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Rockstar Consortium US LP and
6 MobileStar Technologies LLC

7
8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **OAKLAND**

11 Google, Inc.)

12 Plaintiff,)

13 vs.)

14 Rockstar Consortium U.S. LP and MobileStar)
Technologies LLC)

15 Defendants.)
16)
17)
18)
19)

Case No. 13-cv-5933 (CW)

**DECLARATION OF GILLIAN
MCCOLGAN IN SUPPORT OF
DEFENDANTS' ROCKSTAR
CONSORTIUM US LP AND
MOBILESTAR
TECHNOLOGIES LLC'S §1404
MOTION TO TRANSFER TO
THE EASTERN DISTRICT OF
TEXAS**

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

DECLARATION OF GILLIAN MCCOLGAN

1 I, Gillian McColgan, declare as follows:
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3 1. I am Chief Technology Officer (CTO) of Rockstar Consortium US LP (“Rockstar”).

4 I submit this declaration in support of Rockstar’s Motion to Transfer to the Eastern District of Texas
5 Under Section 1404 or, in the Alternative, To Stay. I have personal knowledge of the facts set forth
6 in this Declaration, and if called as a witness, could and would testify competently to such facts under
7 oath.

8 2. I supervise a team of 13 employees with professional degrees. Because both I and
9 many of the team that I supervise have detailed knowledge of Nortel’s history and the technologies
10 related to the patents-in-suit, we will have a substantial amount of knowledge relevant to the cases. I
11 also have personal knowledge regarding documents relevant to this lawsuit, such as licensing
12 correspondence, financial statements, and technical documents.

13 3. I reside in Florida, though my job responsibilities as CTO of Rockstar require that I
14 spend much of my time traveling. I travel to Rockstar’s Plano, Texas, headquarters in the Eastern
15 District of Texas regularly and have access to office space and support facilities in that office
16 whenever I am there. Therefore, if required to testify in these lawsuits mentioned above, it would be
17 much more convenient for me to provide testimony in the Eastern District of Texas than it would in
18 the Northern District of California. Moreover, because of their ability to work out of Rockstar’s
19 Plano office, it is substantially more convenient for the team I manage to testify in the Eastern District
20 of Texas than in the Northern District of California. I declare under penalty of perjury under the laws
21 of the United States of America that the foregoing is true and correct.
22

23 Executed the ___ day of May, 2014.

24 
25 Gillian McColgan
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