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August 23, 2017

VIA CM/ECF

Special Master Allen M. Terrell, Jr.
United States District Court for the District of Delaware
844 North King Street, Unit 26, Room 6124
Wilmington, Delaware 19801

**Re: Acceleration Bay LLC v. Activision Blizzard, Inc. et al.
U.S.D.C., D.Del., Civil Action Nos. 16-453, 16-454, and 16-455-RGA**

Dear Special Master Terrell:

I write on behalf of myself and co-counsel, Tara Elliott of Wilmer Cutler Pickering Hale & Door, seeking permission to intervene on behalf of our client Sony Interactive Entertainment (“Sony”) in the pending matters of *Acceleration Bay v. Activision Blizzard, Inc. et al.*, Civil Action Nos. 16-453, 16-454, and 16-455 (RGA).

We understand that Plaintiff Acceleration Bay has sought in discovery highly confidential and sensitive information belonging to Sony from the defendants in these related actions. We further understand that Acceleration Bay filed a motion to compel, challenging the defendants’ objections to the requests for production, and that briefing is underway. Sony seeks an opportunity to be heard in these proceedings with the permission of the Special Master, in whatever form and procedural mechanism is preferred.

We understand that a schedule has been set and respectfully request the Special Master to revisit and extend the schedule to permit Sony an opportunity to brief its positions and be heard in argument. We have reached out to counsel for Acceleration Bay and counsel for Defendants to confer and inquire whether Acceleration Bay or Defendants have any objection to Sony’s request to intervene and extension of the schedule. Defendants have advised that they no objection to Sony’s request to intervene and extension of the schedule. Our understanding is that Acceleration Bay is considering Sony’s request.

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Special Master Allen M. Terrell, Jr.
August 23, 2017
Page 2

While we wait to hear back from Acceleration Bay on whether it has any objection to Sony's request, we wanted to promptly bring this matter to your attention given the current schedule. We look forward to hearing from you on whether Sony needs to file a formal motion to intervene in this action if Acceleration Bay has an objection or whether this letter will suffice. We also look forward to hearing from you on scheduling. We can make ourselves available for a teleconference at your convenience.

Thank you for your consideration of this matter.

Respectfully,

/s/ Gregory B. Williams (#4195)

Gregory B. Williams

GW:bjr

cc: Tara D. Elliott, Esquire (via Email)
All Counsel of Record (via CM/ECF)