

**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.)	
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ACCELERATION BAY LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 16-454 (RGA)
)	
ELECTRONIC ARTS INC.,)	
)	
Defendant.)	
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ACCELERATION BAY LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 16-455 (RGA)
)	
TAKE-TWO INTERACTIVE SOFTWARE,)	
INC., ROCKSTAR GAMES, INC., and 2K)	
SPORTS, INC.,)	
)	
Defendants.)	

PARTIES' SUPPLEMENTAL JOINT CLAIM CONSTRUCTION CHART

Pursuant to the Court's July 5, 2017 Order (D.I. No. 206, C.A. No. 16-453) and the Parties' Stipulation Regarding Supplemental Claim Construction Briefing (D.I. No. 215, C.A. No. 16-453), Plaintiff Acceleration Bay and Defendants Activision Blizzard, Inc., Electronic Arts Inc., Take-Two Interactive Software Inc., Rockstar Games, Inc. and 2K Sports, Inc. (collectively "Defendants") submit their Supplemental Joint Claim Construction Chart, attached as Exhibit 2, identifying for the Court the terms and phrases of the claims in issue and each

party's proposed supplemental construction of the disputed claim language with citations to the intrinsic evidence in support of their respective proposed constructions.

The parties incorporate by reference the Asserted Patents¹ and portions of the intrinsic record (shown in the following summary table) that were previously filed with the Court (D.I. Nos. 117-124, C.A. No. 16-453):

Ex.	Evidence
Asserted Patents	
A-1	U.S. Pat. No. 6,701,344
A-2	U.S. Pat. No. 6,714,966
A-3	U.S. Pat. No. 6,732,147
A-4	U.S. Pat. No. 6,829,634
A-5	U.S. Pat. No. 6,910,069
A-6	U.S. Pat. No. 6,920,497
File Histories of the Asserted Patents	
B-1	File History of U.S. Pat. No. 6,701,344
B-2	File History of U.S. Pat. No. 6,714,966
B-3	File History of U.S. Pat. No. 6,732,147
B-4	File History of U.S. Pat. No. 6,829,634
B-5	File History of U.S. Pat. No. 6,910,069
B-6	File History of U.S. Pat. No. 6,920,497

¹ The Asserted Patents state that they are "related." Many of the Asserted Patents have the same or similar disclosures, and each party's citation to a disclosure in one patent shall be understood to encompass the same or similar disclosures in the other Asserted Patents. *See also* Docket Numbers 220 and 222 in C.A. No. 16-453.

Ex.	Evidence
<i>Inter Partes</i> Review Decisions	
C-1	'344 Patent, IPR2015-01972, Final Written Decision
C-2	'966 Patent, IPR2015-01953, Final Written Decision
C-3	'634 Patent, IPR2015-01996, Final Written Decision
C-4	'344 Patent, IPR2015-01972, Institution Decision
C-5	'966 Patent, IPR2015-01953, Institution Decision
C-6	'634 Patent, IPR2015-01996, Institution Decision
C-7	'634 Patent, IPR2016-00727, Institution Denial
C-8	'069 Patent, IPR2016-00726, Institution Denial
C-9	'147 Patent, IPR2016-00747, Partial Institution Decision
C-10	'497 Patent, IPR2016-00724, Institution Decision
C-11	'344 Patent, IPR2015-01970, Final Written Decision
C-12	'344 Patent, IPR2016-00931, Institution Denial
C-13	'966 Patent, IPR2015-01951, Final Written Decision
C-14	'966 Patent, IPR2016-00932, Institution Denial
C-15	'966 Patent, IPR2016-00936, Institution Decision
C-16	'634 Patent, IPR2015-01964, Final Written Decision
C-17	'634 Patent, IPR2016-00963, Institution Decision
C-18	'634 Patent, IPR2016-00964, Institution Decision
C-19	'344 Patent, IPR2015-01970, Institution Decision
C-20	'966 Patent, IPR2015-01951, Institution Decision
C-21	'634 Patent: IPR2015-01964, Institution Decision

Ex.	Evidence
IPR Papers²	
D-1	'966 pat.: IPR2015-01953, Patent Owner's Preliminary Response
D-2	'344 pat.: IPR2015-1970, Patent Owner Preliminary Response
D-3	'344 pat: IPR2015-1970, Declaration of Virgil Bourassa
D-4	'344 pat: IPR2015-1970, Declaration of Michael Goodrich
D-5	'344 pat: IPR2015-01972, Patent Owner's Preliminary Response
D-6	'634 pat: IPR2015-01996, Patent Owner's Preliminary Response
D-7	'497 pat.: IPR2016-00724, Patent Owner Response, Paper 24
D-8	'497 pat.: IPR2016-00724, Deposition of Michael Goodrich
D-9	'069 pat: IPR2016-00726, Patent Owner Preliminary Response
D-10	'634 pat.: IPR2016-00727, Patent Owner Preliminary Response
D-11	'147 pat.: IPR2016-00747, Patent Owner Preliminary Response
D-12	'147 pat.: IPR2016-00747, Patent Owner Response
D-13	'147 pat.: IPR2016-00747, Deposition of Dr. Goodrich
D-14	'147 pat.: IPR2016-00747, Deposition of Virgil Bourassa

² Defendants' Statement: Multiple IPRs have been instituted on the Asserted Patents. Unlike most other cases, the records for the IPRs are well-developed and voluminous. Defendants have endeavored to cite the most relevant portions of those papers, and those citations to the papers would necessarily include the materials relating to that argument. When Defendants cite to Plaintiff's statements regarding the meaning of the claims from the IPR proceedings, Defendants are in no way implicitly or explicitly agreeing with those meanings, but intend to argue that Plaintiff is bound by those statements. Further, because many of the patents have the same or similar disclosures, Plaintiff took the same or similar positions in the IPRs. Defendants' citation to one paper shall be understood to encompass the same or similar disclosures in the other IPR papers. Due to the volume of paper, Defendants reserve the right to supplement its citations to the IPR papers, especially in response to any inconsistent positions Plaintiff may take now in these proceedings.

Ex.	Evidence
D-15	IPR2015-01970, Petitioner's Petition for Inter Partes Review
D-16	IPR2015-01970, 10/14/16 Petitioner's Consolidated Reply to Patent Owner's Response
D-17	IPR2015-01970, 1/20/17 Petitioner's Consolidated Reply to Patent Owner's Response
D-18	IPR2015-01972, Petitioner's Petition for Inter Partes Review
D-19	IPR2015-01972, 10/15/16 Petitioners' Reply to Patent Owner's Response
D-20	IPR2015-01951, 9/24/15 Petitioner's Petition for Inter Partes Review
D-21	IPR2015-01951, 10/15/16 Petitioners' Consolidated Reply to Patent Owner's Response
D-22	IPR2015-01951, 1/20/17 Petitioners' Consolidated Reply to Patent Owner's Response
D-23	IPR2015-01953, 9/24/15 Petitioner's Petition for Inter Partes Review
D-24	IPR2015-01953, 10/15/16 Petitioners' Consolidated Reply to Patent Owner's Response
D-25	IPR2016-00932, 4/22/16 Petitioner's Petition
D-26	IPR2016-00936, 4/22/16 Petitioner's Petition
D-27	IPR2015-01964, 9/28/15 Petitioner's Petition
D-28	IPR2015-01964, 10/15/16 Petitioners' Consolidated Reply to Patent Owner's Response
D-29	IPR2015-01964, 1/20/17 Petitioners' Consolidated Reply to Patent Owner's Response
D-30	IPR2015-01996, 9/28/15 Petitioner's Petition
D-31	IPR2016-00963, 4/29/16 Petitioner's Petition
D-32	IPR2016-00964, 4/29/16 Petitioner's Petition
D-33	IPR2016-00726, 3/12/16 Petitioner's Petition
D-34	IPR2016-00747, 3/29/16 Petitioner's Corrected Petition
D-35	IPR2016-00724, 3/11/16 Petition
D-36	IPR2016-00724, 3/28/17 Corrected Reply in Support of Petition

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