

# EXHIBIT J

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

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

**DECLARATION OF NENAD MEDVIDOVIĆ IN SUPPORT OF PLAINTIFF  
ACCELERATION BAY LLC'S REPLY CLAIM CONSTRUCTION BRIEF**

I, Nenad Medvidović, declare:

163. I make this Declaration based upon my own personal knowledge, information, and belief, and I would and could competently testify to the matters set forth herein if called upon to do so.

164. This Declaration is further to my April 28, 2017 Declaration in support of Acceleration Bay's Opening Claim Construction Brief (and continues the paragraph numbering therein). I incorporate by reference the discussion of my qualifications, materials reviewed, person of ordinary skill in the art, and overview of the technology from my April 28, 2017 Declaration.

**KK. Term 27: "computer readable medium" ('634; '147 Patents)**

Plaintiff's Proposed Constructions	Defendants' Proposed Constructions
No construction necessary: plain and ordinary meaning	"any medium for storing or transporting computer readable instructions, including memory, storage devices, carrier waves and communications links."

165. Based on my professional experience, a person of ordinary skill in the art would understand this term to be consistent with its plain and ordinary meaning, e.g., a non-fleeting medium for storing instructions and data that a computer can read, such as hard disks, random access memory, read only memory, DVDs, CD-ROMs, USB drives, etc., and no construction is needed.

166. I disagree with Defendants' proposed construction for this term because it is overly broad and reads in fleeting and transitory transmissions of data, such as carrier waves. "Computer readable medium" is used in the claims with reference to storing instructions used to provide a broadcast channel: "computer-readable medium *containing instructions for controlling communications.*" See, e.g., A-4 at Claim 19 (emphasis added). The specification

explains that the instructions for implementing the broadcast channel are held in persistent storage devices (so they can be executed by the computer performing the steps), while noting, in contrast, that data structures and messages sent over the channel may be carried in communications links. A-3 at 15:56-65 (“The *memory and storage devices* are computer-readable medium that may *contain computer instructions* that implement the broadcaster component. ... the *data structures and message structures* may be stored or transmitted via a signal transmitted on a computer-readable media, such as a *communications link*.”) (emphasis added). The specification does not suggest that the instructions used to provide the network are somehow stored in carrier waves. Carrier waves are transient and, in fact, cannot store information for a computer to read. Instead, they are used to transmit the information (instructions and/or data) to a computer’s network interface, which then must store that information in computer’s transient memory for immediate access or on a persistent storage medium for later, repeated access.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on June 2, 2017 in Los Angeles, California.



---

Nenad Medvidović