

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

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ACCELERATION BAY LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 16-453 (RGA)
	)	
ACTIVISION BLIZZARD, INC.	)	
	)	
Defendant.	)	

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ACCELERATION BAY LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 16-454 (RGA)
	)	
ELECTRONIC ARTS INC.,	)	
	)	
Defendant.	)	

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ACCELERATION BAY LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 16-455 (RGA)
	)	
TAKE-TWO INTERACTIVE SOFTWARE,	)	
INC., ROCKSTAR GAMES, INC. and	)	
2K SPORTS, INC.,	)	
	)	
Defendants.	)	

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**DEFENDANTS' MOTION TO COMPEL COMPLIANCE WITH  
RULE 45 SUBPOENA TO BOEING COMPANY**

Pursuant to the Special Master Order Relating to Procedures for Resolving Discovery Motions (*see* C.A. No. 16-453, D.I. 62 at 2; C.A. No. 15-228, D.I. 113), Defendants move for an Order compelling Boeing Company (“Boeing”) to:

1. Produce a privilege log for any documents withheld on the basis of privilege, work product, or other such protections; and

2. Search and produce responsive emails and electronically stored information and explain how such documents were searched.

Pursuant to D. Del. LR 7.1.1, Defendants state that they have made reasonable effort to reach agreement with Boeing on the matters set forth in this motion and the parties could not reach agreement.

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/s/ John C. Phillips, Jr.

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