

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

ACCELERATION BAY LLC,	)	
	)	
Plaintiff,	)	C.A. No. 16-453 (RGA)
v.	)	
	)	<b>PUBLIC VERSION</b>
ACTIVISION BLIZZARD, INC.	)	
	)	
Defendant.	)	

**DECLARATION OF YURIDIA CAIRE IN SUPPORT OF  
PLAINTIFF ACCELERATION BAY LLC'S OPPOSITION TO  
ACTIVISION'S OBJECTIONS TO ACCELERATION BAY'S DAMAGES PROFFER**

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Dated: April 5, 2019  
Public version dated: April 12, 2019

I, Yuridia Caire, declare as follows:

1. I am an attorney with the law firm Kramer Levin Naftalis & Frankel LLP, counsel of record for Acceleration Bay LLC (“Acceleration Bay”) for the above referenced matter. I have personal knowledge of the facts stated herein and can testify competently to those facts. I make this declaration in support of Plaintiff Acceleration Bay LLC’s Opposition to Activision’s Objections to Acceleration Bay’s Damages Proffer.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the Supplement to Expert Report of Russell Parr, served on March 19, 2019.

3. Attached hereto as **Exhibit 2** is a true and correct copy of a screenshot taken from Call of Duty Team Deathmatch, bearing Bates number AB-AB 002486.

4. Attached hereto as **Exhibit 3** is a true and correct copy of a screenshot taken from Call of Duty Moshpit mode, bearing Bates number AB-AB 002484.

5. Attached hereto as **Exhibit 4** is a true and correct copy of a screenshot taken from Call of Duty Gun Game, bearing Bates number AB-AB 002487.

6. Attached hereto as **Exhibit 5** is a true and correct copy of pages 184-185 from the transcript of the deposition of John Kirk, taken on May 18, 2017.

7. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts from a World of Warcraft document, bearing Bates numbers ATVI0030440–41.

8. Attached hereto as **Exhibit 7** is a true and correct copy of pages 105-106 and 109 from the transcript of the deposition of Ricardo Valerdi, taken on December 21, 2017.

9. Attached hereto as **Exhibit 8** is a true and correct copy of pages 7-10 and 62-63 from the transcript of the deposition of Catharine Mary Lawton, taken on January 25, 2018.

10. Attached hereto as **Exhibit 9** is a true and correct copy of the July 2002 business plan from Panthesis Incorporated, bearing Bates numbers HOLT 002332–59.

11. Attached hereto as **Exhibit 10** is a true and corrected copy of page 490 from the transcript of the deposition of Fred B. Holt, taken on July 26, 2017.

12. Attached hereto as **Exhibit 11** is a true and correct copy of pages 162-163 from the transcript of the deposition of Fred B. Holt, taken on May 31, 2017.

13. Attached hereto as **Exhibit 12** is a true and correct copy of pages 22-23 from the transcript of proceedings held on January 10, 2017.

14. Attached hereto as **Exhibit 13** is a true and correct copy of page 38 from the transcript of the deposition of Natasha Radovsky, taken on May 4, 2017.

I declare under penalty of perjury of the United States of America that the foregoing is true and correct. Executed on April 5, 2019, in El Paso, Texas.

By: /s/ Yuridia Caire  
Yuridia Caire

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