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February 5, 2020

BY CM/ECF & HAND DELIVERY

The Honorable Richard G. Andrews
U.S. District Court for the District of Delaware
U.S. Courthouse
844 North King Street
Wilmington, DE 19801

Re: *Acceleration Bay LLC v. Take-Two Interactive Software, Inc.*,
C.A. No. 16-455-RGA (D. Del.)

Dear Judge Andrews:

Further to the Court's request during yesterday's hearing, Acceleration Bay is asserting the following patents and claims against the Take-Two Defendants:

- 6,701,344, Claims: 12, 13, 14, and 15;
- 6,714,966, Claims: 12 and 13;
- 6,920,497, Claims: 9 and 16;
- 6,732,147, Claim: 1; and
- 6,910,069, Claims: 1 and 11.

Acceleration Bay asserts literal infringement for all elements of the asserted claims. Acceleration Bay further asserts, in the alternative, that the Take-Two Defendants infringe the following claim elements under the Doctrine of Equivalents:

'344 Patent

- Claim 12: processor; at least 3 neighbors; originating participant sends data to the other participants by sending the data through each of its connections to its neighbor participants and wherein each participant sends data that it receives from a neighbor participant to its other neighbor participants; m-regular; non-complete; broadcast channel;

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- Claim 13: distributed game; broadcast channel; provide game information; at least 3 neighbors; originating participant sends data to the other participants by sending the data through each of its connections to its neighbor participants and wherein each participant sends data that it receives from a neighbor participant to its neighbor participants; m-regular; non-complete; identify broadcast channel for game of interest; connecting to the identified broadcast channel;
- Claim 14: accessing web server that maps game to broadcast channel;
- Claim 15: broadcast channel formed by at least 3 other computers;

'966 Patent

- Claim 12: network; computer network at least 3 neighbor participants; relaying; m-regular; incomplete; broadcast channel for a topic of interest;
- Claim 13: information delivery service; plurality of broadcast channels; each broadcast channel provides information to plurality of participants; at least 3 neighbors; relaying; m-regular; non-complete; identifying a broadcast channel; connecting to identified broadcast channel;

'497 Patent

- Claim 9: locate call-in port; identifying portal computer having dynamically selected call-in port; repeatedly trying to establish connection; port ordering algorithm; reordering communications port;

'147 Patent

- Claim 1: m-regular; disconnect message; connection port search; third computer being one of the neighbors on said list of neighbors;

'069 Patent

- Claim 1: m-regular; identifying a pair of participants; contact a portal computer; edge connection request; disconnecting participants of the identified pair; connecting participants of the identified pair.

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Should Your Honor have any further questions, counsel is available at the Court's convenience.

Respectfully,

/s/ Philip A. Rovner

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cc: All Counsel of Record