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

ROCKSTAR CONSORTIUM US LP AND NETSTAR TECHNOLOGIES LLC,

Plaintiff,

Civil Action No. 2:13-cv-893

v.

**GOOGLE INC.,** 

Defendant.

JURY TRIAL DEMANDED

DECLARATION OF AMANDA K. BONN IN SUPPORT OF
PLAINTIFFS' RESPONSE IN OPPOSITION TO GOOGLE INC.'S
MOTION FOR EXPEDITED BRIEFING SCHEDULE ON
PLAINTIFFS' MOTION FOR LEAVE TO FILE A SUPPLEMENTAL BRIEF
IN RESPONSE TO GOOGLE'S MOTION TO TRANSFER, AND,
GOOGLE'S REQUEST, IN THE ALTERNATIVE,
TO STAY PENDING RESOLUTION OF GOOGLE'S TRANSFER MOTION

- I, Amanda K. Bonn, declare as follows:
- 1. I am a member in good standing of the California State Bar.
- 2. I am an attorney at the law firm Susman Godfrey LLP and I am one of the attorneys serving as counsel for Plaintiffs Rockstar Consortium US LP and NetStar Technologies LLC (collectively "Plaintiffs") in this action. I submit this declaration in support of Plaintiffs' Response in Opposition to Google Inc.'s Motion for Expedited Briefing Schedule on Plaintiffs' Motion for Leave to File a Supplemental Brief in Response to Google's Motion to Transfer, and, Google's Request in the Alternative, to Stay Pending Resolution of Google's Transfer Motion, which is filed herewith.

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On June 25, 2014, I met and conferred with counsel for Google. Google's counsel

indicated they believed it appropriate to combine Google's Motion to Stay with Google's

Response to Plaintiffs' Motion for Leave to File a Supplemental Brief because their arguments in

favor of a stay overlapped with their arguments opposing Plaintiffs' Motion for Leave. Although

Google's counsel indicated they might consider offering additional pages of briefing, they

indicated they would do so only if Plaintiffs would also agree to an expedited briefing schedule

on both Plaintiffs' Motion for Leave and Google's Cross-Motion to Stay.

4. Attached hereto as **Exhibit 1** is a true and correct copy of an email exchange

between counsel for Plaintiffs and Google dated June 24, 2014.

5. Attached hereto as **Exhibit 2** is a true and correct copy of Fusion-IO, Inc.'s

Motion to Sever and Transfer in Solid State Storage Solutions, Inc. v. STEC, Inc. et al., No. CV

11-00391 (E.D. Tex. Jan. 24, 2012), Dkt. No. 57.

6. Attached hereto as **Exhibit 3** is a true and correct copy of Fusion-IO, Inc.'s

Petition for Writ of Mandamus in In re Fusion-IO, Inc., No. 12-139 (Fed. Cir. Sept. 25, 2012),

Dkt. No. 2.

3.

7. Attached hereto as **Exhibit 4** is a true and correct copy of Fusion-IO, Inc.'s Reply

in Support of Petition for Writ of Mandamus in In re Fusion-IO, Inc., No. 12-139 (Fed. Cir. Oct.

19, 2012), Dkt. No. 16-1.

I declare under penalty of perjury under the laws of the United States that the foregoing is

true and correct.

Signed this 26<sup>th</sup> day of June, 2014, at Los Angeles, California

/s/ Amanda K. Bonn

Amanda K. Bonn

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**CERTIFICATE OF SERVICE** 

I hereby certify that all counsel of record, who are deemed to have consented to

electronic service are being served this 26<sup>th</sup> day of June, 2014 with a copy of this document and

Exhibits 1-4 hereto via the Court's CM/ECF system per Local Rule CD-5(a)(3).

/s/ Amanda K. Bonn Amanda K. Bonn

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