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.	)	
	)	
	)	
	)	

**DECLARATION OF RICARDO VALERDI, PH.D.
IN SUPPORT OF PLAINTIFF ACCELERATION BAY LLC'S
OPPOSITION TO DEFENDANT ACTIVISION BLIZZARD, INC.'S MOTIONS FOR
SUMMARY JUDGMENT AND TO EXCLUDE EXPERT OPINIONS UNDER FRE 702**

I, Ricardo Valerdi, Ph.D., hereby declare as follows:

1.   I am an Associate Professor in the Systems and Industrial Engineering Department at the University of Arizona, 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 Opposition to Defendant Activision Blizzard, Inc.'s Motions for Summary Judgment and to Exclude Expert Opinions ("Opposition").

3.   Attached to Acceleration Bay's Opposition are true and correct copies of my (1) Expert Report Regarding Cost Estimates, dated September 23, 2017 ("Opening Report"), and (2) Errata to my Opening Report, dated October 23, 2017.

4.   I also understand that Acceleration Bay will submit a copy of its Opposition with hyperlinks linking to complete true and accurate copies of the above reports.
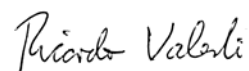
5.   I incorporate by reference the opinions set forth in my expert reports in the above referenced matter, and swear to their contents, as if fully set forth herein.

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

7.   I expect to testify at trial in this action regarding the opinions set forth in my expert reports, 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 23rd day of February, 2018.

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Ricardo Valerdi, Ph.D.