IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

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

DECLARATION OF RICARDO VALERDI, PH.D.
IN SUPPORT OF PLAINTIFF ACCELERATION BAY LLC'S OPPOSITION TO DEFENDANT ELECTRONIC ARTS, INC.'S MOTIONS FOR SUMMARY JUDGMENT AND TO EXCLUDE EXPERT OPINIONS UNDER F.R.E. 702

I, Ricardo Valerdi, Ph.D., hereby declare as follows:

1. I am an Associate Professor in the Systems and Industrial Engineering Department at the University of Arizona, and have been retained by counsel for Plaintiff Acceleration Bay, LLC ("Acceleration Bay") to serve as an expert witness in the above-captioned action.

2. I submit this declaration in support of Acceleration Bay's Opposition to Defendant Electronic Arts, Inc.'s Motions for Summary Judgment and to Exclude Expert Opinions ("Opposition").

3. Attached to Acceleration Bay's Opposition is a true and correct copy of my Expert Report Regarding Cost Estimates, dated October 6, 2017.

4. I also understand that Acceleration Bay will submit a copy of its Opposition with hyperlinks linking to complete true and accurate copy of the above report.

5. I incorporate by reference the opinions set forth in my expert report in the above referenced matter, and swear to their contents, as if fully set forth herein.

6. The statements and opinions set forth in my expert report for this case are true and accurate based on my personal knowledge and professional experience. My expert report also accurately reflect the facts and circumstances described therein.

7. I expect to testify at trial in this action regarding the opinions set forth in my expert report, as well as on any other issues for which I have submitted or will submit an expert report in this action.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed this 13th day of April, 2018.

Ricardo Valerdi, Ph.D.