

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 LANCE YANG IN SUPPORT OF GOOGLE INC.'S RESPONSE IN
OPPOSITION TO PLAINTIFFS' MOTION TO STRIKE GOOGLE INC.'S
OBVIOUSNESS DISCLOSURE UNDER PATENT RULE 3-3(B)**

I, Lance Yang, 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 A is a true and correct copy of an email correspondence between from Andrea Pallios Roberts of Quinn Emanuel to John Lahad of Susman Godfrey, including emails dated April 14 and 18, 2014.

3. Attached as Exhibit B is a true and correct copy of an email from Lance Yang of Quinn Emanuel to John Lahad , dated June 3, 2014.

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

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

6. Attached as Exhibit E is a true and correct copy of a letter from Lance Yang to John Lahad, dated June 30, 2014.

7. Attached as Exhibit F is a true and correct copy of an email correspondence between Lance Yang and John Lahad, including emails dated July 18, 21, and 22, 2014.

8. Attached as Exhibit G is a true and correct copy of an excerpt of Exhibit B to Google’s May 23, 2014 Invalidity Contentions.

9. Attached as Exhibit H is a true and correct copy of Exhibit A-1 to Google’s May 23, 2014 Invalidity Contentions.

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

11. Exhibit J is a true and correct copy of Google's May 23, 2014 Invalidity Contentions.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed August 11, 2014 in Los Angeles, California.



Lance Yang