

**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' MOTION TO STRIKE
DEFENDANT GOOGLE'S INC.'S DEFICIENT OBVIOUSNESS DISCLOSURE
UNDER PATENT RULE 3-3(B)**

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' Motion to Strike Defendant Google Inc.'s Deficient Obviousness Disclosure Under Patent Rule 3-3(b).
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 a letter from counsel for Plaintiffs (Lahad) to counsel for Defendant (Roberts) dated June 25, 2014.

6. Attached as **Exhibit 4** is a true and correct copy of an email exchange between counsel for Google (Yang) and counsel for Plaintiffs (Lahad) dated July 2 to July 3, 2014.

7. Attached as **Exhibit 5** is a true and correct copy of an email from counsel for Google (Yang) to counsel for Plaintiffs (Lahad) dated July 18, 2014.

8. Attached as **Exhibit 6** is a true and correct copy of an email from counsel for Plaintiffs (Lahad) to counsel for Google (Yang) dated July 21, 2014.

9. Attached as **Exhibit 7** is a true and correct copy of a letter from counsel for Google (Yang) to counsel for Plaintiffs (Lahad) dated June 30, 2014.

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

Signed this 23rd 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 23rd 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