

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ACCELERATION BAY LLC,	)	
	)	
Plaintiff,	)	C.A. No. 16-454 (RGA)
	)	
v.	)	
	)	
ELECTRONIC ARTS INC.,	)	
	)	
Defendant.	)	
<hr style="border: 0.5px solid black;"/>		
ACCELERATION BAY LLC,	)	
	)	
Plaintiff,	)	C.A. No. 16-455 (RGA)
	)	
v.	)	
	)	
TAKE-TWO INTERACTIVE SOFTWARE,	)	
INC., ROCKSTAR GAMES, INC., and 2K	)	
SPORTS, INC.,	)	
	)	
Defendants.	)	

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**STIPULATION AND [PROPOSED] ORDER**

WHEREAS, the Court ordered the parties to file a stipulation with trial dates for C.A. No. 16-454 (RGA) (the “*EA Action*”) and C.A. No. 16-455 (RGA) (the “*Take-Two Action*”) as well as certain due dates concerning the conclusion of expert discovery in the *Take-Two Action*; and

WHEREAS, the parties conferred regarding scheduling in these actions;

IT IS HEREBY STIPULATED AND AGREED, by the parties, subject to the approval of the Court that the trials and pre-trial conferences shall be scheduled as follows:

- Pre-Trial Conference (*EA Action*) - February 22, 2019
- Trial (*EA Action*) - March 4, 2019

- Pre-Trial Conference (*Take-Two Action*) - April 26, 2019 (if the trial starts May 6, 2019) or May 3, 2019 (if the trial starts May 13, 2019)
- Trial (*Take-Two Action*) - May 6, 2019 or May 13, 2019 (if the Court is unavailable on May 6, 2019); and

The parties shall simultaneously file letters explaining their respective competing positions concerning pre-trial deadlines and briefing issues in the *Take-Two Action* by June 22, 2018:

<b>Event</b>	<b>Acceleration Bay's Proposal</b>	<b>Defendants' Proposal</b>
Reply Expert Reports ( <i>Take-Two Action</i> )	December 14, 2018	July 18, 2018
Close of expert discovery ( <i>Take-Two Action</i> )	January 16, 2019	August 10, 2018
Opening summary judgment and <i>Daubert</i> motions ( <i>Take-Two Action</i> )	January 23, 2019	August 29, 2018
Oppositions to summary judgment and <i>Daubert</i> motions ( <i>Take-Two Action</i> )	February 13, 2019	September 21, 2018
Reply briefs in support of summary judgment and <i>Daubert</i> motions ( <i>Take-Two Action</i> )	February 20, 2019	October 5, 2018

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*Attorneys for Defendants*

SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2018

\_\_\_\_\_  
United States District Judge

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