

**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. )

**[PROPOSED] ORDER**

WHEREAS, the Special Master, having considered Plaintiff Acceleration Bay LLC’s Motion to Compel Production of Witnesses at Deposition, Substantive Responses to Acceleration Bay’s Common Interrogatory Numbers 10 and 11 and Production of Source Code and the related briefing and oral argument thereto;

IT IS HEREBY ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2016, that:

1. Acceleration Bay's Motion to Compel Production of Witnesses at Deposition is hereby GRANTED. Within seven (7) days of this order, Defendants shall provide a list of deposition witnesses for each of the accused products and a schedule of the dates they are available for deposition.

2. Acceleration Bay's Motion to Compel Substantive Responses to Acceleration Bay's Common Interrogatory Numbers 10 and 11 is hereby GRANTED. Common Interrogatory Numbers 10 and 11 shall count as one interrogatory each towards Acceleration Bay's total allowed Common Interrogatories. Defendants shall provide supplemental, substantive responses to Common Interrogatory Numbers 10 and 11 within fourteen (14) days of this order.

3. Defendant Electronic Arts Inc. shall, within seven (7) days of this order, offer for inspection the source code for the accused product Plants vs. Zombies: Garden Warfare 2.

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Special Master Allen M. Terrell, Jr.