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7 Attorneys for Plaintiff GOOGLE INC.

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION

11
12 GOOGLE INC.,
13 Plaintiff,
14 v.
15 ROCKSTAR CONSORTIUM US LP, and
MOBILESTAR TECHNOLOGIES LLC,
16 Defendants.
17

CASE NO. 13-cv-5933-CW

**DECLARATION OF KRISTIN J.
MADIGAN IN SUPPORT OF
DEFENDANTS ROCKSTAR
CONSORTIUM US LP, AND
MOBILESTAR TECHNOLOGIES LLC'S
ADMINISTRATIVE MOTION TO FILE
DOCUMENTS UNDER SEAL [DOCKET
NO. 19]**

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1 I, Kristin J. Madigan, declare under 28 U.S.C. §1746:

2 1. I am Of Counsel at Quinn Emanuel Urquhart & Sullivan, LLP, counsel for plaintiff
3 Google Inc. (“Google”) in this action. I submit this declaration in support of Defendants Rockstar
4 Consortium US LP and MobileStar Technologies LLC’s Administrative Motion to File
5 Documents Under Seal. I have personal knowledge of the following facts, and would competently
6 testify to them if called upon to do so.

7 2. On January 23, 2014, Rockstar Consortium US LP and MobileStar Technologies
8 LLC (collectively “Rockstar”) filed an administrative motion to file documents under seal (Docket
9 No. 19), which sought to protect information that is confidential to Google and discussed in
10 selected portions of Defendants’ Motion to Dismiss Under Fed. R. Civ. P. 12(b)(2) and 12(b)(3)
11 for Lack of Personal Jurisdiction and Improper Venue and to Decline Exercising Jurisdiction
12 Under the Declaratory Judgment Act (Docket No. 19, Attachment 4) (“Motion”); and in selected
13 portions of the Declaration of Afzal Dean in support of Defendants’ Motion (Docket No. 19,
14 Attachment 6) (“Dean Declaration”). Pursuant to Civil L.R. 79-5(e), Google submits this
15 Declaration in support of Rockstar’s administrative motion to file documents under seal (Docket
16 No. 19), to the extent Rockstar’s Motion and the Dean Declaration reference Google’s highly
17 confidential or proprietary business information.

18 3. Selected portions of Rockstar’s Motion (Docket No. 19, Attachment 4, at 1, 6-8,
19 10, 19) reflect information that is subject to non-disclosure obligations, which Google is bound to
20 keep confidential.

21 4. Selected portions of the Dean Declaration (Docket No. 19, Attachment 6, ¶¶ 10, 12-
22 14, 18) reflect information that is subject to non-disclosure obligations, which Google is bound to
23 keep confidential.

24 I declare under penalty of perjury that the foregoing is true and correct. Executed on
25 January 27, 2014, in San Francisco, California.

26 By /s/ Kristin J. Madigan
27 Kristin J. Madigan
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