

EXHIBIT B

From: Lance Yang

Sent: Tuesday, June 03, 2014 12:48 PM

To: John Lahad; QE-Google-Rockstar; Andrea P Roberts; Charles K Verhoeven; David Perlson; Sam Stake; 'Mark Mann'

Cc: Alexander L. Kaplan; Amanda Bonn; Cyndi Obuz; John Dolan; Justin A. Nelson; Kristin Malone; Max L. Tribble; Parker Folse; Shawn Blackburn; Stacy Schulze; Tammie J. DeNio

Subject: RE: Rockstar v. Google: Google's Invalidity Contentions

John,

The exhibits you reference provide charts for the prior art identified in the descriptions at the top of each chart. For example, A-1 lists the Adapt/X system at the top, which indicates that the Adapt/X system is the charted prior art. The reference cited in A-1, including the Business Wire articles, describe the Adapt/X system. Similarly, A-23 lists WO9721183 at the top of the chart, which indicates that WO9721183 is charted art. The same applies for A-3, A-12, A-21, A-22, A-26, and A-32.

As for the tables in Exhibit B, Exhibits A-1 through A-39 identify each combination that Google intends to rely on for each limitation. For example, page 12 of A-1 indicates that the references in Table B1 render claim element 1b of the '065 patent obvious. Table B1 identifies where to find the disclosure of claim 1b in each reference. The tables in Exhibit B streamline the disclosures. This is particularly necessary given Rockstar's continued assertion of 144 claims and refusal to provide sufficient specificity in its own infringement contentions.

I'm available to discuss today if you'd like.

Best,
Lance