

EXHIBIT 1

**THIS EXHIBIT HAS BEEN
REDACTED IN ITS ENTIRETY**

Exhibit 2

Frankel, Aaron

From: Frankel, Aaron
Sent: Thursday, January 14, 2016 3:57 PM
To: Enzminger, David P.; Tomasulo, Mike; Lin, David K.; Salyer, Robin A.; Cheng, Gino; Kalemeris, Sarah J.; Hodgson, Alissa C; dwebb@winston.com; Blumenfeld, Jack; Kraftschik, Stephen; Myers, Dana
Cc: Andre, Paul; Kobialka, Lisa; Hannah, James; Lee, Hannah; Philip A. Rovner; Jonathan A. Choa
Subject: Acceleration Bay Actions: Post-Hearing Discovery Follow-Up

Follow Up Flag: Follow up
Flag Status: Completed

David:

Thank you for the productive meeting after the hearing yesterday. I write to memorialize our various requested follow-up items. Please let me know if any of the following does not accurately reflect our discussions.

The date for Acceleration Bay's infringement contentions has been moved to March 2, 2016, and the date for Defendants' invalidity contentions has been moved to May 6, 2016.

Please provide proposed dates for the 30(b)(6) depositions of the Defendants. As discussed, we would like to begin with a designee able to speak to the multiplayer, networking and server-interconnection functionality for each of the accused games (we would also cover other noticed topics for which the witnesses are knowledgeable). It may make sense to begin with Take-Two, given your representation that no Take-Two documents will be forthcoming.

As requested in our December 18, 2015 letter to Mike and subsequent follow-ups, please as soon as possible update Defendants' ESI disclosures to identify any third-party sources of relevant source code. In particular, to the extent any of Defendants' games rely on third-party source code, developer kits, software or servers to provide the multiplayer functionality, please let us know now so that Acceleration Bay may timely seek core technical discovery from those third parties.

Please let us know when the World of Warcraft wiki is available for inspection. We request that the sections of the World of Warcraft and Call of Duty wikis relating to networking and multi-player functionality be produced with the source code redacted.

Please produce redacted copies of the main design document for each of the Activision Call of Duty games (located in the technical documents folder), the text files with "mp" in the title (also located in the Call of Duty technical documents folder) and the Activision documents attached as exhibits to Defendants' letter brief. Next week we will provide a list of additional requested game design and specification documents.

Finally, as discussed, we expect to serve productions in response to the various outstanding subpoenas tomorrow. Please let us know when Defendants will complete the production of technical documents referenced in Mike's January 11, 2016 email, and when we should expect the Destiny documents from Activision.

Regards,

Aaron

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