

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

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 “A” REGARDING MOTION TO COMPEL COMPLIANCE  
WITH SPECIAL MASTER ORDER NO. 2 AND SANCTIONS**

IT IS HEREBY ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2017, that Defendants’ Motion to Compel is GRANTED. Plaintiff shall:

- (1) be precluded from accusing any broadcast channel;
- (2) be precluded from accusing any method;
- (3) be precluded from arguing that the Accused Products practice the Broadcasting Limitations as described in elements 1-c, 1-d, 13-e, and 13-f in the ‘344 and ‘966, and claim 22 of the ‘634 patent charts;
- (4) be precluded from arguing that the Accused Products practice the Connect or Disconnect Limitations as described in elements 1-b, 1-e and 1-f of the ‘069 patent chart and elements 1-b, 1-c, 11-b, and 11-c of the ‘147 patent chart;

(5) be precluded from asserting infringement under the doctrine of equivalents;

(6) be precluded from accusing any networks other than those specifically identified in its responses to interrogatories 7 and 9; and

(7) be precluded from asserting any factual allegations other than those specifically cited in its responses to interrogatories 7 and 9.

Furthermore, Plaintiff shall pay a monetary sanction of Defendants' expenses incurred as a result of Plaintiff's failure to give discovery and comply with the Special Master's Order Nos. 2 and 3. Defendants shall submit to the Special Master an accounting of the expenses incurred.

---

Special Master Allen M. Terrell, Jr.

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.	)	
<hr/>		
ACCELERATION BAY LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 16-454 (RGA)
	)	
ELECTRONIC ARTS INC.,	)	
	)	
Defendant.	)	
<hr/>		
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 “B” REGARDING MOTION TO PRECLUDE, STRIKE AND COMPEL AND FOR AN ORDER TO SHOW CAUSE REGARDING DR. ABARBANEL**

IT IS HEREBY ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2017, that that Dr. Abarbanel’s errata to his deposition transcript are stricken, plaintiff is precluded from relying on Dr. Abarbanel’s testimony, and that Kramer Levin and Kramer Levin and Dr. Abarbanel are compelled to explain their conduct and produce all communications and relevant documents.

---

Special Master Allen M. Terrell, Jr.

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.	)	
<hr/>		
ACCELERATION BAY LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 16-454 (RGA)
	)	
ELECTRONIC ARTS INC.,	)	
	)	
Defendant.	)	
<hr/>		
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 “C” REGARDING  
EXPERT REPORT FRAMEWORK**

WHEREAS, the Special Master, having consider Defendants’ Motion for an Order  
Governing Expert Discovery;

IT IS HEREBY ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2017, that  
Defendants’ Motion is GRANTED. Expert discover shall be governed by the following  
framework:

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.