

**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.)	

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

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 DAMAGES DISCOVERY**

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 to provide the following discovery within ten (10) days: (1) gross and net revenues, costs, expenses, and profits for U.S. and foreign

sales broken down by country (all Defendants); (2) disclosure of revenues from the sale of accused products including online distribution platforms, bundled sales and tokens and supplemental responses to Common Interrogatory No. 7, which seeks information related to such revenues (all Defendants); (3) supplemental responses to Common Interrogatory No. 6 regarding the geographical locations where the components of accused products are manufactured, developed, and tested (all Defendants); (4) unredacted patent license agreements that relate to the accused products or Defendants' multi-player networks (Take-Two only); (5) sales forecasts and billings information (all Defendants); and (6) financial information in generally accepted accounting principles (GAAP) format (Activision only).

The grounds for this motion are set forth in Acceleration Bay's letter brief, 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). A telephonic hearing on this motion is scheduled for June 8, 2016 at 1:00 p.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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1225044

By: /s/ Philip A. Rovner
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