

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.)

**DEFENDANTS’ MOTION TO
ENFORCE SPECIAL MASTER ORDER NO. 13**

Pursuant to the Court’s Order Appointing Special Master (*see* D.I. 94 in C.A. No. 15-228-RGA, incorporated into this action by D.I. 62), Defendants hereby move to compel Acceleration Bay to comply with Special Master Order No. 13. The grounds for this motion are set forth in Defendants’ accompanying brief, which will be provided to the Special Master

pursuant to Paragraph 3 of the Order and the Special Master Order Relating to Procedures for Resolving Discovery Motions (D.I. 113 in C.A. No. 15-228- RGA). The precise relief sought is detailed in the brief and proposed order accompanying this motion. A telephonic hearing on this motion is scheduled with the Special Master for March 30, 2018.

Pursuant to D. Del. LR 7.1.1, Defendants state that they have made reasonable effort to reach agreement with Plaintiff on the matters set forth in this motion and the parties could not reach agreement.

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Attorneys for Defendants

7.1.1 CERTIFICATION

I hereby certify that the subject of the foregoing motion has been discussed with counsel for the plaintiff and that we have not been able to reach agreement.

/s/ Stephen J. Kraftschik

Stephen J. Kraftschik (#5623)

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[PROPOSED] ORDER TO ENFORCE SPECIAL MASTER ORDER NO. 13

WHEREAS, the Special Master, having consider Defendants’ Motion to Enforce Special Master Order No. 13;

IT IS HEREBY ORDERED this _____ day of _____, 2018, that Defendants’ Motion is GRANTED as follows:

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