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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

Google, Inc.)
)
 Plaintiff,)
)
 vs.)
)
 Rockstar Consortium U.S. LP and MobileStar)
 Technologies LLC)
)
 Defendants.)
)
 _____)

Case No. 13-cv-5933
HON. CLAUDIA WILKEN
FIRST AMENDED 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. This declaration replaces the declaration filed the morning of February 13, 2014,
8 filed in error.

9 2. Rockstar is bound by non-disclosure agreements with various non-parties to keep
10 confidential the information contained in certain portions of Google Inc.’s Objection to Defendants’
11 Motion to Dismiss or Transfer (hereinafter “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. An unredacted copy of Google’s Opposition, along with all supporting materials, and
23 the confidential portions described above, was filed with the Court on February 6, 2014, and an
24 unredacted copy of the Declaration of Afzal Dean in Support of Rockstar’s Motion to Dismiss, along
25 with supporting materials, was attached to the Declaration of Josh Budwin on January 23, 2014.

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

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David Sochia