

EXHIBIT 19

1 Courtland L. Reichman (SBN 268873)
creichman@mckoolsmithhennigan.com
2 MCKOOL SMITH HENNIGAN P.C.
255 Shoreline Drive, Suite 510
3 Redwood Shores, CA 94065
Telephone: (650) 394-1400
4 Fax: (650) 394-1422

5 ADDITIONAL COUNSEL LISTED ON
SIGNATURE PAGE

6 Attorneys for Defendants Rockstar
7 Consortium US LP and MobileStar
Technologies LLC
8

9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **OAKLAND DIVISION**

12 GOOGLE, INC.)
13)
13 Plaintiff,)
14 vs.)
15)
16 ROCKSTAR CONSORTIUM U.S. LP AND)
MOBILESTAR TECHNOLOGIES LLC)
17)
18 Defendants.)
19)
20)

Case No. 13-cv-5933 CW

**DEFENDANTS' AMENDED
INITIAL DISCLOSURES**

1 Rockstar Consortium U.S. LP (“Rockstar”) and MobileStar Technologies LLC
2 (“MobileStar”) submit their Amended Initial Disclosures under Rule 26(a)(1) of the Federal Rules of
3 Civil Procedure based on information reasonably available to them at this time and without prejudice
4 to its right to amend or supplement these disclosures as discovery continues and to produce, during
5 core discovery or at trial, additional information or documents that are: (i) subsequently discovered;
6 (ii) subsequently determined to be relevant for any purpose; or (iii) subsequently discovered to have
7 been omitted for any reason from these disclosures.
8

9 Rockstar and MobileStar’s Amended Initial Disclosures are being made based upon the
10 information now reasonably available to them. Rockstar and MobileStar reserves the right to further
11 supplement or amend these Amended Initial Disclosures, consistent with applicable Court rules and
12 orders, as and when additional documents or witnesses come to the attention of Rockstar and
13 MobileStar that contain information upon which Rockstar and MobileStar may rely in presenting
14 their claims or defenses herein. Rockstar and MobileStar do not waive any evidentiary objections to
15 the information disclosed, or any applicable privileges. By making these disclosures, Rockstar and
16 MobileStar expressly reserve all objections relative to the use, for any purpose, of these Initial
17 Disclosures or of any information or document references herein.
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19 **I. INDIVIDUALS LIKELY TO HAVE KNOWLEDGE**

20 Based on information presently available, Rockstar and MobileStar identify the persons listed
21 below as potentially having discoverable information that the disclosing party may use to support
22 their claims or defenses. Rockstar and MobileStar expressly reserve their right to supplement this list
23 of individuals as the case progresses and as investigations and discovery continues. Rockstar and
24 MobileStar are unaware of contact information for the individuals where no contact information is
25 given. Further, by indicating the general subject matter of information these individuals may
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1 possess, Rockstar and MobileStar is in no way limiting their right to call any individual listed to
 2 testify concerning other subjects.

Name	Contact Information	Subject(s) of Knowledge
Kasim Alfalahi	Rockstar Board Member c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201 214-978-4000	Board Member of Rockstar Consortium US LP Mr. Alfalahi has knowledge related to Rockstar's history.
Afzal Dean	Rockstar Employee c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201 214-978-4000	President of MobileStar; Vice President, Patent Licensing of Rockstar Consortium Inc. Mr. Dean has knowledge about Rockstar's licensing policies and practices.
Erik Fako	Rockstar Employee c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201 214-978-4000	Senior Patent Counsel, Assertion/Litigation with Rockstar Consortium US LP Mr. Fako has knowledge about efforts to license the patents in suit and Rockstar's licensing policies and practices. Mr. Fako was also Patent Prosecution Counsel of U.S. Patent No. 6,128,298. Mr. Fako may have knowledge about the prosecution of the '298 patent.
Art Fisher	Art Fisher c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201 214-978-4000	Former Nortel Vice-President of IP Law. Mr Fisher may have knowledge about the patents in suit and Nortel efforts (if any) to license or enforce the patents in suit.
Mark Hearn	Rockstar Employee c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201 214-978-4000	Licensing Attorney with Rockstar Consortium US LP. Mr. Hearn may have knowledge about efforts to license the patents in suit.

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Name	Contact Information	Subject(s) of Knowledge
Chad Hilyard	Rockstar Employee c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201 214-978-4000	Chief IP Counsel with Rockstar Consortium US LP Mr. Hilyard has knowledge about the efforts to license the patents in suit and Rockstar's licensing policies and procedures.
Gillian McColgan	Rockstar Employee c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201 214-978-4000	Chief Technology Officer with Rockstar Consortium US LP. Ms. McColgan may have knowledge valuation of the patents.
Randy Mishler	Rockstar Board Member c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201 214-978-4000	Board Member of Rockstar Consortium US LP Mr. Mishler has knowledge related to Rockstar's history.
Donald Powers	Rockstar Employee c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201 214-978-4000	Litigation Attorney with Rockstar Consortium US LP. Mr. Powers is also a former Nortel employee and has knowledge of Nortel's previous business activities, technologies, patents, acquisitions, and licensing.

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Name	Contact Information	Subject(s) of Knowledge
John Veschi	Rockstar Employee c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201 214-978-4000	Attorney and Chief Executive Officer of Rockstar Consortium US LP; MobileStar Board Member. Mr. Veschi has knowledge about Rockstar's operations, formation, patent licensing policies and procedures. Mr. Veschi is also a former Nortel employee and has knowledge of Nortel Networks' previous business activities, technologies, patents, acquisitions, and licensing activities.
Bernie Tiegerman	Rockstar Employee c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201 214-978-4000	Senior Patent Attorney with Rockstar Consortium US LP Patent Prosecution Counsel of U.S. Patent No. 6,463,131. Mr. Tiegerman may have knowledge about the prosecution of the '131 patent
Richard Weiss	Richard Weiss NCR McKinney, TX	Former Nortel Deputy IP Counsel. Mr. Weiss may have knowledge about the patents in suit and Nortel's efforts to license or enforce the patents in suit.
Yee-Ning Chan	Yee-Ning Chan Inphi Corporation Westlake Village, CA 91362	Named inventor of U.S. Patent No, 5,838,551. Mr. Chan may have knowledge regarding the conception and reduction to practice of the invention claimed in the '551 patent.
Jean Pierre Fortin	Jean Pierre Fortin Ericsson Canada Inc. IPR & Licensing 349 Terry Fox Dr Kanata, ON K2K 2V6 CANADA 32819 613-963-8235	Patent Prosecution Counsel of U.S. Patent No, 5,838,551. Mr. Fortin may have knowledge about the prosecution of the '551 patent.

Name	Contact Information	Subject(s) of Knowledge
Brian Finlay Benton	Brian Finlay Benton Telus Ottawa, Canada	Named inventor of U.S. Patent Nos. 6,037,937 and 6,333,973. Mr. Benton may have knowledge regarding the conception and reduction to practice of the inventions claimed in the '937 and '973 patents.
Colin Donald Smith	Colin Donald Smith Hutchinson 3G	Named inventor of U.S. Patent Nos. 6,037,937 and 6,333,973. Mr. Smith may have knowledge regarding the conception and reduction to practice of the inventions claimed in the '937 and '973 patents.
Bruce Dale Stalkie	Bruce Dale Stalkie Kanata, Ontario	Named inventor of U.S. Patent No. 6,037,937. Mr. Stalkie may have knowledge regarding the conception and reduction to practice of the invention claimed in the '937 patent.
Angela De Wilton	Office of Angela C. De Wilton 499 Tillbury Avenue Ottawa, ON K2A 4G8 CANADA 35763 613-755-5347 dewilton@dewilton.com	Patent Prosecution Counsel of U.S. Patent No. 6,037,937. Ms. De Wilton may have knowledge about the prosecution of the '937 patent.
Bruce Anthony Wooton	Bruce Anthony Wooton c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201 214-978-4000	Named inventor of U.S. Patent No. 6,128,298. Mr. Wooton may have knowledge regarding the conception and reduction to practice of the invention claimed in the '298 patent.

Name	Contact Information	Subject(s) of Knowledge
William G. Colvin	William G. Colvin c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201 214-978-4000	Named inventor of U.S. Patent No. 6,128,298. Mr. Colvin may have knowledge regarding the conception and reduction to practice of the invention claimed in the '298 patent.
Tom Gigliotti	Thomas A. Gigliotti, Attorney-at-Law, PLLC 2520 Pennyshire Lane Raleigh, NC 27606 919-345-4076	Patent Prosecution Counsel of U.S. Patent No. 6,128,298. Mr. Gigliotti may have knowledge about the prosecution of the '298 patent.
Marilyn French-St. George	Marilyn French-St. George c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201 214-978-4000	Named inventor of U.S. Patent No. 6,463,131. Ms. French-St. George may have knowledge regarding the conception and reduction to practice of the invention claimed in the '131 patent.
Mitch A. Brisebois	Mitch A. Brisebois Dell Kanata, Ontario Canada	Named inventor of U.S. Patent No. 6,463,131. Mr. Brisebois may have knowledge regarding the conception and reduction to practice of the invention claimed in the '131 patent.
Laura A. Mahan	Laura A. Mahan Blackberry Ottawa, Canada	Named inventor of U.S. Patent No. 6,463,131. Ms. Mahan may have knowledge regarding the conception and reduction to practice of the invention claimed in the '131 patent.
Eric Halber	Eric Halber Apex IP Raleigh-Durham, North Carolina	Patent Prosecution Counsel of U.S. Patent No. 6,463,131. Mr. Halber may have knowledge about the prosecution of the '131 patent.

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Name	Contact Information	Subject(s) of Knowledge
Matthew W. Poisson	Matthew W. Poisson c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201 214-978-4000	Named inventor of U.S. Patent No. 6,765,591. Mr. Poisson may have knowledge regarding the conception and reduction to practice of the invention claimed in the '591 patent.
Melissa L. Deroches	Melissa L. Deroches c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201 214-978-4000	Named inventor of U.S. Patent No. 6,765,591. Ms. Deroches may have knowledge regarding the conception and reduction to practice of the invention claimed in the '591 patent.
James M. Milillo	James M. Milillo Newforma New Hampshire	Named inventor of U.S. Patent No. 6,765,591. Mr. Milillo may have knowledge regarding the conception and reduction to practice of the invention claimed in the '591 patent.
Brianna Hinojosa Flores	Brianna Hinojosa Flores BlackBerry 5000 Riverside Drive Irving, TX 75039	Patent Prosecution Counsel of U.S. Patent No. 6,765,591. Ms. Flores may have knowledge about the prosecution of the '591 patent.
Jaspreet Harit	Jaspreet Harit Former IP Lead Counsel for Nortel Nepean, Ontario, Canada No further information known	Patent Prosecution Counsel of U.S. Patent No. 6,765,591. Mr. Harit may have knowledge about the prosecution of the '591 patent.
Brian B. Egan	Brian B. Egan c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201 214-978-4000	Named inventor of U.S. Patent No. 6,937,572. Mr. Egan may have knowledge regarding the conception and reduction to practice of the invention claimed in the '572 patent.

Name	Contact Information	Subject(s) of Knowledge
Kevin Sembrat	Kevin Sembrat Work address: Alcatel-Lucent 600 Mountain Avenue Room 2F-151 Murray Hill, NJ. 7974 908-582-6445 Last known home address: Califon, NJ	Patent Prosecution Counsel for U.S. Patent No. 6,937,572. Mr. Sembrat may have knowledge about the prosecution of the '572 patent.
Milos Vodsedalek	Current address unknown.	Named inventor of U.S. Patent No. 6,937,572. Mr. Vodsedalek may have knowledge regarding the conception and reduction to practice of the invention claimed in the '572 patent.
Phil Terrett	Phil Terrett c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201 214-978-4000	Former Nortel Product Manager. Mr. Terrett may have knowledge about the patents in suit and Nortel's efforts to commercialize the patents in suit.
Corporate Representative of Rockstar Consortium Inc.	Rockstar Consortium Inc. c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201 214-978-4000	Information related to the assignment history of the Rockstar and MobileStar patents-in-suit and the formation of Rockstar-related entities.
Corporate Representative of Rockstar Consortium US LP	Rockstar Consortium US LP c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201 214-978-4000	Information related to the assignment history of the Rockstar and MobileStar patents-in-suit and the formation of Rockstar-related entities.
Corporate Representative of Rockstar Consortium LLC	Rockstar Consortium LLC c/o LaBarge Weinstein LLP 800-515 Legget Drive Ottawa, Ontario K2K 3G4 Canada Facsimile: (613) 599-0018 Attention: Michael Dunleavy	Information related to the assignment history of the Rockstar and MobileStar patents-in-suit and the formation of Rockstar-related entities.

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Name	Contact Information	Subject(s) of Knowledge
Corporate Representative of Rockstar Bidco, LP	Rockstar Bidco, LP c/o Paul, Weiss, Rifkind, Wharton & Garrison LLP 1285 Avenue of the Americas New York, New York 10019-6064 Attention: Marilyn Sobel Facsimile: +1-212-757-3900	Information related to the assignment history of the Rockstar and MobileStar patents-in-suit and the formation of Rockstar-related entities.
Corporate Representative(s) of ASUS entities		Knowledge regarding modifications they make to the open-source Android code in the products accused of infringement in the Eastern District of Texas Action, the hardware components used in the products accused of infringement in the Eastern District of Texas Action, number of products accused of infringement in the Eastern District of Texas Action sold in the U.S. and revenues thereon, and/or any other fact or issue within the scope of the complaint.
Corporate Representative(s) of LG entities		Knowledge regarding modifications they make to the open-source Android code in the products accused of infringement in the Eastern District of Texas Action, the hardware components used in the products accused of infringement in the Eastern District of Texas Action, number of products accused of infringement in the Eastern District of Texas Action sold in the U.S. and revenues thereon, and/or any other fact or issue within the scope of the complaint.

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Name	Contact Information	Subject(s) of Knowledge
Corporate Representative(s) of ZTE entities		Knowledge regarding modifications they make to the open-source Android code in the products accused of infringement in the Eastern District of Texas Action, the hardware components used in the products accused of infringement in the Eastern District of Texas Action, number of products accused of infringement in the Eastern District of Texas Action sold in the U.S. and revenues thereon, and/or any other fact or issue within the scope of the complaint.
Corporate Representative(s) of HTC entities		Knowledge regarding modifications they make to the open-source Android code in the products accused of infringement in the Eastern District of Texas Action, the hardware components used in the products accused of infringement in the Eastern District of Texas Action, number of products accused of infringement in the Eastern District of Texas Action sold in the U.S. and revenues thereon, and/or any other fact or issue within the scope of the complaint.

Name	Contact Information	Subject(s) of Knowledge
Corporate Representative(s) of Samsung entities		Knowledge regarding modifications they make to the open-source Android code in the products accused of infringement in the Eastern District of Texas Action, the hardware components used in the products accused of infringement in the Eastern District of Texas Action, number of products accused of infringement in the Eastern District of Texas Action sold in the U.S. and revenues thereon, and/or any other fact or issue within the scope of the complaint.
Corporate Representative(s) of Google, Inc.		Knowledge regarding modifications they make to the open-source Android code in the products accused of infringement in the Eastern District of Texas Action, the hardware components used in the products accused of infringement in the Eastern District of Texas Action, number of products accused of infringement in the Eastern District of Texas Action sold in the U.S. and revenues thereon, and/or any other fact or issue within the scope of the complaint.

Rockstar and MobileStar also counter-designate those witnesses identified in Google’s initial disclosures and subsequent disclosures. In addition, Rockstar and MobileStar identify the document custodians for Google and the individuals identified in Google’s Initial Disclosures as persons with knowledge of relevant facts. Rockstar and MobileStar will supplement its disclosures, as

1 appropriate, in accordance with the Federal Rules of Civil Procedure, the Local Rules, and the
2 Court's Docket Control Order.

3 **II. DOCUMENTS AND TANGIBLE THINGS**

4 Rockstar and MobileStar will produce documents pursuant to Case Management Order, E-
5 Discovery Order and the Local Rules. By way of example only, Rockstar and MobileStar may rely
6 upon:
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- 8 a. The patents in suit;
- 9 b. The file history of the patents in suit;
- 10 c. Documents related to the conception and reduction to practice the patents in suit;
- 11 d. Documents related to the ownership of the patents in suit;
- 12 e. Documents related to the validity of the patents in suit; and
- 13 f. Documents related to Google's infringement of the patents in suit.

14 **III. COMPUTATION OF DAMAGES CLAIMED BY ROCKSTAR AND MOBILESTAR**

15 Rockstar and MobileStar have not pled any damages at this point in the litigation.
16 Defendants reserve the right to amend disclosures at the appropriate time once Defendants have filed
17 an answer.
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19 **IV. INDEMNITY AND INSURING AGREEMENTS**

20 Rockstar and MobileStar are not aware of any indemnity and insuring agreement under
21 which any person or entity carrying on an insurance business may be liable to satisfy part or all of a
22 judgment entered in this action or to indemnify or reimburse for payments made to satisfy the
23 judgment.
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Dated June 25, 2014.

Respectfully submitted,

By: /s/ Courtland Reichman

Courtland L. Reichman (SBN 268873)
McKool Smith Hennigan, P.C.
255 Shoreline Drive Suite 510
Redwood Shores, CA 94065
(650) 394-1400
(650) 394-1422 (facsimile)

Mike McKool (Admitted Pro Hac Vice)
mmckool@mckoolsmith.com
Douglas A. Cawley (Admitted Pro Hac Vice)
dcawley@mckoolsmith.com
Ted Stevenson III (Admitted Pro Hac Vice)
tstevenson@mckoolsmith.com
David Sochia (Admitted Pro Hac Vice)
dsochia@mckoolsmith.com
McKool Smith, P.C.
300 Crescent Court Suite 1500
Dallas, TX 75201
(214) 978-4000
(214) 978-4044 (facsimile)

**ATTORNEYS FOR DEFENDANTS
ROCKSTAR CONSORTIUM U.S. LP AND
MOBILESTAR TECHNOLOGIES LLC**

