

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

**ROCKSTAR CONSORTIUM US LP  
AND NETSTAR TECHNOLOGIES  
LLC,**

**Plaintiff,**

**v.**

**GOOGLE INC.,**

**Defendant.**

**Civil Action No. 2:13-cv-893**

**JURY TRIAL DEMANDED**

**DECLARATION OF JOHN P. LAHAD IN SUPPORT OF  
PLAINTIFFS' RESPONSE IN OPPOSITION TO  
GOOGLE'S MOTION FOR THE COURT TO ENTER ITS [MODEL] ORDER  
FOCUSING PATENT CLAIMS AND PRIOR ART TO REDUCE COSTS, TO LIMIT  
THE NUMBER OF ASSERTED CLAIMS, AND TO EXTEND THE DEADLINE FOR  
THE PARTIES TO COMPLY WITH P.R. 4-2**

I, John P. Lahad, declare as follows:

1. I am a member in good standing of the Texas State Bar.
2. I am an attorney at the law firm of Susman Godfrey L.L.P., and I am counsel of record 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's Motion for the Court to Enter its [Model] Order Focusing Patent Claims and Prior Art to Reduce Costs, and to Limit the Number of Asserted Claims, and To Extend the Deadline for the Parties to Comply with P.R. 4-2 (Doc. 105).
3. Attached as **Exhibit 1** is a true and correct copy of Exhibit B to Google's Invalidation Contentions, served on May 23, 2014.

4. Attached as **Exhibit 2** is a true and correct copy of a letter from counsel for Google (Roberts) to counsel for Plaintiffs (Nelson and Lahad) dated June 23, 2014.

5. Attached as **Exhibit 3** is a true and correct copy of an email exchange between counsel for Plaintiffs and counsel for Google occurring between July 2, 2014 and July 3, 2014.

6. Attached as **Exhibit 4** is a true and correct copy of an email from counsel for Google (Yang) to counsel for Plaintiffs (Lahad) dated July 18, 2014.

7. Attached as **Exhibit 5** is a true and correct copy of an email from counsel for Plaintiffs (Lahad) to counsel for Google (Yang) dated July 21, 2014.

8. Attached as **Exhibit 6** is a true and correct copy of General Order 13-20, signed by the Hon. Leonard David, Chief Judge of the Eastern District. Included in General Order 13-20 are (1) are redline/strikeout version of the Federal Circuit's model order and the Local Rules Committee's commentary regarding the Eastern District's model order.

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

Signed this 21st day of July, 2014, at Houston, Texas

/s/ John P. Lahad  
John P. Lahad

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record, who are deemed to have consented to electronic service are being served this 21st day of July, 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/ John P. Lahad  
John P. Lahad