20, 2000
- January 28, 2000
- November 4, 1999
- November 8, 1999
- November 12, 1999
- November 18, 1999
- December 3, 1999
- December 3, 1999
- December 9, 1999
- December 22, 1999
- December 22, 1999

12. I declare that all statements made herein on my own knowledge are true and that all statements made on information and belief are believed to be

true, and further, that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

Executed on July 13, 2015

A handwritten signature in black ink, appearing to read 'Ry C Ferwerda', written over a horizontal line.

RYAN FERWERDA
PRODUCER

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