

1 Courtland L. Reichman  
 MCKOOL SMITH HENNIGAN, P.C.  
 255 Shoreline Drive Suite 510  
 2 Redwood Shores, CA 94065  
 (650) 394-1400  
 3 (650) 394-1422 (facsimile)

4 Mike McKool (Admitted Pro Hac Vice)  
 mmckool@McKoolSmith.com  
 5 Douglas A. Cawley (Admitted Pro Hac Vice)  
 dcawley@McKoolSmith.com  
 6 Ted Stevenson III (Admitted Pro Hac Vice)  
 tstevenson@McKoolSmith.com  
 7 David Sochia (Admitted Pro Hac Vice)  
 dsochia@McKoolSmith.com  
 8 300 Crescent Court, Suite 1500  
 Dallas, TX 75201  
 9 (214) 978-4000  
 (214) 978-4044 (facsimile)

10 Joshua W. Budwin (Admitted Pro Hac Vice)  
 11 jbudwin@McKoolSmith.com  
 300 W. 6th Street, Suite 1700  
 12 Austin, TX 78701  
 (512) 692-8700  
 13 (512) 692-8744 (facsimile)

14 *Attorneys for Defendants Rockstar Consortium*  
 15 *U.S. LP and MobileStar Technologies LLC*

16 UNITED STATES DISTRICT COURT  
 17 NORTHERN DISTRICT OF CALIFORNIA  
 18 OAKLAND DIVISION

19 GOOGLE INC.,  
 20  
 21 Plaintiff,  
 22 v.  
 23 ROCKSTAR CONSORTIUM US LP and  
 MOBILESTAR TECHNOLOGIES LLC,  
 24 Defendants.

CASE NO. 13-cv-5933-CW  
**SECOND UNOPPOSED MOTION TO  
 STAY CASE**

1 Defendants Rockstar Consortium US LP and MobileStar Technologies LLC (“Rockstar”)  
2 request that the Court order that all deadlines in this case be stayed an additional 80 days. On  
3 November 25, 2014, the Court granted Rockstar’s Corrected Unopposed Motion to Stay Case  
4 (Dkt. 143) in its Order (Dkt. 144). RPX Corporation (“RPX”) has agreed to purchase the patents-  
5 in-suit. *See, e.g.*, Ex. 1 (“Rockstar Consortium Inc. has agreed to sell more than 4,000 patents to  
6 San Francisco-based RPX Corp., a patent clearinghouse that helps companies protect themselves  
7 from patent lawsuits. The deal will put an end to several high-profile lawsuits filed by Rockstar  
8 against companies that make phones powered by the Android operating system.”); Ex. 2 (reporting  
9 that “[t]he sale consists of the more than 4,000 patents still owned by Rockstar Consortium,” and  
10 that “[t]he deal puts an end to litigation started last year by Rockstar against several handset  
11 manufacturers whose phones operate on Google Inc’s Android operating system....”). RPX and  
12 Respondents are actively working to close the agreed-upon transaction, which is currently in  
13 escrow. *See* Ex. 3 (describing escrow). The requested extension of time will facilitate that  
14 process. An additional 80-day stay is warranted due to the complexity of the agreed-upon  
15 transaction. Accordingly, Rockstar requests that the Court stay all deadlines until March 26, 2015.

16 In the event the stay is lifted, the Parties agree to work together in good faith to submit a  
17 proposed revised case schedule.

18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 DATED: December 31, 2014

Respectfully submitted,

2 McKOOL SMITH HENNIGAN, P.C.

3 By /s/ Joshua W. Budwin

4 MCKOOL SMITH HENNIGAN, P.C.  
255 Shoreline Drive Suite 510  
Redwood Shores, CA 94065  
5 (650) 394-1400  
6 (650) 394-1422 (facsimile)

7 Mike McKool (Admitted Pro Hac Vice)  
mmckool@McKoolSmith.com  
8 Douglas A. Cawley (Admitted Pro Hac Vice)  
dcawley@McKoolSmith.com  
9 Ted Stevenson III (Admitted Pro Hac Vice)  
tstevenson@McKoolSmith.com  
10 David Sochia (Admitted Pro Hac Vice)  
dsochia@McKoolSmith.com  
300 Crescent Court, Suite 1500  
11 Dallas, TX 75201  
12 (214) 978-4000  
(214) 978-4044 (facsimile)

13 Joshua W. Budwin (Admitted Pro Hac Vice)  
14 jbudwin@McKoolSmith.com  
300 W. 6th Street, Suite 1700  
Austin, TX 78701  
15 (512) 692-8700  
16 (512) 692-8744 (facsimile)

17 *Attorneys for Rockstar Consortium US LP and*  
18 *MobileStar Technologies LLC*

19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF SERVICE**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on December 31, 2014, to all counsel of record who are deemed to have consented to electronic service via the Court’s CM/ECF system. Any other counsel of record will be served by electronic mail, facsimile, U.S. Mail and/or overnight delivery.

/s/ Joshua W. Budwin  
Joshua W. Budwin