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5 Attorneys for Defendants
 Rockstar Consortium US LP and
 6 MobileStar Technologies LLC

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

11	Google, Inc.)	Case No. 13-cv-5933 (CW)
12)	
	Plaintiff,)	DECLARATION OF MARK HEARN
13	vs.)	IN SUPPORT OF DEFENDANTS'
)	ROCKSTAR CONSORTIUM US LP
14	Rockstar Consortium U.S. LP and MobileStar)	AND MOBILESTAR
	Technologies LLC)	TECHNOLOGIES LLC'S §1404
15)	MOTION TO TRANSFER TO THE
	Defendants.)	EASTERN DISTRICT OF TEXAS
16)	
17)	
18)	
19)	

20 **DECLARATION OF MARK HEARN IN SUPPORT OF DEFENDANTS' ROCKSTAR**
 21 **CONSORTIUM US LP AND MOBILESTAR TECHNOLOGIES LLC'S**
 22 **§1404 MOTION TO TRANSFER TO THE EASTERN DISTRICT OF TEXAS**

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DECLARATION OF MARK HEARN

1 I, Mark Hearn, declare as follows:
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3 1. I am Senior Licensing Counsel for Rockstar Consortium US LP (“Rockstar”).
4 Prior to my employment with Rockstar, I was employed by Nortel for over 13 years as
5 Senior Counsel, and I worked at Nortel’s Richardson, Texas office. I submit this declaration
6 in support of Rockstar’s Motion to Transfer to the Eastern District of Texas Under Section
7 1404 or, in the Alternative, To Stay. I make this declaration based upon my own personal
8 knowledge unless otherwise indicated herein, and if called as a witness, I could and would
9 competently testify thereto.
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11 2. I lived in the Eastern District of Texas from 1989 to 2003, and I currently
12 reside in Dallas, Texas in the Northern District of Texas. I currently work out of Rockstar’s
13 Plano, Texas office.
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15 3. I have knowledge relevant to this lawsuit, including knowledge about the
16 licensing and monetization efforts regarding the patents-in-suit.

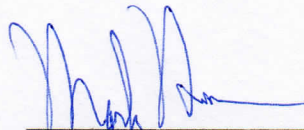
17 4. At various times dating back to at least 2000, including at the time of Nortel’s
18 bankruptcy, Nortel’s Intellectual Property Law Group was run from the Lakeside campus at
19 2221 Lakeside Boulevard in Richardson, Texas. For the majority of that time period,
20 Nortel’s licensing activities were handled exclusively by the IP Law Group.
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22 5. After the bankruptcy, Nortel accelerated the process of laying off its
23 employees. Many of the employees who remained with the company, including many within
24 the IP Law Group, focused on Nortel’s patent assets. This work included preparing the
25 patents for auction and monetizing Nortel’s patents, including the patents-in-suit.
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1 6. Many documents concerning patent monetization have resided in or near the
2 Eastern District of Texas since the time of their creation in the Nortel era.

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4 I declare under penalty of perjury under the laws of the United States of America that
5 the foregoing is true and correct.

6 Signed this 9th day of May, 2014.

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Mark Hearn