

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

DEFENDANTS' MOTION TO COMPEL PLAINTIFF ACCELERATION BAY

Pursuant to the Special Master Order Relating to Procedures for Resolving Discovery Motions (*see* C.A. No. 16-453, D.I. 62 at 2; C.A. No. 15-228, D.I. 113), Defendants move for an Order compelling Plaintiff to:

1. Supplement its response to Interrogatory No. 1 regarding the conception and reduction to practice of each of the asserted claims without objections;

2. Supplement its response to Interrogatory No. 5 regarding testing without objections; and
3. Provide the hit counts for the email searches being conducted on Plaintiff's email and to identify the email addresses being searched.

Pursuant to D. Del. LR 7.1.1, Defendants state that they have made reasonable effort to reach agreement with Plaintiff on the matters set forth in this motion and the parties could not reach agreement.

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March 31, 2017

/s/ Stephen J. Kraftschik

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Attorneys for Defendant

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| 2K SPORTS, INC., |) | |
| |) | |
| Defendants. |) | |

PROPOSED ORDER

WHEREAS, the Special Master, having consider Defendants; Motion to Compel,

IT IS HEREBY ORDERED this _____ day of _____, 2017, that
Defendants’ Motion to Compel is GRANTED. Within 7 days of this Order, Plaintiff shall:

1. Supplement its response to Interrogatory No. 1 regarding the conception and reduction to practice of each of the asserted claims without objections;

2. Supplement its response to Interrogatory No. 5 regarding testing without objections; and
3. Provide the hit counts for the email searches being conducted on Plaintiff's email and to identify the email addresses being searched.

Special Master Allen M. Terrell, Jr.

CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2017, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on March 31, 2017, upon the following in the manner indicated:

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/s/ Stephen J. Kraftschik
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