

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

ROCKSTAR CONSORTIUM US LP)
AND NETSTAR TECHNOLOGIES LLC,)

Plaintiffs,)

v.)

GOOGLE INC.)

Defendant.)

Civil Action No. 13-cv-00893-RG

JURY TRIAL DEMANDED

**DECLARATION OF ANDREA PALLIOS ROBERTS IN SUPPORT OF GOOGLE
INC.'S MOTION TO STRIKE PLAINTIFFS' PATENT RULE 3-1 INFRINGEMENT
CONTENTIONS**

I, Andrea Pallios Roberts, declare as follows:

1. I am an attorney at the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Defendant Google Inc. (“Google”) in this matter. I have personal knowledge of the facts stated herein and if called to testify could and would competently testify thereto.

2. Attached as Exhibit 1 is a true and correct copy of an email from Andrea Pallios Roberts of Quinn Emanuel to John Lahad of Susman Godfrey, dated April 14, 2014.

3. Attached as Exhibit 2 is a true and correct copy of an email from John Lahad to Andrea Pallios Roberts, dated April 18, 2014.

4. Attached as Exhibit 3 is a true and correct copy of an email from John Lahad to Andrea Pallios Roberts, dated June 13, 2014.

5. Attached as Exhibit 4 is a true and correct copy of an email from Andrea Pallios Roberts to John Lahad, dated June 16, 2014.

6. Attached as Exhibit 5 is a true and correct copy of a letter from John Lahad to Andrea Pallios Roberts, dated June 25, 2014.

7. Attached as Exhibit 6 is a true and correct copy of a letter from Andrea Pallios Roberts to John Lahad and Justin Nelson of Susman Godfrey, dated June 23, 2014.

8. Attached as Exhibit 7 is a true and correct copy of a letter from Lance Yang of Quinn Emanuel to John Lahad, dated June 30, 2014.

9. Attached as Exhibit 8 is a true and correct copy of an email from Amanda Bonn of Susman Godfrey to Andrea Pallios Roberts, dated July 2, 2014.

10. Attached as Exhibit 9 is a true and correct copy of an email from Andrea Pallios Roberts to Amanda Bonn, dated July 3, 2014.

11. Exhibit 10 was intentionally omitted.

12. Exhibit 11 was intentionally omitted.

13. Attached as Exhibit 12 is a true and correct copy of Rockstar's P.R. 3-1 Infringement Claim Chart for U.S. Patent No. 7,236,969.

14. Attached as Exhibit 13 is a true and correct copy of Rockstar's P.R. 3-1 Infringement Claim Chart for U.S. Patent No. 7,469,245.

15. Attached as Exhibit 14 is a true and correct copy of Rockstar's P.R. 3-1 Infringement Claim Chart for U.S. Patent No. 7,672,970.

16. Attached as Exhibit 15 is a true and correct copy of Rockstar's P.R. 3-1 Infringement Claim Chart for U.S. Patent No. 7,895,178.

17. Attached as Exhibit 16 is a true and correct copy of Rockstar's P.R. 3-1 Infringement Claim Chart for U.S. Patent No. 7,895,183.

18. Attached as Exhibit 17 is a true and correct copy of Rockstar's P.R. 3-1 Infringement Claim Chart for U.S. Patent No. 7,933,883.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed August 8, 2014 in Redwood Shores, California.



Andrea Pallios Roberts