UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

_____

ELECTRONIC ARTS, INC.,

Petitioner,

vs.

WHITE KNUCKLE GAMING, LLC,

Patent Owner,

_____

Case No. IPR2016-00634

Patent 8,540,575

_____

DEPOSITION OF:	RYAN FERWERDA
TAKEN:	Pursuant to Notice Instance of Patent Owner
DATE:	November 29, 2016
TIME:	10:05 a.m. to 11:30 a.m.
PLACE:	Court Reporting Specialists 5401 South Kirkman Road, #310 Orlando, Florida 32819
BEFORE:	TRINA SEMINO, RPR Stenographic Court Reporter and Notary Public State of Florida at Large

1 APPEARANCES

2 GERARD M. DONOVAN, Esquire
Reed, Smith, LLP
3 1301 K Street, N.W.
Suite 1000, East Tower
4 Washington, D.C. 20005
202-414-9200
5
Attorney for Petitioner
6

7 ANDREW S. HANSEN, Esquire
Workman, Nydegger
8 60 East South Temple
Suite 1000
9 Salt Lake City, Utah 84111
801-917-6152
10
Attorney for Patent Owner
11

12

13 Also Present: David Jones, White Knuckle Gaming

14

15

16

17

18

19

20

21

22

23

24

25

PAGE

INDEX

Direct Examination by Mr. Hansen 4
Cross-Examination by Mr. Donovan 43
Stipulations 47
Errata Sheet 48
Certificate of Oath 51
Court Reporter's Certification Page 52
Transcript Transmittal Page 53

EXHIBITS

Patent Owner's Exhibit Number 1 (Ferwerda Declaration) 8
Patent Owner's Exhibit Number 1-A (1) (EA Sports) 20
Patent Owner's Exhibit Number 1-A (2) (Screenshot) 20
Patent Owner's Exhibit Number 1-A (3) (Screenshot) 20
Patent Owner's Exhibit Number 1-A (4) (Screenshot) 20
Patent Owner's Exhibit Number 1-A (5) (Screenshot) 20
Patent Owner's Exhibit Number 1-A (6) (Screenshot) 20
Patent Owner's Exhibit Number 1-A (7) (Screenshot) 20
Patent Owner's Exhibit Number 1-A (8) (Screenshot) 20
Patent Owner's Exhibit Number 1-A (9) (Screenshot) 20
Patent Owner's Exhibit Number 1-A (10)(Screenshot) 20
Patent Owner's Exhibit Number 1-A (11)(Screenshot) 20
Patent Owner's Exhibit Number 1-A (12)(EA Sports) 20
Patent Owner's Exhibit Number 1-A (13)(Screenshot) 20
Patent Owner's Exhibit Number 1-A (14)(Screenshot) 20
Patent Owner's Exhibit Number 1-A (15)(Screenshot) 20
Patent Owner's Exhibit Number 1-B (1) (Madden Screen) 20
Patent Owner's Exhibit Number 1-B (2) (Screenshot) 20
Patent Owner's Exhibit Number 1-B (3) (Screenshot) 20
Patent Owner's Exhibit Number 1-B (4) (Screenshot) 20
Patent Owner's Exhibit Number 1-B (5) (Screenshot) 20
Patent Owner's Exhibit Number 1-B (6) (Screenshot) 20
Patent Owner's Exhibit Number 1-B (7) (Screenshot) 20
Patent Owner's Exhibit Number 1-B (8) (Screenshot) 20
Patent Owner's Exhibit Number 1-B (9) (Screenshot) 20
Patent Owner's Exhibit Number 1-B (10)(Screenshot) 20
Patent Owner's Exhibit Number 1-B (11)(Screenshot) 20
Patent Owner's Exhibit Number 1-B (12)(Screenshot) 20
Patent Owner's Exhibit Number 1-B (13)(Screenshot) 20
Patent Owner's Exhibit Number 1-B (14)(Screenshot) 20
Patent Owner's Exhibit Number 1-B (15)(Screenshot) 20
Patent Owner's Exhibit Number 2-A (Programming Sheet) 26
Patent Owner's Exhibit Number 2-B (Programming Sheet) 26

WHEREUPON,

RYAN FERWERDA,

having been first duly sworn to tell the truth, the whole truth, and nothing but the truth, testified as follows:

MR. HANSEN: Andrew Hansen, for White Knuckle Gaming.

MR. JONES: David Jones, White Knuckle Games.

MR. DONOVAN: Gerard Donovan, with Reed, Smith, for Electronic Arts.

THE WITNESS: Ryan Ferwerda, Electronic Arts Tiburon.

MR. HANSEN: All right.

DIRECT EXAMINATION

BY MR. HANSEN:

Q Ryan, I'd like to start with, just, your background.

A Uh-huh.

Q Do you have a degree in --

A I do not.

Q You do not have a degree?

A Huh-uh, nope.

Q Do you have experience in computer programming?

A Yeah. I worked at Electronic Arts. I started in May of 1999, temporarily, and I've been there since 2002, if I recall. So, I've made a career out of it.

Q Okay. Can you describe what you do at Electronic Arts?

A Yeah. So, right now, I'm a live content producer for Madden mobile and NBA Live mobile. Basically, I handle live services for the mobile games each day they go out.

Q Okay. Do you have an understanding of computer programming?

A I'm not a programmer, no. I'm a producer by trade.

Q Okay. And what does a producer do?

A Generally speaking, you provide creative leadership. You help the team make decisions, et cetera, but no hands-on technical stuff, no.

Q Okay. Do you have a general understanding of bio-structures?

A Um, not enough to speak as an expert, no.

Q Okay. Have you -- are you familiar with the Madden 2000 video game?

A Yeah, actually --

MR. DONOVAN: Object to the form.

THE WITNESS: I worked on Madden 2000 for PlayStation.

BY MR. HANSEN:

Q Okay. So, you know what the game, the

Madden 2000 game, looks like?

A I do, for PlayStation. And I have played it as a consumer, for PC, yes.

Q Okay. So, you've actually put the game on a PC and --

A A long time ago, yeah.

Q But you've put it on a PC? You've loaded it, played the game?

A Uh-huh.

Q Okay. Would you say that you still are familiar with the look of the video game?

A Um, I think, with a refresher, I could identify it, yeah.

Q Okay. You supplied DAT zip files that had a DAT file and a text file in it that were updates to the 2000 Madden video game, correct?

A For PC, that's correct.

Q For PC?

A Yep.

Q Those updates were created by Electronic Arts; is that correct?

A Yes.

Q They were created for the Madden 2000 PC video game --

A Uh-huh.

Q -- is that correct?
Did you participate in creating the updates?
A I did not.
Q Did you ever use the updates as you played the 2000 -- Madden 2000 video game?
A As a consumer, on PC, yes.
Q Do you recall which, if any, of the updates --
A I don't. That was a long time ago.
MR. HANSEN: Okay. Understandable.
THE COURT REPORTER: And, I'm sorry, if I can just say: You're cutting into him when he's not finished with his question, and I can only take down one at a time.
THE WITNESS: Oh, sorry, gotcha.
THE COURT REPORTER: Thank you.
BY MR. HANSEN:
Q So, you're the custodian of -- or, you're familiar with the procedures of EA for maintaining those update files on a server?
MR. DONOVAN: Object to form.
MR. HANSEN: I'll rephrase the question.
Let's turn to your Declaration, on Page 2, Paragraph 7.
MR. DONOVAN: Is this marked as an exhibit?
MR. HANSEN: This is his Declaration. We can

mark it.

THE WITNESS: On the bottom?

MR. DONOVAN: It is. I just want the record to reflect it.

THE WITNESS: Oh.

MR. DONOVAN: You just handed us Exhibit EA-1028?

MR. HANSEN: Correct.

(Whereupon, Ferwerda Exhibit Number 1 was marked for identification by Mr. Hansen).

BY MR. HANSEN:

Q So, this is EA Exhibit 1028, Page 3, Paragraph 7.

Are you there?

A Uh-huh, yep.

Q Okay. So, Paragraph 7 reads: "I am knowledgeable regarding the website." And then it has a URL?

A Uh-huh.

Q To your knowledge, were the Madden 2000 downloads available on that website as of the signing of this Declaration?

A I can speak to their accessibility via Archive.org. I don't know if they're still up via the general website, no.

Q Okay. So, but this is an EA Sports' website, correct?

A Yeah, it's in the URL.

Q So, the updates are stored on the website at that URL, correct?

A Via my verification and Archive.org, yes.

Q Can you explain how that works? How does Archive.org store the updates?

A I'm not an expert on Archive.org.

MR. DONOVAN: Object to the form.

BY MR. HANSEN:

Q Did you access those downloads from this URL? So, in Paragraph 7, it refers to a URL and those -- and the Madden 2000 downloads are allegedly stored on -- in zip files on that -- at that URL --

A Uh-huh.

Q -- correct?

MR. DONOVAN: Object to form.

BY MR. HANSEN:

Q Did you access those files yourself?

A Yes; part of my going through the Declaration via Archive.org, yes.

Q Can you explain how you did that?

A You go to Archive.org, and you search the URLs, and it snapshots the website, and that's how you get to

them.

Q So, were the -- the URLs on Archive.org provided you access to the zip files --

MR. DONOVAN: Object to form.

BY MR. HANSEN:

Q -- in the Madden 2000 video game zip files that contained the updates to the Madden 2000 video game?

MR. DONOVAN: Sorry, I didn't mean to interrupt your question. Object to form.

THE WITNESS: (No response).

BY MR. HANSEN:

Q I guess, Ryan, what I'm trying to get at is, is: How do you actually get these updates?

A I mean, as a consumer, in 2000, you would have gone to the site, and downloaded the zip file, and access them.

Q So, in Paragraph 8 of your Declaration, it says: "The various zip files were, and continue to be, publicly available on the Madden 2000 Updates website."

A Uh-huh.

Q Do you know -- so, when you signed this Declaration, those zip files were publicly available on the Madden 2000 Updates website; is that correct?

A They were available via, again, going back to Archive.org.

Q So, do you have a policy with -- does EA Sports have a policy about -- when links are taken down or left for the public to access, is there a policy about when they decide how to take them down or leave them up?

MR. DONOVAN: Object to the form, and object to outside the scope of his testimony, and object to relevance.

THE WITNESS: I'm unaware of the policy. That's a different job position than I have.

BY MR. HANSEN:

Q Do you know if the zip files are still available on the website?

A I have not checked recently, no.

Q Do you know who controls whether the files are available?

MR. DONOVAN: Object, outside the scope; object, relevance.

THE WITNESS: I don't know who controls all that anymore.

BY MR. HANSEN:

Q So, in Paragraph 8, it says: "The Madden 2000 Updates website and the links they're on were publicly available.

So, were they publicly available on EA's servers or were they publicly available on the Archive website?

MR. DONOVAN: Object to form.

THE WITNESS: My understanding is when you go through Archive, that's just a recreation of the same site, and they're hosting the same area, but that's how you would get to them, yeah. I'm not an internet expert. I don't know how all the whole back end stuff, so...

BY MR. HANSEN:

Q Do you know if the Madden 2000 Update files were being hosted on Archive.com or on EA's servers?

MR. DONOVAN: Object to form, object to relevance, object to the scope.

THE WITNESS: Again, that would be out of the scope. I don't understand how the back end for all that worked. I know, as a consumer, you would go to this site and you can access the files.

BY MR. HANSEN:

Q Your testimony says: "I am knowledgeable regarding the website http://www.EASports.com."

That's an EA Sports' website, right?

A Uh-huh.

Q And it says: "And the server from which various zip files could be downloaded at the Madden 2000 Updates website."

A I'm knowledgeable that the site exists and that

you can get them from there. I don't under- -- I don't know the back end of it, no, where files are where -- or, which files are where, excuse me.

Q Do you want to try and -- I'd like you to try and access that website right now from a --

MR. DONOVAN: Object.

Do you have any exhibit you want to put in front of him? What --

MR. HANSEN: Well, he's testifying that this website is publicly available, and we haven't been able to access them, and I'm trying to understand how this URL is an Archive.com website -- or, is accessing an Archive.com website, when it, itself, is an EA Sports' website. And he works for EA Sports, and he's testifying that this is available, and we haven't been able to access it.

MR. DONOVAN: You can ask him any questions you want about his Declaration. That's why he's here. His Declaration also, just for the record, states that the various zip files were, and continue to be, publicly available. I don't believe he says that the website in Paragraph 7 remains publicly available. And that paragraph he's referring to -- he separately refers to Archive.org, I believe.

MR. HANSEN: Okay.

BY MR. HANSEN:

Q So, how are you aware of this EASports.com website in Paragraph 7?

A You can look for it.

Q How would you look for it?

A You can search on the internet.

Q And, so, when you signed your Declaration, was that website, at this URL, an active link?

A Again, I verified it through Archive.org.

Q So, this is -- do you agree that this URL is not an Archive.com [sic] URL in Paragraph 7? That is not a URL to Archive.com [sic], correct?

MR. DONOVAN: Object to the form.

THE WITNESS: I'm not entirely sure what you're asking.

BY MR. HANSEN:

Q That URL, is that a URL that accesses Archive.com [sic]?

MR. DONOVAN: Object to form.

THE WITNESS: One, it's Archive.org, and that site's goal is to provide historical snapshots of the internet.

MR. HANSEN: Can you repeat what he just -- can you read back to me what he just said?

(Whereupon, a pertinent portion of the Record

was read back by the Court Reporter).

BY MR. HANSEN:

Q Is the URL, in Paragraph 7, a historical -- a URL to a historical website?

MR. DONOVAN: Object to form.

THE WITNESS: I'm not entirely -- can you reframe the question, just so I know exactly what you're asking me?

BY MR. HANSEN:

Q Is the URL, in Paragraph 7, a URL to an archived website?

A This piece, now, for me to verify, I would need to access through Archive.org to view it when it was accessible at that time.

Q So, in Paragraph 8, where it says: "The various zip files were, and continue to be, publicly available on the Madden 2000 Updates website," do you know what website that is referring to, the Madden 2000 Updates website?

A Well, there's two. There's the site that we verify how the consumers would access via this URL, which, again, used Archive.org to see a snapshot of it. And, then, if you look on the next page, there's a list of FTPs where all the files and zip files are hosted.

Q Okay. Is -- so, for instance, Playoff Week 1, in Paragraph 10, there's a URL.

A Uh-huh.

Q It begins ftp, colon, slash, slash, ftp, ea.com, slash, pub, slash, eaSports, slash, patches, slash, Madden2000, slash, PlayoffWeek1.zip, correct?

Do you see that?

A Yes.

Q Where is that file stored?

A Again, I'm not an expert of the EA back end, but if you look at the URL, you can follow the structure backwards.

Q So, do you agree that that file is stored on an EA server?

MR. DONOVAN: Object to relevance.

THE WITNESS: I can agree that when I look at the URL, when I look at it, I would make a logical explanation that it is. But, again, I can't verify. I'm not an EA IT or understand how all that stuff works.

BY MR. HANSEN:

Q Do you agree that there's -- or, it's true that there's nothing in that URL that would suggest that that is a website to Archive.com [sic], correct?

MR. DONOVAN: Object to form, object to relevance.

THE WITNESS: I'm not entirely sure, again, what

you're asking me.

BY MR. HANSEN:

Q This first zip file --

A Uh-huh.

Q -- and its bio-location, as evidenced by the ftp site, is not an address to Archive.com [sic], correct?

A Correct.

MR. DONOVAN: Object to relevance.

BY MR. HANSEN:

Q Is it your understanding that EA owns the domain EA.com?

MR. DONOVAN: Object, outside the --

MR. HANSEN: Sorry, let me rephrase.

BY MR. HANSEN:

Q Is it your understanding that Electronic Arts, Inc., is the owner of -- or, its subsidiaries are the owner of the website -- the domain EA.com?

MR. DONOVAN: Object; outside the scope of this deposition, object to relevance.

MR. HANSEN: So, I would just like to comment that he is testifying as to where these files are stored, and that they were publicly available, and it appears that the file is stored on an EA.com website, which would mean -- which would be relevant to who had control of the file and whether he should be

1 testifying as to the public availability of this
2 website, so...
3 MR. DONOVAN: I don't see how the ownership of a
4 domain is relevant to whether or not they were
5 publicly available, or his ability to testify to
6 that, which is why I don't think that's relevant
7 either to his deposition topic, which is his
8 Declaration, or, you know, the relevancy issues in
9 this case.
10 But you can ask your questions.
11 MR. HANSEN: Okay. Maybe I can ask this a
12 different way.
13 BY MR. HANSEN:
14 Q Who is your employer?
15 A Electronic Arts.
16 Q Can you explain the relationship between
17 EA Tiburon and Electronic Arts?
18 A We're -- I mean, at this point, we're just --
19 it's all part of one, together. We're a studio within the
20 giant organization.
21 Q So, does your paycheck come with EA Tiburon or
22 Electronic Arts?
23 A I actually have to look. I just do direct
24 deposit. I believe it's Electronic Arts directly. We're
25 a studio within the entire organization.

Q So, it's your understanding that EA Tiburon is an affiliate of --

MR. DONOVAN: Object to form.

BY MR. HANSEN:

Q -- Electronic Arts?

MR. DONOVAN: Sorry. Object to form.

THE WITNESS: (No response).

BY MR. HANSEN:

Q Can you explain what EA Sports is, the name EA Sports?

A Yeah. So, EA Sports is a collection of games that are branded under the Electronic Arts' umbrella. So, there's Electronics Arts, and EA Sports would be a collection of games within that.

Q Okay. Is it your understanding that Electronic Arts owns the domain EA.com?

A It is my understanding that, yes, they do.

Q Okay. And Electronic Arts owns the domain EASports.com?

A Again, that's my understanding. I don't know who is and the entire back end of it.

Q All right. So, are you aware of who maintains control of the zip file that is in Paragraph 10?

MR. DONOVAN: Object to relevance.

THE WITNESS: No, I'm not.

BY MR. HANSEN:

Q So, but you say that it was publicly available. How do you know that?

A Because you can access it publicly. That wouldn't make me an expert on who hosts the file, or creates the file, or any of that.

MR. HANSEN: All right. Let's go to Exhibit 1-B.

MR. DONOVAN: Do you have a copy for me?

MR. HANSEN: Yes. Oh, and 1-A. I'll describe to you what those are here in a second. Let's get you a copy.

(Whereupon, Ferwerda Exhibits Numbered 1-A (1-15), and 1-B (1-15), respectively, were marked for identification by Mr. Hansen).

BY MR. HANSEN:

Q In your Declaration, there's two zip files in Paragraph 10. The first one, which we read, which ends in Playoff Week 1 --

A Uh-huh.

Q -- that contains a DAT file and a zip file, correct?

A Correct.

Q And, then --

A Oh, I'm sorry, a DAT file and a txt file.

Q A DAT file and a txt file, yes.

And, then, the fourth one down is a zip file that ends in EASuperBowl.zip, correct?

A Correct.

Q That's a second zip file, with a second DAT file and a second txt file, correct?

A Correct.

Q So, Exhibits 1-A and 1-B are screenshots of a video game?

MR. DONOVAN: I don't -- sorry, where is 1-A and 1-B?

MR. HANSEN: Or, 1-A and 1-B are a set -- are pages -- Exhibit~1-A, Pages 1 through 15 --

MR. DONOVAN: That's this one (indicating), right?

MR. HANSEN: Yeah. 1-A, Pages 1 through 15 is a -- are screenshots of a video game running -- this is updated with Playoff Week 1. This -- the DAT file in -- from Paragraph 10 -- the PlayoffWeek1.zip. And Exhibits 1-B, Pages 1 through 15, are screenshots of the same video game, Madden 2000, running the DAT with -- that is updated with the DAT file from the zip files that ends in EASuperBowl.zip. So, in other words, updated the video game with those two DAT files.

And we'd like to discuss the screen shots from those updates and confirm that that's your understanding of what this game looks like when it runs an updated file from the URLs that you've provided in Paragraph 10.

MR. DONOVAN: And we object to both of these exhibits as both outside the scope of this deposition, outside the scope of his direct testimony and it's not relevant to this proceeding.

MR. HANSEN: Okay.

BY MR. HANSEN:

Q So, in Exhibit~1-A, dash, 1, do you see that it has copyright 1999 NFLP, and has an EA Sports' logo, correct?

A Correct.

MR. DONOVAN: Object to form, object to relevance, object to outside the scope.

THE WITNESS: Correct.

BY MR. HANSEN:

Q Do those logos look like logos that you're familiar with from EA Sports -- or, from Electronic Arts?

MR. DONOVAN: Same objections.

THE WITNESS: Yes.

BY MR. HANSEN:

Q Okay. Page 2, this is a screenshot of the

Madden 2000 video game on its first page, where it's loading.

Can you -- does this appear to be the Madden 2000 video game that you played?

MR. DONOVAN: Same objections.

THE WITNESS: Yes.

BY MR. HANSEN:

Q Page 3, it's somewhat difficult to read, but at the bottom it says "Press space bar to advance."

MR. DONOVAN: Object, same objections.

MR. HANSEN: We'll move on to the next question.

BY MR. HANSEN:

Q On Page 4, it shows a series of menus: Arcade, Exhibit [sic], Season, Franchise, Tournament, Practice, Situation.

Do those -- do you see those menus?

MR. HANSEN: Same objections.

THE WITNESS: Yeah, just to clarify, it says Exhibition, but, yeah, you do need your glasses.

MR. HANSEN: Yeah, I don't have my glasses on.

THE WITNESS: I do see those.

MR. HANSEN: Okay.

BY MR. HANSEN:

Q On the bottom row, there are four menu items that are just graphics. The second one is a roster

update.

Is that familiar to you, the picture --

A Uh-huh.

MR. DONOVAN: Same objections; this is outside the scope.

BY MR. HANSEN:

Q The second graphic over from the EA Sports' logo has a picture of a piece of paper, it looks like?

A Uh-huh.

Q Representative of a roster?

MR. DONOVAN: Same objections.

BY MR. HANSEN:

Q On Page 5, it shows the roster menu highlighted.

MR. DONOVAN: Is there a question?

MR. HANSEN: Yeah.

BY MR. HANSEN:

Q So, are you familiar with the roster updating in the 2000 -- Madden 2000 video game?

MR. DONOVAN: Objection; outside the scope of his Declaration, and not relevant.

THE WITNESS: I'm familiar, as a consumer, in understanding how that works, yes.

BY MR. HANSEN:

Q Okay. On Page 6, it shows Roster Information. This is a menu.

Do you agree that this is a menu showing how to enter the roster viewing portion of the video game?

MR. DONOVAN: Same objections.

THE WITNESS: Yeah, that's the main roster hub, with --

BY MR. HANSEN:

Q Under the words Roster Info, it says: "Roster options include viewing, editing and managing rosters."

MR. DONOVAN: Same objections. Also, I just want to state for the record: I understand that there may have been a historic team option relating to some of the older Madden games. I just want to clarify that my understanding is nothing here relating to the updates relates to anything of the historic teams. It's updating based on the playoffs and what was happening in that season.

MR. HANSEN: Correct. So, on Page 6, at the bottom of the screen, it says: "The current roster loaded is," then it says Roster -- ROSTDATA," correct?

MR. DONOVAN: Object; outside the scope, and relevance.

THE WITNESS: Correct.

BY MR. HANSEN:

Q Is it -- do you know how the video game

determines which file to load into the roster or to select the roster data?

MR. DONOVAN: Same objection, and object to form.

THE WITNESS: So, again, by reading the txt file and the zips, that tells you how -- what file the game wants you to use.

MR. HANSEN: Okay.

BY MR. HANSEN:

Q So, if you take the DAT file from the -- that you mention in Paragraph 10, and you store it in the roster file that's in the video game, is it your understanding that you can select that roster file in this video game and that --

MR. DONOVAN: Are you finished?

MR. HANSEN: Yeah.

MR. DONOVAN: Okay. Object to form, object to relevance, object to scope.

THE WITNESS: Yes, that's my understanding. So, you load the file in and then you can basically use the updated stuff.

MR. HANSEN: Okay.

(Whereupon, Ferwerda Exhibits Numbered 2-A and 2-B, respectively, were marked for identification by Mr. Hansen).

BY MR. HANSEN:

Q So, let's turn to Exhibit 2-A. That's --

A This one? Got it.

Q Does this list of files here appear to you to be files from a Madden 2000 video game?

MR. DONOVAN: Object; outside the scope, object to relevancy.

We've never seen this document before. Can you let me know what this document is?

MR. HANSEN: Yeah. So, this is a Madden 2000 PC video game file.

MR. DONOVAN: Okay.

MR. HANSEN: And it includes a roster file. You can see, halfway down, it was --

BY MR. HANSEN:

Q So, on 2-A, two-thirds of the way down the list of files, do you see a folder that says Rosters? It's a folder. And it says, today, 10:32 p.m., is the last time it was modified. And, then, in that folder is Roster -- ROSTDATA.DAT, and it says that it was -- can you read when it was last modified?

MR. DONOVAN: Object to form, object to outside the scope, and object to relevance.

THE WITNESS: January 6, 2000.

BY MR. HANSEN:

Q At 11:22 a.m., correct?

MR. DONOVAN: Object; outside the scope, relevance.

THE WITNESS: Correct.

BY MR. HANSEN:

Q And it has 459 kilobytes?

MR. DONOVAN: Same objections.

THE WITNESS: Correct.

BY MR. HANSEN:

Q Are you familiar with that date, and time, and file size as being the date, time and file size of the week one update DAT file referred to -- or, downloaded from the ftpEA.com website that ends in PlayoffWeek1?

MR. DONOVAN: Same objections and object to form.

THE WITNESS: You're referring to Playoff Week 1, right?

MR. HANSEN: Playoff week 1.

THE WITNESS: Obviously it's been a long time since I've updated all that, but, from my understanding, that would be around the same time that the playoffs would be happening in the NFL.

MR. HANSEN: All right. Let's turn to Page 7 of Exhibit~1-A.

THE WITNESS: (Witness complies).

BY MR. HANSEN:

Q This screenshot shows the managed rosters menu. Do you agree that it shows a menu, also, that says View Roster?

MR. DONOVAN: Object to scope and relevance.

THE WITNESS: Yes.

BY MR. HANSEN:

Q Do you agree that selecting that roster allows you to view the individual players on a roster of a real NFL -- or, that simulates a real NFL team in the video game?

MR. DONOVAN: Same objection; object to form.

THE WITNESS: Yes, that would be my understanding.

BY MR. HANSEN:

Q So, turning to Page 8, this is a screenshot after selecting the menu, view rosters, and it has selected a particular team, Steelers, and it has selected a particular position, wide receiver.

Do you see that?

MR. DONOVAN: Object to scope and relevance.

THE WITNESS: I do, yes.

BY MR. HANSEN:

Q Do you know how to select teams and players -- or, positions within the Madden 2000 video game?

MR. DONOVAN: Same objections.

THE WITNESS: Yes.

BY MR. HANSEN:

Q So, would you expect the -- with the Steelers selected and the WR selected, is that your understanding that it's the Steelers NFL team, Pittsburgh Steelers NFL team, and WR stands for wide receiver?

MR. DONOVAN: Same objections.

THE WITNESS: Yes, absolutely.

BY MR. HANSEN:

Q Do you see, in the list of players that are shown on that screen, that it includes K. Stewart?

MR. DONOVAN: Same objections. So that I don't have to keep interrupting, can we just agree that we object to each of the questions in this line of questioning about the game?

MR. HANSEN: Correct -- or, agreed. The entire line of questioning regarding exhibits 1-A and 1-B are objected to on the same grounds.

MR. DONOVAN: Thank you.

BY MR. HANSEN:

Q Is it your understanding that K. Stewart is a real-life player in the NFL and that this game simulates K. Stewart?

A Yes, that's Kordell Stewart.

Q Kordell Stewart?
A Uh-huh.
Q Okay, very good.
So, the video game screenshot on Page 8 also shows various abbreviations: OVR, STR, AGI, SPD, et cetera.
Do you see that?
A I do.
Q Do you agree that those are ratings of -- those are categories for rating of players in the video game?
A Yeah. They can have many names or attributes, ratings, et cetera; but, yeah, the intent of those is to accurately represent how a player performs.
Q Okay. So, for K. Stewart, his numbers for Overall, STR, AGI, SPG, ACC, AWR, CTH was shown in this update to be 72, 53, 81, 86, 80, 64 and 69, respectively?
A Yeah, that is correct. There's also other ratings that would be available if you were to pull the slider over.
Q Great. Okay, let's go to Figure 9. You'll see that Figure 9 is a screenshot with those -- with the slider -- that -- that the bar in the middle of that slider shows what position you are, relative to those numbers, right?
And you can see that it's moved to the middle,

correct?

A Yes, correct.

Q And, so, that would mean that we've slid over to the side, and we're showing numbers, and -- or, player ratings that are more to the right of -- as compared to the screenshot in Page 8. It shows, for instance, CAR, THP, THA, KPW, KAC, BTK. And Kordell Stewart has numbers, starting with CAR, that are 67, 86, 62, 3, 3 and 56, correct?

A Correct.

Q And, then, if we go to Page 10, you'll see that the slider's moved all the way to the right, and it shows -- that would indicate that it's showing the very last player rating that ends in ING [sic], correct?

A Correct.

Q All right. So, I'd like to turn now to Exhibit 1-B.

A (Witness complies).

MR. DONOVAN: So that I don't have to interrupt your questioning: Our objections regarding the scope and relevance to your questions on this also apply, correct?

MR. HANSEN: Correct.

MR. DONOVAN: Thank you.

BY MR. HANSEN:

Q 1-B is -- includes screenshots from the Madden video game running -- that is updated with the DAT file from -- the zip file -- or, the DAT file in the zip file ending in EASuperBowl and --

A There's one thing I want to clarify. So, I'm unable to verify, by looking at the first screens, whether or not that file's been updated or not. I'm just going with it.

MR. HANSEN: Correct, yes. We will be providing that evidence separate.

BY MR. HANSEN:

Q So, on 1-B, Page 6, you'll see that that -- I'll let you get there.

1-B, Page 6, you'll see that that is also a screenshot that shows the Steelers team selected, correct?

A Correct.

Q Wide receiver selected, correct?

A Correct.

Q And it also shows Kordell Stewart again, correct?

A Correct.

Q And you'll see -- can you read those numbers for us, starting with OVR for Kordell Stewart?

A OVR, 72; STR, 53; AGI, 81; SPD, 86; ACC, 83; AWR, 64; CTH, 69.

Q Okay. And, then, if we turn to Page 7, continuing with CAR, will you read to us the numbers, through BTK, for Kordell Stewart?

MR. DONOVAN: Object to the form.

THE WITNESS: CAR, 67; THP, 86; THA, 62; KPW, 3; KAC, 3; BTK, 56.

BY MR. HANSEN:

Q Okay. And, then, on Page 8, beginning with TAK for Kordell Stewart, to the end ING?

MR. DONOVAN: Same objection.

THE WITNESS: TAK, 18; INP, 90; PBK, 9; RBK, 9; ING, 90.

MR. HANSEN: Okay. Now I'd like to compare Exhibit~1-A, the numbers for Kordell Stewart. And I'll just let you -- and 1-A begins on Page 9, and 1-B begins on Page 6.

BY MR. HANSEN:

Q Do you see any differences in those numbers?

A I do not.

MR. HANSEN: Okay. Let's go back to Exhibit~1-A.

MR. DONOVAN: I just also want to restate for the record that we don't know how these were updated or to what extent they were. So, his testimony is given just in the context as to the document that's

in front of him.

MR. HANSEN: Correct. And it's under the assumption that the update is based on the DAT files that were provided to White Knuckle for week one and Super Bowl in 1-A and 1-B, respectively, and that you're not admitting or testifying to how that happened, or if it did happen. We're just assuming that that's the case for purposes of this deposition.

MR. DONOVAN: All right.

THE WITNESS: Can I make one key note?

MR. HANSEN: Sure.

THE WITNESS: When you say Week 1 and Playoff Week 1, those are very different times in the NFL season, so I think that's an important delineation.

BY MR. HANSEN:

Q Correct.

So, when we say "Week 1," we're talking about Playoff Week 1?

A Yeah, per the files that you have.

MR. HANSEN: Per in your Declaration, Page 10 -- or, Paragraph 10, on Page 3, when it says -- it says Playoff Week 1, it ends in Week1.zip, that's the week 1 we're talking about.

In fact, I forgot to ask you: There is no week one through week seven in your list of files.

BY MR. HANSEN:

Q Do you know why there's no week one through week seven?

MR. DONOVAN: Object to relevance.

THE WITNESS: I do not know the update schedule the team had.

BY MR. HANSEN:

Q Is it your understanding that the weeks in the zip file correspond to weeks in NFL seasons?

A Yes.

Q So, for instance, where it says Week 8, in the fifth zip file down, on Page 3 of your Declaration --

A Okay, I'm there.

Q -- that refers to data from week eight of the NFL season?

MR. DONOVAN: Object to form.

THE WITNESS: That would be my assumption, yes.

BY MR. HANSEN:

Q Okay. And, similarly, Playoff Week 1, Playoff Week 3, Playoff Week 3, and Super Bowl, are the weeks preceding the Super Bowl and including the Super Bowl, correct?

A That would be my assumption, yes.

Q All right. Okay. So, returning now to Exhibit~1-A, dash, 11 -- so, 1-A, Page 11 --

A Yes.

Q -- this is a screenshot of the video game Madden 2000, with Steelers selected, and the position quarterback selected, correct?

A Correct.

Q And you'll note that Kordell Stewart is not listed as one of the quarterbacks in the video game, correct?

A Correct.

Q If we can turn to Exhibit 1-B, Page 9, again, this is allegedly the video game running the Super Bowl update. And the screenshot shows the Steelers. Quarterback is selected as the position.

And, again, it does not show Kordell Stewart in the quarterback position, correct?

A Correct.

Q Okay. Let's turn now to Exhibit~1-A, Page 12.

A (Witness complies).

Q Again, this would be for the video game running the Playoff Week 1 update, allegedly.

And it shows the Titans selected and LCB as the position; is that correct?

A Yes.

Q Yours is color. I think you can probably see it better than we can, LCB.

Do you happen to know what LCB stands for?

A I'm trying to remember. I believe it's left cornerback.

Q Okay. That sounds right. I don't actually know, either.

You'll see that the screenshot shows that for LCB there are players D. Walker and A. Dorsett, correct?

A Correct.

Q And the overall rating for A. Dorsett is 51 and the overall rating for D. Walker is 76, correct?

A Correct.

Q Okay. I'd like to turn to Exhibit 1-B, Page 10. Again, this would be the video game running -- allegedly running the Super Bowl update. You'll see that the screenshot shows the Titans, and position FS.

Is that what yours shows?

A Yes.

Q But it shows players M. Robertson and A. Dorsett, as well, in this position?

A Yes.

Q And the ratings are -- for A. Dorsett is 71, overall, and M. Robertson, 89, overall; is that correct?

A That is correct.

Q So, on Page 10 of Exhibit 1-B, I'm going to go ahead and read the numbers for A. Dorsett, and I'd like

you to confirm that -- the following numbers.

So, for OVR, 71; STR, 46; AGI, 77; SPD, 83; ACC, 79; AWR, 62; CTH, 39.

Moving to Page 11: CAR, 38; THP, 3; THR, 3; KPW, 3; BTK, 14.

Continuing to Page 12: TAK, 52; IMP, 29; PBK, 9; RBK, 9; and INJ, 77, correct?

MR. DONOVAN: Object to form. I just want to clarify that this is confirming what's on the piece of paper as opposed to the process, or anything like that, that went into any update?

MR. HANSEN: Correct. These are confirming the numbers as shown in the screenshots in the exhibit.

THE WITNESS: Correct.

BY MR. HANSEN:

Q All right. All right. Now I'm going to do the same thing for M. Robertson, Player Number 31, shown on -- starting on Exhibit 1-B, Page 12 -- oh, sorry, starting on Page 10: OVR, 9; STR, 52; AGI, 83; SPD, 82; ACC, 80; AWR, 83; CTH, 59; CAR, 49; THP, 3; THA, 3; KPW, 3; KAC, 3; BTK, 32; TAK, 81; IMP, 75; PBK, 9; RBK, 14 and INJ, 11, correct?

A Correct.

Q Okay. All right.

Let's turn to Exhibit 1-B, Page 13.

A (Witness complies).

Q This appears to be a screenshot of the Madden 2000 video game, with the Rams as the team selected; is that correct?

A That is correct.

Q The position selected appears to be K, correct?

A Correct.

Q Kicker?

A Kicker.

Q And you'll see that it shows N. Lowery as being a kicker on the roster, correct?

A Correct.

MR. HANSEN: Okay. And, again, this is for -- allegedly for Madden 2000, running the Super Bowl update.

THE WITNESS: Could we can take a five-minute break?

MR. HANSEN: Sure.

(Whereupon, a break was taken at 11:06 a.m., after which the proceedings continued at 11:15 a.m.)

MR. HANSEN: Let's go back on the record. I have a couple more questions.

BY MR. HANSEN:

Q I'd like to turn to your Declaration, Page 4, Paragraph 11.

You there?

A Uh-huh.

Q Has dates, in Paragraph 11, that are associated with the URL from Paragraph 10?

A Yes.

Q Those dates correspond to the date that the file was allegedly made available, correct?

A Correct.

Q Do you have any knowledge, other than the file date, of these files being available? Like --

A Um --

Q Go ahead and answer.

A I do not, just beyond the date here.

Q And that was taken from -- or, where were these dates taken from, do you know?

A From the files themselves and the listing house (inaudible) on the ftp.

Q So, if you were to look at the ftp site, it had a save date? Is that --

A Yeah, a save date, or you can tell a date when the file was packaged.

Q Okay. Packaged date or some date associated with the creation or storage of that file on the ftp site; is that correct?

A That is correct.

Q And these are the dates, starting with January 6 and ending with December 22, '99, Paragraph 11, that corresponds to the dates -- or, corresponding to the files in Paragraph 10, but you didn't actually participate in putting those files on the server and don't have firsthand knowledge of the creation or storage of the files, correct?

A That is correct.

Q All right. You'll notice several of the files -- or, several of the dates are identical. So, for instance, January 20, 2000, appears that there were two updates made available at the same time. And, then, again on -- or, at the bottom, December 22, 1999, there were two updates made available at the same time.

Do you know why they were made available at the same time?

A I actually don't. When I looked at the dates, I saw that. So, yeah, I don't know.

MR. HANSEN: Don't know? Okay. Thought I'd ask.

All right, no further questions.

MR. DONOVAN: I might have a few questions. Let's take another five-minute break, if you don't mind.

MR. HANSEN: Okay.

MR. DONOVAN: Thank you.

(Whereupon, a break was taken at 11:18 a.m., after which the proceedings continued at 11:24 a.m.)

CROSS-EXAMINATION

BY MR. DONOVAN:

Q All right. Mr. Ferwerda, can you turn to Page 1-A, 12?

A (Witness complies).

MR. DONOVAN: And my understanding is that White Knuckle represents that this is the game with, I believe, the week one playoff update, correct?

MR. HANSEN: Correct.

MR. DONOVAN: And can you actually -- put that side by side with Page 1-B, 10.

THE WITNESS: (Witness complies).

MR. DONOVAN: And my understanding is that White Knuckle represents that this is after -- was it the Super Bowl update?

MR. HANSEN: Correct.

BY MR. DONOVAN:

Q And if we look at A. Dorsett's numbers there, have those changed?

A Yes.

Q Why would those have changed?

A Two reasons: One is that the position is

different. In 1-B, it's free safety. However, the Titans -- and I need to verify this -- I believe, were in the Super Bowl that year, so they would see performance improvement from Playoff Week 1 to the Super Bowl. I believe that's the '99 Super Bowl. We need to clarify that, but that would be my assumption, again, as a consumer. But the position can change certain attributes; but other attributes, likely, would have changed based on playoffs to the Super Bowl because the teams in the Super Bowl aren't on there. But they are different positions.

MR. HANSEN: And objection to exceeds the scope of the Cross-Examination.

MR. DONOVAN: I'm sorry?

MR. HANSEN: I'm sorry, he started answering before I had a chance to object. I just want to make the record clear that we object to the scope of the question. It exceeds -- or, the question exceeds the scope of the Cross-Examination.

MR. DONOVAN: Can you explain why this exceeds the scope of the Cross-Examination? You were asking about these players and these numbers on each of these pages.

MR. HANSEN: Particularly, I asked him questions about what the numbers were. I didn't ask him his

opinion about why he thinks that they would have changed.

MR. DONOVAN: Okay.

BY MR. DONOVAN:

Q Mr. Ferwerda, what affect would the changed numbers have on the game itself if a player was playing?

A Just to clarify: In game?

Q In game.

A It can have a pretty profound affect on how the players perform differently. Player attributes, again, based on my experience, are used to differentiate player performance based on positions, how they played, et cetera. All of these attributes, ratings, or however you want to refer to them, all control specific things on the field and how they play differently.

So, in this case, A. Dorsett, just looking at what I'm looking at on the sheet here, 1-B, 10, his speed or his agility would be worse, if you were playing, than M. Robertson's above him, based on that. So -- and each of these would contribute to some sort of mechanic on the field.

MR. HANSEN: Again, I object to the question still, as exceeding the scope of the Cross-Examination, in the sense that we didn't ask him his opinion about how the characters would

perform differently on the video game.

BY MR. DONOVAN:

Q And in your experience with Madden, have you downloaded updates?

A To be clear, for 2000 or other -- anything in the Madden franchise?

Q For Madden 2000.

A Yeah, as a consumer, way back when. I'm having to jog my memory, yes.

Q Do you recall, from when you were a consumer, the timing of updates relating to playoffs or the Super Bowl?

A Again, not offhand. It's a long time ago.

Q In your general knowledge of when updates are released from EA, do you have knowledge of when updates would be released with regard to the playoffs for the Super Bowl?

A Yes; based on work experience, yes.

Q When would the timing typically be?

A Typically we try to release an update every week to align with that. It's not always the same. There's lots of things that can come up, but, generally speaking, a weekly cadence (inaudible).

Q Would that mean that, generally speaking, the week 1 playoffs would be released the week after the week

one playoff game for an NFL game?

A Yeah. So, obviously you can't predict what's going to happen in the future, so you watch the games and then somebody makes a decision to update that based on the performance in that week.

MR. DONOVAN: I have no further questions.

MR. HANSEN: No questions.

All right, call it a wrap. Thank you.

THE COURT REPORTER: Are you going to have him read the transcript?

MR. DONOVAN: Yes.

THE COURT REPORTER: Are you having this transcribed?

MR. HANSEN: Yeah.

THE COURT REPORTER: Regular ten business days?

MR. HANSEN: Yeah.

MR. DONOVAN: And you can send me my copy and then I'll give it to him to read.

THE COURT REPORTER: Okay. Thank you.

(Whereupon, the deposition concluded at 11:45 a.m.)

STIPULATION

It is hereby stipulated and agreed, by and between counsel present at this deposition, that the reading and signing of this deposition would be not waived.

DEPOSITION ERRATA SHEET

Our Assignment No. 20839

Case Caption: EA, Inc. vs. White Knuckle Gaming

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that I have read the entire transcript of my Deposition taken in the captioned matter, or the same has been read to me, and the same is true and accurate, save and except for changes and/or corrections, if any, as indicated by me on the DEPOSITION ERRATA SHEET hereof, with the understanding that I offer these changes as if still under oath.

Signed on the _____ day of _____, 20___.

_____

RYAN FERWERDA

DEPOSITION ERRATA SHEET

Page No._____Line No._____Change to:_____

_____

Reason for change:_____

Page No._____Line No._____Change to:_____

_____

Reason for change:_____

Page No._____Line No._____Change to:_____

_____

Reason for change:_____

Page No._____Line No._____Change to:_____

_____

Reason for change:_____

Page No._____Line No._____Change to:_____

_____

Reason for change:_____

Page No._____Line No._____Change to:_____

_____

Reason for change:_____

Page No._____Line No._____Change to:_____

_____

Reason for change:_____

Page No._____Line No._____Change to:_____

_____

Reason for change:_____

SIGNATURE:_____DATE:_____

RYAN FERWERDA

DEPOSITION ERRATA SHEET

Page No._____Line No._____Change to:_____

_____

Reason for change:_____

Page No._____Line No._____Change to:_____

_____

Reason for change:_____

Page No._____Line No._____Change to:_____

_____

Reason for change:_____

Page No._____Line No._____Change to:_____

_____

Reason for change:_____

Page No._____Line No._____Change to:_____

_____

Reason for change:_____

Page No._____Line No._____Change to:_____

_____

Reason for change:_____

Page No._____Line No._____Change to:_____

_____

Reason for change:_____

SIGNATURE:_____DATE:_____

RYAN FERWERDA

CERTIFICATE OF OATH

STATE OF FLORIDA

COUNTY OF SEMINOLE

I, THE UNDERSIGNED AUTHORITY, CERTIFY THAT THE WITNESS NAMED HEREIN PERSONALLY APPEARED BEFORE ME AND WAS DULY SWORN BY ME.

WITNESS my hand and official seal this 8th day of December, 2016.

__Trina Semino_

TRINA SEMINO, RPR
Court Reporter and
Notary Public
My Commission Expires:
February 18, 2017
#EE 844836

CERTIFICATE OF REPORTER

STATE OF FLORIDA

COUNTY OF SEMINOLE

I, TRINA SEMINO, REGISTERED PROFESSIONAL REPORTER, CERTIFY THAT I WAS AUTHORIZED TO AND DID STENOGRAPHICALLY REPORT THE FOREGOING DEPOSITION; AND THAT THE FOREGOING TRANSCRIPT IS A TRUE RECORD OF THE TESTIMONY GIVEN BY THE WITNESS.

I FURTHER CERTIFY THAT I AM NOT A RELATIVE, EMPLOYEE, ATTORNEY, OR COUNSEL OF ANY OF THE PARTIES, NOR AM I A RELATIVE OR EMPLOYEE OF ANY OF THE PARTIES' ATTORNEYS OR COUNSEL CONNECTED WITH THE ACTION, NOR AM I FINANCIALLY INTERESTED IN THE ACTION.

DATED THIS 8TH DAY OF DECEMBER, 2016, AT SEMINOLE COUNTY, FLORIDA.

_____

TRINA SEMINO, RPR
Notary Public-State of Florida
Commission Number: EE 844836
Expires: February 18, 2017

TRANSCRIPT TRANSMITTAL SLIP

TO: Gerard M. Donovan, Esquire

DATE: December 8, 2016

IN RE: EA, Inc. Vs. White Knuckle Gaming

DEPOSITION OF: Ryan Ferwerda

ENCLOSED PLEASE FIND THE ORIGINAL ERRATA SHEET ALONG WITH A COPY OF THE ABOVE TRANSCRIPT FOR READING AND SIGNING FOR ANY NECESSARY CORRECTIONS.

ALSO NOTE, IF THE CASE SETTLES, YOU MUST STILL COMPLETE READING AND SIGNING OF THE TRANSCRIPT.

PLEASE FORWARD THE ORIGINAL ERRATA SHEET BACK TO OUR OFFICE SO THAT WE MAY SUPPLY COPIES TO ALL PARTIES.

IF YOU SHOULD HAVE ANY QUESTIONS, PLEASE DO NOT HESITATE TO CALL.

SINCERELY,

Trisa Semino

PRODUCTION DEPARTMENT,
COURT REPORTING SPECIALISTS, LLC
707 MABBETTE STREET
KISSIMMEE, FLORIDA 34741
(407) 847-0330

Enclosure

cc: Andrew S. Hansen, Esquire

WORD INDEX

< 1 >
1 3:9, 9, 17 8:9 15:24 20:19 21:13, 16, 18, 20 22:12 28:17, 18 35:12, 13, 18, 22, 23 36:19 37:20 44:4 46:25
1, 35:17
10 3:14, 21 15:25 19:23 20:18 21:19 22:5 26:11 32:11 35:20, 21 38:12, 24 39:19 41:4 42:4 43:14 45:17
10:05 1:14
10:32 27:18
1000 2:3, 8
1028 8:12
11 3:14, 22 36:25, 25 39:4, 21 40:25 41:3 42:2
11:06 40:19
11:15 40:20
11:18 43:2
11:22 28:1
11:24 43:3
11:30 1:14
11:45 47:21
1-15 20:14, 14
12 3:15, 22 37:17 39:6, 18 43:7
13 3:15, 23 39:25
1301 2:3
14 3:16, 23 39:5, 21
15 3:16, 24 21:13, 16, 20
18 34:11 51:15 52:20
1999 4:24 22:13 42:13
1-A 3:9, 10, 10, 11, 11, 12, 12, 13, 13, 14, 14, 15, 15, 16, 16 20:10, 13 21:8, 10, 12, 13, 16 22:12 28:24 30:18 34:14, 15, 21 35:5 36:25, 25 37:17 43:7
1-B 3:17, 17, 18, 18, 19, 19, 20, 20, 21, 21, 22, 22, 23, 23, 24 20:8, 14 21:8, 11, 12, 20 30:18 32:17 33:1, 12, 14 34:16 35:5 37:10 38:12, 24 39:18, 25 43:14 44:1 45:17

< 2 >
2 3:10, 17 7:22 22:25
20 3:9, 10, 10, 11, 11, 12, 12, 13, 13, 14, 14, 15, 15, 16, 16, 17, 17, 18, 18, 19, 19, 20, 20, 21, 21, 22, 22, 23, 23, 24 42:11 48:18
2000 5:19, 22 6:1, 15, 23 7:5, 5 8:20 9:14 10:6, 7, 14, 19, 23 11:21 12:9, 23 15:17, 18 21:21 23:1, 4 24:18, 18 27:5, 10, 24 29:25 37:3 40:3, 14 42:11 46:5, 7
20005 2:4
2002 4:25
2016 1:14 51:10 52:14 53:3
2017 51:15 52:20
202-414-9200 2:4
20839 48:4
22 42:2, 13
26 3:24, 25
29 1:14 39:6
2-A 3:24 26:23 27:2, 16
2-B 3:25 26:24

< 3 >
3 3:10, 18 8:12 23:8 32:8, 8 34:5, 6 35:21 36:12, 20, 20 39:4, 4, 5, 20, 20, 20, 20
31 39:17
310 1:18
32 39:21
32819 1:18
34741 53:18
38 39:4
39 39:3

< 4 >
4 3:3, 11, 18 23:13 40:24
407 53:19
43 3:3
459 28:6
46 39:2
47 3:4
48 3:4
49 39:20

< 5 >
5 3:11, 19 24:13
51 3:5 38:9
52 3:5 39:6, 19
53 3:6 31:16 33:24
5401 1:18
56 32:8 34:6
59 39:20

< 6 >
6 3:12, 19 24:24 25:17 27:24 33:12, 14 34:16 42:1
60 2:8
62 32:8 34:5 39:3
64 31:16 33:25
67 32:8 34:5
69 31:16 33:25

< 7 >
7 3:12, 20 7:23 8:13, 16 9:13 13:22 14:3, 11 15:3, 10 28:23 34:1
707 53:18
71 38:21 39:2
72 31:16 33:24
75 39:21
76 38:10
77 39:2, 7
79 39:3

< 8 >
8 3:9, 13, 20 10:17 11:21 15:15 29:16 31:4 32:6 34:8 36:11 53:3
8,540,575 1:11
80 31:16 39:19
801-917-6152 2:9
81 31:16 33:24 39:21
82 39:19
83 33:24 39:2, 19, 20
84111 2:9
844836 51:15 52:20
847-0330 53:19
86 31:16 32:8 33:24 34:5
89 38:22
8th 51:9 52:14

< 9 >
9 3:13, 21 31:20, 21 34:11, 11, 15 37:10 39:7, 7, 19, 21
90 34:11, 12
99 42:2 44:5

< A >
a.m 1:14, 14 28:1 40:19, 20 43:2, 3 47:21
abbreviations 31:5
ability 18:5
able 13:11, 16
absolutely 30:9
ACC 31:15 33:24 39:2, 19
access 9:12, 20 10:3, 15 11:3 12:16 13:5, 11, 16 15:13, 20 20:4
accesses 14:17
accessibility 8:23
accessible 15:14
accessing 13:13
accurate 48:12
accurately 31:13
ACTION 52:12, 13
active 14:8
address 17:6
admitting 35:6
advance 23:9
affect 45:5, 9
affiliate 19:2
AGI 31:5, 15 33:24 39:2, 19
agility 45:18
ago 6:6 7:8 46:13
agree 14:10 16:11, 14, 20 25:1 29:3, 8 30:14 31:9
agreed 30:17 47:23
ahead 38:25 41:12
align 46:21
allegedly 9:14 37:11, 20 38:13 40:14 41:7
allows 29:8
ANDREW 2:7 4:5 53:22
answer 41:12
answering 44:15
anymore 11:19
APPEAL 1:2
appear 23:3 27:4
APPEARANCES 2:1
APPEARED 51:7
appears 17:23 40:2, 6 42:11
apply 32:21
Arcade 23:13
Archive 11:25 12:3
Archive.com 12:10 13:12, 13 14:11, 12, 18 16:22 17:6
Archive.org 8:24 9:6, 8, 9, 22, 24 10:2, 25 13:24 14:9, 20 15:13, 21
archived 15:10
area 12:4
ARTS 1:4 4:9, 10, 23 5:2 6:20 17:15 18:15, 17, 22, 24 19:5, 12, 13, 16, 18 22:21
asked 44:24

asking 14:15 15:8 17:1 44:21
Assignment 48:4
associated 41:3, 22
assuming 35:7
assumption 35:3 36:17, 23 44:6
Attorney 2:4, 9 52:10
ATTORNEYS 52:11
attributes 31:11 44:7, 8 45:10, 13
AUTHORITY 51:6
AUTHORIZED 52:5
availability 18:1
available 8:21 10:19, 22, 24 11:11, 15, 23, 24, 25 13:10, 15, 21, 22 15:16 17:22 18:5 20:2 31:18 41:7, 10 42:12, 14, 15
aware 14:2 19:22
AWR 31:15 33:25 39:3, 19

< B >
back 10:24 12:6, 14 13:2 14:24 15:1 16:8 19:21 34:20 40:21 46:8 53:12
background 4:16
backwards 16:10
bar 23:9 31:22
based 25:15 35:3 44:8 45:11, 12, 19 46:18 47:4
Basically 5:5 26:20
beginning 34:8
begins 16:2 34:15, 16
believe 13:21, 24 18:24 38:2 43:11 44:2, 5
better 37:25
beyond 41:13
bio-location 17:5
bio-structures 5:16
BOARD 1:2
bottom 8:2 23:9, 24 25:18 42:13
Bowl 35:5 36:20, 21, 21 37:11 38:14 40:14 43:18 44:3, 4, 5, 9, 10 46:12, 17
branded 19:12
break 40:17, 19 42:23 43:2
BTK 32:7 34:3, 6 39:5, 20
business 47:15

< C >
cadence 46:23
call 47:8 53:15
Caption 48:5
captioned 48:11
CAR 32:6, 8 34:2, 5 39:4, 20
career 4:25
Case 1:10 18:9 35:8 45:16 48:5 53:10
categories 31:10
cc 53:22
certain 44:7
Certificate 3:5 51:1 52:1
Certification 3:5
CERTIFY 51:6 52:5, 9
cetera 5:13 31:6, 12 45:13
chance 44:16
change 44:7 49:2, 5, 8, 11, 14, 17, 20 50:2, 5, 8, 11, 14, 17, 20
change: 49:4, 7, 10, 13, 16, 19, 22 50:4, 7, 10, 13, 16, 19, 22
changed 43:22, 24 44:8 45:2, 5
changes 48:13, 15
characters 45:25
checked 11:13
City 2:9
clarify 23:18 25:13 33:5 39:9 44:5 45:7
clear 44:17 46:5
collection 19:11, 14
colon 16:2
color 37:24
come 18:21 46:22
comment 17:20
Commission 51:14 52:20
compare 34:13
compared 32:5
COMPLETE 53:11
complies 28:25 32:18 37:18 40:1 43:8, 15
computer 4:22 5:7
concluded 47:20
confirm 22:2 39:1
confirming 39:9, 12
CONNECTED 52:12
consumer 6:3 7:6 10:14 12:15 24:21 44:7 46:8, 10
consumers 15:20
contained 10:7
contains 20:21
content 5:3
context 34:25
continue 10:18 13:20 15:16
continued 40:20 43:3
continuing 34:2 39:6
contribute 45:20
control 17:25 19:23 45:14
controls 11:14, 18
COPIES 53:13
copy 20:9, 12 47:17 53:8
copyright 22:13
cornerback 38:3
correct 6:16, 17, 21 7:1 8:8 9:2, 5, 17 10:23 14:12 16:4, 22 17:6, 7 20:22, 23 21:3, 4, 6, 7 22:14, 15, 18 25:17, 20, 23 28:1, 4, 8 30:17 31:17 32:1, 2, 9, 10, 14, 15, 22, 23 33:9, 15, 16, 17, 18, 20, 21 35:2, 16 36:22 37:4, 5, 8, 9, 15, 16, 22 38:7, 8, 10, 11, 22, 23 39:7, 12, 14, 22, 23 40:4, 5, 6, 7, 11, 12 41:7, 8, 24, 25 42:7, 8 43:11, 12, 19
corrections 48:13 53:9
correspond 36:9 41:6
corresponding 42:3
corresponds 42:3
counsel 47:24 52:10, 12
COUNTY 51:5 52:3, 15
couple 40:22
Court 1:14, 20 3:5 7:10, 15 15:1 47:9, 12, 15, 19 51:13 53:17
created 6:20, 23
creates 20:6
creating 7:2
creation 41:23 42:6
creative 5:12
Cross-Examination 3:3 43:4 44:13, 19, 21 45:24
CTH 31:15 33:25 39:3, 20
current 25:18
custodian 7:17
cutting 7:11

< D >
D.C 2:4
dash 22:12 36:25
DAT 6:14, 14 20:21, 25 21:1, 5, 18, 21, 22, 24 26:10 28:12 33:2, 3 35:3
data 26:2 36:14
DATE 1:14 28:10, 11 41:6, 10, 13, 19, 20, 20, 22, 22 53:3
DATE: 49:24 50:24
DATED 52:14
dates 41:3, 6, 15 42:1, 3, 10, 17
David 2:13 4:7
day 5:6 48:17 51:9 52:14
days 47:15
December 42:2, 13 51:10 52:14 53:3
decide 11:4
decision 47:4
decisions 5:13
Declaration 3:9 7:22, 25 8:22 9:21 10:17, 22 13:18, 19 14:7 18:8 20:17 24:20 35:20 36:12 40:24 48:8
declare 48:9
degree 4:18, 20
delineation 35:14
DEPARTMENT 53:17
deposit 18:24
DEPOSITION 1:13 17:19 18:7 22:8 35:8 47:20, 24, 25 48:1, 10, 14 49:1 50:1 52:6 53:5
describe 5:1 20:10
determines 26:1
differences 34:18
different 11:9 18:12 35:13 44:1, 10
differentiate 45:11
differently 45:10, 15 46:1
difficult 23:8
Direct 3:3 4:13 18:23 22:8
directly 18:24
discuss 22:1
document 27:8, 9 34:25
domain 17:10, 17 18:4 19:16, 18
DONOVAN 2:2 3:3 4:8, 8 5:21 7:20, 24 8:3, 6 9:10, 18 10:4, 8 11:5, 16 12:1, 11 13:6,

17 14:13, 19 15:5 16:13, 23 17:8, 12, 18 18:3 19:3, 6, 24 20:9 21:10, 14 22:6, 16, 22 23:5, 10 24:4, 11, 14, 19 25:3, 9, 21 26:3, 15, 17 27:6, 12, 22 28:2, 7, 14 29:5, 12, 21 30:1, 8, 13, 20 32:19, 24 34:4, 10, 22 35:9 36:4, 16 39:8 42:22 43:1, 5, 9, 13, 16, 20 44:14, 20 45:3, 4 46:2 47:6, 11, 17 53:2
Dorsett 38:7, 9, 19, 21, 25 45:16
Dorsett's 43:21
downloaded 10:15 12:23 28:12 46:4
downloads 8:21 9:12, 14
duly 4:3 51:8

< E >
EA 3:9, 15 7:18 8:12 9:1 11:1 12:20 13:14, 14 16:8, 12, 17 17:10 18:17, 21 19:1, 9, 10, 11, 13 22:13, 21 24:7 46:15 48:5 53:4
ea.com 16:2 17:11, 17, 23 19:16
EA-1028 8:7
EA's 11:24 12:10
eaSports 16:3
EASports.com 14:2 19:19
East 2:3, 8
EASuperBowl 33:4
EASuperBowl.zip 21:3, 23
editing 25:8
EE 51:15 52:20
eight 36:14
either 18:7 38:5
ELECTRONIC 1:4 4:9, 10, 23 5:2 6:20 17:15 18:15, 17, 22, 24 19:5, 12, 16, 18 22:21
Electronics 19:13
EMPLOYEE 52:9, 11
employer 18:14
ENCLOSED 53:7
Enclosure 53:21
ends 20:18 21:3, 23 28:13 32:14 35:22
enter 25:2
entire 18:25 19:21 30:17 48:10
entirely 14:14 15:6 16:25
Errata 3:4 48:1, 14 49:1 50:1 53:7, 12
Esquire 2:2, 7 53:2, 22
et 5:13 31:6, 12 45:13
evidence 33:10
evidenced 17:5
exactly 15:7
Examination 3:3 4:13
exceeding 45:23
exceeds 44:12, 18, 18, 20
excuse 13:3
Exhibit 3:9, 9, 10, 10, 11, 11, 12, 12, 13, 13, 14, 14, 15, 15, 16, 16, 17, 17, 18, 18, 19, 19, 20, 20, 21, 21, 22, 22, 23, 23, 24, 24, 25 7:24 8:6, 9, 12 13:7 20:8 21:13 22:12 23:14 27:2 28:24 32:17 34:14, 21 36:25 37:10, 17 38:12, 24 39:13, 18, 25
Exhibition 23:19
EXHIBITS 3:8 20:13 21:8, 20 22:7 26:23 30:18
exists 12:25
expect 30:4
experience 4:22 45:11 46:3, 18
expert 5:17 9:9 12:6 16:8 20:5
Expires 51:14 52:20
explain 9:7, 23 18:16 19:9 44:20
explanation 16:16
extent 34:24

< F >
fact 35:24
familiar 5:18 6:10 7:18 22:21 24:2, 17, 21 28:10
February 51:15 52:20
FERWERDA 1:13 3:9 4:2, 10 8:9 20:13 26:23 43:6 45:5 48:21 49:25 50:25 53:5
field 45:15, 21
fifth 36:12
Figure 31:20, 21
file 6:15, 15 10:15 16:7, 11 17:3, 23, 25 19:23 20:5, 6, 21, 21, 25, 25 21:1, 1, 2, 5, 5, 6, 18, 22 22:4 26:1, 5, 6, 10, 12, 13, 20 27:11, 13 28:11, 11, 12 33:2, 3, 3, 3 36:9, 12 41:6, 9, 21, 23
files 6:14 7:19 9:15, 20 10:3, 6, 18, 22 11:11, 14 12:9, 16, 23 13:2, 3, 20 15:16, 23, 23 17:21 20:17 21:23, 25 27:4, 5, 17 35:3, 19, 25 41:10, 16 42:3, 5, 6, 10
file's 33:7
FINANCIALLY 52:12
FIND 53:7
finished 7:12 26:15
first 4:3 17:3 20:18 23:1 33:6
firsthand 42:5
five-minute 40:16 42:23
Florida 1:18, 21 51:4 52:2, 15, 19 53:18
folder 27:17, 18, 19
follow 16:9
following 39:1
follows 4:4
FOREGOING 52:6, 6
forgot 35:24
form 5:21 7:20 9:10, 18 10:4, 9 11:5 12:1, 11 14:13, 19 15:5 16:23 19:3, 6 22:16 26:4, 17 27:22 28:15 29:12 34:4 36:16 39:8
FORWARD 53:12
four 23:24
fourth 21:2
Franchise 23:14 46:6
free 44:1
front 13:7 35:1
FS 38:15
ftp 16:2, 2 17:5 41:17, 18, 23
ftpEA.com 28:13
FTPs 15:22
further 42:21 47:6 52:9
future 47:3

< G >
game 5:19, 25 6:1, 4, 8, 11, 16, 24 7:5 10:6, 7 21:9, 17, 21, 24 22:3 23:1, 4 24:18 25:2, 25 26:7, 12, 14 27:5, 11 29:11, 25 30:16, 23 31:4, 10 33:2 37:2, 7, 11, 19 38:13 40:3 43:10 45:6, 7, 8 46:1 47:1, 1
Games 4:7 5:5 19:11, 14 25:12 47:3
GAMING 1:7 2:13 4:6 48:5 53:4
general 5:15 8:25 46:14
Generally 5:12 46:22, 24
GERARD 2:2 4:8 53:2
giant 18:20
give 47:18
given 34:25 52:7
glasses 23:19, 20
go 5:6 9:24 12:2, 15 20:7 31:20 32:11 34:20 38:24 40:21 41:12
goal 14:21
going 9:21 10:24 33:7 38:24 39:16 47:3, 9
good 31:3
gotcha 7:14
graphic 24:7
graphics 23:25
Great 31:20
grounds 30:19
guess 10:12

< H >
halfway 27:14
hand 51:9
handed 8:6
handle 5:5
hands-on 5:14
HANSEN 2:7 3:3 4:5, 5, 12, 14 5:24 7:9, 16, 21, 25 8:8, 10, 11 9:11, 19 10:5, 11 11:10, 20 12:8, 17 13:9, 25 14:1, 16, 23 15:2, 9 16:19 17:2, 9, 13, 14, 20 18:11, 13 19:4, 8 20:1, 7, 10, 15, 16 21:12, 16 22:10, 11, 19, 24 23:7, 11, 12, 17, 20, 22, 23 24:6, 12, 15, 16, 23 25:6, 17, 24 26:8, 9, 16, 22, 25 27:1, 10, 13, 15, 25 28:5,

9, 18, 23 29:1, 7, 15, 23 30:3, 10, 17, 21 32:23, 25 33:9, 11 34:7, 13, 17, 20 35:2, 11, 15, 20 36:1, 7, 18 39:12, 15 40:13, 18, 21, 23 42:19, 25 43:12, 19 44:12, 15, 24 45:22 47:7, 14, 16 53:22
happen 35:7 38:1 47:3
happened 35:7
happening 25:16 28:22
help 5:13
hereof 48:14
HESITATE 53:15
highlighted 24:13
historic 25:11, 15
historical 14:21 15:3, 4
hosted 12:10 15:23
hosting 12:4
hosts 20:5
house 41:16
http: 12:19
hub 25:4
Huh-uh 4:21

< I >
identical 42:10
identification 8:10 20:15 26:24
identify 6:12
IMP 39:6, 21
important 35:14
improvement 44:4
inaudible 41:17 46:23
include 25:8
includes 27:13 30:12 33:1
including 36:21
INDEX 3:2
indicate 32:13
indicated 48:13
indicating 21:14
individual 29:9
Info 25:7
Information 24:24
ING 32:14 34:9, 12
INJ 39:7, 21
INP 34:11
Instance 1:14 15:24 32:6 36:11 42:11
intent 31:12
INTERESTED 52:13
internet 12:5 14:6, 22
interrupt 10:8 32:19
interrupting 30:14
IPR2016-00634 1:10
is, 25:19
issues 18:8
items 23:24
its 17:5, 16 23:1

< J >
January 27:24 42:1, 11
job 11:9
jog 46:9
Jones 2:13 4:7, 7

< K >
KAC 32:7 34:6 39:20
keep 30:14
key 35:10
Kicker 40:8, 9, 11
kilobytes 28:6
Kirkman 1:18
KISSIMMEE 53:18
know 5:25 8:24 10:21 11:11, 14, 18 12:6, 9, 15 13:2 15:7, 17 18:8 19:20 20:3 25:25 27:9 29:24 34:23 36:2, 5 38:1, 5 41:15 42:15, 18, 19
knowledge 8:20 41:9 42:6 46:14, 15
knowledgeable 8:17 12:18, 25
KNUCKLE 1:7 2:13 4:5, 7 35:4 43:10, 17 48:5 53:4
Kordell 30:25 31:1 32:7 33:19, 23 34:3, 9, 14 37:6, 14
KPW 32:7 34:5 39:5, 20

< L >
Lake 2:9
Large 1:21
LCB 37:21, 25 38:1, 7
leadership 5:13
leave 11:4
left 11:2 38:2
line 30:15, 18 49:2, 5, 8, 11, 14, 17, 20 50:2, 5, 8, 11, 14, 17, 20
link 14:8
links 11:2, 22
list 15:22 27:4, 16 30:11 35:25
listed 37:7
listing 41:16
live 5:3, 4, 5
LLC 1:7 53:17
LLP 2:2
load 26:1, 20
loaded 6:7 25:19
loading 23:2
logical 16:15
logo 22:13 24:7
logos 22:20, 20
long 6:6 7:8 28:19 46:13
look 6:11 14:4, 5 15:22 16:9, 14, 15 18:23 22:20 41:18 43:21
looked 42:17
looking 33:6 45:16, 17
looks 6:1 22:3 24:8
lots 46:22
Lowery 40:10

< M >
MABBETTE 53:18
Madden 3:17 5:4, 19, 22 6:1, 16, 23 7:5 8:20 9:14 10:6, 7, 19, 23 11:21 12:9, 23 15:17, 18 21:21 23:1, 3 24:18 25:12 27:5, 10 29:25 33:1 37:3 40:2, 14 46:3, 6, 7
Madden2000 16:4
main 25:4
maintaining 7:18
maintains 19:22
managed 29:2
managing 25:8
mark 8:1
marked 7:24 8:9 20:14 26:24
matter 48:11
mean 10:8, 14 17:24 18:18 32:3 46:24
mechanic 45:20
memory 46:9
mention 26:11
menu 23:24 24:13, 25 25:1 29:2, 3, 17
menus 23:13, 16
middle 31:22, 25
mind 42:24
mobile 5:4, 4, 5
modified 27:19, 21
move 23:11
moved 31:25 32:12
Moving 39:4

< N >
N.W 2:3
name 19:9
NAMED 51:7
names 31:11
NBA 5:4
NECESSARY 53:9
need 15:12 23:19 44:2, 5
never 27:8
NFL 28:22 29:10, 10 30:6, 6, 23 35:13 36:9, 15 47:1
NFLP 22:13
nope 4:21
Notary 1:20 51:14 52:19
note 35:10 37:6 53:10
Notice 1:14 42:9
November 1:14
Number 3:9, 9, 10, 10, 11, 11, 12, 12, 13, 13, 14, 14, 15, 15, 16, 16, 17, 17, 18, 18, 19, 19, 20, 20, 21, 21, 22, 22, 23, 23, 24, 24, 25 8:9 39:17 52:20
Numbered 20:13 26:23
numbers 31:14, 24 32:4, 7 33:22 34:2, 14, 18 38:25 39:1, 13 43:21 44:22, 25 45:6
Nydegger 2:7

< O >
Oath 3:5 48:16 51:1
Object 5:21 7:20 9:10, 18 10:4, 9 11:5, 5, 6, 16, 16 12:1, 11, 11, 12 13:6 14:13, 19 15:5 16:13, 23, 23 17:8, 12, 18, 19 19:3, 6, 24 22:6, 16, 16, 17 23:10 25:21 26:3, 17, 17, 18 27:6, 6, 22, 22, 23 28:2, 14 29:5, 12, 21 30:15 34:4 36:4, 16 39:8 44:16, 17 45:22
objected 30:19
Objection 24:19 26:3 29:12 34:10 44:12
objections 22:22 23:5, 10, 17 24:4, 11 25:3, 9 28:7, 14 30:1, 8, 13 32:20
Obviously 28:19

47:2
offer 48:15
offhand 46:13
OFFICE 1:1 53:13
official 51:9
Oh 7:14 8:5 20:10, 25 39:18
Okay 5:1, 7, 11, 15, 18, 25 6:4, 10, 14 7:9 8:16 9:1 13:25 15:24 18:11 19:15, 18 22:10, 25 23:22 24:24 26:8, 17, 22 27:12 31:3, 14, 20 34:1, 8, 13, 20 36:13, 19, 24 37:17 38:4, 12 39:24 40:13 41:22 42:19, 25 45:3 47:19
older 25:12
opinion 45:1, 25
opposed 39:10
option 25:11
options 25:8
organization 18:20, 25
ORIGINAL 53:7, 12
Orlando 1:18
outside 11:6, 16 17:12, 18 22:7, 8, 17 24:4, 19 25:21 27:6, 22 28:2
Overall 31:15 38:9, 10, 22, 22
OVR 31:5 33:23, 24 39:2, 19
Owner 1:8, 14 2:9 17:16, 17
Owner's 3:9, 9, 10, 10, 11, 11, 12, 12, 13, 13, 14, 14, 15, 15, 16, 16, 17, 17, 18, 18, 19, 19, 20, 20, 21, 21, 22, 22, 23, 23, 24, 24, 25
ownership 18:3
owns 17:10 19:16, 18

< P >
p.m 27:18
packaged 41:21, 22
PAGE 3:1, 5, 6 7:22 8:12 15:22 22:25 23:1, 8, 13 24:13, 24 25:17 28:23 29:16 31:4 32:6, 11 33:12, 14 34:1, 8, 15, 16 35:20, 21 36:12, 25 37:10, 17 38:12, 24 39:4, 6, 18, 19, 25 40:24 43:7, 14 49:2, 5, 8, 11, 14, 17, 20 50:2, 5, 8, 11, 14, 17, 20
Pages 21:13, 13, 16, 20 44:23
paper 24:8 39:10
Paragraph 7:23 8:13, 16 9:13 10:17 11:21 13:22, 23 14:3, 11 15:3, 10, 15, 25 19:23 20:18 21:19 22:5 26:11 35:21 40:25 41:3, 4 42:2, 4
part 9:21 18:19
participate 7:2 42:4
particular 29:18, 19
Particularly 44:24
PARTIES 52:10, 11 53:13
patches 16:3
PATENT 1:1, 2, 8, 11, 14 2:9 3:9, 9, 10, 10, 11, 11, 12, 12, 13, 13, 14, 14, 15, 15, 16, 16, 17, 17, 18, 18, 19, 19, 20, 20, 21, 21, 22, 22, 23, 23, 24, 24, 25
paycheck 18:21
PBK 34:11 39:6, 21
PC 6:3, 4, 7, 17, 18, 23 7:6 27:10
PENALTY 48:8, 9
perform 45:10 46:1
performance 44:3 45:12 47:5
performs 31:13
PERJURY 48:8, 9
PERSONALLY 51:7
pertinent 14:25
Petitioner 1:5 2:4
picture 24:2, 8
piece 15:12 24:8 39:9
Pittsburgh 30:6
PLACE 1:14
play 45:15
played 6:2, 8 7:4 23:4 45:12
player 30:23 31:13 32:4, 14 39:17 45:6, 10, 11
players 29:9, 24 30:11 31:10 38:7, 18 44:22 45:10
playing 45:6, 18
Playoff 15:24 20:19 21:18 28:16, 18 35:12, 18, 22 36:19, 19, 20 37:20 43:11 44:4 47:1
playoffs 25:15 28:22 44:9 46:11, 16, 25
PlayoffWeek1 28:13
PlayoffWeek1.zip 16:4 21:19
PlayStation 5:23 6:2
PLEASE 53:7, 12, 14
point 18:18
policy 11:1, 2, 3, 8
portion 14:25 25:2
position 11:9 29:19 31:23 37:3, 13, 15, 22 38:15, 19 40:6 43:25 44:7
positions 29:25 44:11 45:12
Practice 23:14
preceding 36:21
predict 47:2
Present 2:13 47:24
Press 23:9
pretty 45:9
probably 37:24
procedures 7:18
proceeding 22:9
proceedings 40:20 43:3
process 39:10
producer 5:4, 9, 11
PRODUCTION 53:17
PROFESSIONAL 52:4
profound 45:9
programmer 5:9
Programming 3:24, 25 4:22 5:8
provide 5:12 14:21
provided 10:2 22:5 35:4
providing 33:9
pub 16:3
Public 1:20 11:3 18:1 51:14
publicly 10:18, 22 11:22, 24, 25 13:10, 21, 22 15:16 17:22 18:5 20:2, 4
Public-State 52:19
pull 31:18
purposes 35:8
Pursuant 1:14
put 6:4, 7 13:7 43:13
putting 42:5

< Q >
quarterback 37:4, 13, 15
quarterbacks 37:7
question 7:12, 21 10:9 15:7 23:11 24:14 44:18, 18 45:22
questioning 30:16, 18 32:20
questions 13:17 18:10 30:15 32:21 40:22 42:21, 22 44:24 47:6, 7 53:14

< R >
Rams 40:3
rating 31:10 32:14 38:9, 10
ratings 31:9, 12, 18 32:5 38:21 45:13
RBK 34:11 39:7, 21
read 14:24 15:1 20:18 23:8 27:20 33:22 34:2 38:25 47:10, 18 48:10, 11
reading 26:5 47:24 53:8, 11
reads 8:16
real 29:9, 10
real-life 30:23
Reason 49:4, 7, 10, 13, 16, 19, 22 50:4, 7, 10, 13, 16, 19, 22
reasons 43:25
recall 4:25 7:7 46:10
receiver 29:19 30:7 33:17
record 8:3 13:19 14:25 25:10 34:23 40:21 44:17 52:7
recreation 12:3
Reed 2:2 4:8
refer 45:14
referred 28:12
referring 13:23 15:18 28:16
refers 9:13 13:24 36:14
reflect 8:4
reframe 15:7
refresher 6:12
regard 46:16
regarding 8:17 12:19 30:18 32:20
REGISTERED 52:4
Regular 47:15
relates 25:14
relating 25:11, 14 46:11
relationship 18:16
relative 31:23 52:9, 11
release 46:20
released 46:15, 16, 25
relevance 11:7, 17 12:12 16:13, 24 17:8, 19 19:24 22:17 25:22

26:18 27:23 28:3 29:5, 21 32:21 36:4
relevancy 18:8 27:7
relevant 17:24 18:4, 6 22:9 24:20
remains 13:22
remember 38:2
repeat 14:23
rephrase 7:21 17:13
REPORT 52:6
Reporter 1:20 7:10, 15 15:1 47:9, 12, 15, 19 51:13 52:1, 4
Reporter's 3:5
Reporting 1:14 53:17
represent 31:13
Representative 24:10
represents 43:10, 17
respectively 20:14 26:24 31:16 35:5
response 10:10 19:7
restate 34:22
returning 36:24
right 4:12 5:3 12:20 13:5 19:22 20:7 21:15 28:17, 23 31:24 32:5, 12, 16 35:9 36:24 38:4 39:16, 16, 24 42:9, 21 43:6 47:8
Road 1:18
Robertson 38:18, 22 39:17
Robertson's 45:19
ROSTDATA, 25:19
ROSTDATA.DAT 27:20
roster 23:25 24:10, 13, 17, 24 25:2, 4, 7, 7, 18, 19 26:1, 2, 12, 13 27:13, 19 29:4, 8, 9 40:11
rosters 25:8 27:17 29:2, 17
row 23:24
RPR 1:18 51:13 52:19
running 21:17, 21 33:2 37:11, 19 38:13, 14 40:14
runs 22:4
RYAN 1:13 4:2, 10, 15 10:12 48:21 49:25 50:25 53:5

< S >
safety 44:1
Salt 2:9
save 41:19, 20 48:12
saw 42:18
says 10:17 11:21 12:18, 22 13:21 15:15 23:9, 18 25:7, 18, 19 27:17, 18, 20 29:4 35:21, 21 36:11
schedule 36:5
scope 11:6, 16 12:12, 14 17:18 22:7, 8, 17 24:5, 19 25:21 26:18 27:6, 23 28:2 29:5, 21 32:20 44:12, 17, 19, 21 45:23
Screen 3:17 22:1 25:18 30:12
screens 33:6
Screenshot 3:10, 10, 11, 11, 12, 12, 13, 13, 14, 14, 15, 16, 16, 17, 18, 18, 19, 19, 20, 20, 21, 21, 22, 22, 23, 23, 24 22:25 29:2, 16 31:4, 21 32:6 33:15 37:2, 12 38:6, 15 40:2
screenshots 21:8, 17, 20 33:1 39:13
seal 51:9
search 9:24 14:6
Season 23:14 25:16 35:14 36:15
seasons 36:9
second 20:11 21:5, 5, 6 23:25 24:7
see 15:21 16:5 18:3 22:12 23:16, 21 27:14, 17 29:20 30:11 31:7, 20, 25 32:11 33:12, 14, 22 34:18 37:24 38:6, 14 40:10 44:3
seen 27:8
select 26:1, 13 29:24
selected 29:18, 18 30:5, 5 33:15, 17 37:3, 4, 13, 21 40:3, 6
selecting 29:8, 17
SEMINO 1:18 51:13 52:4, 19
SEMINOLE 51:5 52:3, 14
send 47:17
sense 45:24
separate 33:10
separately 13:23
series 23:13
server 7:19 12:22 16:12 42:5
servers 11:24 12:10
services 5:5
set 21:12
SETTLES 53:10
seven 35:25 36:3
Sheet 3:4, 24, 25 45:17 48:1, 14 49:1 50:1 53:7, 12
shots 22:1
show 37:14
showing 25:1 32:4, 13
shown 30:12 31:15 39:13, 17
shows 23:13 24:13, 24 29:2, 3 31:5, 23 32:6, 13 33:15, 19 37:12, 21 38:6, 15, 16, 18 40:10
sic 14:11, 12, 18 16:22 17:6 23:14 32:14
side 32:4 43:14, 14
SIGNATURE: 49:24 50:24
signed 10:21 14:7 48:17
signing 8:21 47:25 53:9, 11
similarly 36:19
simulates 29:10 30:23
SINCERELY 53:16
site 10:15 12:4, 16, 25 15:19 17:6 41:18, 23
site's 14:21
Situation 23:15
size 28:11, 11
slash 16:2, 2, 3, 3, 3, 3, 4
slid 32:3
slider 31:19, 22, 23
slider's 32:12
SLIP 53:1
Smith 2:2 4:8
snapshot 15:21
snapshots 9:25 14:21
somebody 47:4
somewhat 23:8
sorry 7:10, 14 10:8 17:13 19:6 20:25 21:10 39:18 44:14, 15
sort 45:20
sounds 38:4
South 1:18 2:8
space 23:9
SPD 31:5 33:24 39:2, 19
speak 5:17 8:23
speaking 5:12 46:22, 24
Specialists 1:14 53:17
specific 45:14
speed 45:17
SPG 31:15
Sports 3:9, 15 9:1 11:1 12:20 13:14, 14 19:9, 10, 11, 13 22:13, 21 24:7
stands 30:7 38:1
start 4:15
started 4:23 44:15
starting 32:8 33:23 39:18, 18 42:1
State 1:21 25:10 51:4 52:2
STATES 1:1 13:19
Steelers 29:18 30:4, 6, 6 33:15 37:3, 12
Stenographic 1:20
STENOGRAPHICALLY 52:5
Stewart 30:12, 22, 24, 25 31:1, 14 32:7 33:19, 23 34:3, 9, 14 37:6, 14
stipulated 47:23
STIPULATION 47:22
Stipulations 3:4
storage 41:23 42:6
store 9:8 26:11
stored 9:4, 14 16:7, 11 17:22, 23
STR 31:5, 15 33:24 39:2, 19
Street 2:3 53:18
structure 16:9
studio 18:19, 25
stuff 5:14 12:7 16:17 26:21
subsidiaries 17:16
suggest 16:21
Suite 2:3, 8
Super 35:5 36:20, 21, 21 37:11 38:14 40:14 43:18 44:3, 4, 5, 9, 10 46:12, 17
supplied 6:14
SUPPLY 53:13
sure 14:14 16:25 35:11 40:18
sworn 4:3 51:8

< T >
TAK 34:8, 11 39:6, 21

take 7:12 11:4 26:10 40:16 42:23
TAKEN 1:14 11:2 40:19 41:14, 15 43:2 48:10
talking 35:17, 23
team 5:13 25:11 29:10, 18 30:6, 7 33:15 36:6 40:3
teams 25:15 29:24 44:9
technical 5:14
tell 4:3 41:20
tells 26:6
Temple 2:8
temporarily 4:24
ten 47:15
testified 4:4
testify 18:5
testifying 13:9, 15 17:21 18:1 35:6
testimony 11:6 12:18 22:8 34:24 52:7
text 6:15
THA 32:7 34:5 39:20
Thank 7:15 30:20 32:24 43:1 47:8, 19
thing 33:5 39:17
things 45:14 46:22
think 6:12 18:6 35:14 37:24
thinks 45:1
Thought 42:19
THP 32:7 34:5 39:4, 20
THR 39:4
Tiburon 4:11 18:17, 21 19:1
TIME 1:14 6:6 7:8, 13 15:14 27:18 28:10, 11, 19, 21 42:12, 14, 16 46:13
times 35:13
timing 46:11, 19
Titans 37:21 38:15 44:2
to: 49:2, 5, 8, 11, 14, 17, 20 50:2, 5, 8, 11, 14, 17, 20
today 27:18
topic 18:7
Tournament 23:14
Tower 2:3
trade 5:10
TRADEMARK 1:1
transcribed 47:13
Transcript 3:6 47:10 48:10 52:7 53:1, 8, 11
Transmittal 3:6 53:1
TRIAL 1:2
TRINA 1:18 51:13 52:4, 19
true 16:20 48:12 52:7
truth 4:3, 4, 4
try 13:4, 4 46:20
trying 10:12 13:11 38:2
turn 7:22 27:2 28:23 32:16 34:1 37:10, 17 38:12 39:25 40:24 43:6
turning 29:16
two 15:19 20:17 21:24 42:11, 13 43:25
two-thirds 27:16
txt 20:25 21:1, 6 26:5
typically 46:19, 20

< U >
Uh-huh 4:17 6:9, 25 8:15, 19 9:16 10:20 12:21 16:1 17:4 20:20 24:3, 9 31:2 41:2
Um 5:17 6:12 41:11
umbrella 19:12
unable 33:6
unaware 11:8
UNDERSIGNED 51:6
understand 12:14 13:11 16:17 25:10
Understandable 7:9
understanding 5:7, 15 12:2 17:10, 15 19:1, 15, 17, 20 22:3 24:22 25:13 26:13, 19 28:21 29:14 30:5, 22 36:8 43:9, 16 48:15
UNITED 1:1
update 7:19 12:9 24:1 28:12 31:16 35:3 36:5 37:12, 20 38:14 39:11 40:15 43:11, 18 46:20 47:4
updated 21:18, 22, 24 22:4 26:21 28:20 33:2, 7 34:23
updates 6:15, 20 7:2, 4, 7 9:4, 8 10:7, 13, 19, 23 11:22 12:23 15:17, 18 22:2 25:14 42:12, 14 46:4, 11, 14, 15
updating 24:17 25:15
URL 8:18 9:3, 5, 12, 13, 15 13:12 14:8, 10, 11, 12, 17, 17 15:3, 4, 10, 10, 20, 25 16:9, 15, 21 41:4
URLs 9:24 10:2 22:4
use 7:4 26:7, 20
Utah 2:9

< V >
various 10:18 12:22 13:20 15:15 31:5
verification 9:6
verified 14:9
verify 15:12, 20 16:16 33:6 44:2
video 5:19 6:11, 16, 23 7:5 10:6, 7 21:9, 17, 21, 24 23:1, 4 24:18 25:2, 25 26:12, 14 27:5, 11 29:10, 25 31:4, 10 33:2 37:2, 7, 11, 19 38:13 40:3 46:1
view 15:13 29:4, 9, 17
viewing 25:2, 8
vs 1:6 48:5 53:4

< W >
waived 47:25
Walker 38:7, 10
want 8:3 13:4, 7, 18 25:10, 12 33:5 34:22 39:8 44:16 45:14
wants 26:7
Washington 2:4
watch 47:3
way 18:12 27:16 32:12 46:8
website 8:17, 21, 25 9:1, 4, 25 10:19, 23 11:12, 22, 25 12:19, 20, 24 13:5, 10, 12, 13, 14, 22 14:3, 8 15:4, 11, 17, 18 16:22 17:17, 23 18:2 28:13
website, 15:17
Week 15:24 20:19 21:18 28:12, 16, 18 35:4, 12, 13, 17, 18, 22, 22, 24, 25 36:2, 2, 11, 14, 19, 20, 20 37:20 43:11 44:4 46:20, 25, 25, 25 47:5
Week1.zip 35:22
weekly 46:23
weeks 36:8, 9, 20
Well 13:9 15:19 38:19
went 39:11
We're 18:18, 18, 19, 24 32:4 35:7, 17, 23
We've 27:8 32:3
WHITE 1:7 2:13 4:5, 7 35:4 43:10, 17 48:5 53:4
wide 29:19 30:7 33:17
WITNESS 4:10 5:22 7:14 8:2, 5 10:10 11:8, 18 12:2, 13 14:14, 20 15:6 16:14, 25 19:7, 25 22:18, 23 23:6, 18, 21 24:21 25:4, 23 26:5, 19 27:24 28:4, 8, 16, 19, 25, 25 29:6, 13, 22 30:2, 9 32:18 34:5, 11 35:10, 12 36:5, 17 37:18 39:14 40:1, 16 43:8, 15, 15 51:7, 9 52:8
words 21:24 25:7
work 46:18
worked 4:23 5:22 12:15
Workman 2:7
works 9:7 13:14 16:18 24:22
worse 45:18
WR 30:5, 7
wrap 47:8
www.EASports.com 12:19

< Y >
Yeah 4:23 5:3, 20 6:6, 13 9:3 12:5 19:11 21:16 23:18, 19, 20 24:15 25:4 26:16 27:10 31:11, 12, 17 35:19 41:20 42:18 46:8 47:2, 14, 16
year 44:3
Yep 6:19 8:15

< Z >
zip 6:14 9:15 10:3, 6, 15, 18, 22 11:11 12:23 13:20 15:16, 23 17:3 19:23 20:17, 21 21:2, 5, 23 33:3, 3 36:9, 12
zips 26:6

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.

9. I have reviewed the document attached in Exhibit A to the Christopher Butler Declaration, and as Exhibit EA-1015 to the David Crane Declaration, and understand and believe that it depicts the web page of the Madden 2000 Updates website as it existed on March 2, 2000.

10. I can confirm that each of the various links on the Madden 2000 Updates web page depicted in Exhibit EA-1015 to the David Crane Declaration are assigned to a respective Uniform Resource Locator (URL) address on the server from where the respective zip file may be downloaded to a user's computer over the Internet. The respective URL addresses on the server include the following:

- ftp://ftp.ea.com/pub/easports/patches/madden2000/PlayoffWeek1.zip
- ftp://ftp.ea.com/pub/easports/patches/madden2000/PlayoffWeek2.zip
- ftp://ftp.ea.com/pub/easports/patches/madden2000/PlayoffWeek3.zip
- ftp://ftp.ea.com/pub/easports/patches/madden2000/EASuperBowl.zip
- ftp://ftp.ea.com/pub/easports/patches/madden2000/EAWeek8.zip
- ftp://ftp.ea.com/pub/easports/patches/madden2000/EAWeek9.zip
- ftp://ftp.ea.com/pub/easports/patches/madden2000/EAWeek10.zip
- ftp://ftp.ea.com/pub/easports/patches/madden2000/EAWeek11.zip
- ftp://ftp.ea.com/pub/easports/patches/madden2000/EAWeek12.zip
- ftp://ftp.ea.com/pub/easports/patches/madden2000/EAWeek13.zip
- ftp://ftp.ea.com/pub/easports/patches/madden2000/EAWeek14.zip

- ftp://ftp.ea.com/pub/easports/patches/madden2000/EAWeek15.zip
- ftp://ftp.ea.com/pub/easports/patches/madden2000/EAWeek16.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

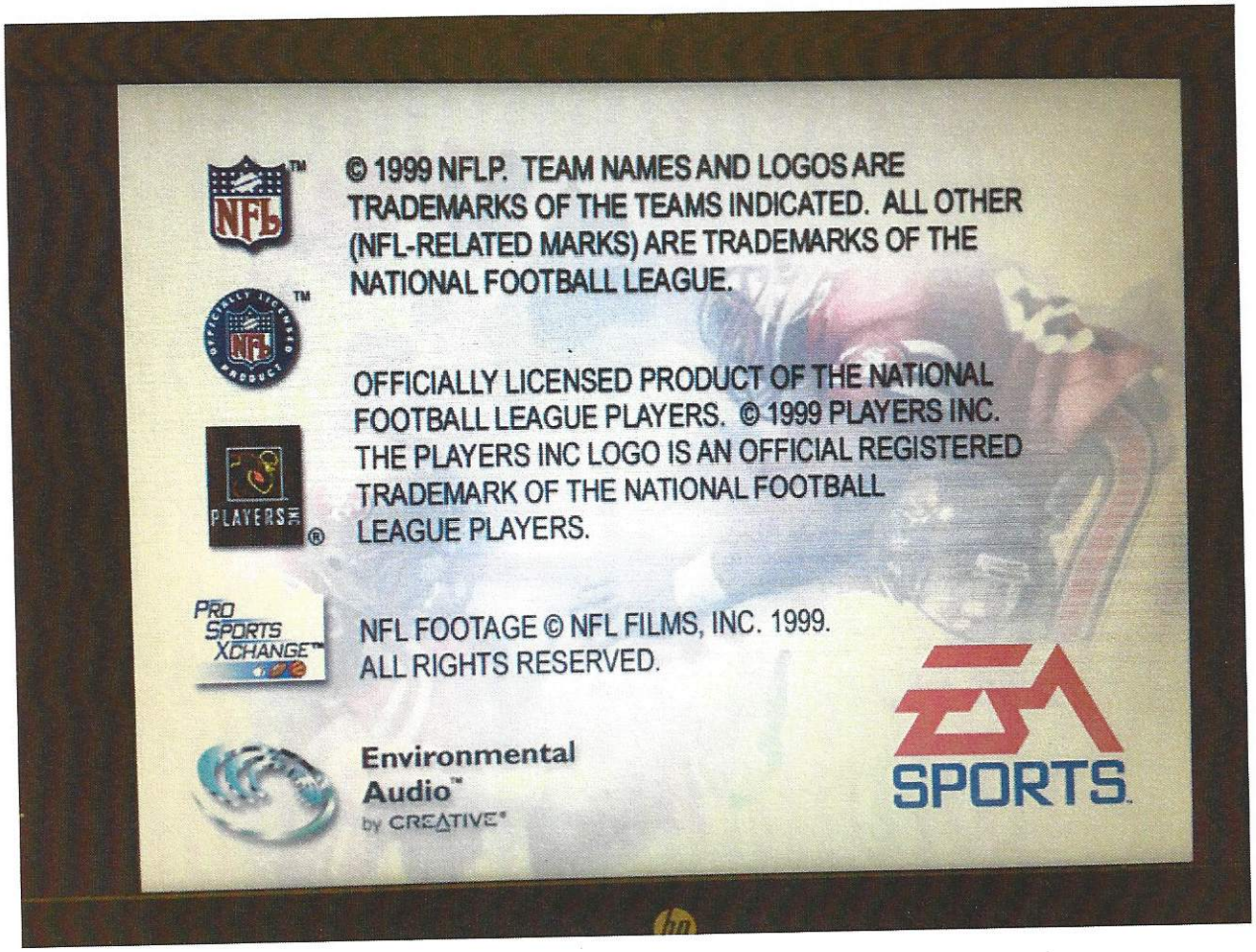
12. I declare that all statements made herein on my own knowledge are true and that all statements made on information and belief are believed to be

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

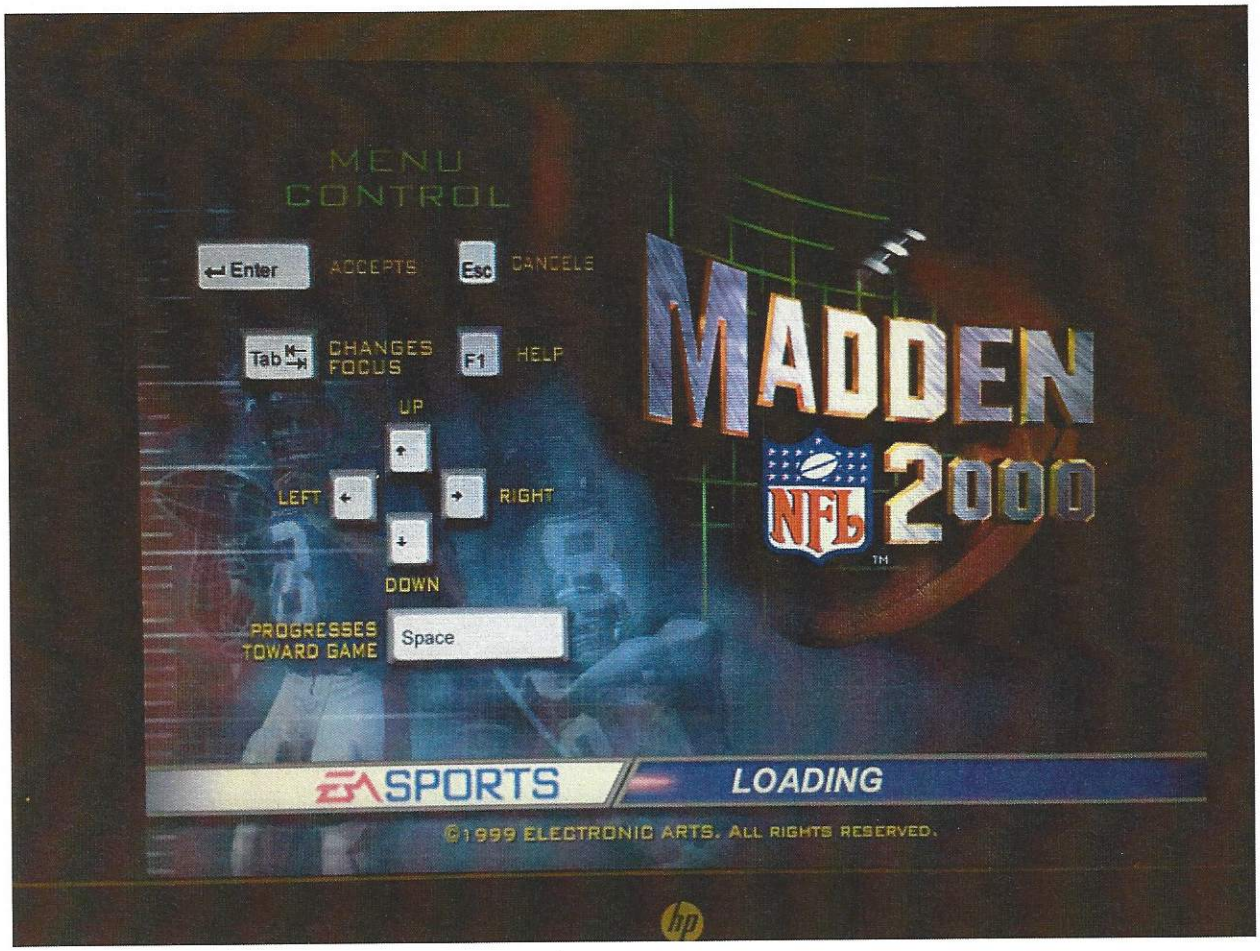
RYAN FERWERDA
PRODUCER

DM2\5909473.4

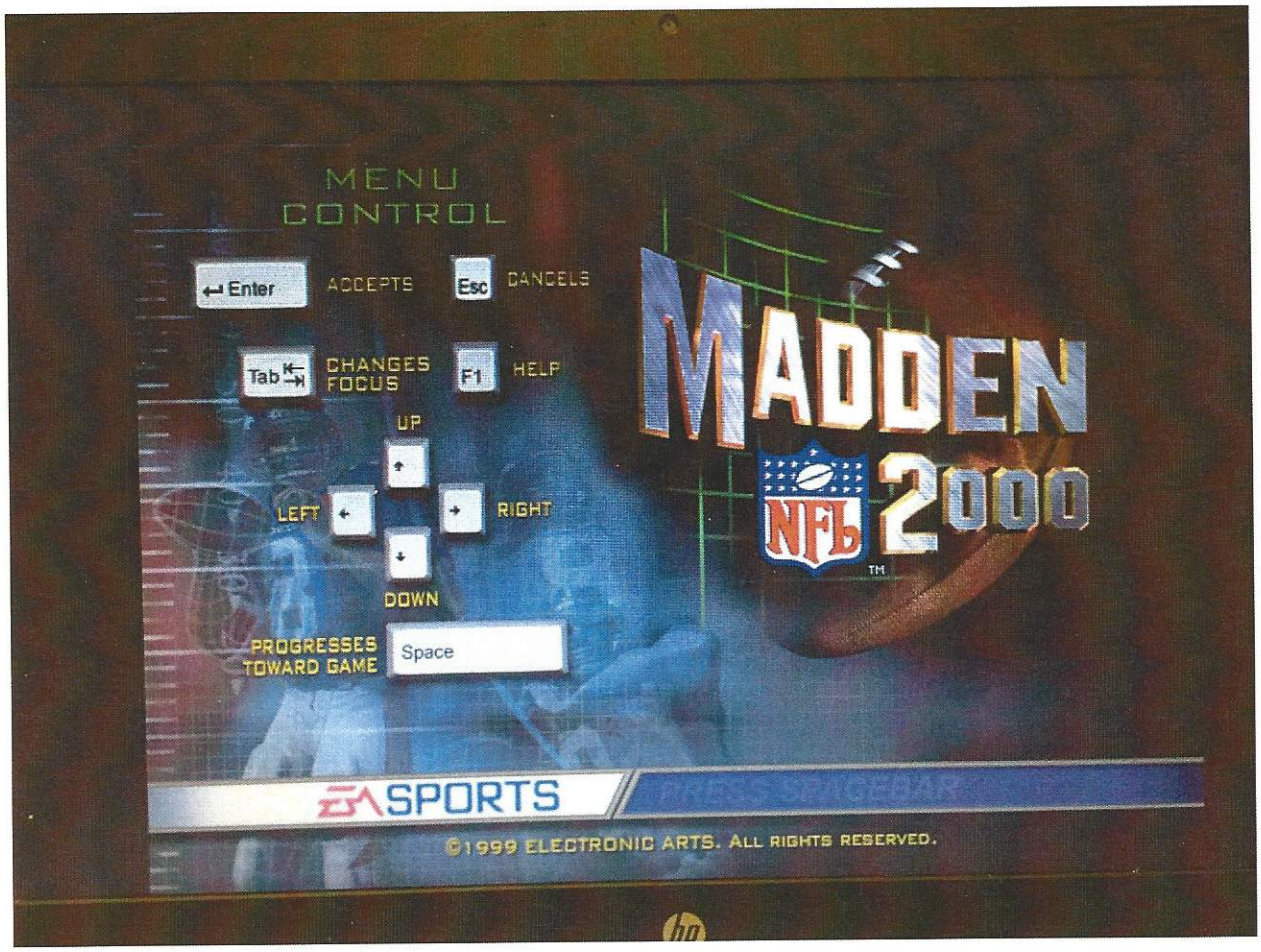


1A - 1

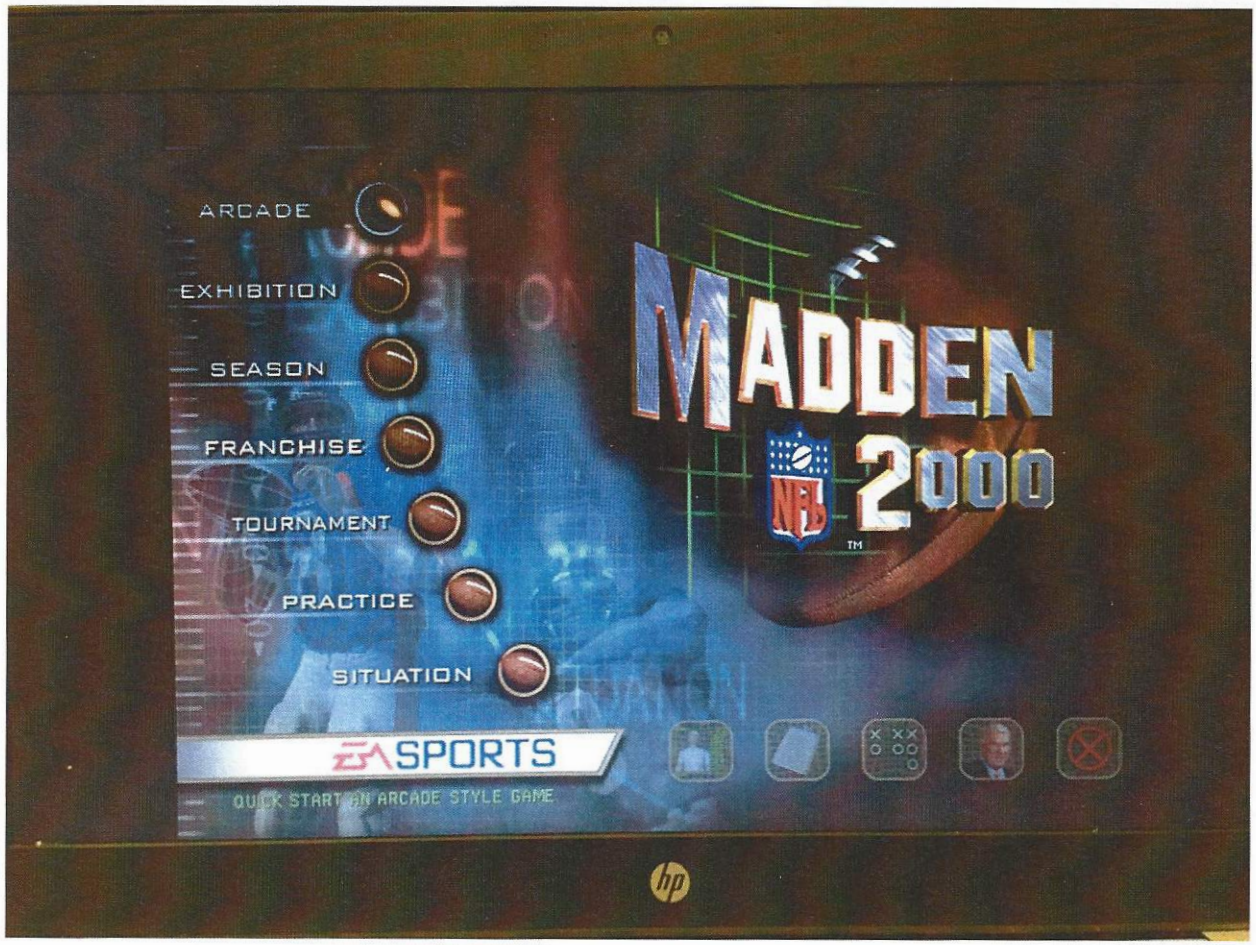
EXHIBIT 1-A
Deponent Ferwerda
Date 11-29-16 Rptr. TS
WWW.DEPOBOOK.COM


MENU CONTROL
Enter
ACCEPTS
Esc
CANCELE
Tab
CHANGES FOCUS
F1
HELP
UP
LEFT
RIGHT
DOWN
PROGRESSES TOWARD GAME
Space
MADDEN
NFL 2000
EA SPORTS
LOADING
©1999 ELECTRONIC ARTS. ALL RIGHTS RESERVED.

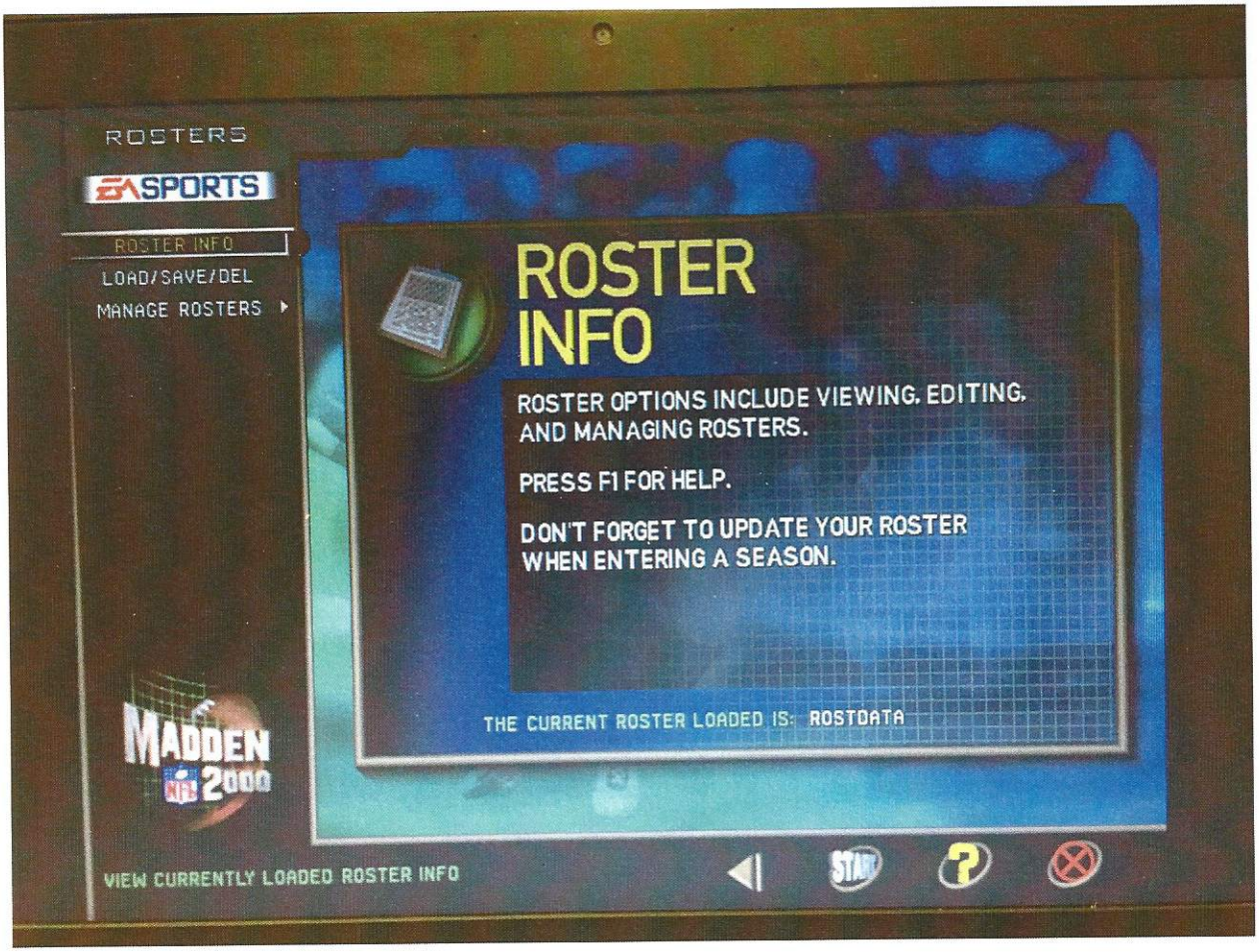
1A-2

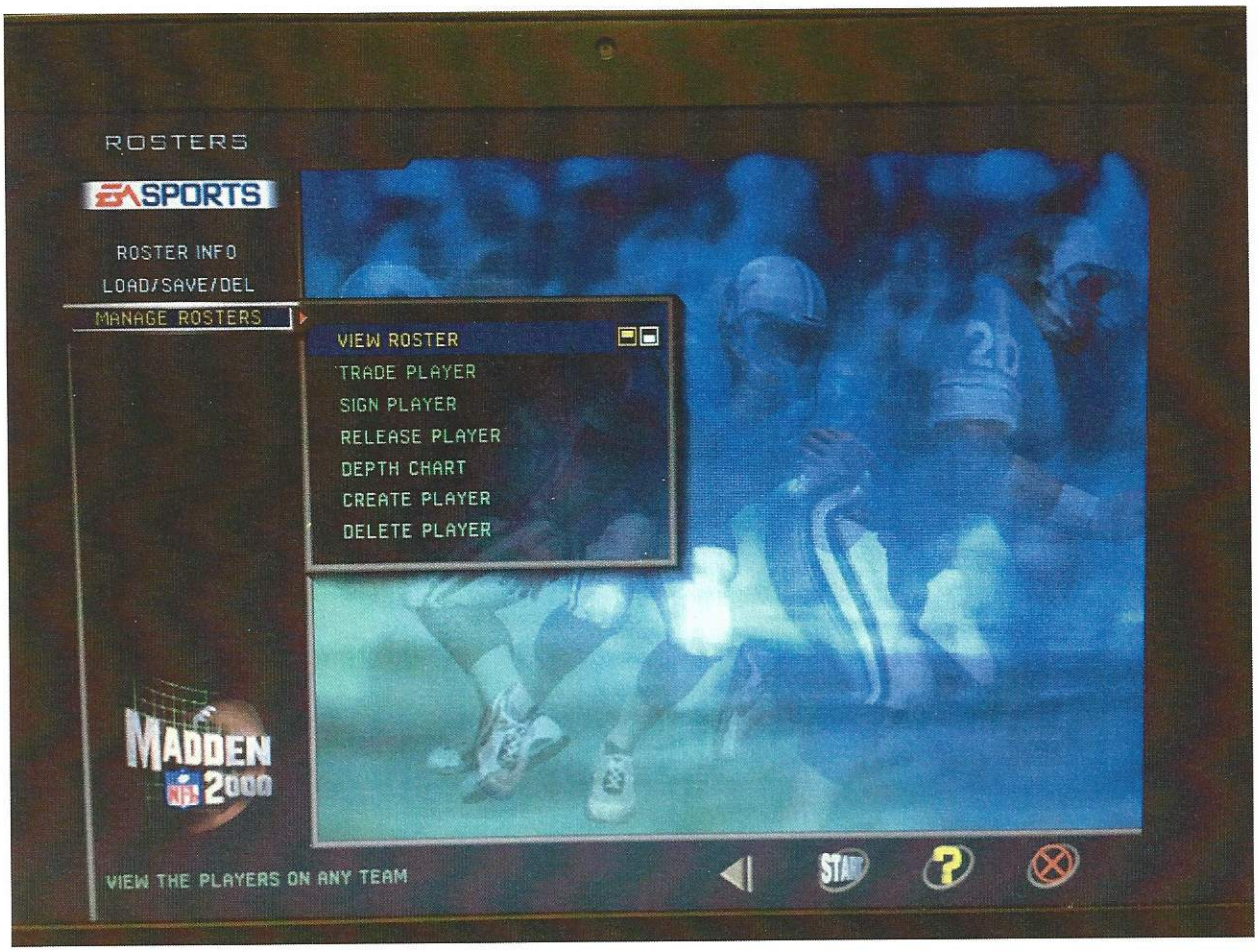

MENU
CONTROL
Enter
ACCEPTS
Esc
CANCELS
Tab
CHANGES FOCUS
F1
HELP
UP
LEFT
RIGHT
DOWN
PROGRESSES TOWARD GAME
Space
MADDEN
NFL 2000
EA SPORTS
©1999 ELECTRONIC ARTS. ALL RIGHTS RESERVED.

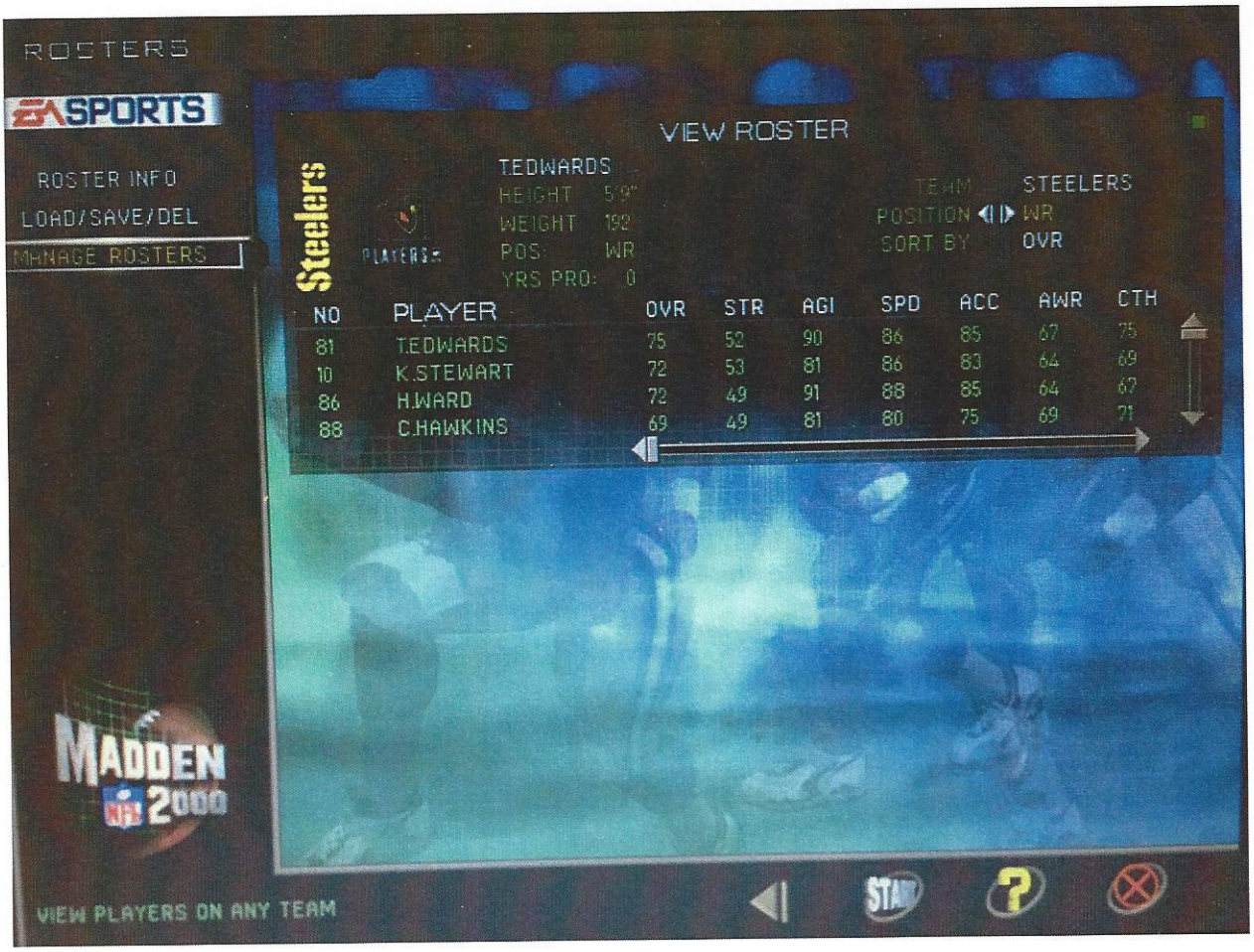
1A-3


ARCADE
EXHIBITION
SEASON
FRANCHISE
TOURNAMENT
PRACTICE
SITUATION
MADDEN
NFL 2000
EA SPORTS
QUICK START AN ARCADE STYLE GAME

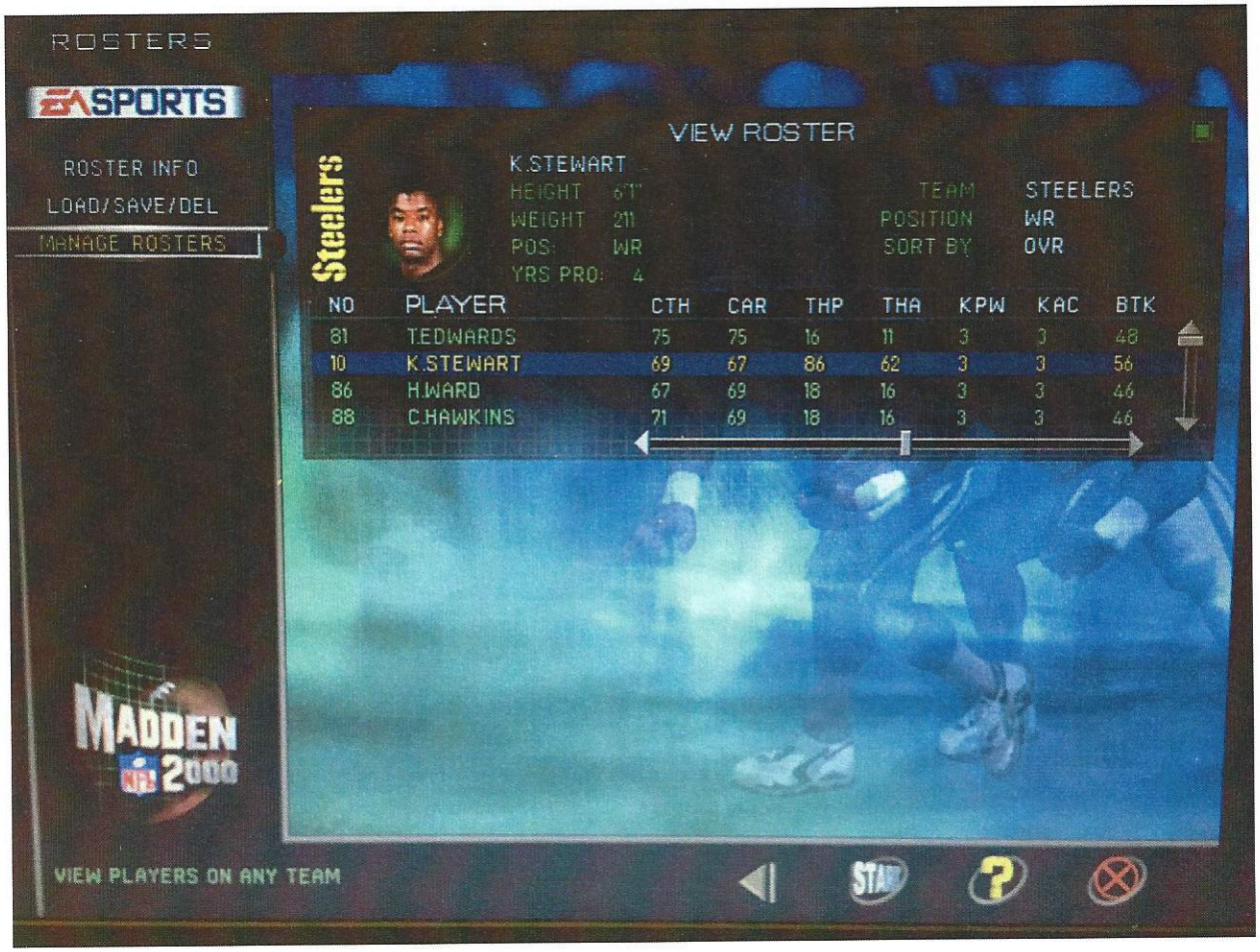
1A-4


ROSTERS
EA SPORTS
ROSTER INFO
LOAD/SAVE/DEL
MANAGE ROSTERS
ROSTER INFO
ROSTER OPTIONS INCLUDE VIEWING, EDITING, AND MANAGING ROSTERS.
PRESS F1 FOR HELP.
DON'T FORGET TO UPDATE YOUR ROSTER WHEN ENTERING A SEASON.
THE CURRENT ROSTER LOADED IS: ROSTDATA
MADDEN NFL 2000
VIEW CURRENTLY LOADED ROSTER INFO
START

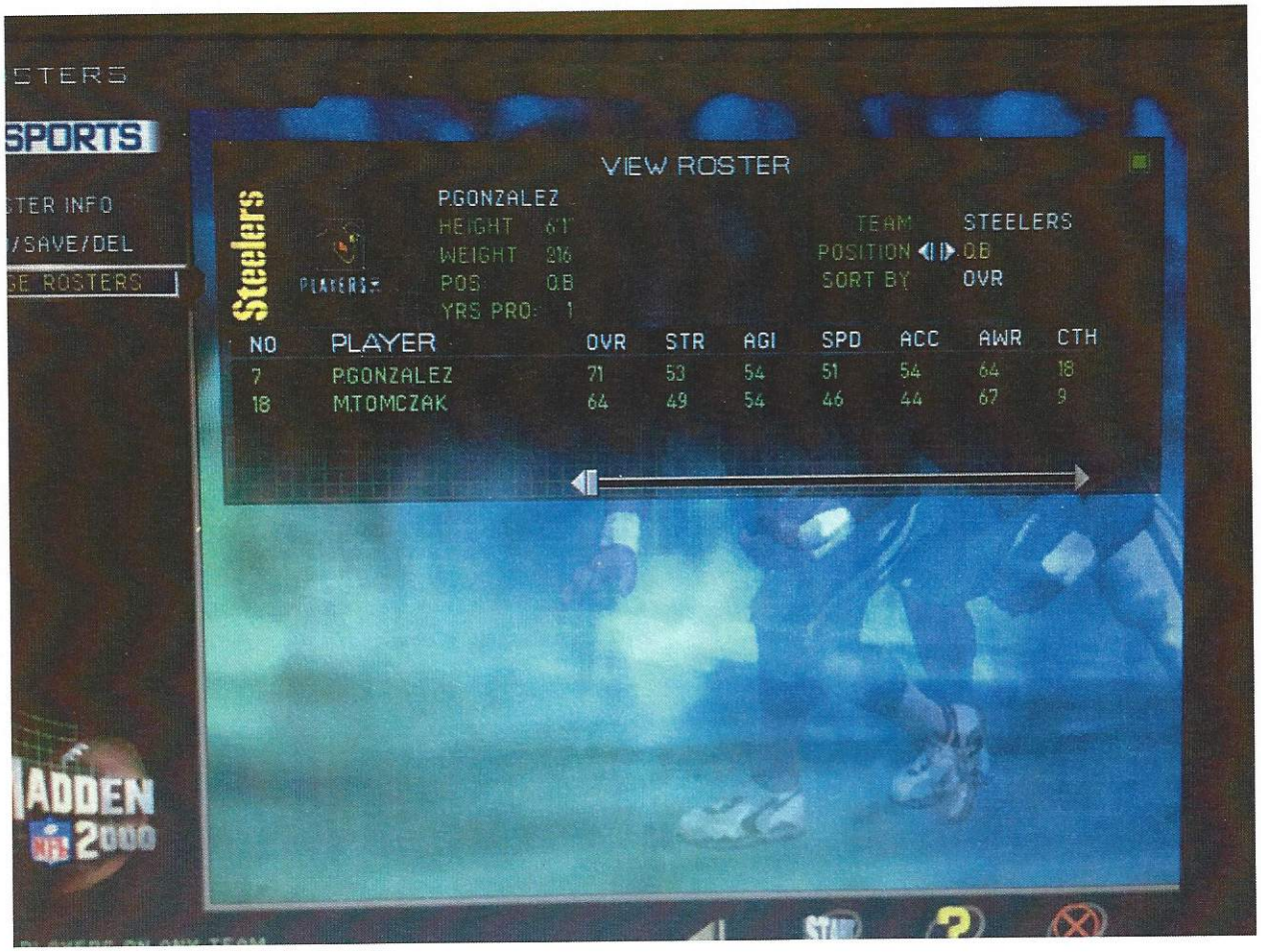

ROSTERS
EA SPORTS
ROSTER INFO
LOAD/SAVE/DEL
MANAGE ROSTERS
VIEW ROSTER
TRADE PLAYER
SIGN PLAYER
RELEASE PLAYER
DEPTH CHART
CREATE PLAYER
DELETE PLAYER
MADDEN NFL 2000
VIEW THE PLAYERS ON ANY TEAM

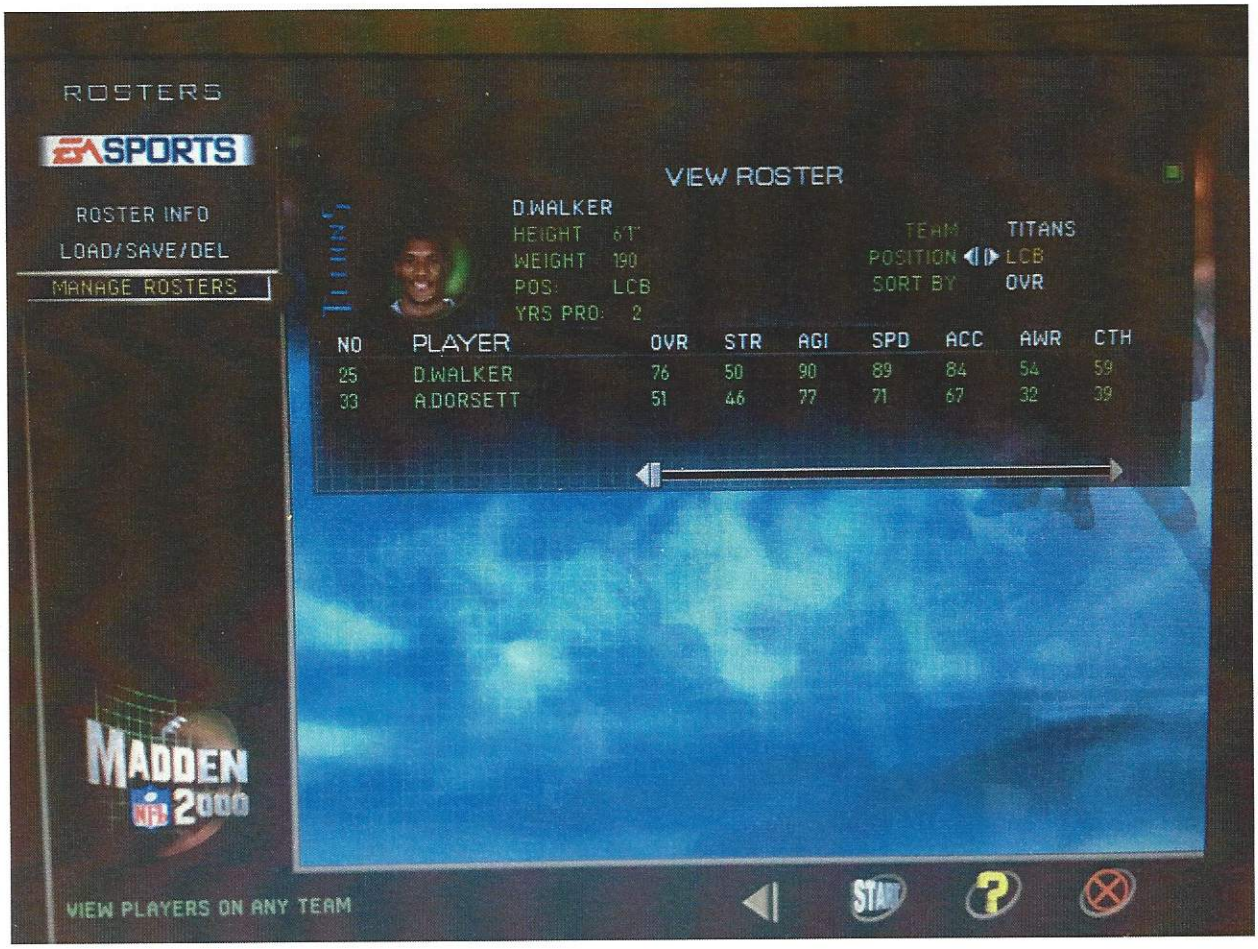

ROSTERS
EA SPORTS
ROSTER INFO
LOAD/SAVE/DEL
MANAGE ROSTERS
VIEW ROSTER
Steelers
T.EDWARDS
HEIGHT 5'9"
WEIGHT 192
POS: WR
YRS PRO: 0
TEAM STEELERS
POSITION WR
SORT BY OVR
NO PLAYER OVR STR AGI SPD ACC AWR CTH
81 T.EDWARDS 75 52 90 86 85 67 75
10 K.STEWART 72 53 81 86 83 64 69
86 H.WARD 72 49 91 88 85 64 67
88 C.HAWKINS 69 49 81 80 75 69 71
MADDEN NFL 2000
VIEW PLAYERS ON ANY TEAM

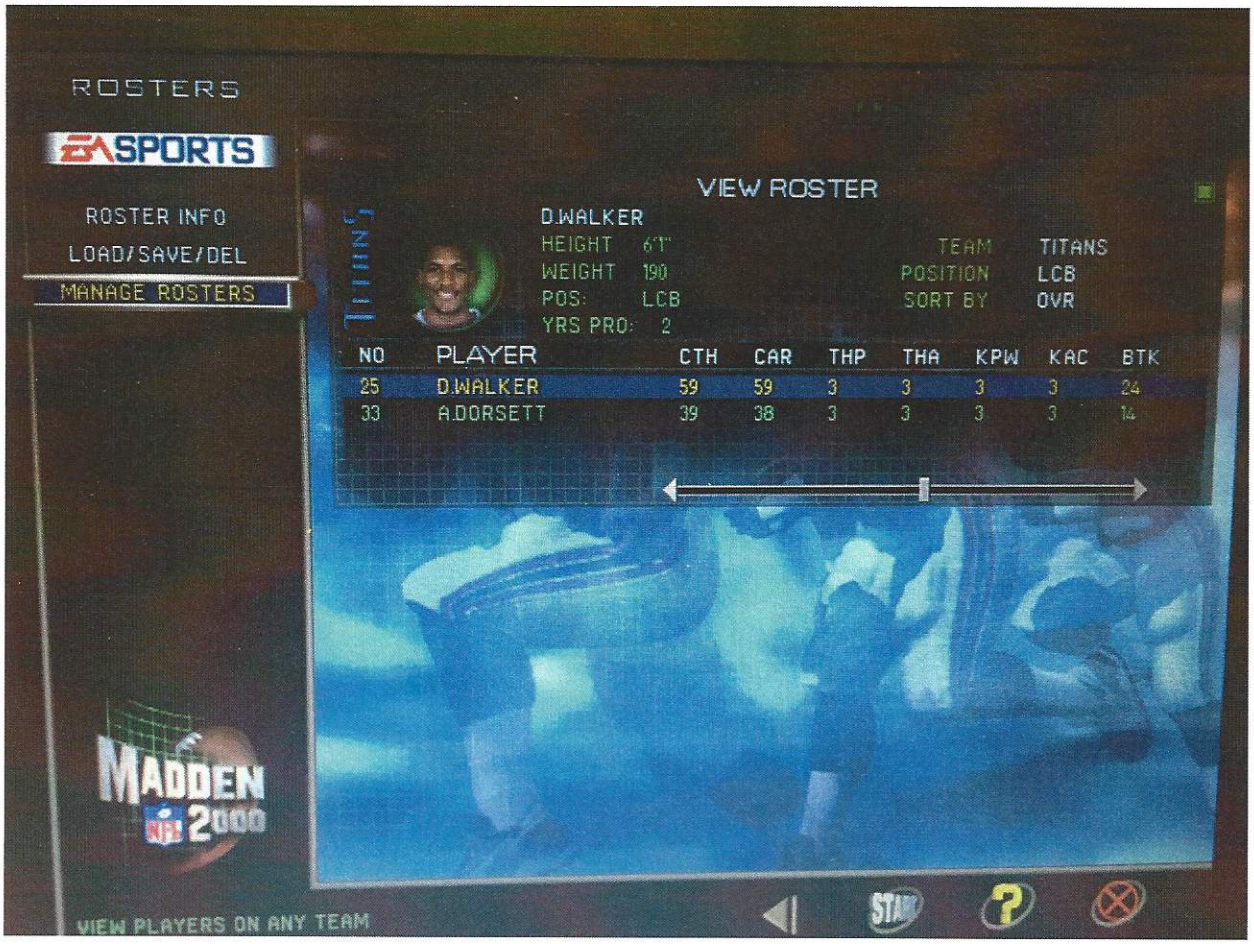
1A-8


ROSTERS
EA SPORTS
ROSTER INFO
LOAD/SAVE/DEL
MANAGE ROSTERS
VIEW ROSTER
Steelers
K.STEWART
HEIGHT 6'1"
WEIGHT 211
POS: WR
YRS PRO: 4
TEAM STEELERS
POSITION WR
SORT BY OVR
NO PLAYER CTH CAR THP THA KPW KAC BTK
81 T.EDWARDS 75 75 16 11 3 3 48
10 K.STEWART 69 67 86 62 3 3 56
86 H.WARD 67 69 18 16 3 3 46
88 C.HAWKINS 71 69 18 16 3 3 46
MADDEN NFL 2000
VIEW PLAYERS ON ANY TEAM

ROSTERS
EA SPORTS
ROSTER INFO
LOAD/SAVE/DEL
MANAGE ROSTERS
VIEW ROSTER
Steelers
K.STEWART
HEIGHT 6'1"
WEIGHT 211
POS: WR
YRS PRO: 4
TEAM STEELERS
POSITION WR
SORT BY OVR
NO PLAYER KAC BTK TAK IMP PBK RBK INJ
81 T.EDWARDS 3 48 9 54 13 28 90
10 K.STEWART 3 56 18 90 9 9 90
86 H.WARD 3 46 18 59 13 28 69
88 C.HAWKINS 3 46 24 64 13 28 54
MADDEN NFL 2000
VIEW PLAYERS ON ANY TEAM
START


STERS
SPORTS
TER INFO
/SAVE/DEL
E ROSTERS
VIEW ROSTER
Steelers
PLAYERS
P.GONZALEZ
HEIGHT 6'1"
WEIGHT 216
POS QB
YRS PRO: 1
TEAM STEELERS
POSITION QB
SORT BY OVR
NO PLAYER OVR STR AGI SPD ACC AWR CTH
7 P.GONZALEZ 71 53 54 51 54 64 18
18 M.TOMCZAK 64 49 54 46 44 67 9
MADDEN
NFL 2000


ROSTERS
EA SPORTS
ROSTER INFO
LOAD/SAVE/DEL
MANAGE ROSTERS
VIEW ROSTER
D.WALKER
HEIGHT 6'1"
WEIGHT 190
POS: LCB
YRS PRO: 2
TEAM TITANS
POSITION LCB
SORT BY OVR
NO PLAYER OVR STR AGI SPD ACC AWR CTH
25 D.WALKER 76 50 90 89 84 54 59
33 A.DORSETT 51 46 77 71 67 32 39
MADDEN NFL 2000
VIEW PLAYERS ON ANY TEAM
START


ROSTERS
EA SPORTS
ROSTER INFO
LOAD/SAVE/DEL
MANAGE ROSTERS
VIEW ROSTER
TITANS
D.WALKER
HEIGHT 6'1"
WEIGHT 190
POS: LCB
YRS PRO: 2
TEAM TITANS
POSITION LCB
SORT BY OVR
NO PLAYER CTH CAR THP THA KPW KAC BTK
25 D.WALKER 59 59 3 3 3 3 24
33 A.DORSETT 39 38 3 3 3 3 14
MADDEN NFL 2000
VIEW PLAYERS ON ANY TEAM
START

ROSTERS
EA SPORTS
ROSTER INFO
LOAD/SAVE/DEL
MANAGE ROSTERS
VIEW ROSTER
D.WALKER
HEIGHT 6'1"
WEIGHT 190
POS: LCB
YRS PRO: 2
TEAM TITANS
POSITION LCB
SORT BY OVR
NO PLAYER KAC BTK TAK IMP PBK RBK INJ
25 D.WALKER 3 24 59 62 9 9 79
33 A.DORSETT 3 14 52 29 9 9 77
MADDEN NFL 2000
VIEW PLAYERS ON ANY TEAM
START

ROSTERS
EA SPORTS
ROSTER INFO
LOAD/SAVE/DEL
MANAGE ROSTERS
VIEW ROSTER
JWILKINS
HEIGHT 6'2"
WEIGHT 205
POS. K
YRS PRO. 5
TEAM RAMS
POSITION K
SORT BY OVR
NO PLAYER OVR STR AGI SPD ACC AWR CTH
14 JWILKINS 84 34 38 34 34 75 18
MADDEN NFL 2000
START

1A-15

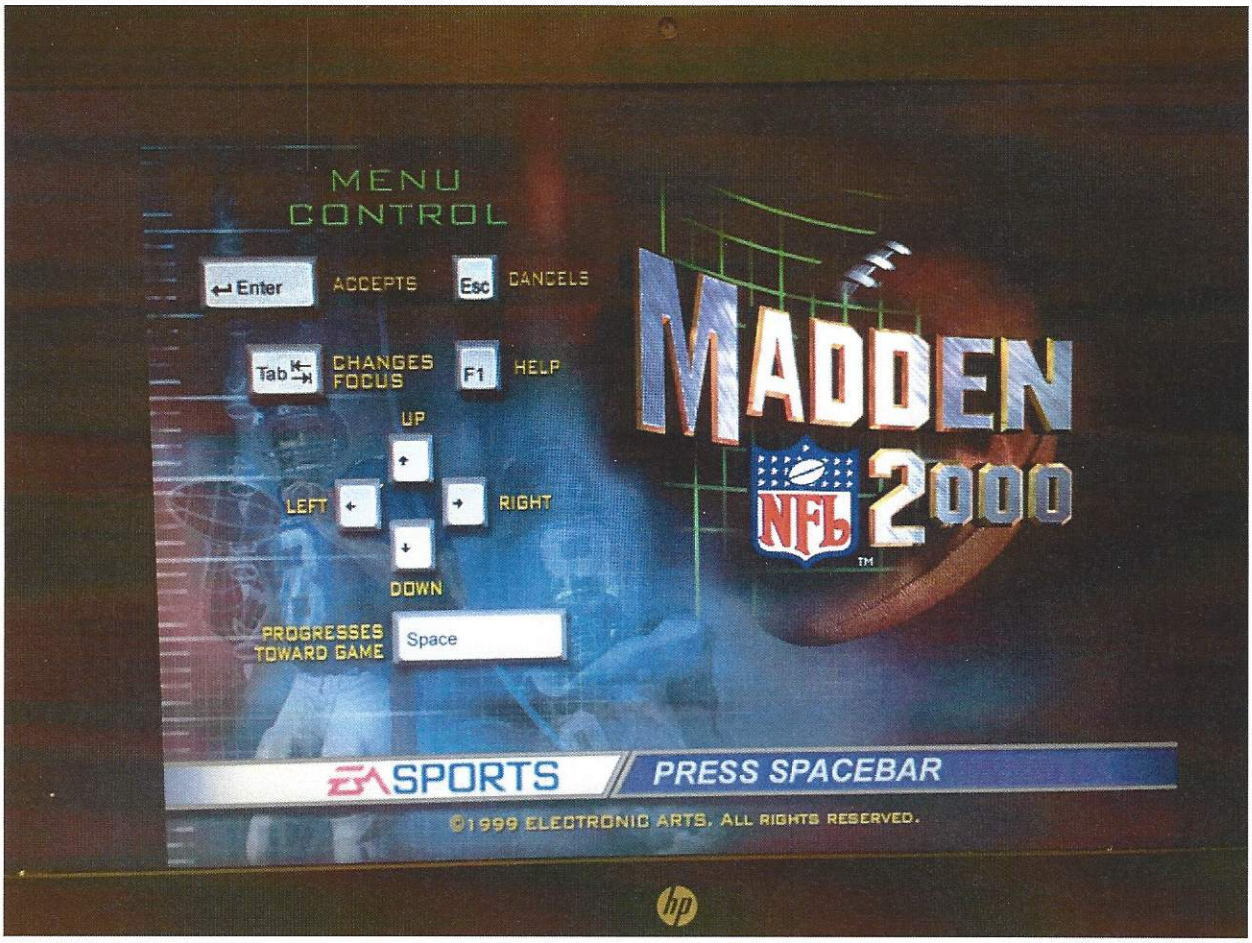
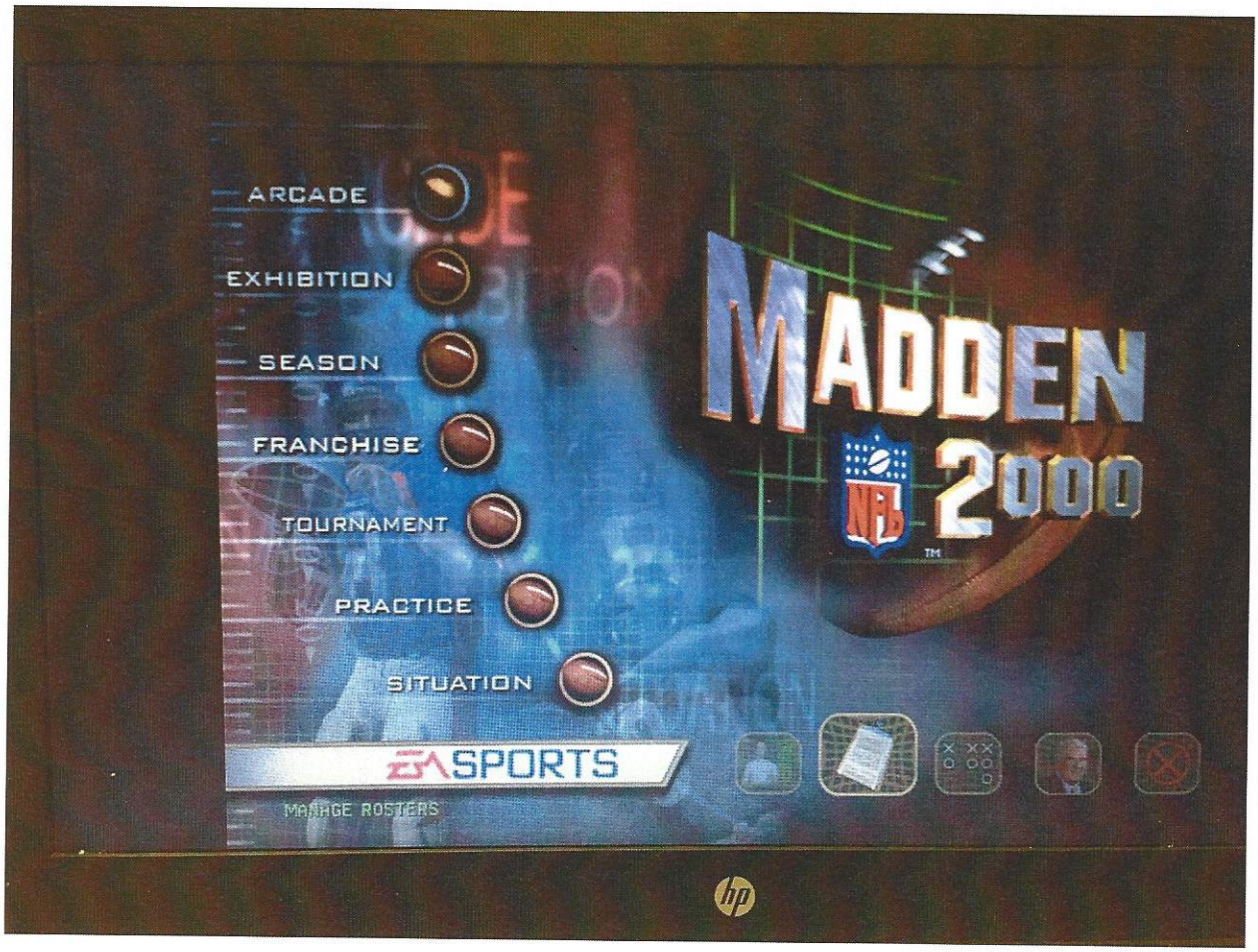
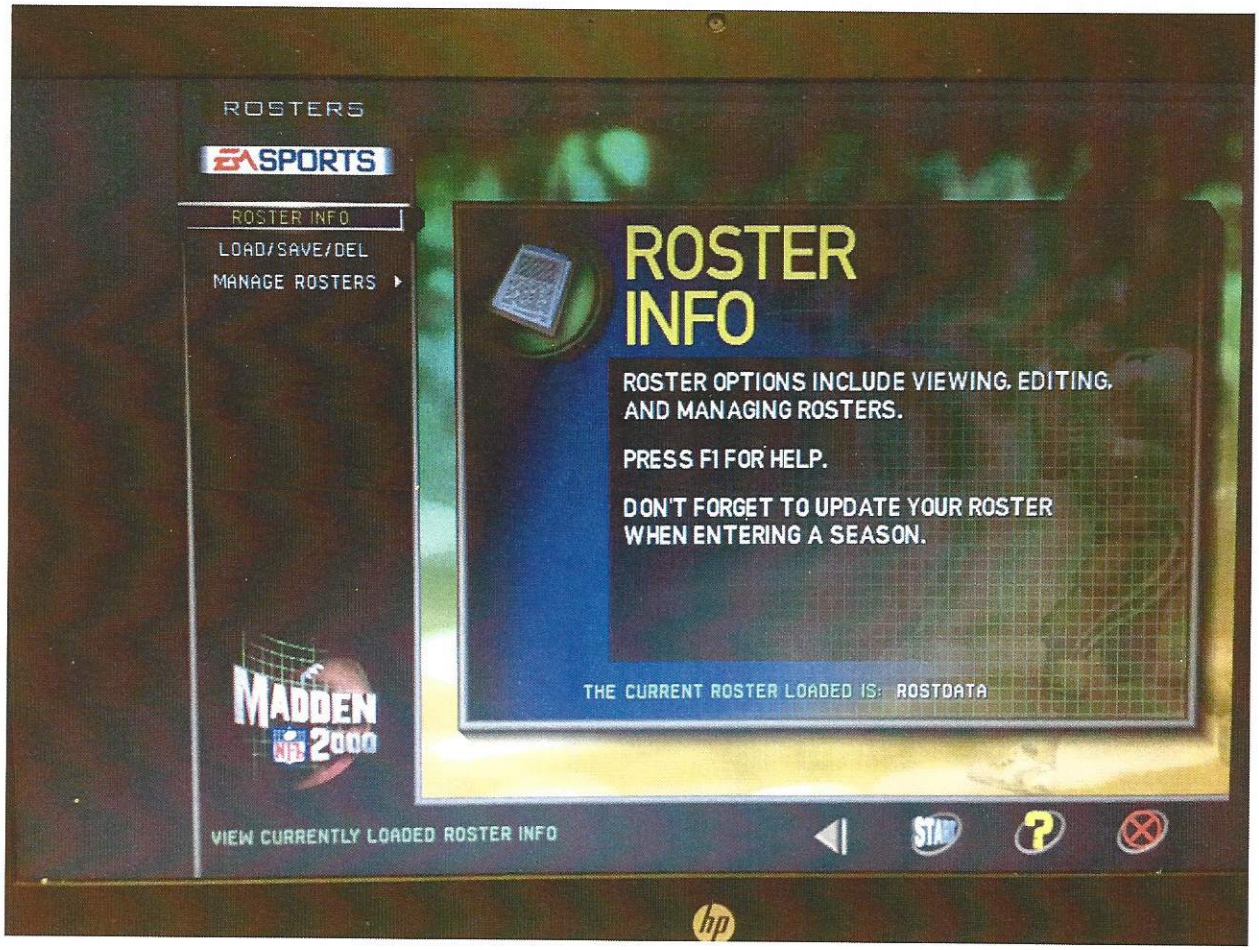


EXHIBIT 1-B
Deponent Ferwerda
Date 11-22-16 Rptr. JS
WWW.DEPOBOOK.COM

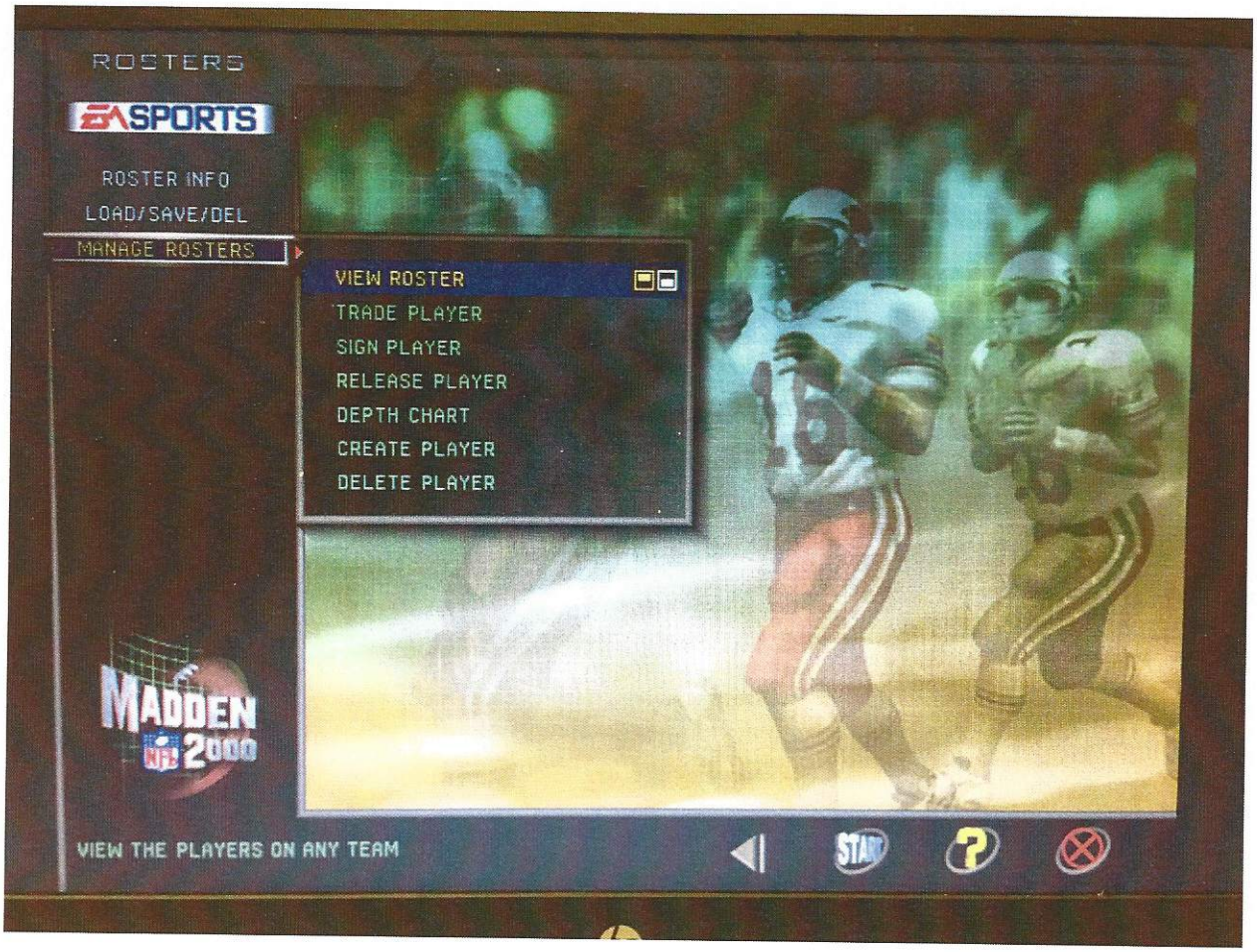
1B - 7


ARCADE
EXHIBITION
SEASON
FRANCHISE
TOURNAMENT
PRACTICE
SITUATION
EA SPORTS
MANAGE ROSTERS
MADDEN
NFL
2000
TM

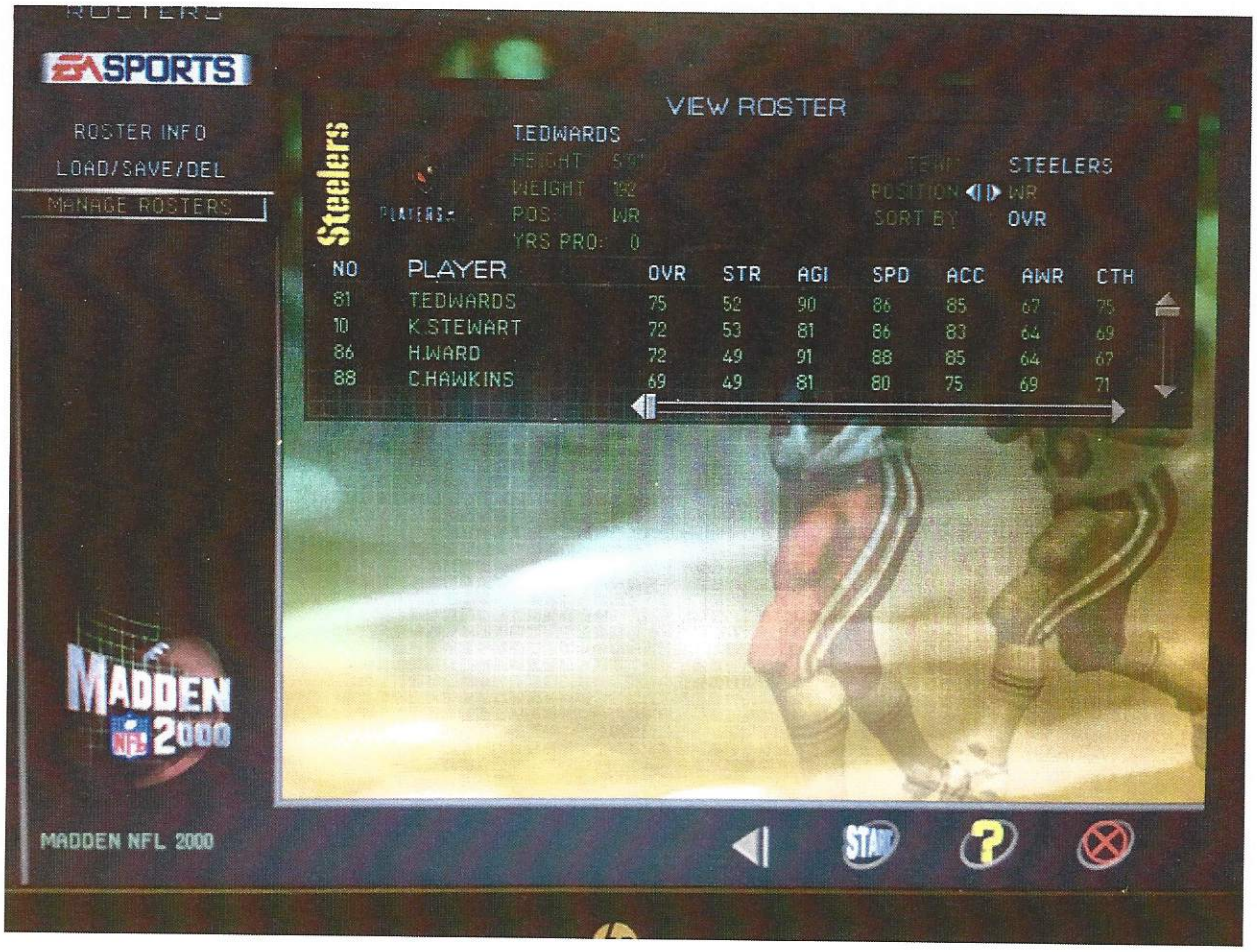
1-B-2


ROSTERS
EA SPORTS
ROSTER INFO
LOAD/SAVE/DEL
MANAGE ROSTERS
ROSTER INFO
ROSTER OPTIONS INCLUDE VIEWING, EDITING, AND MANAGING ROSTERS.
PRESS F1 FOR HELP.
DON'T FORGET TO UPDATE YOUR ROSTER WHEN ENTERING A SEASON.
THE CURRENT ROSTER LOADED IS: ROSTDATA
MADDEN NFL 2000
VIEW CURRENTLY LOADED ROSTER INFO

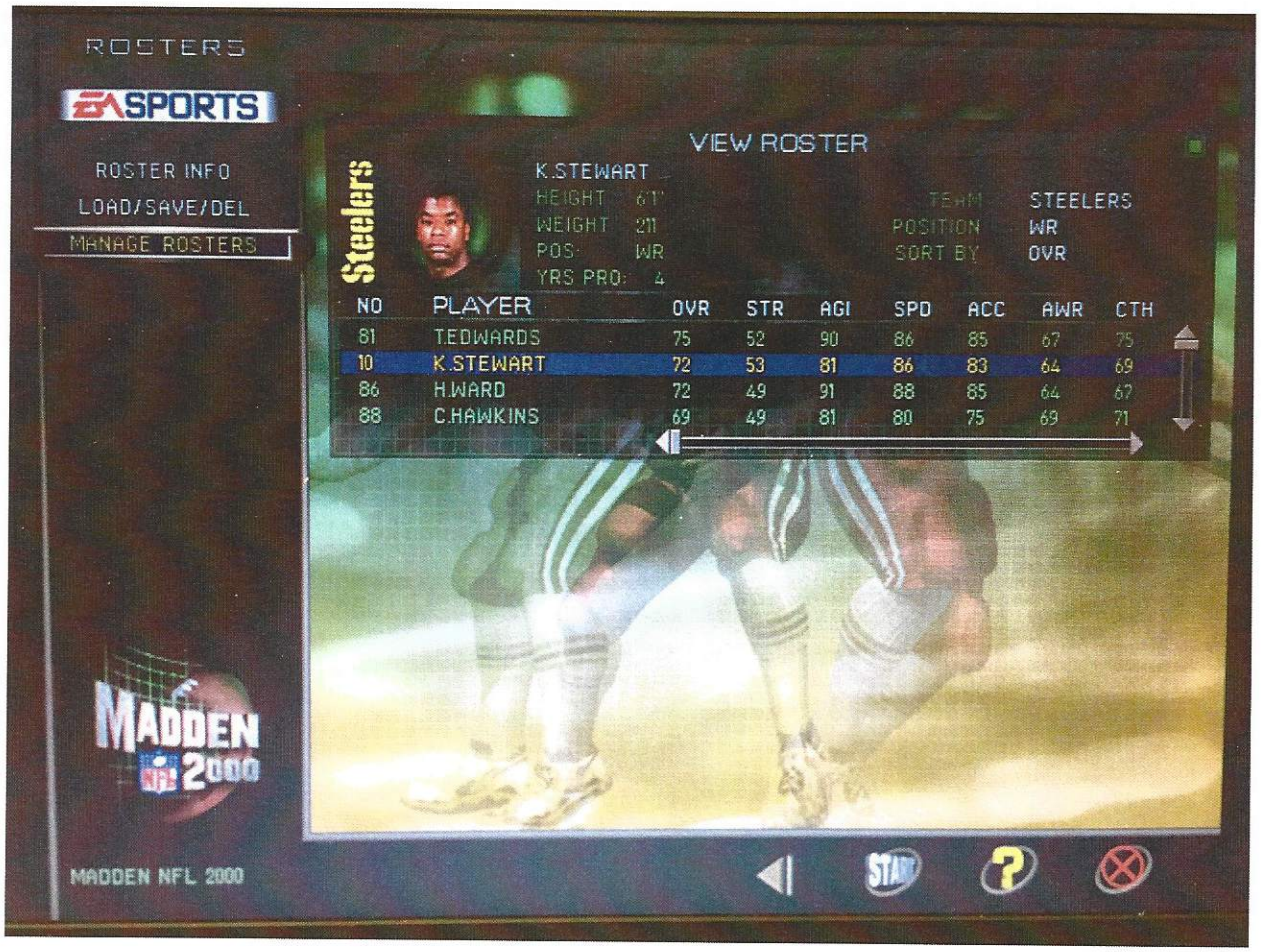
7B-3


ROSTERS
EA SPORTS
ROSTER INFO
LOAD/SAVE/DEL
MANAGE ROSTERS
VIEW ROSTER
TRADE PLAYER
SIGN PLAYER
RELEASE PLAYER
DEPTH CHART
CREATE PLAYER
DELETE PLAYER
MADDEN NFL 2000
VIEW THE PLAYERS ON ANY TEAM
START

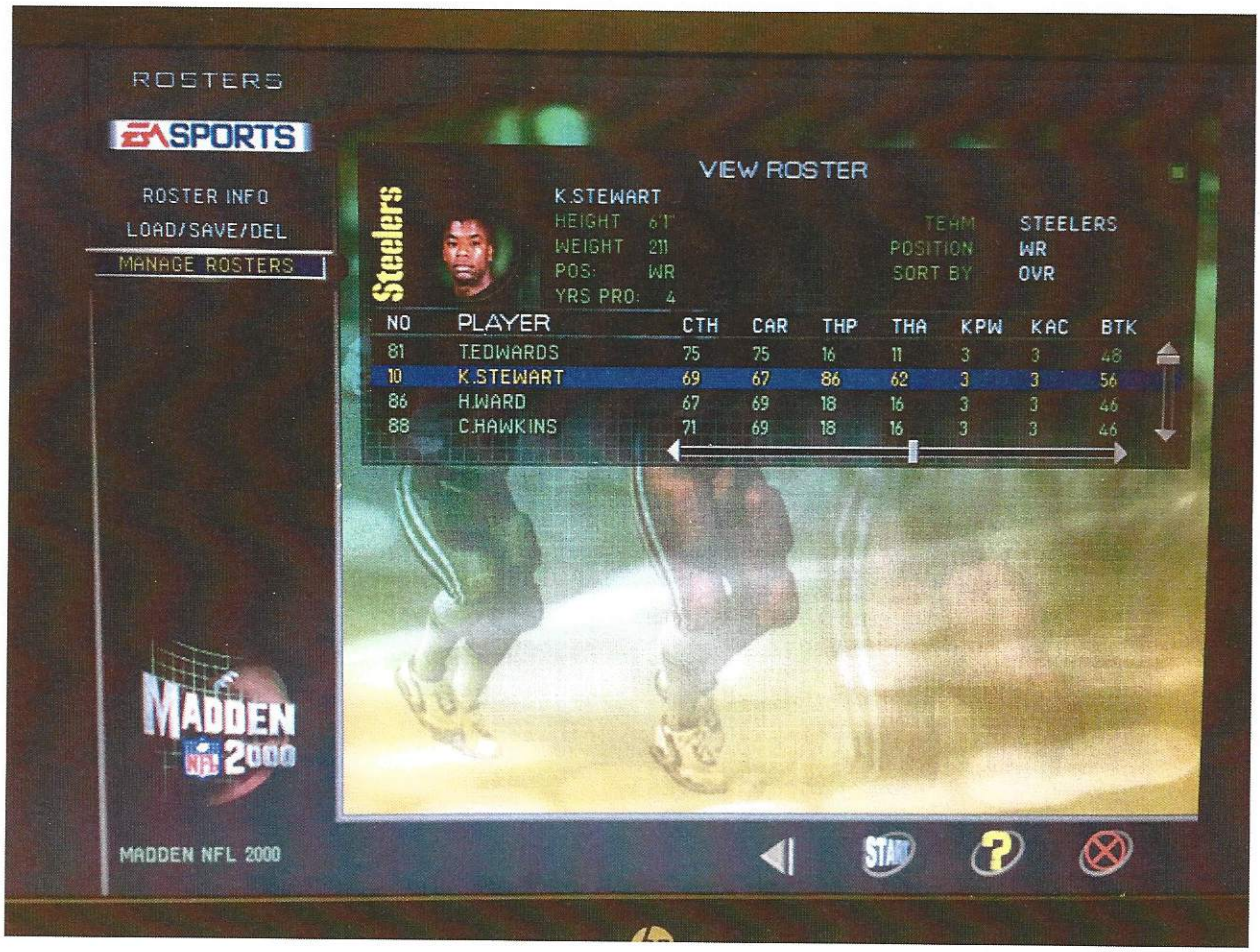
1B-4

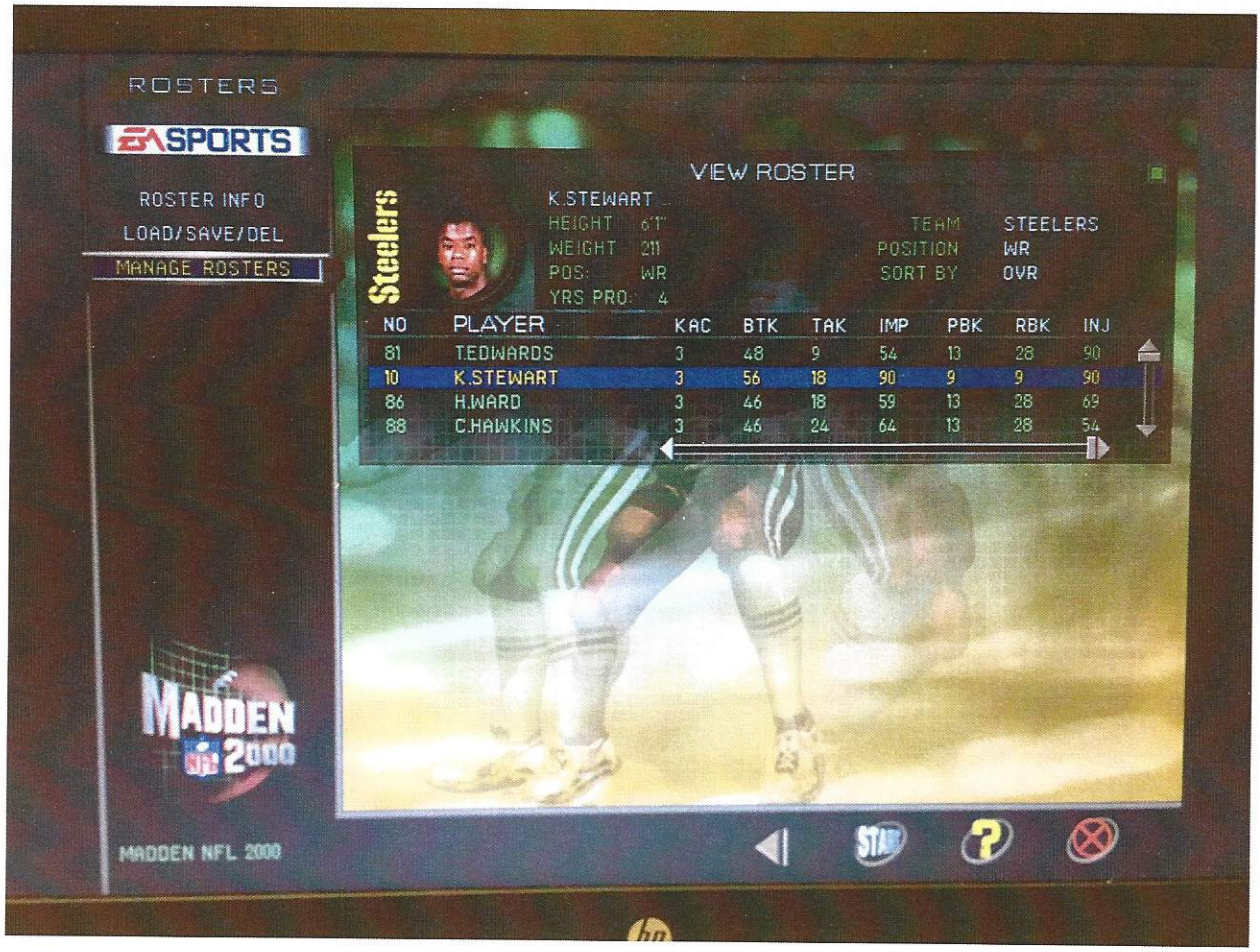

EA SPORTS
ROSTER INFO
LOAD/SAVE/DEL
MANAGE ROSTERS
VIEW ROSTER
Steelers
TEDWARDS
HEIGHT 5'9"
WEIGHT 192
POS: WR
YRS PRO: 0
TEAM: STEELERS
POSITION WR
SORT BY: OVR
NO PLAYER OVR STR AGI SPD ACC AWR CTH
81 T.EDWARDS 75 52 90 86 85 67 75
10 K.STEWART 72 53 81 86 83 64 69
86 H.WARD 72 49 91 88 85 64 67
88 C.HAWKINS 69 49 81 80 75 69 71
MADDEN NFL 2000
START

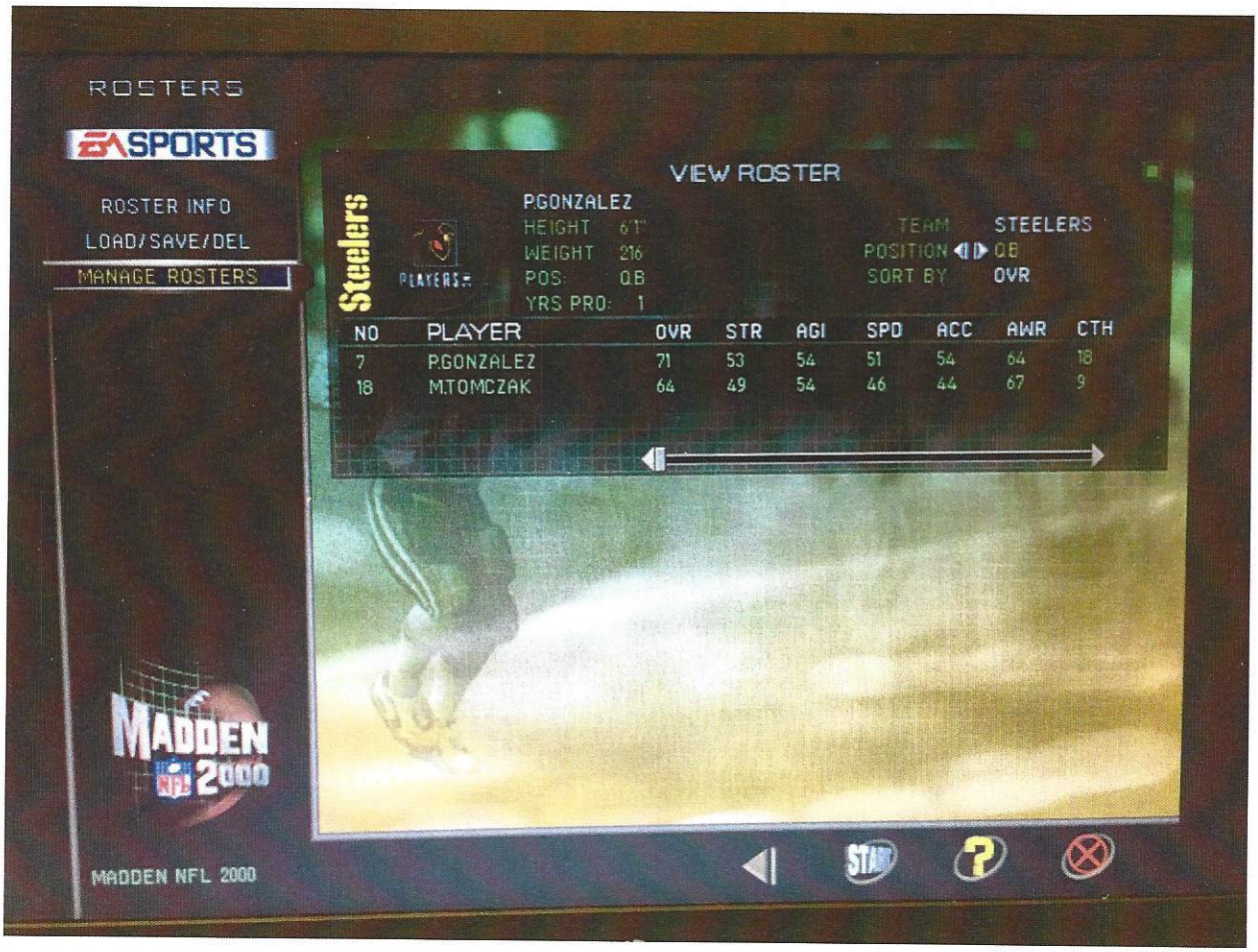
1B-5

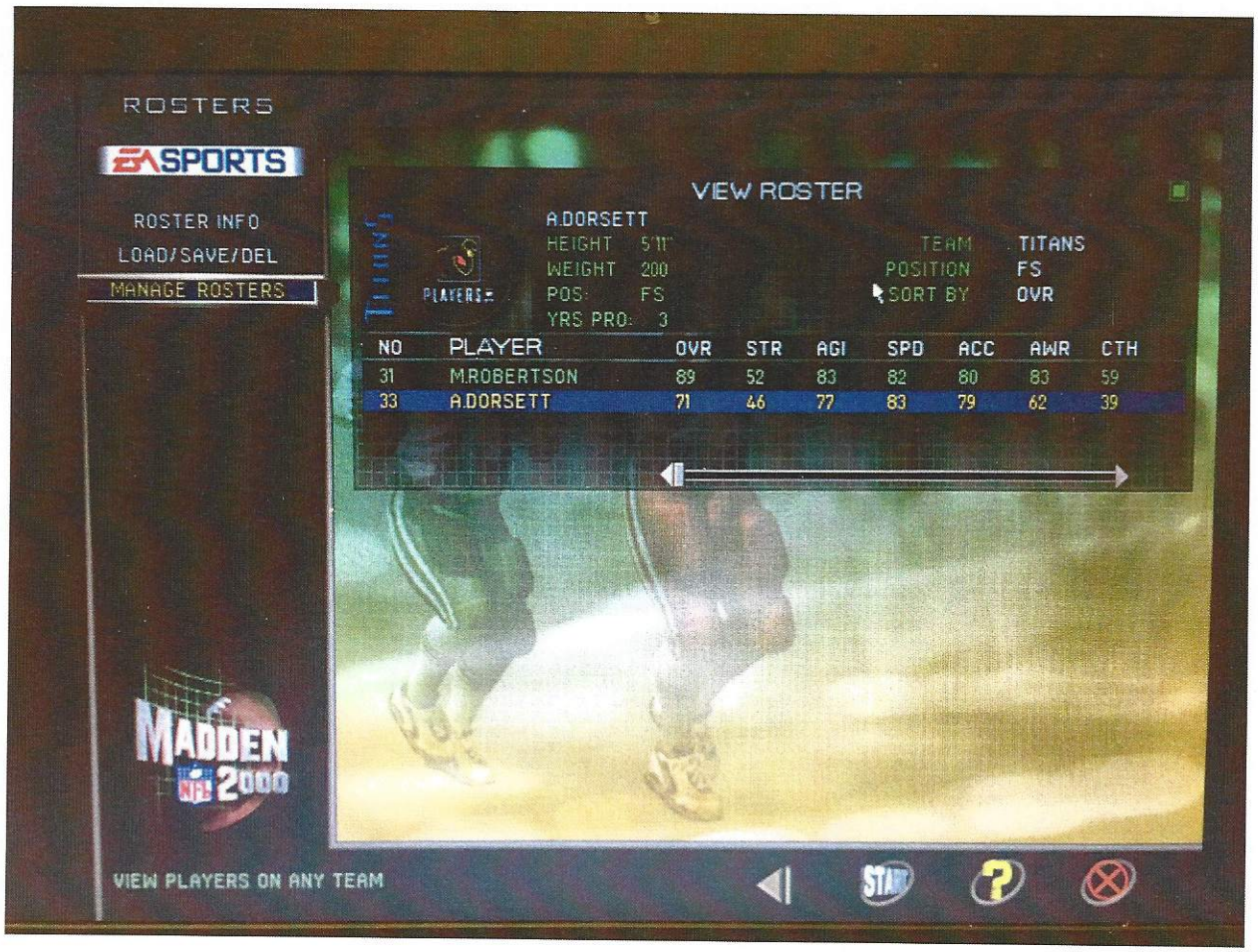

ROSTERS
EA SPORTS
ROSTER INFO
LOAD/SAVE/DEL
MANAGE ROSTERS
VIEW ROSTER
Steelers
K.STEWART
HEIGHT 6'1"
WEIGHT 211
POS: WR
YRS PRO: 4
TEAM STEELERS
POSITION WR
SORT BY OVR
NO PLAYER OVR STR AGI SPD ACC AWR CTH
81 T.EDWARDS 75 52 90 86 85 67 75
10 K.STEWART 72 53 81 86 83 64 69
86 H.WARD 72 49 91 88 85 64 67
88 C.HAWKINS 69 49 81 80 75 69 71
MADDEN NFL 2000
START
MADDEN NFL 2000

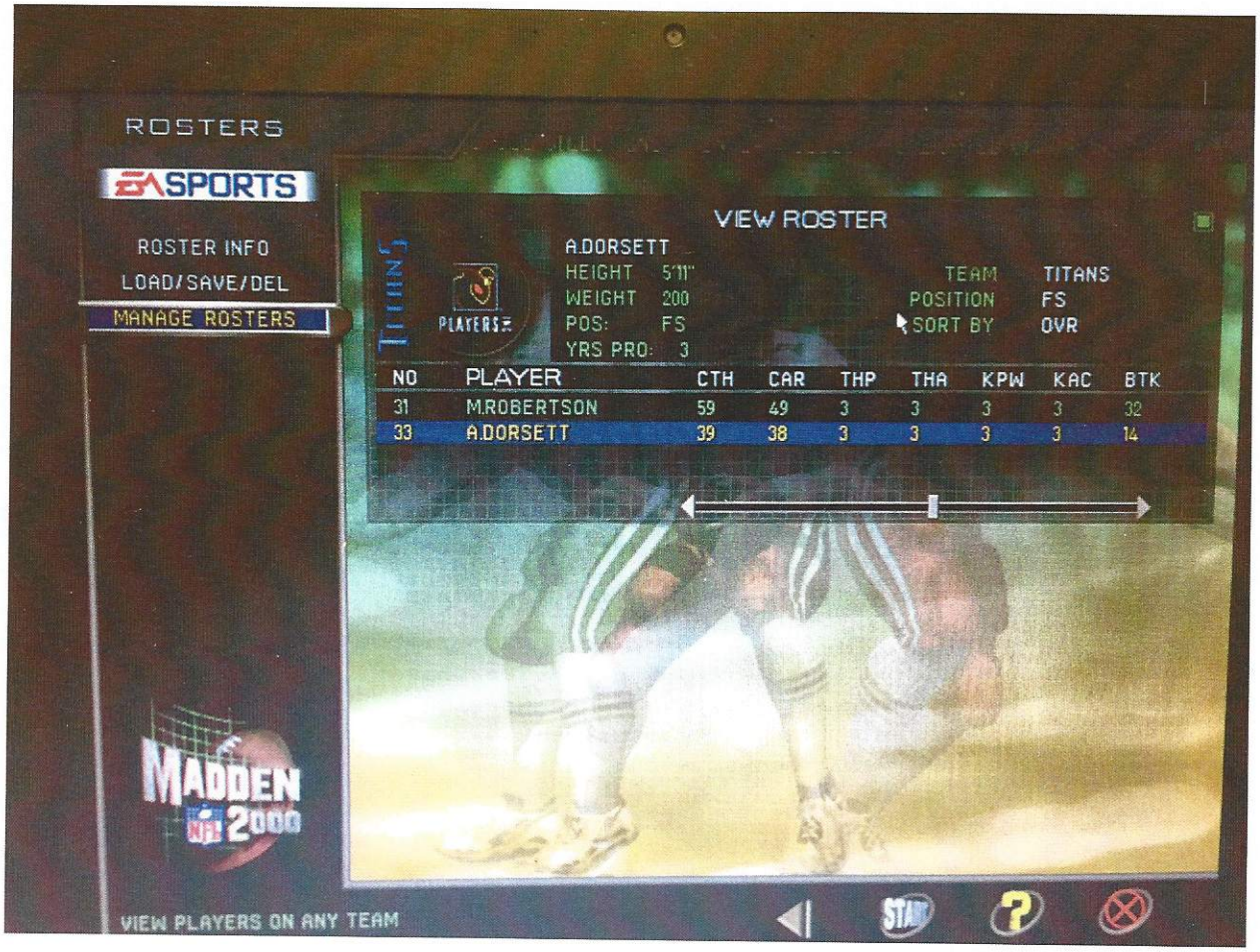
1B-6

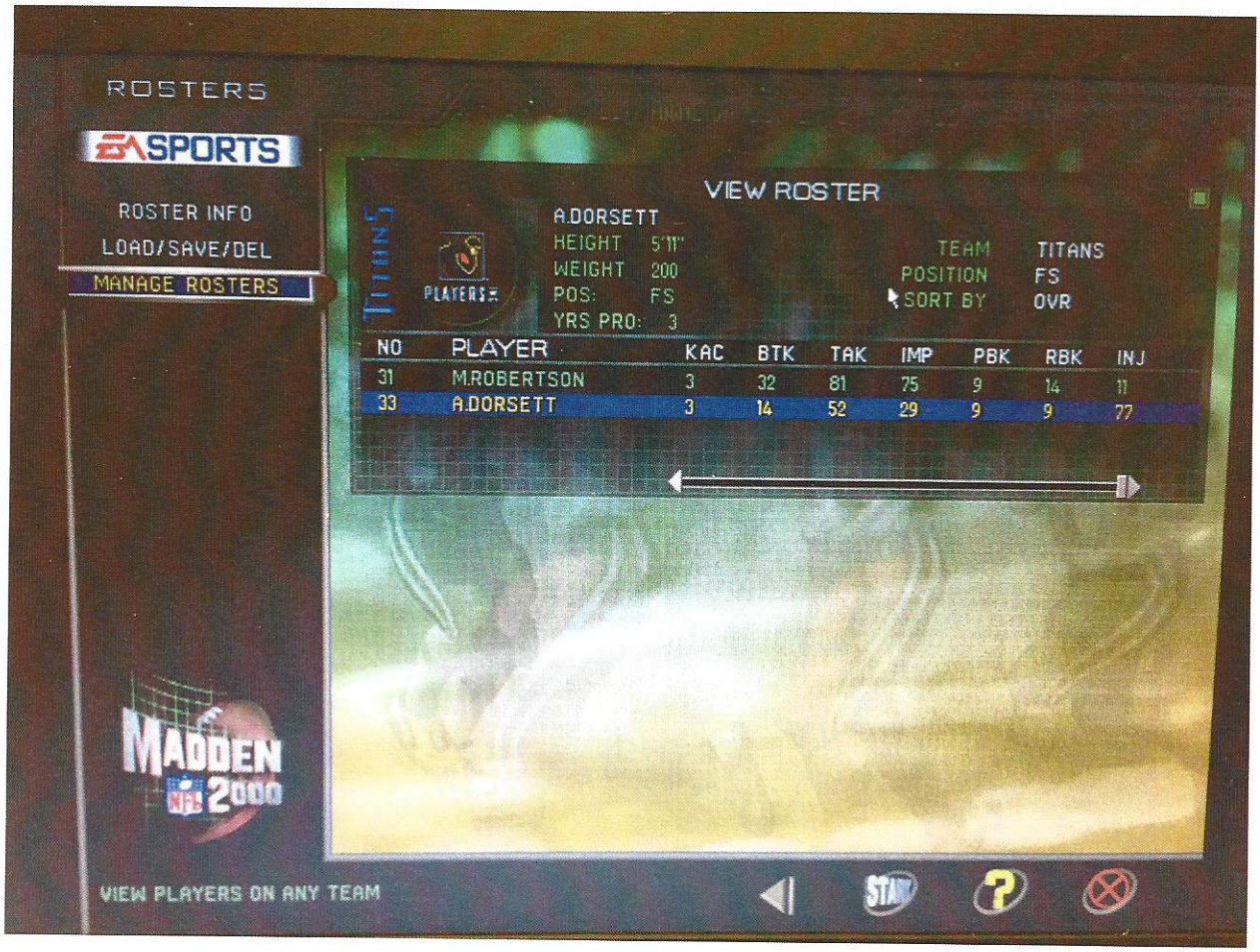

ROSTERS
EA SPORTS
ROSTER INFO
LOAD/SAVE/DEL
MANAGE ROSTERS
VIEW ROSTER
Steelers
K.STEWART
HEIGHT 6'1"
WEIGHT 211
POS: WR
YRS PRO: 4
TEAM STEELERS
POSITION WR
SORT BY OVR
NO PLAYER CTH CAR THP THA KPW KAC BTK
81 T.EDWARDS 75 75 16 11 3 3 48
10 K.STEWART 69 67 86 62 3 3 56
86 H.WARD 67 69 18 16 3 3 46
88 C.HAWKINS 71 69 18 16 3 3 46
MADDEN NFL 2000
START

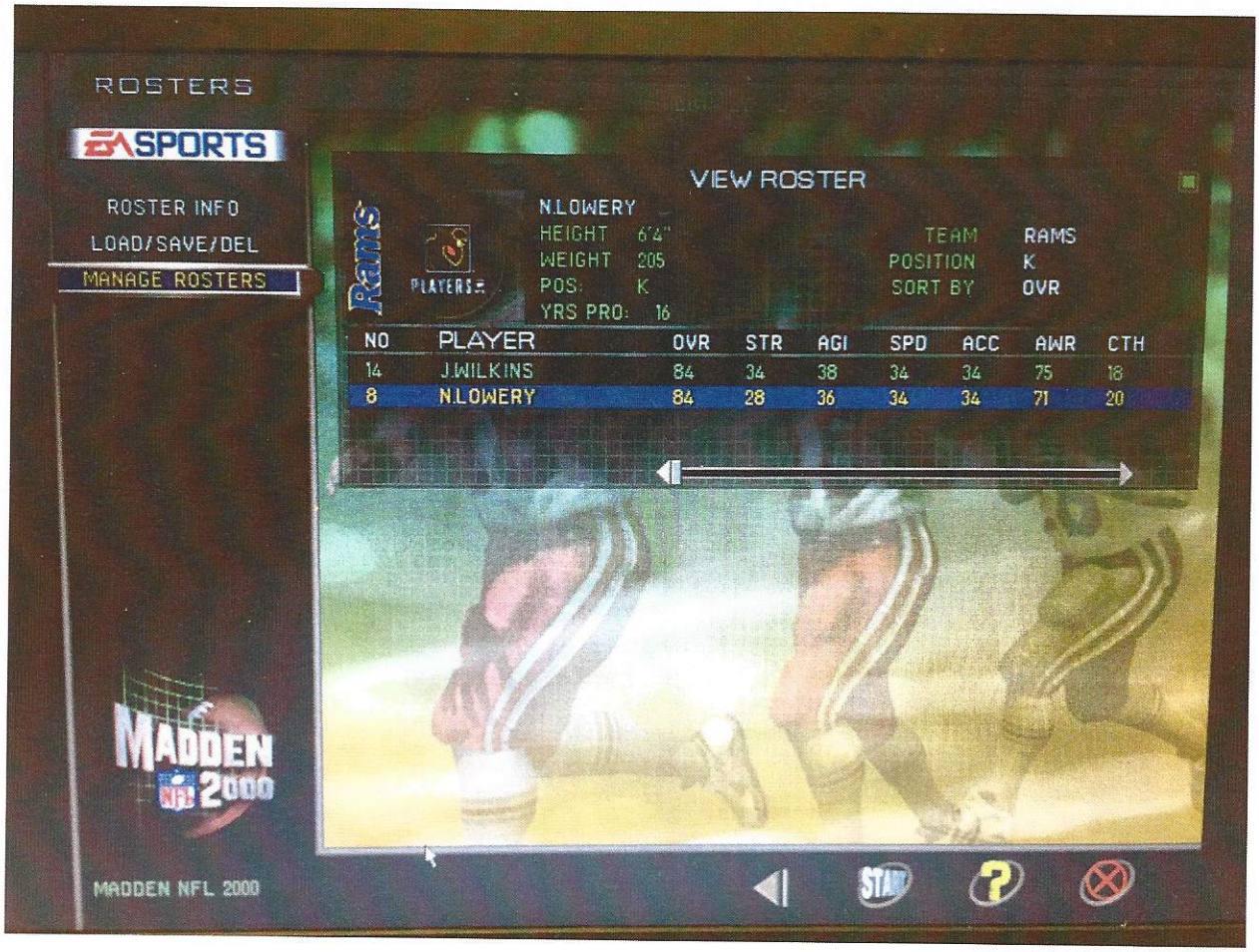

ROSTERS
EA SPORTS
ROSTER INFO
LOAD/SAVE/DEL
MANAGE ROSTERS
VIEW ROSTER
Steelers
K.STEWART
HEIGHT 6'1"
WEIGHT 211
POS: WR
YRS PRO: 4
TEAM STEELERS
POSITION WR
SORT BY OVR
NO PLAYER KAC BTK TAK IMP PBK RBK INJ
81 T.EDWARDS 3 48 9 54 13 28 90
10 K.STEWART 3 56 18 90 9 9 90
86 H.WARD 3 46 18 59 13 28 69
88 C.HAWKINS 3 46 24 64 13 28 54
MADDEN NFL 2000
START
MADDEN NFL 2000

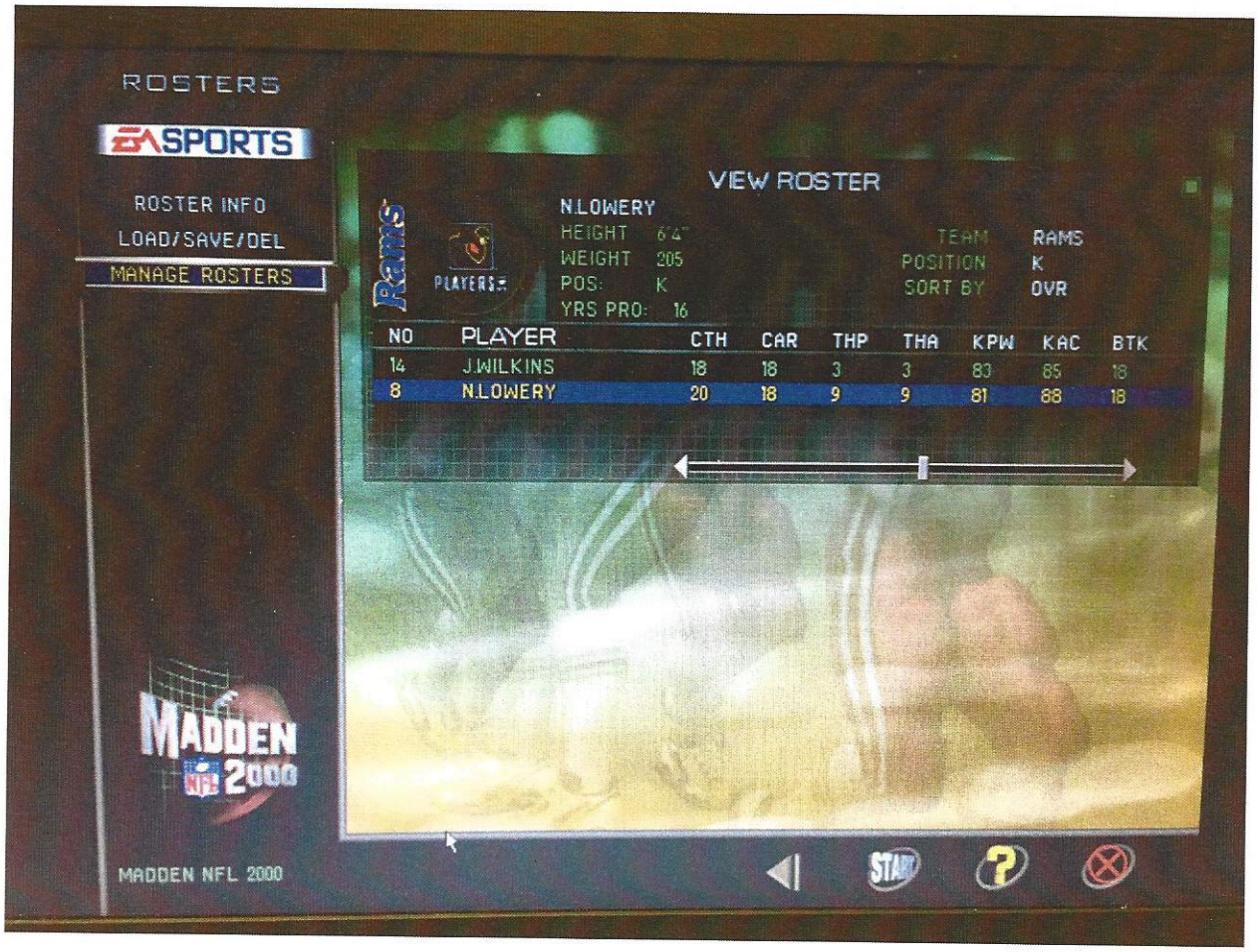

ROSTERS
EA SPORTS
ROSTER INFO
LOAD/SAVE/DEL
MANAGE ROSTERS
VIEW ROSTER
Steelers
PLAYER 1
P.GONZALEZ
HEIGHT 6'1"
WEIGHT 216
POS: QB
YRS PRO: 1
TEAM STEELERS
POSITION QB
SORT BY OVR
NO PLAYER OVR STR AGI SPD ACC AWR CTH
7 P.GONZALEZ 71 53 54 51 54 64 18
18 M.TOMCZAK 64 49 54 46 44 67 9
MADDEN NFL 2000
START
MADDEN NFL 2000

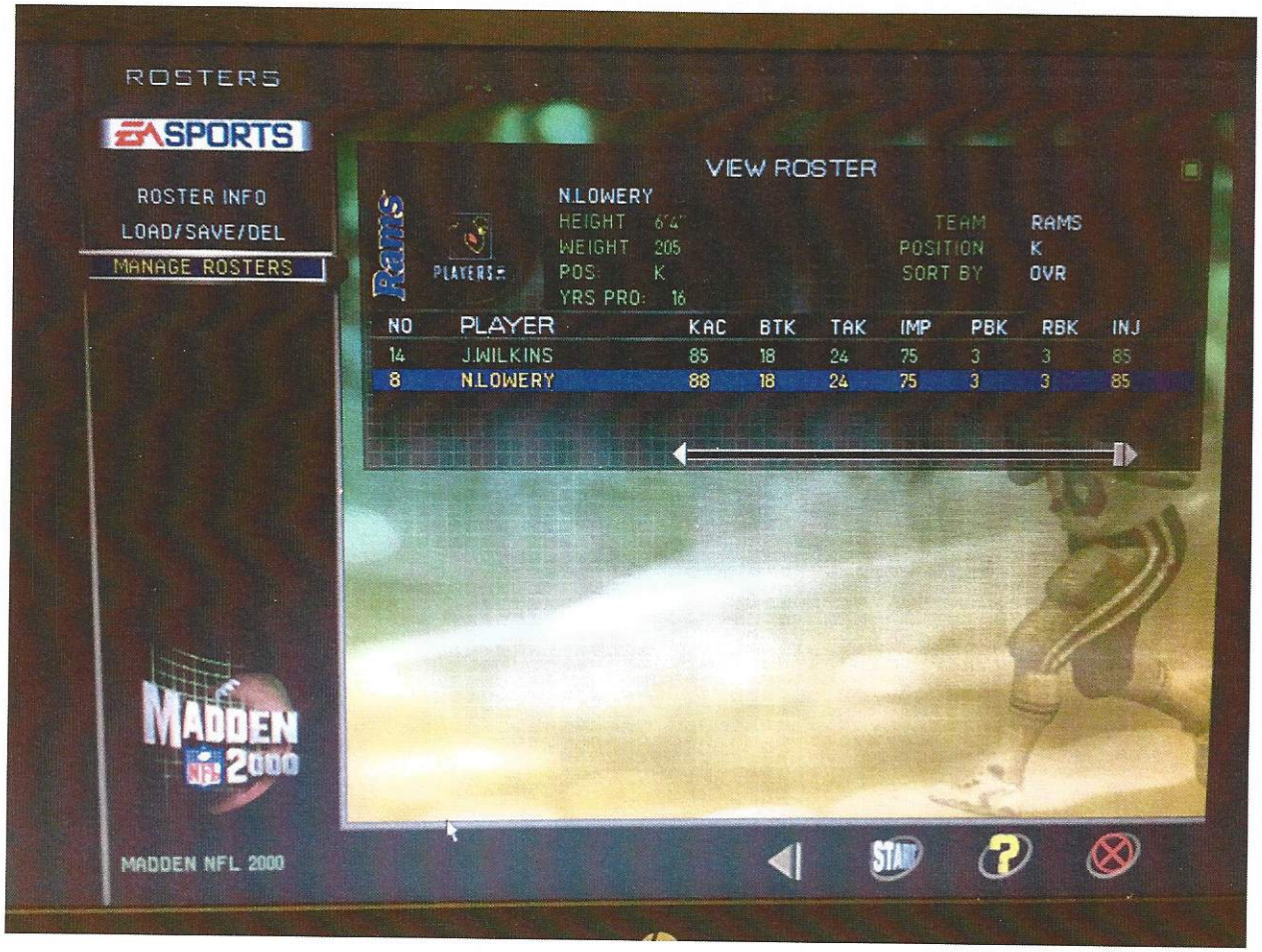

ROSTERS
EA SPORTS
ROSTER INFO
LOAD/SAVE/DEL
MANAGE ROSTERS
VIEW ROSTER
TITANS
PLAYERS
A.DORSETT
HEIGHT 5'11"
WEIGHT 200
POS: FS
YRS PRO: 3
TEAM TITANS
POSITION FS
SORT BY OVR
NO PLAYER OVR STR AGI SPD ACC AWR CTH
31 M.ROBERTSON 89 52 83 82 80 83 59
33 A.DORSETT 71 46 77 83 79 62 39
MADDEN NFL 2000
VIEW PLAYERS ON ANY TEAM
START


ROSTERS
EA SPORTS
ROSTER INFO
LOAD/SAVE/DEL
MANAGE ROSTERS
VIEW ROSTER
TITANS
PLAYERS
A.DORSETT
HEIGHT 5'11"
WEIGHT 200
POS: FS
YRS PRO: 3
TEAM TITANS
POSITION FS
SORT BY OVR
NO PLAYER CTH CAR THP THA KPW KAC BTK
31 M.ROBERTSON 59 49 3 3 3 3 32
33 A.DORSETT 39 38 3 3 3 3 14
MADDEN NFL 2000
VIEW PLAYERS ON ANY TEAM
START


ROSTERS
EA SPORTS
ROSTER INFO
LOAD/SAVE/DEL
MANAGE ROSTERS
VIEW ROSTER
TITANS
PLAYERS
A.DORSETT
HEIGHT 5'11"
WEIGHT 200
POS: FS
YRS PRO: 3
TEAM TITANS
POSITION FS
SORT BY OVR
NO PLAYER KAC BTK TAK IMP PBK RBK INJ
31 M.ROBERTSON 3 32 81 75 9 14 11
33 A.DORSETT 3 14 52 29 9 9 77
MADDEN NFL 2000
VIEW PLAYERS ON ANY TEAM
START


ROSTERS
EA SPORTS
ROSTER INFO
LOAD/SAVE/DEL
MANAGE ROSTERS
VIEW ROSTER
Rams
PLAYERS
N.LOWERY
HEIGHT 6'4"
WEIGHT 205
POS: K
YRS PRO: 16
TEAM RAMS
POSITION K
SORT BY OVR
NO PLAYER OVR STR AGI SPD ACC AWR CTH
14 J.WILKINS 84 34 38 34 34 75 18
8 N.LOWERY 84 28 36 34 34 71 20
MADDEN NFL 2000
MADDEN NFL 2000


ROSTERS
EA SPORTS
ROSTER INFO
LOAD/SAVE/DEL
MANAGE ROSTERS
VIEW ROSTER
Rams
PLAYERS
N.LOWERY
HEIGHT 6'4"
WEIGHT 205
POS: K
YRS PRO: 16
TEAM RAMS
POSITION K
SORT BY OVR
NO PLAYER CTH CAR THP THA KPW KAC BTK
14 J.WILKINS 18 18 3 3 83 85 18
8 N.LOWERY 20 18 9 9 81 88 18
MADDEN NFL 2000
MADDEN NFL 2000


ROSTERS
EA SPORTS
ROSTER INFO
LOAD/SAVE/DEL
MANAGE ROSTERS
VIEW ROSTER
RAMS
PLAYERS
N.LOWERY
HEIGHT 6'4"
WEIGHT 205
POS: K
YRS PRO: 16
TEAM RAMS
POSITION K
SORT BY OVR
NO PLAYER KAC BTK TAK IMP PBK RBK INJ
14 J.WILKINS 85 18 24 75 3 3 85
8 N.LOWERY 88 18 24 75 3 3 85
MADDEN NFL 2000
MADDEN NFL 2000

Name	Date Modified	Size	Kind
autorun.exe	Sep 2, 1999, 12:06 AM	2.2 MB	Micros...ication
BHMM04.asf	Jun 15, 1999, 6:07 PM	2.7 MB	Micros...ormat
blank0.dat	Apr 2, 1999, 12:33 AM	1 byte	Unix E...le File
clcd16.dll	Aug 2, 1999, 10:05 PM	7 KB	Micros...library
clcd32.dll	Aug 2, 1999, 10:05 PM	28 KB	Micros...library
clokspl.exe	Aug 2, 1999, 10:05 PM	177 KB	Micros...ication
comntary.dat	Sep 1, 1999, 7:43 PM	109 KB	Unix E...le File
CTPIX.dat	May 9, 1999, 3:44 PM	22.6 MB	Unix E...le File
DDMM01.asf	Jun 15, 1999, 6:08 PM	2.8 MB	Micros...ormat
DelsL1.isu	Sep 1, 1999, 1:53 PM	21 KB	Unix E...le File
dplayerx.dll	Aug 2, 1999, 10:05 PM	156 KB	Micros...library
drvmgt.dll	Aug 2, 1999, 10:05 PM	32 KB	Micros...library
DVMM02.asf	Jun 15, 1999, 6:08 PM	2.8 MB	Micros...ormat
EAHELP.HLP	Aug 2, 1999, 8:20 PM	648 KB	Unix E...le File
FMMM02.asf	Jun 15, 1999, 6:08 PM	3.3 MB	Micros...ormat
FONTS01.dat	Jul 28, 1999, 5:23 PM	431 KB	Unix E...le File
HELMETS.dat	Jul 21, 1999, 11:52 AM	1.7 MB	Unix E...le File
HINTLIB.dat	Jul 21, 1999, 12:07 PM	7 KB	Unix E...le File
HOLDING.dat	Jul 28, 1999, 7:30 PM	549 KB	Unix E...le File
IFORCE2.dll	Dec 11, 1998, 6:25 PM	75 KB	Micros...library
IG.dat	Jul 28, 1999, 4:40 PM	3.5 MB	Unix E...le File
IGT.dat	Jul 23, 1999, 9:26 PM	38.3 MB	Unix E...le File
JDMM02.asf	Jun 15, 1999, 6:08 PM	2.3 MB	Micros...ormat
Language.txt	Jul 28, 1999, 7:25 PM	1 KB	text
legal555.raw	Jul 19, 1999, 9:59 PM	614 KB	Panaso...image
legal565.raw	Jul 19, 1999, 9:59 PM	614 KB	Panaso...image
LOADDATA.dat	Jul 23, 1999, 7:17 PM	2.7 MB	Unix E...le File
Madden NFL (TM) 2000.lnk	Sep 1, 1999, 1:52 PM	306 bytes	Unix E...le File
Madden.ico	Jul 13, 1999, 10:35 PM	8 KB	Windo...image
MADN3DFX.exe	Sep 2, 1999, 1:14 AM	2.2 MB	Micros...ication
MADNPCL.exe	Sep 2, 1999, 12:08 AM	2.1 MB	Micros...ication
MODEL01.dat	Jul 29, 1999, 5:10 PM	67.8 MB	Unix E...le File
MOUSE1.dat	Jul 15, 1999, 6:38 PM	984 bytes	Unix E...le File
music.dat	Sep 1, 1999, 7:43 PM	109 KB	Unix E...le File
PIX01.dat	Jul 20, 1999, 9:29 PM	6.7 MB	Unix E...le File
PIXLIB.dat	Jul 19, 1999, 4:16 PM	1.1 MB	Unix E...le File
PORTRAIT.dat	Jul 26, 1999, 4:20 PM	9.3 MB	Unix E...le File
QUESTIONS.dat	Jul 26, 1999, 8:08 PM	15 KB	Unix E...le File
README.TXT	Aug 2, 1999, 8:24 PM	9 KB	text
rosters	Today, 10:32 PM	--	Folder
ROSTDATA.DAT	Jan 6, 2000, 11:22 AM	459 KB	Unix E...le File
save	Nov 23, 2016, 3:06 PM	--	Folder
MADN2K SETTINGS	Jan 19, 2014, 9:03 PM	22 KB	Unix E...le File
SS.SAV0	Sep 2, 1999, 1:02 AM	25 KB	Unix E...le File
secdrv.sys	Aug 2, 1999, 10:05 PM	14 KB	Unix E...le File
SETUP.BAT	Sep 2, 1999, 12:59 AM	50 bytes	Unix E...le File
setupreg.exe	Sep 1, 1999, 8:03 PM	28 KB	Micros...ication
SNDDATA.dat	Jul 21, 1999, 1:24 PM	5.3 MB	Unix E...le File
Sponsors	Nov 23, 2016, 3:06 PM	--	Folder
SPRITES.dat	Jul 25, 1999, 6:34 PM	1.2 MB	Unix E...le File
SR_MODEL.dat	Jul 13, 1999, 3:43 PM	5.7 MB	Unix E...le File
SR_PORTR.dat	Jul 25, 1999, 5:53 PM	5.9 MB	Unix E...le File
SR_SPRTE.dat	Jul 23, 1999, 2:56 PM	1.3 MB	Unix E...le File
STPIX.dat	May 9, 1999, 5:47 PM	47 KB	Unix E...le File
TEXTLIB.dat	Jul 28, 1999, 4:00 AM	52 KB	Unix E...le File
TMSMLOGO.dat	Jul 21, 1999, 11:51 AM	406 KB	Unix E...le File
Uninstall Madden NFL (TM) 2000.lnk	Sep 1, 1999, 1:52 PM	330 bytes	Unix E...le File

NO NAME ▸ Madden2000_Week1

Δπ EXHIBIT 2-A
Deponent Ferweda
Date 11-29-16 Rptr. TS
WWW.DEPOBOOK.COM

2A

Name	Date Modified	Size	Kind
autorun.exe	Sep 2, 1999, 12:06 AM	2.2 MB	Micros...ication
BHMM04.asf	Jun 15, 1999, 6:07 PM	2.7 MB	Micros...ormat
blank0.dat	Apr 2, 1999, 12:33 AM	1 byte	Unix E...le File
clcd16.dll	Aug 2, 1999, 10:05 PM	7 KB	Micros...library
clcd32.dll	Aug 2, 1999, 10:05 PM	28 KB	Micros...library
clokspl.exe	Aug 2, 1999, 10:05 PM	177 KB	Micros...ication
comntary.dat	Sep 1, 1999, 7:43 PM	109 KB	Unix E...le File
CTPIX.dat	May 9, 1999, 3:44 PM	22.6 MB	Unix E...le File
DDMM01.asf	Jun 15, 1999, 6:08 PM	2.8 MB	Micros...ormat
DelsL1.isu	Sep 1, 1999, 1:53 PM	21 KB	Unix E...le File
dplayerx.dll	Aug 2, 1999, 10:05 PM	156 KB	Micros...library
drvmgt.dll	Aug 2, 1999, 10:05 PM	32 KB	Micros...library
DVMM02.asf	Jun 15, 1999, 6:08 PM	2.8 MB	Micros...ormat
EAHELP.HLP	Aug 2, 1999, 8:20 PM	648 KB	Unix E...le File
FMMM02.asf	Jun 15, 1999, 6:08 PM	3.3 MB	Micros...ormat
FONTS01.dat	Jul 28, 1999, 5:23 PM	431 KB	Unix E...le File
HELMETS.dat	Jul 21, 1999, 11:52 AM	1.7 MB	Unix E...le File
HINTLIB.dat	Jul 21, 1999, 12:07 PM	7 KB	Unix E...le File
HOLDING.dat	Jul 28, 1999, 7:30 PM	549 KB	Unix E...le File
IFORCE2.dll	Dec 11, 1998, 6:25 PM	75 KB	Micros...library
IG.dat	Jul 28, 1999, 4:40 PM	3.5 MB	Unix E...le File
IGT.dat	Jul 23, 1999, 9:26 PM	38.3 MB	Unix E...le File
JDMM02.asf	Jun 15, 1999, 6:08 PM	2.3 MB	Micros...ormat
Language.txt	Jul 28, 1999, 7:25 PM	1 KB	text
legal555.raw	Jul 19, 1999, 9:59 PM	614 KB	Panaso...image
legal565.raw	Jul 19, 1999, 9:59 PM	614 KB	Panaso...image
LOADDATA.dat	Jul 23, 1999, 7:17 PM	2.7 MB	Unix E...le File
Madden NFL (TM) 2000.lnk	Sep 1, 1999, 1:52 PM	306 bytes	Unix E...le File
Madden.ico	Jul 13, 1999, 10:35 PM	8 KB	Windo...image
MADN3DFX.exe	Sep 2, 1999, 1:14 AM	2.2 MB	Micros...ication
MADNPCL.exe	Sep 2, 1999, 12:08 AM	2.1 MB	Micros...ication
MODEL01.dat	Jul 29, 1999, 5:10 PM	67.8 MB	Unix E...le File
MOUSE1.dat	Jul 15, 1999, 6:38 PM	984 bytes	Unix E...le File
music.dat	Sep 1, 1999, 7:43 PM	109 KB	Unix E...le File
PIX01.dat	Jul 20, 1999, 9:29 PM	6.7 MB	Unix E...le File
PIXLIB.dat	Jul 19, 1999, 4:16 PM	1.1 MB	Unix E...le File
PORTRAIT.dat	Jul 26, 1999, 4:20 PM	9.3 MB	Unix E...le File
QUESTIONS.dat	Jul 26, 1999, 8:08 PM	15 KB	Unix E...le File
README.TXT	Aug 2, 1999, 8:24 PM	9 KB	text
rosters	Today, 10:45 PM	--	Folder
ROSTDATA.DAT	Jan 26, 2000, 6:51 PM	459 KB	Unix E...le File
save	Nov 23, 2016, 3:06 PM	--	Folder
MADN2K SETTINGS	Jan 19, 2014, 9:03 PM	22 KB	Unix E...le File
SS.SAV0	Sep 2, 1999, 1:02 AM	25 KB	Unix E...le File
secdrv.sys	Aug 2, 1999, 10:05 PM	14 KB	Unix E...le File
SETUP.BAT	Sep 2, 1999, 12:59 AM	50 bytes	Unix E...le File
setupreg.exe	Sep 1, 1999, 8:03 PM	28 KB	Micros...ication
SNDDATA.dat	Jul 21, 1999, 1:24 PM	5.3 MB	Unix E...le File
Sponsors	Nov 23, 2016, 3:06 PM	--	Folder
SPRITES.dat	Jul 25, 1999, 6:34 PM	1.2 MB	Unix E...le File
SR_MODEL.dat	Jul 13, 1999, 3:43 PM	5.7 MB	Unix E...le File
SR_PORTR.dat	Jul 25, 1999, 5:53 PM	5.9 MB	Unix E...le File
SR_SPRTE.dat	Jul 23, 1999, 2:56 PM	1.3 MB	Unix E...le File
STPIX.dat	May 9, 1999, 5:47 PM	47 KB	Unix E...le File
TEXTLIB.dat	Jul 28, 1999, 4:00 AM	52 KB	Unix E...le File
TMSMLOGO.dat	Jul 21, 1999, 11:51 AM	406 KB	Unix E...le File
Uninstall Madden NFL (TM) 2000.lnk	Sep 1, 1999, 1:52 PM	330 bytes	Unix E...le File

NO NAME ▸ Madden2000_SuperBowl

Δπ EXHIBIT 2-B
Deponent Erwenda
Date 11-29-16 Rptr. TS
WWW.DEPOBOOK.COM

2B