

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

ACCELERATION BAY LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 16-453 (RGA)
)	
ACTIVISION BLIZZARD, INC.,)	
)	
Defendant.)	
)	
-----)	
ACCELERATION BAY LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 16-454 (RGA)
)	
ELECTRONIC ARTS INC.,)	
)	
Defendant.)	
)	
-----)	
ACCELERATION BAY LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 16-455 (RGA)
)	
TAKE-TWO INTERACTIVE SOFTWARE,)	
INC., ROCKSTAR GAMES, INC., and 2K)	
SPORTS, INC., Delaware Corporations,)	
)	
Defendant.)	
)	
-----)	

[PROPOSED] ORDER

WHEREAS, the Special Master having considered Plaintiff Acceleration Bay LLC’s (“Acceleration Bay”) Motion to Compel and the related briefing and oral argument thereto;

IT IS HEREBY ORDERED this ___ day of _____, 2017, that Acceleration Bay’s Motion is hereby GRANTED.

(1) Defendants shall produce or make available, within 14 days, source code, core technical discovery, sales information and other financial data for the updated versions of the accused products identified in Acceleration Bay's February 13, 2017 Updated Identifications of Accused Products.

(2) Defendant Take-Two shall make John Hynd available for deposition within two days of the deposition of Daniel Yelland, at the same location.

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Special Master Allen M. Terrell, Jr.