

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ACCELERATION BAY LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 16-453 (RGA)
)	
ACTIVISION BLIZZARD, INC.,)	
)	
Defendant.)	
)	
ACCELERATION BAY LLC,)	
)	
Plaintiff,)	
)	C.A. No. 16-455 (RGA)
v.)	
)	
TAKE-TWO INTERACTIVE SOFTWARE,)	
INC., ROCKSTAR GAMES, INC., and 2K)	
SPORTS, INC., Delaware Corporations,)	
)	
Defendant.)	
)	

PLAINTIFF ACCELERATION BAY LLC’S MOTION TO COMPEL

Pursuant to the Court’s Order Appointing Special Master (D.I. 94 in C.A. No. 15-228-RGA, incorporated into this action by D.I. 62) (“Order”), Plaintiff Acceleration Bay LLC (“Acceleration Bay”) hereby moves for an order: (1) compelling Defendant Activision Blizzard, Inc. to produce World of Warcraft wiki files; (2) compelling Defendant Take-Two to provide documents, source code and software development kits related to the accused Grand Theft Auto (GTA) and NBA 2K products; and (3) compelling third-party Joe Rumsey to comply with Acceleration Bay’s March 13, 2017 deposition and document subpoenas.

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 May 10, 2017.

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 have been informed that Defendants oppose the relief sought.

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5112394

By: /s/ Philip A. Rovner
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