

EXHIBIT G

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ROCKSTAR CONSORTIUM US LP, INC. AND
MOBILESTAR TECHNOLOGIES, LLC

Plaintiffs,

v.

LG ELECTRONICS, INC., LG ELECTRONICS
U.S.A., INC., and LG ELECTRONICS
MOBILECOMM USA INC.,

Defendants.

Civil Action No. 13-cv-0898-JRG

JURY TRIAL DEMANDED

**DECLARATION OF RICHARD D. HARRIS. IN SUPPORT OF THE LG
DEFENDANTS' MOTION TO STAY OR, IN THE ALTERNATIVE,
TO TRANSFER THIS ACTION TO THE NORTHERN DISTRICT OF CALIFORNIA**

I, Richard D. Harris affirm as follows:

I am an attorney at Greenberg Traurig, LLP, attorneys for Defendants LG Electronics, Inc., LG Electronics U.S.A., Inc., and LG Electronics MobileComm USA Inc. (collectively, "LG") in the above-captioned matter. I have personal knowledge of the facts discussed herein and, if called to testify, I would and could competently testify to those facts. I respectfully submit this Declaration in Support of the LG Defendants' Motion to Stay or, in the Alternative, to Transfer This Action to the Northern District of California. Attached hereto as the exhibit number identified is a true and correct copy of the document described:

<u>EX NO.</u>	<u>DOCUMENT</u>
1	3/25/14 Declaration of Cecilia Son
2	3/25/14 Declaration of Timothy Alessi

EX NO. **DOCUMENT**

3 3/12/12 and 5/23/12 Ltrs. From A. Dean
(Rockstar) to J. Park (LG)

I declare under penalty of perjury under the laws of the United States that the foregoing information is true and correct to the best of my knowledge, information and belief.

Dated: March 25, 2014

/s/Richard D. Harris
Richard D. Harris

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on March 25, 2014.

/s/ Richard D. Harris

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
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ROCKSTAR CONSORTIUM US LP, INC. and
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DECLARATION OF CECILIA SON

I, Cecilia Son, make the following declaration based on my personal knowledge and investigation, or on information received from someone with knowledge. If called as a witness, I could and would testify competently to the following facts:

1. I am currently employed as Director in the Partner Engineering team at LG Electronics Mobile Research U.S.A., LLC (“LGEMR”), which is a wholly-owned subsidiary of LG Electronics Mobilecomm U.S.A., Inc. (“LGEMU”). Both LGEMR and LGEMU have a principal place of business at 10255 Willow Creek Road, San Diego, CA 92131. My office is located at 2540 North First St., Suite #300, San Jose, CA 95131 (the “San Jose Office”).

2. I understand that Rockstar Consortium US LP, Inc. and MobileStar Technologies, LLC (“Plaintiffs”) have brought a patent infringement action against LGEMU, LG Electronics, Inc. (“LGEKR”), and LG Electronics U.S.A., Inc. (“LGEUS”). I further understand that Plaintiffs have accused certain LG-branded mobile communication devices having an Android

operating system (“Android OS”) of infringing Plaintiffs’ patents (“LG-branded Android Products”). LGEMU also sells mobile communication devices that do not use the Android OS.

3. The Android OS is an open-source operating system for communication devices that was developed and is provided by Google Inc. (“Google”).

4. LGEKR manufactures the LG-branded Android Products. During the manufacturing process, LGEKR obtains the Android OS from the Android Open Source Project (“AOSP”), which is led by Google.

5. Google also provides certain Android OS applications, such as Google Play Music, YouTube, and Google Maps. Google develops, maintains, and supports these Android OS applications.

6. LGEMU imports the LG-branded Android Products into the United States, and is responsible for marketing and sales of the LG-branded Android Products in the United States, including throughout the state of California and in San Francisco, California.

7. As noted earlier, I am a Director in the Partner Engineering team in San Jose, CA. The Partner Engineering team was called “Strategic Google Alliance” until early 2013. Other members of my team include Steven Howard, Bum Suk Bae, Joonhyun Baek, Jae Wook Cho, Dong Ho Han, Jeong Rae Kim, Kush Shrivastava, and Namrata Suryavanshi.

8. One of the key functions that my team manages out of the San Jose Office is Android OS certification for the LG-branded Android Products. Android OS certification is a process by which Google and LGEMR ensure that LG-branded Android Products marketed and sold by LGEMU adhere to Google’s Android OS compatibility requirements.

9. As of October 31, 2013, the San Jose Office employed 59 employees. The office space occupied by these employees is approximately 25,000 square feet, and is leased by

LGEMU. Employees in the San Jose Office, including the individuals in my team, communicate and interact with Google personnel, including Mr. Jongyeong Lee and Mr. Joseph Hwang, in connection with LG-branded Android products. Both Mr. Lee and Mr. Hwang are located in Mountain View, CA.

10. Documents and records relating to LG-branded Android Products and Android OS certification are either physically present or electronically accessible at the San Jose Office.

11. LGEMU and LGEMR have approximately 108 employees in the San Diego Office. The San Diego Office, which is owned by LGEMU, is over 71,000 square feet. The San Diego Office oversees the product quality management of LG-branded Android Products sold in the United States. The San Diego Office also shares responsibility for selling LG-branded Android Products. For example, Eric Ley is located in the San Diego Office, and is a Vice President and Director of National Retail Accounts. Mr. Ley's job responsibilities include managing sales and handling account management for LGEMU's national retailers, such as Best Buy, Target, Walmart, Costco, and Radio Shack. Mr. Ley is also responsible for LGEMU's "Go-to-Market" business, which involves LGEMU's Android OS tablet business.

12. Documents and records relating to LG-branded Android Products, such as sales agreements, marketing documents and market strategy reports, are either physically present or electronically accessible at the San Diego Office.

13. LGEMU does not have any Android OS certification personnel in Texas.

14. There are no documents relating to Android OS certification physically present or electronically accessible in Texas.

I declare under penalty of perjury under the laws of the United States of America that to the best of my knowledge the foregoing is true and correct.

Executed at San Jose, California this 25 day of March, 2014.

Cecilia Son

Cecilia Son

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
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ROCKSTAR CONSORTIUM US LP, INC. and
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U.S.A., INC., and LG ELECTRONICS
MOBILECOMM USA INC.,

Defendants.

Civil Action No. 13-cv-0898-JRG

JURY TRIAL DEMANDED

DECLARATION OF TIMOTHY ALESSI

I, Timothy Alessi, make the following declaration based on my personal knowledge and investigation, or on information received from someone with knowledge. If called as a witness, I could and would testify competently to the following facts:

1. I am currently employed as Director—New Product Development at LG Electronics U.S.A., Inc. (“LGEUS”), which is a wholly-owned subsidiary of LG Electronics, Inc. (“LGEKR”). LGEUS has a principal place of business at 1000 Sylvan Ave., Englewood Cliffs, NJ 07632.

2. I understand that Rockstar Consortium US LP, Inc. and MobileStar Technologies, LLC (“Plaintiffs”) have brought a patent infringement action against LGEUS, LG Electronics Mobilecomm U.S.A., Inc. (“LGEMU”), and LGEKR. I further understand that Plaintiffs have accused certain LG-branded mobile communication devices having an Android operating system (“Android OS”) of infringing Plaintiffs’ patents (“LG-branded Android Products”).

3. LGEUS is a wholly-owned subsidiary of LGEKR.

4. LGEUS is in the business of marketing and selling non-mobile consumer products in the United States. Such products include, for example, televisions, Blu-ray players, home theater systems, computer monitors, air conditioners, dehumidifiers, washers and dryers, refrigerators, microwaves, and LED lighting.


5. LGEUS does not make, import, offer for sale, or sell any LG-branded Android Products.

6. LGEUS does not have any Android OS certification personnel in Texas.

7. LGEUS does not have any documents in Texas relating to Android OS certification.

I declare under penalty of perjury under the laws of the United States of America that to the best of my knowledge the foregoing is true and correct.

Executed at Newburgh, NY this 25th day of March, 2014.



Timothy Alessi

EXHIBIT 3



**VIA COURIER and REGULAR MAIL
WITHOUT PREJUDICE - FOR SETTLEMENT PURPOSES ONLY**

May 23, 2012

Mr. Jong-Seok Park
Executive Vice President and CEO / Mobile Communications Company
LG Electronics Inc.
LG Twin Towers
20, Yeouido-dong, Yeongdeungpo-gu
Seoul, Korea 150-721
Tel: +82.2.3777.1114

Re: Rockstar Patent Portfolio (Formerly Nortel Networks Patent Portfolio)

Dear Sir:

In my letter dated March 12, 2012 (copy attached), I informed LGE of Rockstar's patent portfolio and identified certain Rockstar patents and exemplary LGE products believed to implement functionalities in accordance with those patents. To date, however, we have not received a response from LGE with respect to this matter.

In addition to the patents already identified, I would like to bring an additional Rockstar patent to your attention. We believe that LGE is selling products (e.g. Optimus T P509) that implement functionalities in accordance with U.S. Patent No. 6,973,572, entitled Call Trace on a Packet Switched Network. Accordingly, LGE may require a license under this patent as well as the Rockstar patents previously identified and Rockstar is willing to offer LGE a license under these, as well as all other Rockstar patents, within an appropriate field of use.

Rockstar Consortium Inc.
Rockstar Consortium US LP
300-515 Legget Drive

Kanata, Ontario
K2K 3G4 Canada

Rockstar



We recognize that LGE is known for respecting the intellectual property rights of others, and as an initial next step, we would like to arrange a meeting where we can provide a detailed presentation demonstrating the relationship between Rockstar patents and LGE products.

We will be travelling to Asia in June and are currently available to meet with LGE at its Seoul office on June 20, 2012. If this date is not acceptable, please propose an alternate date during the week of June 18, 2012.

We look forward to meeting with the LGE's representatives.

Very truly yours,



Afzal Dean
Director IP Licensing
Rockstar Consortium Inc.
Email - adean@ip-rockstar.com
Telephone: 613-576-1004
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Facsimile: 613-576-1028

Rockstar Consortium Inc.
Rockstar Consortium US LP
300-515 Legget Drive

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**VIA COURIER
WITHOUT PREJUDICE - FOR SETTLEMENT PURPOSES ONLY**

March 12, 2012

Mr. Jong-Seok Park
Executive Vice President and CEO / Mobile Communications Company
LG Electronics Inc.
LG Twin Towers
20, Yeouido-dong, Yeongdeungpo-gu
Seoul, Korea 150-721
Tel: +82.2.3777.1114

Dear Sir:

Re: Rockstar Patent Portfolio (Formerly Nortel Networks Patent Portfolio)

I am writing to you with respect to Rockstar Consortium's patent portfolio, which it recently acquired at auction from Nortel Networks (Nortel). Rockstar Consortium press release in that regard is attached for your information. Nortel's press release announcing the sale of over 6000 issued patents and pending applications to Rockstar, as well as a brief history of Nortel's achievements and product innovations for over 100 years, are also attached for your convenience.

Within this patent portfolio there are a number of standards essential and implementation patents directed to telecommunications methods, devices, and computers. Exemplary patents relevant to mobile handsets and tablets in this portfolio are listed below:

- U.S. Patent No. 6,037,937 entitled Navigation Tool for Graphical User Interface
- U.S. Patent No. 6,333,973 entitled Integrated Message Center
- U.S. Patent No. 6,614,899 entitled Method and Apparatus for Providing Advanced IP Telephony Services in an Intelligent Endpoint
- U.S. Patent No. 6,510,452 entitled System and Method for Communications Management With a Network Presence Icon

Rockstar Consortium Inc.
Rockstar Consortium US LP
300-515 Legget Drive

Kanata, Ontario
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We are aware that LGE is selling products (e.g., Optimus T P509, Optimus P504, Marquee LG855, Ignite AS855, V900 Optimus PAD) that implement functionalities in accordance with at least the above referenced Rockstar patents. Consequently, we believe that LGE requires a license under the Rockstar patents and Rockstar would be willing to offer LGE a license within a defined field of use.

We recognize that LGE is known for respecting the intellectual property rights of others and, as an initial next step, we would like to arrange a meeting where we will provide a detailed presentation showing the relationship between at least the above patents and LGE's products.

We look forward to meeting with the representatives from LGE.

Very truly yours,

A handwritten signature in black ink, appearing to be "Afzal Dean", with a long horizontal flourish extending to the right.

Afzal Dean
Director IP Licensing
Rockstar Consortium Inc.
Email – adean@ip-rockstar.com
Telephone: 613-763-3120
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Facsimile: 613-576-1028

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