

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.)	

**DECLARATION OF COUNSEL (DAVID K. LIN) IN SUPPORT OF DEFENDANTS’
REPLY BRIEF IN SUPPORT OF THEIR MOTION TO DISMISS
REGARDING U.S. PATENT NOS. 6,701,344, 6,714,966, AND 6,829,634**

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October 31, 2016

DECLARATION OF DAVID K. LIN

I, David K. Lin, make the following Declaration pursuant to 28 U.S.C. § 1746:

1. I am counsel for defendants in the above-captioned actions. I make this declaration of my own personal knowledge.

2. Exhibits 1A-C are excerpts of certain infringement claim charts that Plaintiff attached to its Complaints. The Exhibits contain highlighting but otherwise are true and correct.

Exhibit 1A	Plaintiff's infringement chart as to World of Warcraft. Activision (C.A. No. 16-453), D.I. 1, Ex. 7.
Exhibit 1B	Plaintiff's infringement chart as to FIFA. EA (C.A. No. 16-454), D.I. 1, Ex. 8.
Exhibit 1C	Plaintiff's infringement chart as to NBA2K. Take-Two, <i>et al.</i> (C.A. No. 16-455), D.I. 1, Ex. 8.

3. Exhibits 2A-C are excerpts of certain infringement claim charts that Plaintiff attached to its Complaints. The Exhibits contain highlighting but otherwise are true and correct.

Exhibit 2A	Plaintiff's infringement chart as to World of Warcraft. Activision (C.A. No. 16-453), D.I. 1, Ex. 7.
Exhibit 2B	Plaintiff's infringement chart as to FIFA. EA (C.A. No. 16-454), D.I. 1, Ex. 8.
Exhibit 2C	Plaintiff's infringement chart as to NBA2K. Take-Two, <i>et al.</i> (C.A. No. 16-455), D.I. 1, Ex. 8.

4. Exhibits 3A-C are excerpts of certain infringement claim charts that Plaintiff attached to its Complaints. The Exhibits contain highlighting but otherwise are true and correct.

Exhibit 3A	Plaintiff's infringement chart as to World of Warcraft. Activision (C.A. No. 16-453), D.I. 1, Ex. 7.
Exhibit 3B	Plaintiff's infringement chart as to FIFA. EA (C.A. No. 16-454), D.I. 1, Ex. 8.
Exhibit 3C	Plaintiff's infringement chart as to NBA2K. Take-Two, <i>et al.</i> (C.A. No. 16-455), D.I. 1, Ex. 8.

I declare under penalty of perjury that the foregoing is true and correct.

Date: October 31, 2016

By: /s/ David K. Lin

CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2016, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on October 31, 2016, upon the following in the manner indicated:

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