IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ACCELERATION BAY LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 16-454 (RGA)
	)	
	)	REDACTED - PUBLIC VERSION
ELECTRONIC ARTS INC.,	)	
	)	
Defendant.	)	

**DECLARATION OF JOE NETIKOSOL IN SUPPORT OF DEFENDANT
ELECTRONIC ART INC.'S MOTIONS FOR SUMMARY JUDGMENT AND
EXCLUSION OF EXPERT OPINIONS UNDER FRE 702**

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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.,	)	**CONFIDENTIAL –**
	)	**OUTSIDE COUNSEL ONLY**
Defendant.	)	**FILED UNDER SEAL**

**DECLARATION OF JOE NETIKOSOL IN SUPPORT OF DEFENDANT
ELECTRONIC ART INC.'S MOTIONS FOR SUMMARY JUDGMENT AND
EXCLUSION OF EXPERT OPINIONS UNDER FRE 702**

I, Joe Netikosol, declare as follows:

1.   I am an associate attorney with the law firm Winston & Strawn LLP, counsel of record for Electronic Arts Inc. ("EA") for the above referenced matter.

2.   I have a bachelor of science in Computer Engineering with emphasis in computer network and multimedia, and worked as an engineer before attending law school. I understand the operations of computer networks and communication, as well as file-storage, including file size, number, and organization structures.

3.   I have personal knowledge of the facts stated herein and can testify competently to those facts. I make this declaration in support of EA's Motions for Summary Judgment and Exclusion of Expert Opinions under FRE 702.
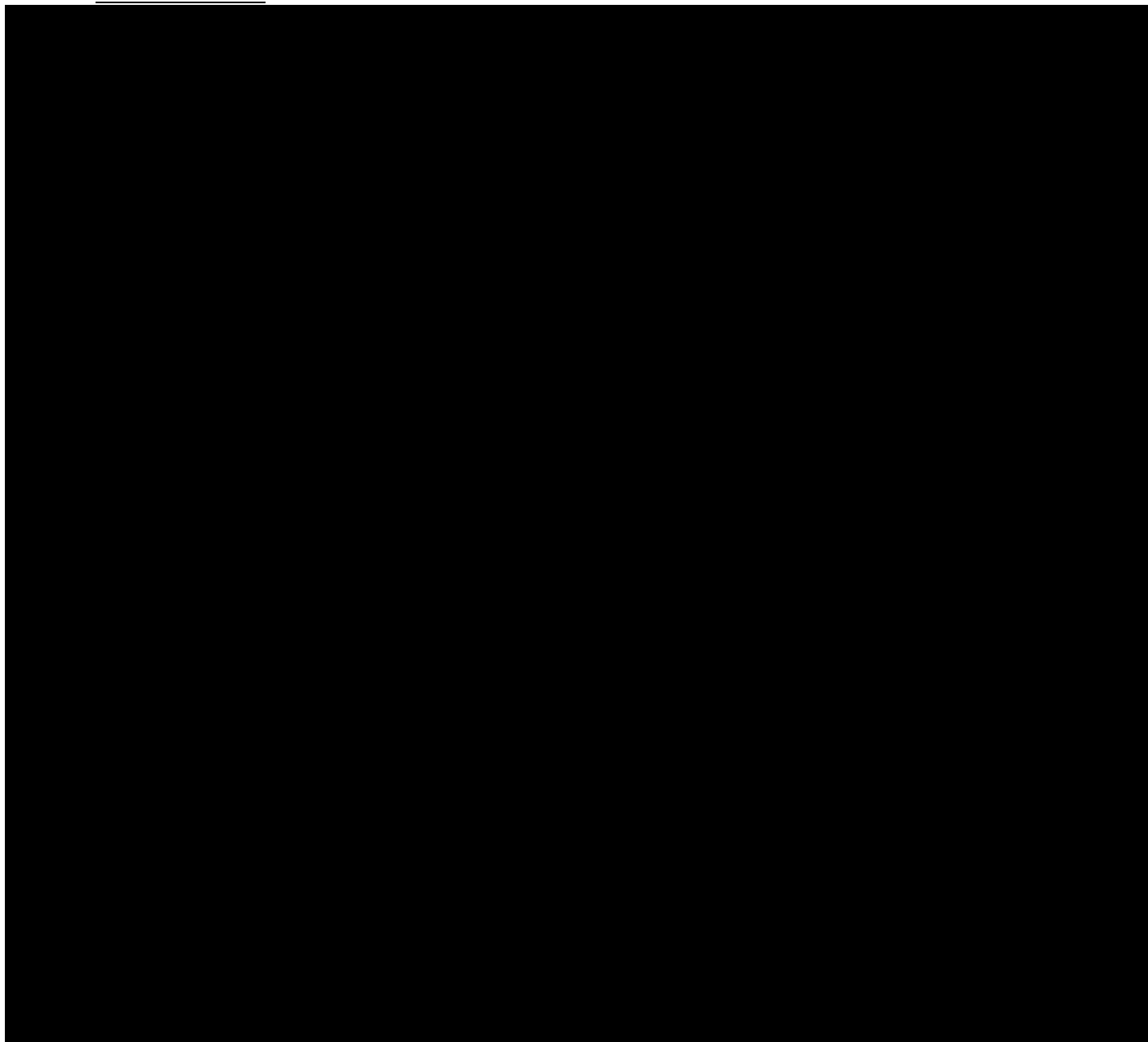
4.   I am admitted to practice law in California. I have been admitted *pro hac vice* in this case.
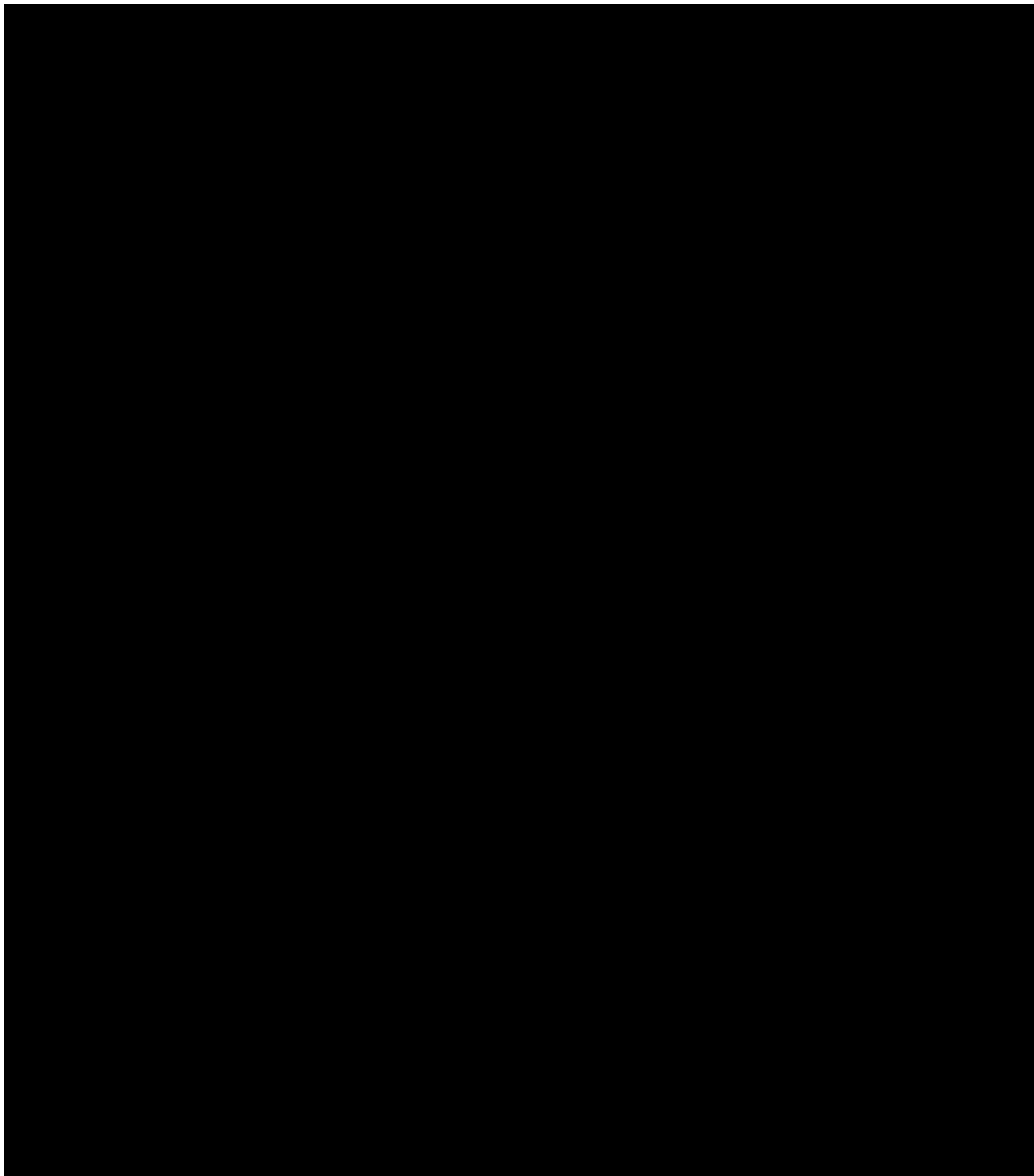
5.   I have reviewed the expert report of Dr. Valerdi, as well the EA source code made available for inspection, on which Dr. Valerdi relied for his calculation of estimated cost to re-design the networking functionality of the accused products. In so doing, I observed that Dr.

Valerdi included in his calculation many source code files for platforms that are outside of this case.

6.   I understand that these source code files are stored the same way as they were when EA made the source code available for inspection to Acceleration Bay. No new files were added, and no modification has been made to the file structure.

Number of Files

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