

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 IPR2016-00747
U.S. Patent No. 6,732,147

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* IPR2016-00747, Paper 13 (PTAB September 12, 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 for additional discovery pursuant to 37 C.F.R. § 42.51;
3. Possible motion to compel deposition dates of declarants; and
4. Possible motion to file supplemental information pursuant to 37 C.F.R. § 42.123.

Patent Owner's List of Proposed Motions
IPR2016-00747 (U.S. Patent No. 6,732,147)

Respectfully submitted,

Dated: October 10, 2016

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(Case No. IPR2016-00747)

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 October 10, 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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