EXHIBIT A

From: John Lahad [mailto:jlahad@SusmanGodfrey.com]
Sent: Friday, April 18, 2014 1:51 PM
To: Andrea P Roberts
Cc: jrambin@capshawlaw.com; ederieux@capshawlaw.com; ccapshaw@capshawlaw.com; jw@wsfirm.com; claire@wsfirm.com; Alexander L. Kaplan; Max L. Tribble; Mark Mann; blake@themannfirm.com; atindel@andytindel.com; QE-Google-Rockstar
Subject: RE: Rockstar v. Google

Andrea,
Thanks for your email, and good chatting with you today. We disagree that the number of patents and claims is unreasonable at this stage in the litigation. As you mentioned, under the Court's model order – which has not been issued in this case – the earliest Rockstar would have to make an election is "by the date set for completion of claim construction discovery." Under the Court's current sample DCO, that's not until September. Google's only argument is burden, but that was explicitly taken into consideration by the Court in its model order, which intends to "streamline[] the issues in this case." Accordingly, to the extent Rockstar must limit claims, it will do so when ordered by the Court.

You add that Rockstar's infringement contentions "do not provide sufficient specificity to put Google on notice of what functionalities Rockstar contends infringes the asserted patents." Suffice it to say, we disagree. Per PR 3-1, Rockstar's infringement contentions name each instrumentality currently accused of infringement and provide ample evidence "identifying specifically where each element of each asserted claim is found within each Accused Instrumentality."

Happy to discuss.
Thanks,
John

John P. Lahad
Susman Godfrey L.L.P.
713-653-7859 (office)
713-725-3557 (mobile)
713-654-6666 (fax)

From: Andrea P Roberts [mailto:andreaproberts@quinnemanuel.com]
Sent: Monday, April 14, 2014 1:56 PM
To: John Lahad
Cc: jrambin@capshawlaw.com; ederieux@capshawlaw.com; ccapshaw@capshawlaw.com; jw@wsfirm.com; claire@wsfirm.com; Alexander L. Kaplan; Max L. Tribble; Mark Mann; blake@themannfirm.com; atindel@andytindel.com; QE-Google-Rockstar
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

Andrea Pallios Roberts
Of Counsel,
Quinn Emanuel Urquhart & Sullivan, LLP

555 Twin Dolphin Drive, 5th Floor
Redwood Shores, CA 94065
650-801-5023 Direct
650.801.5000 Main Office Number
650.801.5100 FAX
andreaproberts@quinnemanuel.com
www.quinnemanuel.com