

EXHIBIT 1

From: Andrea P Roberts
Sent: Monday, April 14, 2014 11:56 AM
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Subject: Rockstar v. Google

Counsel,

I write regarding Rockstar's infringement contentions. First, Rockstar's assertion of 144 claims in 7 patents is unreasonable. As a practical matter, this is far too many. Not only is it extremely difficult for Google to analyze Rockstar's infringement contentions, but it will greatly increase the volume of Google's invalidity contentions, which will be a burden to all parties. Moreover, Rockstar cannot possibly try anything remotely close to 144 claims and must know that it will, at least eventually, have to reduce the number of asserted claims. Indeed, under the Court's Model Order Focusing Patent Claims and Prior Art to Reduce Costs, Rockstar will need to limit itself to 32 asserted claims by the close of claim construction discovery. Rockstar should reduce the number of asserted claims now, before Google serves its invalidity contentions under P.R. 3-3. Please confirm that Rockstar will do so by Friday, April 18.

Second, Rockstar's infringement contentions, while voluminous due to the number of asserted claims, do not provide sufficient specificity to put Google on notice of what functionalities Rockstar contends infringes the asserted patents. Without such specificity, it is extremely difficult, if not impossible, for Google to identify "documentation sufficient to show the operation" of such accused functionalities, as required by P.R. 3-4, or to do so by May 19, much less determine what other documents or source code is relevant to Rockstar's infringement contentions. We request that Rockstar provide more specificity as to what is accused. Please confirm that Rockstar will do so by Friday, April 18.

If Rockstar does not agree to either of the above, please provide a time this week when Rockstar is available to meet and confer on these issues.

Thanks,

Andrea

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