

**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’S AND ACTIVISION BLIZZARD, INC.’S  
PRELIMINARY AND FINAL JURY INSTRUCTIONS**

Pursuant to Paragraph 15 of the Court’s Rule 16 Scheduling Order, plaintiff Acceleration Bay, LLC (“Acceleration Bay”) and defendant Activision Blizzard, Inc. (“Activision”) (collectively, “Parties”) hereby submit the updated jury materials listed below. Each of these materials is subject to the Parties’ pending motions *in limine*. The Parties reserve their right to raise additional objections or to make changes to the jury materials based on the Court’s rulings and/or further narrowing of the case by the Parties for trial.

Exhibit A-1	Acceleration Bay’s Proposed Preliminary Jury Instructions
Exhibit A-2	Acceleration Bay’s Proposed Final Jury Instructions
Exhibit B-1	Activision’s Proposed Preliminary Jury Instructions
Exhibit B-2	Activision’s Proposed Final Jury Instructions

POTTER ANDERSON & CORROON LLP

OF COUNSEL:

Paul J. Andre  
Lisa Kobialka  
KRAMER LEVIN NAFTALIS  
& FRANKEL LLP  
990 Marsh Road  
Menlo Park, CA 94025  
(650) 752-1700  
pandre@kramerlevin.com  
lkobialka@kramerlevin.com

Aaron M. Frankel  
Cristina Martinez  
KRAMER LEVIN NAFTALIS  
& FRANKEL LLP  
1177 Avenue of the Americas  
New York, NY 10036  
(212) 715-9100  
afrankel@kramerlevin.com  
cmartinez@kramerlevin.com

Dated: October 16, 2018

By: /s/ Philip A. Rovner

Philip A. Rovner (#3215)  
Jonathan A. Choa (#5319)  
Hercules Plaza  
P.O. Box 951  
Wilmington, DE 19899  
(302) 984-6000  
provner@potteranderson.com  
jchoa@potteranderson.com

*Attorneys for Plaintiff*  
ACCELERATION BAY LLC