EXHIBIT 9

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3					
4	Telephone: (650) 394-1400 Fax: (650) 394-1422				
5	ADDITIONAL COUNSEL LISTED ON				
6	SIGNATURE PAGE				
7	Attorneys for Defendants Rockstar Consortium US LP and MobileStar Technologies LLC				
8					
9		ES DISTRICT COURT			
10		TRICT OF CALIFORNIA			
11		AND DIVISION			
12	GOOGLE, INC.				
13	Plaintiff,				
14	vs.	Case No. 13-cv-5933 CW			
15)	DEFENDANTS' INITIAL			
16	ROCKSTAR CONSORTIUM U.S. LP AND) MOBILESTAR TECHNOLOGIES LLC)	DISCLOSURES			
17	Defendants.				
18					
19)				
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22 23					
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_	DEFEN McKool 986119v11	NDANTS' INITIAL DISCLOSURE–Case No. 3:13-cv-5933-CW			

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Rockstar Consortium U.S. LP ("Rockstar") and MobileStar Technologies LLC ("MobileStar") submit their Initial Disclosures under Rule 26(a)(1) of the Federal Rules of Civil Procedure based on information reasonably available to them at this time and without prejudice to its right to amend or supplement these disclosures as discovery continues and to produce, during core discovery or at trial, additional information or documents that are: (i) subsequently discovered; (ii) subsequently determined to be relevant for any purpose; or (iii) subsequently discovered to have been omitted for any reason from these disclosures.

Rockstar and MobileStar's Initial Disclosures are being made based upon the information now reasonably available to them. Rockstar and MobileStar reserves the right to supplement or amend these Initial Disclosures, consistent with applicable Court rules and orders, as and when additional documents or witnesses come to the attention of Rockstar and MobileStar that contain information upon which Rockstar and MobileStar may rely in presenting their claims or defenses Rockstar and MobileStar do not waive any evidentiary objections to the information herein. disclosed, or any applicable privileges. By making these disclosures, Rockstar and MobileStar expressly reserve all objections relative to the use, for any purpose, of these Initial Disclosures or of any information or document references herein.

I.

INDIVIDUALS LIKELY TO HAVE KNOWLEDGE

Based on information presently available, Rockstar and MobileStar identify the persons listed below as potentially having discoverable information that the disclosing party may use to support their claims or defenses. Rockstar and MobileStar expressly reserve their right to supplement this list of individuals as the case progresses and as investigations and discovery continues. Rockstar and MobileStar are unaware of contact information for the individuals where no contact information is given. Further, by indicating the general subject matter of information these individuals may

possess, Rockstar and MobileStar is in no way limiting their right to call any individual listed to
 testify concerning other subjects.

Name	Contact Information	Subject(s) of Knowledge
Kasim Alfalahi	Rockstar Board Member c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201 214-978-4000	Board Member of Rockstar Consortium US LP Mr. Alfalahi has knowledge related to Rockstar's history.
Afzal Dean	Rockstar Employeec/o McKool Smith, P.C.300 Crescent Court, Suite 1500Dallas, Texas 75201214-978-4000	President of MobileStar; Vice President, Patent Licensing of Rockstar Consortium Inc. M Dean has knowledge about Rockstar's licensing policies and practices.
Erik Fako	Rockstar Employee	Senior Patent Counsel, Assertion/Litigation with
	c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500	Rockstar Consortium US LP
	Dallas, Texas 75201 214-978-4000	Mr. Fako has knowledge about efforts to license the patents in suit and Rockstar's
		licensing policies and practices. Mr. Fako was also
		Patent Prosecution Counsel o U.S. Patent No. 6,128,298.
		Mr. Fako may have knowledge about the prosecution of the '298 pater
Art Fisher	Art Fisher	Former Nortel Vice-Presiden of IP Law. Mr Fisher may
	c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500	have knowledge about the patents in suit and Nortel
	Dallas, Texas 75201 214-978-4000	efforts (if any) to license or enforce the patents in suit.
Mark Hearn	Rockstar Employee	Licensing Attorney with Rockstar Consortium US LP
	c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500	Mr. Hearn may have knowledge about efforts to
	Dallas, Texas 75201	license the patents in suit.

Chad Hilyard Gillian McColgan Randy Mishler Donald Powers	Rockstar Employee c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201 214-978-4000 Rockstar Employee c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500	Chief IP Counsel with Rockstar Consortium US LP Mr. Hilyard has knowledge about the efforts to license the patents in suit and Rockstar's licensing policies and procedures. Chief Technology Officer with Rockstar Consortium US
Randy Mishler	300 Crescent Court, Suite 1500 Dallas, Texas 75201 214-978-4000 Rockstar Employee c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500	Mr. Hilyard has knowledge about the efforts to license the patents in suit and Rockstar's licensing policies and procedures. Chief Technology Officer
Randy Mishler	Dallas, Texas 75201 214-978-4000 Rockstar Employee c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500	about the efforts to license the patents in suit and Rockstar's licensing policies and procedures. Chief Technology Officer
Randy Mishler	Rockstar Employee c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500	licensing policies and procedures. Chief Technology Officer
Randy Mishler	c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500	procedures. Chief Technology Officer
Randy Mishler	c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500	
	300 Crescent Court, Suite 1500	
		LP. Ms. McColgan may have
	Dallas, Texas 75201	knowledge valuation of the patents.
	214-978-4000	patents.
Donald Powers	Rockstar Board Member	Board Member of Rockstar
Donald Powers	c/o McKool Smith, P.C.	Consortium US LP
Donald Powers	300 Crescent Court, Suite 1500 Dallas, Texas 75201	Mr. Mishler has knowledge related to Rockstar's history.
Donald Powers	214-978-4000	Tenated to Rockstar 5 history.
	Rockstar Employee	Litigation Attorney with
	c/o McKool Smith, P.C.	Rockstar Consortium US LP. Mr. Powers is also a former
	300 Crescent Court, Suite 1500 Dallas, Texas 75201	Nortel employee and has knowledge of Nortel's
	214-978-4000	previous business activities,
		technologies, patents, acquisitions, and licensing.
		acquisitions, and neensing.
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Name	Contact Information	Subject(s) of Knowledge
John Veschi	Rockstar Employee	Attorney and Chief Executive
	a/a Makaal Smith DC	Officer of Rockstar
	c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500	Consortium US LP;
	Dallas, Texas 75201	MobileStar Board Member. Mr. Veschi has knowledge
	214-978-4000	about Rockstar's operations,
		formation, patent licensing
		policies and procedures. Mr. Veschi is also a former Norte
		employee and has knowledge
		of Nortel Networks' previous
		business activities,
		technologies, patents,
		acquisitions, and licensing
		activities.
Bernie Tiegerman	Rockstar Employee	Senior Patent Attorney with
		Rockstar Consortium US LP
	c/o McKool Smith, P.C.	
	300 Crescent Court, Suite 1500	Patent Prosecution Counsel of
	Dallas, Texas 75201 214-978-4000	U.S. Patent No. 6,463,131. Mr. Tiegerman may have
	214-978-4000	knowledge about the
		prosecution of the '131 pater
Richard Weiss	Richard Weiss	Former Nortel Deputy IP
	NCR	Counsel. Mr. Weiss may have
	McKinney, TX	knowledge about the patents
	Werkinney, TX	in suit and Nortel's efforts to
		license or enforce the patents in suit.
		III Suit.
Yee-Ning Chan	Yee-Ning Chan	Named inventor of U.S.
	Inphi Corporation Westlake Village, CA 91362	Patent No, 5,838,551. Mr. Chan may have knowledge
	weshake vinage, CA 71502	regarding the conception and
		reduction to practice of the
		invention claimed in the '55
		patent.
Jean Pierre Fortin	Jean Pierre Fortin	Patent Prosecution Counsel of
	Ericsson Canada Inc.	U.S. Patent No, 5,838,551.
	IPR & Licensing	Mr. Fortin may have
	349 Terry Fox Dr	knowledge about the
	Kanata, ON K2K 2V6	prosecution of the '551 pater
	CANADA 32819 613-963-8235	
	013-903-6233	

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Name	Contact Information	Subject(s) of Knowledge
Brian Finlay Benton	Brian Finlay Benton Telus Ottawa, Canada	Named inventor of U.S. Patent Nos. 6,037,937 and 6,333,973. Mr. Benton may have knowledge regarding th conception and reduction to practice of the inventions claimed in the '937 and '973 patents.
Colin Donald Smith	Colin Donald Smith Hutchinson 3G	Named inventor of U.S. Patent Nos. 6,037,937 and 6,333,973. Mr. Smith may have knowledge regarding th conception and reduction to practice of the inventions claimed in the '937 and '973 patents.
Bruce Dale Stalkie	Bruce Dale Stalkie Kanata, Ontario	Named inventor of U.S. Patent No. 6,037,937. Mr. Stalkie may have knowledge regarding the conception and reduction to practice of the invention claimed in the '937patent.
Angela De Wilton	Office of Angela C. De Wilton 499 Tillbury Avenue Ottawa, ON K2A 4G8 CANADA 35763 613-755-5347 dewilton@dewilton.com	Patent Prosecution Counsel U.S. Patent No. 6,037,937. Ms. De Wilton may have knowledge about the prosecution of the '937 pate
Bruce Anthony Wooton	Bruce Anthony Wooton c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201 214-978-4000	Named inventor of U.S. Patent No. 6,128,298. Mr. Wooton may have knowledg regarding the conception and reduction to practice of the invention claimed in the '29 patent.
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Name	Contact Information	Subject(s) of Knowledge
William G. Colvin	William G. Colvin	Named inventor of U.S. Patent No. 6,128,298. Mr.
	c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500	Colvin may have knowledge
	Dallas, Texas 75201	regarding the conception and reduction to practice of the
	214-978-4000	invention claimed in the '29 patent.
Tom Gigliotti	Thomas A. Gigliotti,	Patent Prosecution Counsel
	Attorney-at-Law, PLLC	U.S. Patent No. 6,128,298.
	2520 Pennyshire Lane Raleigh, NC 27606	Mr. Gigiotti may have knowledge about the
	919-345-4076	prosecution of the '298 pate
Marilyn French-St.	Marilyn French-St. George	Named inventor of U.S.
George	c/o McKool Smith, P.C.	Patent No. 6,463,131. Ms. French-St. George may have
	300 Crescent Court, Suite 1500	knowledge regarding the
	Dallas, Texas 75201 214-978-4000	conception and reduction to practice of the invention
		claimed in the '131 patent.
Mitch A. Brisebois	Mitch A. Brisebois Dell	Named inventor of U.S.
	Kanata, Ontario	Patent No. 6,463,131. Mr. Brisebois may have
	Canada	knowledge regarding the
		conception and reduction to practice of the invention
		claimed in the '131 patent.
Laura A. Mahan	Laura A. Mahan	Named inventor of U.S.
	Blackberry Ottawa, Canada	Patent No. 6,463,131. Ms. Mahan may have knowledg
		regarding the conception an
		reduction to practice of the invention claimed in the '13
		patent.
Eric Halber	Eric Halber	Patent Prosecution Counsel
	Apex IP Raleigh-Durham, North Carolina	U.S. Patent No. 6,463,131. Mr. Halber may have
		knowledge about the
		prosecution of the '131 pate

1	Name	Contact Information	Subject(s) of Knowledge
2 3 4 5 6	Matthew W. Poisson	Matthew W. Poisson c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201 214-978-4000	Named inventor of U.S. Patent No. 6,765,591. Mr. Poisson may have knowledge regarding the conception and reduction to practice of the invention claimed in the '591 patent.
7 8 9 10	Melissa L. Deroches	Melissa L. Deroches c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201 214-978-4000	Named inventor of U.S. Patent No. 6,765,591. Ms. Deroches may have knowledge regarding the conception and reduction to practice of the invention claimed in the '591 patent.
 11 12 13 14 15 	James M. Milillo	James M. Milillo Newforma New Hampshire	Named inventor of U.S. Patent No. 6,765,591. Mr. Milillo may have knowledge regarding the conception and reduction to practice of the invention claimed in the '591 patent.
16 17	Brianna Hinojosa Flores	Brianna Hinojosa Flores BlackBerry 5000 Riverside Drive Irving, TX 75039	Patent Prosecution Counsel of U.S. Patent No. 6,765,591. Ms. Flores may have knowledge about the prosecution of the '501 petert
 18 19 20 21 	Jaspreet Harit	Jaspreet Harit Former IP Lead Counsel for Nortel Nepean, Ontario, Canada No further information known	 prosecution of the '591 patent. Patent Prosecution Counsel of U.S. Patent No. 6,765,591. Mr. Harit may have knowledge about the prosecution of the '591 patent.
 21 22 23 24 25 	Brian B. Egan	Brian B. Egan c/o McKool Smith, P.C. 300 Crescent Court, Suite 1500 Dallas, Texas 75201 214-978-4000	Named inventor of U.S. Patent No. 6,937,572. Mr. Egan may have knowledge regarding the conception and reduction to practice of the invention claimed in the '572 patent.
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Name	Contact Information	Subject(s) of Knowledge
Kevin Sembrat	Kevin Sembrat	Patent Prosecution Counsel
	Work address:	for U.S. Patent No. 6,937,572
	Alcatel-Lucent 600 Mountain Avenue	Mr. Sembrat may have
	Room 2F-151	knowledge about the prosecution of the '572 pater
	Murray Hill, NJ. 7974	prosecution of the 372 pater
	908-582-6445	
	Last known home address:	
	Califon, NJ	
Milos Vodsedalek	Current address unknown.	Named inventor of U.S.
		Patent No. 6,937,572. Mr.
		Vodsedalek may have knowledge regarding the
		conception and reduction to
		practice of the invention
		claimed in the '572 patent.
Phil Terrett	Phil Terrett	Former Nortel Product
		Manager. Mr. Terrett may
	c/o McKool Smith, P.C.	have knowledge about the
	300 Crescent Court, Suite 1500 Dallas, Texas 75201	patents in suit and Nortel's
	214-978-4000	efforts to commercialize the patents in suit.
		patents in suit.
Corporate	Rockstar Consortium Inc.	Information related to the
Representative of Rockstar	c/o McKool Smith, P.C.	assignment history of the Rockstar and MobileStar
Consortium Inc.	300 Crescent Court, Suite 1500	patents-in-suit and the
	Dallas, Texas 75201	formation of Rockstar-relate
	214-978-4000	entities.
Corporate	Rockstar Consortium US LLC	Information related to the
Representative of Rockstar	c/o McKool Smith, P.C.	assignment history of the Rockstar and MobileStar
Consortium US	300 Crescent Court, Suite 1500	patents-in-suit and the
LLC	Dallas, Texas 75201 214-978-4000	formation of Rockstar-relate
		entities.
Corporate	Rockstar Consortium LLC	Information related to the
Representative of		assignment history of the
Rockstar	c/o LaBarge Weinstein LLP 800–515 Legget Drive	Rockstar and MobileStar
Consortium LLC	Ottawa, Ontario K2K 3G4	patents-in-suit and the formation of Rockstar-relate
	Canada Eagsimile: (612) 500,0018	entities.
	Facsimile: (613) 599-0018 Attention: Michael Dunleavy	

1	Name	Contact Information	Subject(s) of Knowledge
2	Corporate	Rockstar Bidco, LP	Information related to the
3	Representative of Rockstar Bidco, LP	c/o Paul, Weiss, Rifkind, Wharton & Garrison LLP	assignment history of the Rockstar and MobileStar patents-in-suit and the
4 5		1285 Avenue of the Americas New York, New York 10019-6064 Attention: Marilyn Sobel	formation of Rockstar-related entities.
6	Corporate	Facsimile: +1-212-757-3900	Knowledge regarding
7	Representative(s) of ASUS entities		modifications they make to the open-source Android code
8	Abob citiles		in the products accused of infringement in the Eastern
9			District of Texas Action, the hardware components used in
10			the products accused of
11			infringement in the Eastern District of Texas Action,
12			number of products accused of infringement in the Eastern
13			District of Texas Action sold
14			in the U.S. and revenues thereon, and/or any other fact
15			or issue within the scope of the complaint.
16	Corporate		Knowledge regarding
17	Representative(s) of LG entities		modifications they make to
18	LO entities		the open-source Android code in the products accused of infringement in the Eastern
19			District of Texas Action, the
20			hardware components used in the products accused of
21			infringement in the Eastern District of Texas Action,
22			number of products accused
23			of infringement in the Eastern District of Texas Action sold
24			in the U.S. and revenues thereon, and/or any other fact
25			or issue within the scope of
26			the complaint.
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1	Name	Contact Information	Subject(s) of Knowledge
2	Corporate		Knowledge regarding
3	Representative(s) of ZTE entities		modifications they make to the open-source Android code
4			in the products accused of
			infringement in the Eastern District of Texas Action, the
5			hardware components used in
6			the products accused of infringement in the Eastern
7			District of Texas Action,
8			number of products accused of infringement in the Eastern District of Texas Action sold
9			in the U.S. and revenues
10			thereon, and/or any other fact
11			or issue within the scope of the complaint.
12	Corporate		Knowledge regarding
13	Representative(s) of		modifications they make to
14	HTC entities		the open-source Android code in the products accused of
15			infringement in the Eastern
			District of Texas Action, the hardware components used in
16			the products accused of
17			infringement in the Eastern District of Texas Action,
18			number of products accused
19			of infringement in the Eastern District of Texas Action sold
20			in the U.S. and revenues
21			thereon, and/or any other fact or issue within the scope of
			the complaint.
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1	Name	Contact Information	Subject(s) of Knowledge
2	Corporate		Knowledge regarding
	Representative(s) of		modifications they make to
3	Samsung entities		the open-source Android code
4			in the products accused of
5			infringement in the Eastern District of Texas Action, the
			hardware components used in
5			the products accused of
7			infringement in the Eastern
			District of Texas Action, number of products accused
8			of infringement in the Eastern
9			District of Texas Action sold
			in the U.S. and revenues
0			thereon, and/or any other fact
1			or issue within the scope of the complaint.
			the complaint.
2	Corporate		Knowledge regarding
3	Representative(s) of		modifications they make to
4	Google, Inc.		the open-source Android code in the products accused of
*			infringement in the Eastern
5			District of Texas Action, the
6			hardware components used in
			the products accused of
7			infringement in the Eastern District of Texas Action,
3			number of products accused
			of infringement in the Eastern
9			District of Texas Action sold
) ·			in the U.S. and revenues
,			thereon, and/or any other fact
1			or issue within the scope of the complaint.
2			
3	Rockstar and Mobiles	Star also counter-designate those	witnesses identified in Google's ini
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114	disclosures and subsequent disclosures. In addition, Rockstar and MobileStar identify the docume		

custodians for Google and the individuals identified in Google's Initial Disclosures as persons with

knowledge of relevant facts. Rockstar and MobileStar will supplement its disclosures, as

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appropriate, in accordance with the Federal Rules of Civil Procedure, the Local Rules, and the 2 Court's Docket Control Order.

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II.

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DOCUMENTS AND TANGIBLE THINGS

Rockstar and MobileStar will produce documents pursuant to Case Management Order, E-Discovery Order and the Local Rules. By way of example only, Rockstar and MobileStar may rely upon:

- a. The patents in suit;
- b. The file history of the patents in suit;
- Documents related to the conception and reduction to practice the patents in suit; c.

d. Documents related to the ownership of the patents in suit;

- Documents related to the validity of the patents in suit; and e.
 - f. Documents related to Google's infringement of the patents in suit.

III. COMPUTATION OF DAMAGES CLAIMED BY ROCKSTAR AND MOBILESTAR

Rockstar and MobileStar have not pled any damages at this point in the litigation. Defendants reserve the right to amend disclosures at the appropriate time once Defendants have filed an answer.

IV.

INDEMNITY AND INSURING AGREEMENTS

Rockstar and MobileStar are not aware of any indemnity and insuring agreement under which any person or entity carrying on an insurance business may be liable to satisfy part or all of a judgment entered in this action or to indemnify or reimburse for payments made to satisfy the judgment.

1	Dated April 30, 2014.	Respectfully submitted,
2		
3		By: <u>/s/ Courtland Reichman</u>
4		Courtland L. Reichman (SBN 268873) McKool Smith Hennigan, P.C.
5		255 Shoreline Drive Suite 510
6		Redwood Shores, CA 94065 (650) 394-1400
7		(650) 394-1422 (facsimile)
8		Mike McKool (Admitted Pro Hac Vice) mmckool@mckoolsmith.com
9		Douglas A. Cawley (Admitted Pro Hac Vice) dcawley@mckoolsmith.com
10		Ted Stevenson III (Admitted Pro Hac Vice) tstevenson@mckoolsmith.com
11		David Sochia (Admitted Pro Hac Vice) dsochia@mckoolsmith.com
12		McKool Smith, P.C.
13		300 Crescent Court Suite 1500 Dallas, TX 75201
14		(214) 978-4000 (214) 978-4044 (facsimile)
15		ATTORNEYS FOR DEFENDANTS
16		ROCKSTAR CONSORTIUM U.S. LP AND MOBILESTAR TECHNOLOGIES LLC
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1	CERTIFICATE OF SERVICE	
2	I hereby certify that on April 30, 2014, I caused the within and foregoing DEFENDANTS'	
3	INITIAL DISCLOSURES to be e-emailed to counsel of record for Google, Inc.	
4		
5	Signed: <u>/s</u>	/ <i>Jared Hoggan</i> n Employee of McKool Smith, PC
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