

**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.)

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

ELECTRONIC ARTS INC.,)
)
Defendant.)

ACCELERATION BAY LLC,)
)
Plaintiff,)
)
v.) C.A. No. 16-455 (RGA)

TAKE-TWO INTERACTIVE SOFTWARE,)
INC., ROCKSTAR GAMES, INC., and 2K)
SPORTS, INC., Delaware Corporations,)
)
Defendant.)

PLAINTIFF ACCELERATION BAY LLC’S MOTION TO COMPEL

Pursuant to the Court’s Order Appointing Special Master (D.I. 94 in C.A. No. 15-228-RGA, incorporated into this action by D.I. 62) (“Order”), Plaintiff Acceleration Bay LLC (“Acceleration Bay”) hereby moves for an order: (1) compelling Defendants to produce responsive emails; (2) compelling Defendants to amend their invalidity contentions; (3)

compelling Activision Blizzard, Inc. to produce all responsive documents related to its Software and Publishing and Development Agreement with Bungie; (4) compelling Defendants to supplement their response to Common Interrogatory No. 6; and (5) compelling Defendant Electronic Arts Inc. to produce gross revenue information from before FY2015 for the accused products.

The grounds for this motion are set forth in Acceleration Bay's letter brief, which will be provided to the Special Master pursuant to Paragraph 3 of the Order and the Special Master Order Relating to Procedures for Resolving Discovery Motions (D.I. 113 in C.A. No. 15-228-RGA). A hearing on this motion is scheduled for April 14, 2017 at the offices of Potter Anderson & Corroon LLP.

Pursuant to D. Del. LR 7.1.1, Acceleration Bay states that it has made reasonable effort to reach agreement with Defendants on the matters set forth in this motion and have been informed that Defendants oppose the relief sought.

POTTER ANDERSON & CORROON LLP

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