

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ACTIVISION BLIZZARD, INC.,
ELECTRONIC ARTS INC.
TAKE-TWO INTERACTIVE SOFTWARE, INC.
2K SPORTS, INC., and
ROCKSTAR GAMES, INC.,
Petitioner,

v.

ACCELERATION BAY, LLC,
Patent Owner.

Case IPR2015-01996
Patent 6,829,634

PATENT OWNER'S LIST OF PROPOSED MOTIONS

Patent Owner, Acceleration Bay, LLC, provides a list of the proposed motions it presently expects it may file in the above-captioned *inter partes* review proceeding. Pursuant to the Board's Scheduling Order, a first motion to amend claims, motions for observations on cross-examination, and motions to exclude evidence are automatically authorized by the Board. *See* IPR2015-01996, Paper 9 (PTAB Mar. 31, 2016). Accordingly, these proposed motions are not included in Patent Owner's list of Proposed Motions. Further, it is Patent Owner's understanding that, as stated in the Trial Practice Guide (at 48,765), "[s]ubmission of [this] list would not preclude the filing of additional motions not contained in the list." Patent Owner also reserves the right to file opposition(s) to Petitioner's motion(s) as permitted under the appropriate rules.

PATENT OWNER'S PROPOSED MOTIONS

1. Motion to seal pursuant to 37 C.F.R. § 42.54;
2. Motion to compel deposition dates and location of declarants in United States;
3. Motion to swear behind prior art;
4. Possible motion for additional discovery pursuant to 37 C.F.R. § 42.51; and
5. Possible motion to file supplemental information pursuant to 37 C.F.R. § 42.123.

Patent Owner's List of Proposed Motions
IPR2015-01996 (U.S. Patent No. 6,829,634)

Respectfully submitted,

Dated: April 25, 2016

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(Case No. IPR2015-01996)

Attorneys for Patent Owner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that a true and correct copy of the foregoing Patent Owner's List of Proposed Motions was served on April 25, 2016, by filing this document through the Patent Review Processing System as well as delivering via electronic mail upon the following counsel of record for Petitioner:

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