

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  
ENFORCE SPECIAL MASTER ORDER NO. 13**

Pursuant to the Court's Order Appointing Special Master (*see* D.I. 94 in C.A. No. 15-228-RGA, incorporated into this action by D.I. 62), Defendants hereby move to compel Acceleration Bay to comply with Special Master Order No. 13. The grounds for this motion are set forth in Defendants' accompanying 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). The precise relief sought is detailed in the brief and proposed order accompanying this motion. A telephonic hearing on this motion is scheduled with the Special Master for March 30, 2018.

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

OF COUNSEL:

Michael A. Tomasulo  
Gino Cheng  
David K. Lin  
Joe S. Netikosol  
WINSTON & STRAWN LLP  
333 South Grand Avenue, 38th Floor  
Los Angeles, CA 90071  
(213) 615-1700

David P. Enzminger  
Louis L. Campbell  
WINSTON & STRAWN LLP  
275 Middlefield Road, Suite 205  
Menlo Park, CA 94025  
(650) 858-6500

Dan K. Webb  
Kathleen B. Barry  
WINSTON & STRAWN LLP  
35 West Wacker Drive  
Chicago, IL 60601  
(312) 558-5600

Krista M. Enns  
WINSTON & STRAWN LLP  
101 California Street, 35th Floor  
San Francisco, CA 94111  
(415) 591-1000

Michael M. Murray  
Anup K. Misra  
WINSTON & STRAWN LLP  
200 Park Avenue,  
New York, NY 10166  
(212) 294-6700

Andrew R. Sommer  
Thomas M. Dunham  
Michael Woods  
Paul N. Harold  
Joseph C. Masullo  
WINSTON & STRAWN LLP  
1700 K Street, N.W.  
Washington, DC 20006  
(202) 282-5000

March 19, 2018  
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MORRIS, NICHOLS, ARSHT & TUNNELL LLP

*/s/ Stephen J. Kraftschik*

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Jack B. Blumenfeld (#1014)  
Stephen J. Kraftschik (#5623)  
1201 North Market Street  
P.O. Box 1347  
Wilmington, DE 19899  
(302) 658-9200  
jblumenfeld@mnat.com  
skraftschik@mnat.com

*Attorneys for Defendants*

**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/ Stephen J. Kraftschik*

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Stephen J. Kraftschik (#5623)

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**[PROPOSED] ORDER TO ENFORCE SPECIAL MASTER ORDER NO. 13**

WHEREAS, the Special Master, having consider Defendants’ Motion to Enforce Special Master Order No. 13;

IT IS HEREBY ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2018, that Defendants’ Motion is GRANTED as follows:

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