

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.	)	
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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.	)	

**DEFENDANTS' JULY 5, 2017 MOTIONS TO COMPEL (I) – (J)**

Activision Blizzard, Inc. (“Activision”), Electronic Arts Inc. (“EA”) and Take-Two Interactive Software, Inc., Rockstar Games, Inc., and 2K Sports, Inc. (“Take-Two”) (collectively, “Defendants”) move to compel on the issues set forth in the following table:

<b><u>Brief</u></b>	<b><u>Motion Title</u></b>	<b><u>Relief Sought</u></b>	<b><u>Moving Party</u></b>
I.	Defendants' motion for an order compelling Boeing to produce a Rule 30(b)(6) deponent.	Order compelling Boeing to produce a Rule 30(b)(6) witness.	EA
J.	Defendants' motion for an order compelling production of Boeing's communications with Global IP.	Order overruling Boeing's objection that communications with Global IP are privileged and requiring production of all communications between Boeing and Global IP related to the SWAN patents.	All Defendants

The grounds for these motions are set forth in the Opening Letter Briefs I-J submitted to the Special Master herewith.

PHILLIPS, GOLDMAN, McLAUGHLIN &  
HALL, P.A.

/s/ John C. Phillips, Jr.

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July 5, 2017

**7.1.1 CERTIFICATION**

I hereby certify that the subject of the foregoing motion has been discussed with counsel for the plaintiff and that we have not been able to reach agreement.

*/s/ John C. Phillips, Jr.* \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 5, 2017, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on July 5, 2017, upon the following in the manner indicated:

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