

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ACCELERATION BAY LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 15-228 (RGA)
	)	
ACTIVISION BLIZZARD, INC.,	)	
	)	
Defendant.	)	

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ACCELERATION BAY LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 15-282 (RGA)
	)	
ELECTRONIC ARTS INC.,	)	
	)	
Defendant.	)	

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ACCELERATION BAY LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 15-311 (RGA)
	)	
TAKE-TWO INTERACTIVE SOFTWARE,	)	
INC., ROCKSTAR GAMES, INC. and	)	
2K SPORTS, INC.,	)	
	)	
Defendants.	)	

**PLAINTIFF ACCELERATION BAY LLC’S MOTION TO COMPEL DEPOSITIONS,  
SUBSTANTIVE RESPONSES TO COMMON INTERROGATORY  
NUMBERS 10 AND 11 AND PRODUCTION OF SOURCE CODE**

Pursuant to the Court’s Order Appointing Special Master (D.I. 94 in C.A. No. 15-228-RGA) (“Order”), Plaintiff Acceleration Bay LLC, (“Acceleration Bay”) hereby moves for an order compelling Defendants in the above captioned actions (1) to provide within seven days a list of deposition witnesses for each of the accused products and a schedule of the dates they are

available for deposition, so that technical depositions can proceed without any further delay; and (2) to provide substantive responses to Acceleration Bay's Common Interrogatory Nos. 10 and 11. Acceleration Bay also moves for a finding that Common Interrogatory Nos. 10 and 11 count as only one interrogatory each against Acceleration Bay's total allowed Common Interrogatories under the Scheduling Order (D.I. 34 in C.A. No. 15-228-RGA). Finally, Acceleration Bay moves for an order compelling Defendant Electronic Arts Inc. to offer for inspection within seven days the source code for the accused product Plants vs. Zombies: Garden Warfare 2.

The grounds for this motion are set forth in the Parties' letter briefs, copies of which will be provided to the Special Master pursuant to Paragraph 3 of the Order and the Special Master Order Relating to Procedures for Resolving Discovery Motions (D.I. 113 in C.A. No. 15-228-RGA). An in-person hearing on this motion is scheduled for April 14, 2016 at 11:00 a.m.

Pursuant to D. Del. LR 7.1.1, Acceleration Bay states that it has made reasonable effort to reach agreement with Defendants on the matters set forth in this motion and has been informed that Defendants oppose the relief sought.

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Dated: April 5, 2016  
1220541

By: /s/ Philip A. Rovner  
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