

EXHIBIT

“E”

**Exhibit D: Infringement Chart of U.S. Patent No. 6,200,216
as to Panini America Inc.’s NFL Adrenalyn XL**

The accused systems and methods are identified as those that are used to operate NFL Adrenalyn XL (the “Accused Instrumentality”) created by Panini America Inc., referred hereon as Panini America. In support of these infringement contentions are NFL Adrenalyn XL Screenshots (attached hereto as ‘NFL Adrenalyn XL Exhibit1’).

The following claim charts provide non-limiting contentions and examples demonstrating the manner in which the accused systems and methods meet the limitations of the asserted claims. The contentions and examples set forth for a particular claim limitation are not limited in application to that particular claim limitation and should be understood to apply to other claim limitations and other claims to which similar contentions and examples are provided. In addition, specific examples of products or services are intended to apply to other products or services on the Accused Instrumentality.

Claim 1	Infringement Analysis
<p>A system for the implementation of a trading card metaphor, comprising:</p>	<p>The preamble does not function as a claim limitation. In any event, the preamble is met by the Accused Instrumentality.</p> <p>The Accused Instrumentality is an implementation of a trading card metaphor.</p> <p>NFL Adrenalyn XL™ is a virtual world created for users to play the trading card game. Users can collect and trade electronic NFL Adrenalyn XL cards. Trading of cards is exercised through the “Trade Center” available to registered users.</p> <p>(See, e.g., NFL Adrenalyn XL Exhibit 1: NFL Screenshot 1, NFL Adrenalyn XL Screenshot 2, NFL Adrenalyn XL Screenshot 3, and NFL Adrenalyn XL Screenshot 4)</p> <p>Source: http://nfl.paniniadrenalyn.com/about http://nfl.paniniadrenalyn.com/trades (for access to this web page, a user is required to log in) http://nfl.paniniadrenalyn.com/lockerroom (for access to this web page, a user is required to log in)</p>
<p>a disassociated computer program,</p>	<p>The Accused Instrumentality meets this limitation as it provides a dissociated computer program.</p> <p>NFL Adrenalyn XL™ Trading Card Game is a dissociated computer program running on a web browser at web address http://nfl.paniniadrenalyn.com. A separate profile is maintained for each registered user. Moreover, the game comprises many unique electronic trading cards, each dissociated from the other.</p>

Claim 1	Infringement Analysis
	<p>(See, e.g., NFL Adrenalyn XL Exhibit 1: NFL Adrenalyn XL Screenshot 5, and NFL Adrenalyn XL Screenshot 6)</p> <p>Source: http://nfl.paniniadrenalyn.com http://nfl.paniniadrenalyn.com/leaderboard (for access to this web page, a user is required to log in)</p>
<p>consisting of a plurality of electronic trading cards (ETCs),</p>	<p>The Accused Instrumentality meets this limitation as it consists of a plurality of electronic trading cards (ETCs).</p> <p>The browser based NFL Adrenalyn XL™ Trading Card Game consists of many electronic trading cards. Initially, a registered user gets a starter deck of 14 random cards. Users can also buy or trade electronic cards online, or can obtain electronic trading cards using the unlock codes present on the physical cards that can be entered in the game.</p> <p>(See, e.g., NFL Adrenalyn XL Exhibit 1: NFL Adrenalyn XL Screenshot 7, and NFL Adrenalyn XL Screenshot 8)</p> <p>Source: http://nfl.paniniadrenalyn.com/lockerroom/</p>
<p>each ETC corresponding to a disassociated computer code segment embodied in a tangible medium and</p>	<p>The Accused Instrumentality meets this limitation as each ETC corresponds to a disassociated computer code segment embodied in a tangible medium.</p> <p>Every electronic trading card in the game is unique with many attributes such as ‘Player Name’, ‘Team’, ‘Collection’, ‘Position’, ‘Run’, ‘Pass’, ‘Star’, ‘Card Set’, etc. The electronic trading cards are stored on the game server (tangible medium). Since the cards are unique and are in electronic form, it is obvious that each card corresponds to a disassociated computer code segment.</p> <p>(See, e.g., NFL Adrenalyn XL Exhibit 1: NFL Adrenalyn XL Screenshot 9, and NFL Adrenalyn XL Screenshot 10)</p> <p>Source: http://nfl.paniniadrenalyn.com/cards (for access to this web page, a user is required to log in) http://nfl.paniniadrenalyn.com/trades</p>
<p>having an electronic format that supports card scarcity and card authenticity.</p>	<p>The Accused Instrumentality meets this limitation as it possesses an electronic format that supports card scarcity and card authenticity.</p>

Claim 1	Infringement Analysis
	<p>The NFL Adrenalyn XL™ electronic trading cards support scarcity. These rare cards are termed as ‘Ultimate’ cards, and can be bought online or collected in a trade. These ‘Ultimate’ cards are identified by their ‘Card Set’ attribute. NFL Adrenalyn XL™ Trading Card Game allows users to trade cards through the game application server via the host http://nfl.paniniadrenalyn.com therefore since the server controls the cards it can be ensured that all cards are authentic and the server can control card scarcity.</p> <p>(See, e.g., NFL Adrenalyn XL Exhibit 1: NFL Adrenalyn XL Screenshot 11, NFL Adrenalyn XL Screenshot 12, and NFL Adrenalyn XL Screenshot 13)</p> <p>Source: http://nfl.paniniadrenalyn.com/trades http://nfl.paniniadrenalyn.com/lockerroom http://nfl.paniniadrenalyn.com/cards</p>
Claim 9	Infringement Analysis
<p>The system of claim 1, wherein said ETC is randomly distributed in partial sets.</p>	<p>In addition to infringing claim 1 as outlined above, the Accused Instrumentality meets this dependent limitation.</p> <p>In NFL Adrenalyn XL™ Trading Card Game, initially a registered user gets a starter deck (a partial set) of 14 random cards.</p> <p>(See, e.g., NFL Adrenalyn XL Exhibit 1: NFL Adrenalyn XL Screenshot 7, and NFL Adrenalyn XL Screenshot 8)</p> <p>Source: http://nfl.paniniadrenalyn.com/about</p>
Claim 10	Infringement Analysis
<p>The system of claim 1, further comprising: a runtime engine that must be present in a local computing device for a user to view and interact with an</p>	<p>In addition to infringing claim 1 as outlined above, the Accused Instrumentality meets this dependent limitation as it requires a runtime engine that must be present on a local computing device for a user to view and interact with the ETCs.</p> <p>NFL Adrenalyn XL™ is an online trading card game which is played on a web browser at the website http://nfl.paniniadrenalyn.com/. The game on this website runs on the user’s browser as a flash application,</p>

Claim 10	Infringement Analysis
ETC,	<p>wherein Flash acts as the runtime engine which is required to run the application. This application is required to allow the users to interact with the ETCs.</p> <p>(See, e.g., NFL Adrenalyn XL Exhibit 1: NFL Adrenalyn XL Screenshot 15)</p> <p>Source: http://nfl.paniniadrenalyn.com/play (for access of this Web page, a user is required to log in)</p>
<p>said runtime engine including media handlers and display routines, a timing mechanism, display management, and input handlers.</p>	<p>The Accused Instrumentality meets this limitation as the runtime engine includes media handlers and display routines, a timing mechanism, display management, and input handlers.</p> <p>NFL Adrenalyn XL™ is a browser based trading card game application. The game requires the Flash runtime engine in order to run. Flash is required for the critical mechanisms such as media handling, display routines, input handling, timing and display management to function.</p> <p>(See, e.g., NFL Adrenalyn XL Exhibit 1: NFL Adrenalyn XL Screenshot 15)</p> <p>Source: http://nfl.paniniadrenalyn.com/play</p>

Claim 21	Infringement Analysis
<p>A method for the implementing a trading card metaphor, comprising the steps of:</p>	<p>The preamble does not function as a claim limitation. In any event, the preamble is met by the Accused Instrumentality.</p> <p>The Accused Instrumentality is an implementation of a trading card metaphor.</p> <p>NFL Adrenalyn XL™ is a virtual world created for users to play the electronic trading card game. Users can collect and trade electronic NFL Adrenalyn XL trading cards. Trading of cards is exercised through the “Trade Center” available to registered users.</p> <p>(See, e.g., NFL Adrenalyn XL Exhibit 1: NFL Screenshot 1, NFL Adrenalyn XL Screenshot 2, NFL Adrenalyn XL Screenshot 3, and NFL Adrenalyn XL Screenshot 4)</p> <p>Source: http://nfl.paniniadrenalyn.com/about http://nfl.paniniadrenalyn.com/trades http://nfl.paniniadrenalyn.com/lockerroom</p>

Claim 21	Infringement Analysis
dissociating a computer program,	<p>The Accused Instrumentality meets this limitation as it provides a dissociated computer program.</p> <p>NFL Adrenalyn XL™ Trading Card Game is a dissociated computer program running on a web browser at http://nfl.paniniadrenalyn.com. A separate profile is maintained for each registered user. Moreover, the game comprises many unique electronic trading cards, each dissociated from the other.</p> <p>(See, e.g., NFL Adrenalyn XL Exhibit 1: NFL Adrenalyn XL Screenshot 5, and NFL Adrenalyn XL Screenshot 6)</p> <p>Source: http://nfl.paniniadrenalyn.com http://nfl.paniniadrenalyn.com/leaderboard</p>
consisting of a plurality of electronic trading cards (ETCs),	<p>The Accused Instrumentality meets this limitation as it consists of a plurality of electronic trading cards (ETCs).</p> <p>The browser based NFL Adrenalyn XL™ Trading Card Game consists of many electronic trading cards. Initially, a registered user gets a starter deck of 14 random electronic trading cards. Users can also buy ETCs online, or can obtain them using the unlock codes present on the physical cards which can be entered into the game to gain ETCs.</p> <p>(See, e.g., NFL Adrenalyn XL Exhibit 1: NFL Adrenalyn XL Screenshot 7, and NFL Adrenalyn XL Screenshot 8)</p> <p>Source: http://nfl.paniniadrenalyn.com/lockerroom/</p>
each ETC corresponding to a disassociated computer code segment and	<p>The Accused Instrumentality meets this limitation as each ETC corresponds to a dissociated computer code segment.</p> <p>Every electronic trading card in the game is unique with many attributes such as ‘Player Name’, ‘Team’, ‘Collection’, ‘Position’, ‘Run’, ‘Pass’, ‘Star’, ‘Card Set’, etc. The electronic trading cards are stored on the game server. Since the cards are unique and are electronic, it is obvious that each card corresponds to a disassociated computer code segment.</p> <p>(See, e.g., NFL Adrenalyn XL Exhibit 1: NFL Adrenalyn XL Screenshot 9, and NFL Adrenalyn XL Screenshot 10)</p> <p>Source: http://nfl.paniniadrenalyn.com/cards</p>

Claim 21	Infringement Analysis
	http://nfl.paniniadrenalyn.com/trades
having an electronic format that supports card scarcity and card authenticity.	<p>The Accused Instrumentality meets this limitation as it possesses an electronic format that supports card scarcity and card authenticity.</p> <p>The NFL Adrenalyn XL™ electronic trading cards support scarcity. The rare cards are termed as ‘Ultimate’ cards, and can be bought online or collected in a trade. These ‘Ultimate’ cards are identified by their ‘Card Set’ attribute. NFL Adrenalyn XL™ Trading Card Game allows users to trade electronic cards through the game application server via the host http://nfl.paniniadrenalyn.com which ensures that the cards are authentic while the server control enables card scarcity to be enforced.</p> <p>(See, e.g., NFL Adrenalyn XL Exhibit 1: NFL Adrenalyn XL Screenshot 11, NFL Adrenalyn XL Screenshot 12, and NFL Adrenalyn XL Screenshot 13)</p> <p>Source: http://nfl.paniniadrenalyn.com/trades http://nfl.paniniadrenalyn.com/lockerroom http://nfl.paniniadrenalyn.com/cards</p>

Claim 29	Infringement Analysis
The method of claim 21, wherein said ETC is randomly distributed in partial sets.	<p>In addition to infringing claim 21 as outlined above, the Accused Instrumentality meets this dependent limitation.</p> <p>On signing up for the NFL Adrenalyn XL™ Trading Card Game, a user gets a Starter Deck (a partial set) with 14 randomly distributed electronic trading cards.</p> <p>(See, e.g., NFL Adrenalyn XL Exhibit 1: NFL Adrenalyn XL Screenshot 14)</p> <p>Source: http://nfl.paniniadrenalyn.com/about</p>

Claim 30	Infringement Analysis
The method of claim 21, further comprising the step of:	In addition to infringing claim 1 as outlined above, the Accused Instrumentality meets this dependent limitation as a runtime engine is required on a local computing device before a user can view and interact with the ETCs.

Claim 30	Infringement Analysis
<p>requiring the presence of a runtime engine in a local computing device before a user can view and interact with an ETC.</p>	<p>NFL Adrenalyn XL™ is an online trading card game which is played on a web browser at the website http://nfl.paniniadrenalyn.com/. The game on this website runs on the user’s browser using Flash, which serves as the runtime engine and is required to play the game. This application is required to enable the users to view or interact with the ETCs.</p> <p>(See, e.g., NFL Adrenalyn XL Exhibit 1: NFL Adrenalyn XL Screenshot 15)</p> <p>Source: http://nfl.paniniadrenalyn.com/play</p>
Claim 36	Infringement Analysis
<p>The method of claim 21, further comprising the step of: trading ETCs on-line.</p>	<p>In addition to infringing claim 1 as outlined above, the Accused Instrumentality meets this limitation as the ETCs can be traded on-line.</p> <p>NFL Adrenalyn XL™ is an online trading card game wherein trading of electronic trading cards is exercised through the “Trade Center” available to registered users on the website http://nfl.paniniadrenalyn.com.</p> <p>(See, e.g., NFL Adrenalyn XL Exhibit 1: NFL Screenshot 1, and NFL Adrenalyn XL Screenshot 2)</p> <p>Source: http://nfl.paniniadrenalyn.com/lockerroom</p>