

**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.,)	
)	
Defendants.)	

[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.

Within 10 days of this order:

1) Activision Blizzard Inc. shall produce all documents responsive to Acceleration Bay's RFP Nos. 2, 25-27, 30-38, 40-41, 44-45, 51, 53-56, 65, 71-72, 78-79, 102-103, 115, 135-138, 140-146, and 152-168;

2) Electronic Arts, Inc. shall produce all documents responsive to Acceleration Bay's RFP Nos. 2, 21-23, 26-34, 36-37, 42, 47-52, 61, 67-68, 77, 81-84, 86-92, 96, 98-114, and 116; and

3) Take-Two Interactive Software, Inc., Rockstar Games, Inc. and 2K Sports, Inc. shall produce all documents responsive to Acceleration Bay's RFP Nos. 2, 16-18, 21-29, 31-32, 37, 42, 44-47, 58, 67-68, 76-79, 81-87, 93-110 and non-source code documents stored in Rockstar's source code repository relevant to GTA's multiplayer networking.

Take-Two shall also immediately make available for inspection the source code for GTA and NBA2K identified in Acceleration Bay's letter brief in support of its Motion to Compel.

5259930

Special Master Allen M. Terrell, Jr.