

**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.)

[PROPOSED] ORDER

WHEREAS, the Special Master, having considered Plaintiff Acceleration Bay LLC’s Motion to Compel Damages Discovery and the related briefing and oral argument thereto;

IT IS HEREBY ORDERED this ____ day of _____, 2016, that:

1. Acceleration Bay’s Motion to Compel Damages Discovery is hereby GRANTED.

Within ten (10) day of this order Defendants shall provide: (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).

Special Master Allen M. Terrell, Jr.

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