

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

ACCELERATION BAY LLC,)
)
Plaintiff,) C.A. No. 16-453 (RGA)
)
v.)
)
ACTIVISION BLIZZARD, INC.,)
)
Defendant.)

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

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

STIPULATION AND [PROPOSED] ORDER

WHEREAS, in light of the recently modified dates for the trials in the 16-454 and 16-455 actions, the parties have conferred and propose further modifications to certain upcoming due dates in the above referenced actions;

WHEREAS, the parties agree that the requested schedule changes will benefit both the parties and the Court and will not disrupt the existing trial dates set in any of the above referenced actions;

IT IS HEREBY STIPULATED by the parties, subject to the approval of the Court, that the Scheduling Order in the above referenced actions is amended as shown in the table below:

Event	Current Schedule 16-453 (<i>Activision</i>)	Amended Schedule 16-453 (<i>Activision</i>)
Reply Expert Reports	December 14, 2017	December 14, 2017 (unchanged)
Completed Depositions of Experts	January 10, 2018	January 17, 2018
Summary Judgment/ Daubert Motions	February 2, 2018	February 2, 2018: (unchanged)
Pre Trial Conf.	April 20, 2018	April 20, 2018 (unchanged)
Trial	April 30, 2018	April 30, 2018 (unchanged)

Event	Current Schedule 16-454 (<i>Electronic Arts</i>)	Amended Schedule 16-454 (<i>Electronic Arts</i>)
Rebuttal Expert Reports	November 13, 2017: validity rebuttal report December 8, 2017: all other rebuttal reports as to EA	November 13, 2017: validity rebuttal report (unchanged) December 15, 2017: all other rebuttal reports as to EA
Reply Expert Reports	December 14, 2017: invalidity reply reports January 24, 2018: all other reply reports as to EA	December 14, 2017: invalidity reply reports (unchanged) February 7, 2018: all other reply reports as to EA

Event	Current Schedule 16-454 (<i>Electronic Arts</i>)	Amended Schedule 16-454 (<i>Electronic Arts</i>)
Completed Depositions of Experts	January 10, 2018: validity expert depositions	January 10, 2018: validity expert depositions (unchanged)
	February 23, 2018: all other EA expert depositions	February 23, 2018: all other EA expert depositions (unchanged)
Summary Judgment/ Daubert Motions	February 2, 2018: invalidity/validity	February 2, 2018: invalidity/validity (unchanged)
	March 23, 2018: all other motions as to EA	March 23, 2018: all other motions as to EA (unchanged)
Pre Trial Conf.	August 17, 2018	August 17, 2018 (unchanged)
Trial	August 27, 2018	August 27, 2018 (unchanged)

Event	Current Schedule 16-455 (<i>Take-Two</i>)	Amended Schedule 16-455 (<i>Take-Two</i>)
Rebuttal Expert Reports	November 13, 2017: validity rebuttal report	November 13, 2017: validity rebuttal report
	January 12, 2018: all other rebuttal reports as to TT	January 24, 2018: all other rebuttal reports as to TT
Reply Expert Reports	December 14, 2017: invalidity reply reports	December 14, 2017: invalidity reply reports (unchanged)
	March 7, 2018: all other reply reports as to TT	March 12, 2018: all other reply reports as to TT
Completed Depositions of Experts	January 10, 2018: validity expert depositions	January 10, 2018: validity expert depositions (unchanged)
	April 4, 2018: all other TT expert depositions	April 4, 2018: all other TT expert depositions (unchanged)

Event	Current Schedule 16-455 (Take-Two)	Amended Schedule 16-455 (Take-Two)
Summary Judgment/ Daubert Motions	February 2, 2018: invalidity/validity June 15, 2018: all other motions as to TT	February 2, 2018: invalidity/validity (unchanged) June 15, 2018: all other motions as to TT (unchanged)
Pre Trial Conf.	October 19, 2018 at 8:30 a.m.	October 19, 2018 at 8:30 a.m. (unchanged)
Trial	October 29, 2018	October 29, 2018 (unchanged)

POTTER ANDERSON & CORROON LLP

MORRIS, NICHOLS, ARSHT & TUNNELL
LLP

By: /s/ Philip A. Rovner

Philip A. Rovner (# 3215)
Jonathan A. Choa (#5319)
1313 North Market Street 6th Floor
Wilmington, Delaware 19801
(302) 984-6000
provner@potteranderson.com
jchoa@potteranderson.com

*Attorneys for Plaintiff
Acceleration Bay LLC*

Dated: December 15, 2017
5586814

By: /s/ Stephen J. Kraftschik

Jack B. Blumenfeld (#1014)
Stephen J. Kraftschik (#5623)
1201 North Market Street
P.O. Box 1347
Wilmington, DE 19899
(302) 658-9200
jblumenfeld@mnat.com
skraftschik@mnat.com

Attorneys for Defendants

SO ORDERED this _____ day of December, 2017

United States District Judge