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12 Attorneys for Defendants Rockstar
 Consortium US LP and MobileStar
 13 Technologies LLC

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 15 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA
 16 **OAKLAND DIVISION**

17 GOOGLE INC.,

18 Plaintiff,

19 vs.

20 ROCKSTAR CONSORTIUM US LP, and
 21 MOBILESTAR TECHNOLOGIES LLC,

22 Defendant.

) Case No. 13-CV-05933 (CW)

) **DEFENDANTS ROCKSTAR CONSORTIUM**
) **US LP, AND MOBILESTAR**
) **TECHNOLOGIES LLC'S**
) **ADMINISTRATIVE MOTION TO FILE**
) **DOCUMENTS UNDER SEAL**

) Judge: Honorable Claudia Wilken

McKool Smith Hennigan, P.C.
 255 Shoreline Drive, Suite 510
 Redwood Shores, CA 94065

1 TO PLAINTIFF GOOGLE INC. AND ITS COUNSEL OF RECORD:
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3 PLEASE TAKE NOTICE THAT Pursuant to Civil Local Rules 7-11 and 79-5, Defendants
4 Rockstar Consortium US LP (“Rockstar”) and Mobilestar Technologies LLC (“MobileStar”) submit
5 a request for an order instructing the Clerk to file under seal (1) certain portions of Defendants’
6 Motion to Dismiss under Fed. R. Civ. P. 12(b)(2) and 12(b)(3) for Lack of Personal Jurisdiction and
7 Improper Venue and to Decline Exercising Jurisdiction under the Declaration Judgment Act
8 (“Motion”) and (2) certain portions of the Declaration of Afzal Dean in Support of Defendants’
9 Motion to Dismiss under Fed. R. Civ. P. 12(b)(2) and 12(b)(3) for Lack of Personal Jurisdiction and
10 Improper Venue and to Decline Exercising Jurisdiction under the Declaration Judgment Act (“Dean
11 Declaration”).

12 Defendants’ Motion discusses licensing meetings between Rockstar, MobileStar and other
13 parties. Rockstar and MobileStar executed non-disclosure agreements prior to entering into these
14 meetings, and the agreements cover the existence of licensing meeting between the parties. The
15 Dean Declaration also discusses licensing meetings between Rockstar, MobileStar and other parties
16 that are covered by non-disclosure agreements.

17 Details of Rockstar and MobileStar’s licensing negotiations with others, including identities
18 of parties currently negotiating with Defendants, is sensitive confidential and proprietary business
19 information relevant to Rockstar and MobileStar’s licensing and business strategies. As such,
20 Defendants will be harmed by disclosure of this information.

21 On these grounds, Defendants Rockstar and MobileStar requests the Court to seal these two
22 documents. This request is narrowly tailored to seal only that material for which good cause to seal
23 has been established. A Proposed Order granting this Administrative Motion has been filed and
24 served herewith.
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DATED: January 23, 2014

Respectfully submitted,

MCKOOL SMITH P.C.

By s/ Courtland Reichman
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Attorneys for Defendants Rockstar
Consortium US LP and MobileStar
Technologies LLC

Attorney for Plaintiffs
Rockstar Consortium US LP and
MobileStar Technologies LLC

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2 **CERTIFICATE OF SERVICE**

3 I am more than eighteen years old and not a party to this action. My business address is
4 McKool Smith Hennigan P.C., 255 Shoreline Drive, Suite 510, California 94065. On January 23,
5 2014 I served the following:

6 ■ **Defendants ROCKSTAR CONSORTIUM US LP, and MOBILESTAR**
7 **TECHNOLOGIES LLC's Administrative Motion to File Documents Under Seal**

8	Served via email and deposited with FedEx for counsel of record listed below on
9 X	January 23, 2014.

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11 QUINN EMANUEL URQUHART & SULLIVAN, LLP

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22 Attorneys for Plaintiff

23 GOOGLE INC.

24 Executed on January 23, 2014, at Redwood Shores, California. I declare under penalty of
25 perjury under the laws of the State of California that the foregoing is true and correct.

26
27 By: s/ Christina Mogannam