

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

ACCELERATION BAY LLC,	)	
	)	C.A. No. 16-453 (RGA)
Plaintiff,	)	
	)	
v.	)	
	)	
ACTIVISION BLIZZARD, INC.,	)	
	)	
Defendant.	)	
	)	
	)	
	)	
ACCELERATION BAY LLC,	)	
	)	
Plaintiff,	)	
	)	C.A. No. 16-454 (RGA)
v.	)	
	)	
ELECTRONIC ARTS 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.,	)	
	)	
Defendants.	)	

**DECLARATION OF MICHAEL GOODRICH, PH.D.  
IN SUPPORT OF PLAINTIFF ACCELERATION BAY LLC.' S  
MOTIONS FOR SUMMARY JUDGMENT**

I, Michael Goodrich, Ph.D., hereby declare as follows:

1. I am a Chancellor's Professor in the Department of Computer Science at the University of California, Irvine, and have been retained by counsel for Plaintiff Acceleration Bay, LLC ("Acceleration Bay") to serve as an expert witness in the above-captioned action.

2. I submit this declaration in support of Acceleration Bay's Motions for Summary Judgment.

3. Attached to Acceleration Bay's Motions for Summary Judgment Brief is a true and correct copy of my Expert Report Regarding Validity of U.S. Patent Nos. 6,701,344, 6,829,634, 6,714,966, 6,732,147, 6,920,497 and 6,910,069 dated November 13, 2017 ("Expert Report").

4. I also understand that Acceleration Bay will submit a copy of its summary judgment papers with hyperlinks linking to complete true and accurate copies of the above report.

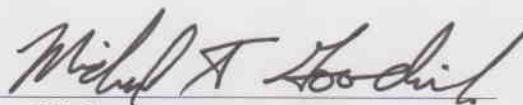
5. I incorporate by reference the opinions set forth in my Expert Report in the above referenced matter, and swear to their contents, as if fully set forth herein.

6. The statements and opinions set forth in my Expert Report for this case are true and accurate based on my personal knowledge and professional experience. My Expert Report also accurately reflects the facts and circumstances described therein.

7. I expect to testify at trial in this action regarding the opinions set forth in my Expert Report, as well as on any other issues for which I have submitted or will submit an expert report in this action.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed this 2nd day of February, 2018.

A handwritten signature in black ink, reading "Michael A. Goodrich". The signature is written in a cursive style with a horizontal line underneath it.

Michael Goodrich, Ph.D.