

Exhibit 4

John Lahad

From: Lance Yang <lanceyang@quinnemanuel.com>
Sent: Friday, July 18, 2014 6:28 PM
To: John Lahad; Andrea P Roberts; David Perlson
Cc: Amanda Bonn; Justin A. Nelson; Alexander L. Kaplan; jrambin@capshawlaw.com; ederieux@capshawlaw.com; ccapshaw@capshawlaw.com; jw@wsfirm.com; claire@wsfirm.com; Kristin Malone; Parker Folse; Cyndi Obuz; John Dolan; Shawn Blackburn; QE-Google-Rockstar; James Mark Mann; Andy Tindel; Gregory Blake Thompson; Stacy Schulze; Tammie J. DeNio; Max L. Tribble
Subject: RE: Rockstar v. Google

John,

Google understands that Rockstar is complaining about the number of combinations disclosed in Google's invalidity contentions, and not that Google has failed to identify and chart, on a element by element basis, each asserted combination. The basis for your allegation that the number of combinations is impermissible remains unclear. As Rockstar acknowledged during the July 10 in person conference, the local rules place no limit on the number of combinations. Google maintains the position that its invalidity contentions fully comply with the Court's Patent Rules.

In the spirit of compromise, however, Google proposes as follows. Google will identify no more than 5 references that Google presently intends to rely on in light of information currently available for each of the six tables in Exhibit B that chart obviousness references on a limitation by limitation basis. This amounts to a specific identification of no more 30 references total in these tables. The actual number may be lower if Google identifies the same references for multiple tables. Google would make this identification by July 28. Due to ongoing discovery, the number of asserted claims, and unsettled claim construction issues, Google would reserve its right to rely on the other references identified in Exhibit B as the case evolves. Please let us know if Rockstar agrees to this proposal.

Google still believes that adopting the Court's model order is the most appropriate and reasonable mechanism for narrowing the issues in this case, including the number of Google's combinations. In light of Google's proposal to identify a limited set of obviousness references, let us know if Rockstar would be willing drop its opposition to Google's motion to adopt the model order.

Best,
Lance

-----Original Message-----

From: John Lahad [mailto:jlahad@SusmanGodfrey.com]
Sent: Friday, July 18, 2014 9:22 AM
To: Andrea P Roberts; David Perlson
Cc: Lance Yang; Amanda Bonn; Justin A. Nelson; Alexander L. Kaplan; jrambin@capshawlaw.com; ederieux@capshawlaw.com; ccapshaw@capshawlaw.com; jw@wsfirm.com; claire@wsfirm.com; Kristin Malone; Parker Folse; Cyndi Obuz; John Dolan; Shawn Blackburn; QE-Google-Rockstar; James Mark Mann; Andy Tindel; Gregory Blake Thompson; Stacy Schulze; Tammie J. DeNio; Max L. Tribble; Lance Yang
Subject: RE: Rockstar v. Google

David and Andrea,
Will Google be responding to my email?

Thanks,
John