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

12 **UNITED STATES DISTRICT COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **OAKLAND**

15 Google, Inc.)
16)
17 Plaintiff,)
18 vs.)
19 Rockstar Consortium U.S. LP and MobileStar)
Technologies LLC)
20 Defendants.)
21 _____)

Case No. 13-cv-5933

HON. CLAUDIA WILKEN

**DECLARATION OF DAVID
SOCHIA IN SUPPORT OF
DEFENDANTS' 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 Defendants’ Reply to Google, Inc.’s
10 Oppositon to Defendants’ Motion to Dismiss and to Decline Exercising Jurisdiction Under the
11 Declaratory Judgment Act (hereinafter “Reply”).

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 and
14 Declaration of Afzal Dean in Support of Rockstar’s Motion to Dismiss, both cited in the Reply.

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 the Reply, along with all supporting materials, is attached
25 hereto.

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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