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17 **Attorneys for Defendants**  
 18 **Rockstar Consortium U.S. LP and**  
 19 **MobileStar Technologies LLC**

20 **UNITED STATES DISTRICT COURT**  
 21 **NORTHERN DISTRICT OF CALIFORNIA**  
 22 **OAKLAND**

23 Google, Inc. )  
 24 )  
 25 Plaintiff, )  
 26 )  
 27 vs. )  
 28 )  
 29 Rockstar Consortium U.S. LP and MobileStar )  
 30 Technologies LLC )  
 31 Defendants. )  
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Case No. 13-cv-5933  
 HON. CLAUDIA WILKEN  
**DECLARATION OF DAVID  
 SOCHIA IN SUPPORT OF  
 PLAINTIFF GOOGLE INC.'S  
 ADMINISTRATIVE MOTION TO  
 FILE UNDER SEAL**

1 I, David Sochia, declare:

2 1. I am an attorney with the law firm of McKool Smith P.C., counsel of record for  
3 Defendants Rockstar Consortium U.S. LP and MobileStar Technologies LLC (collectively  
4 “Rockstar”) in the above-entitled action. I am duly licensed to practice law in the State of Texas. I  
5 make this declaration based on my personal knowledge, the record in this action, and matters of  
6 public record, and if called upon as a witness, I could and would testify competently as to the matters  
7 set forth below.

8 2. Rockstar is bound by non-disclosure agreements with various non-parties to keep  
9 confidential the information contained in certain portions of Google Inc.’s Objection to Defendants’  
10 Motion to Dismiss or Transfer (hereinafter “Objection”) and Exhibits 11 and 33 to Madigan’s  
11 Declaration in Support of Google’s Objection.

12 3. Rockstar is also bound by non-disclosure agreements with various non-parties to keep  
13 confidential information contained in certain portions of Rockstar’s Motion to Dismiss, the  
14 Declaration of Afzal Dean in Support of Rockstar’s Motion to Dismiss, both cited in the Objection.

15 4. Details of Rockstar’s licensing negotiations with non-parties, including the identities  
16 of entities currently negotiating with Rockstar, is sensitive, confidential and proprietary business  
17 information of Rockstar and these non-party entities. Such information is relevant to Rockstar’s  
18 licensing and business strategies. Rockstar and these non-party entities will be harmed by public  
19 disclosure of this information because the identities of the parties to licensing negotiations with  
20 Rockstar and the timing of those negotiations are essential to Rockstar’s business and licensing  
21 strategies, as shown by the parties’ execution of non-disclosure agreements.

22 5. I have served this declaration on the Declaratory Judgment Plaintiff on February 13,  
23 2014 pursuant to Local Rule 79-5(e).

24 6. An unredacted copy of Google’s Opposition, along with all supporting materials,  
25 including Exhibits 11 and 33 to Madigan’s Declaration in Support of Google’s Objection and the  
26 confidential portions described above, was filed with the Court on February 6, 2014, and an  
27 unredacted copy of the Declaration of Afzal Dean in Support of Rockstar’s Motion to Dismiss, along  
28 with supporting materials, was attached to the Declaration of Josh Budwin on January 23, 2014.

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7. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on February 13, 2014, at Dallas, Texas.

  
David Sochia