

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

**ROCKSTAR CONSORTIUM US LP
AND NETSTAR TECHNOLOGIES
LLC,**

Plaintiff,

v.

GOOGLE INC.,

Defendant.

Civil Action No. 2:13-cv-893

JURY TRIAL DEMANDED

**DECLARATION OF SHAWN D. BLACKBURN IN SUPPORT OF
PLAINTIFFS' RESPONSE TO DEFENDANT'S MOTION TO STRIKE
PLAINTIFFS' PATENT RULE 3-1 INFRINGEMENT CONTENTIONS**

I, Shawn D. Blackburn, declare as follows:

1. I am a member in good standing of the Texas State Bar.
2. I am an attorney at the law firm of Susman Godfrey L.L.P., and I am counsel of record for Plaintiffs Rockstar Consortium US LP and NetStar Technologies LLC (collectively "Plaintiffs") in this action. I submit this declaration in support of Plaintiffs' Response to Defendant's Motion to Strike Plaintiffs' Patent Rule 3-1 Infringement Contentions.
3. Attached as **Exhibit 1** is a true and correct copy of Rockstar's P.R. 3-1 Disclosure of Asserted Claims and Infringement Contentions.
4. Attached as **Exhibit 2** is a true and correct copy of Rockstar's P.R. 3-1 Infringement Claim Chart for U.S. Patent No. 6,098,065.

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

6. Attached as **Exhibit 4** is a true and correct copy of Rockstar's P.R. 3-1 Infringement Claim Chart for U.S. Patent No. 7,469,245.

7. Attached as **Exhibit 5** is a true and correct copy of Rockstar's P.R. 3-1 Infringement Claim Chart for U.S. Patent No. 7,672,970.

8. Attached as **Exhibit 6** is a true and correct copy of Rockstar's P.R. 3-1 Infringement Claim Chart for U.S. Patent No. 7,895,178.

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

10. Attached as **Exhibit 8** is a true and correct copy of Rockstar's P.R. 3-1 Infringement Claim Chart for U.S. Patent No. 7,933,883.

11. Attached as **Exhibit 9** is a true and correct copy of an email from counsel for Defendant (Roberts) to counsel for Plaintiffs (Lahad) dated April 14, 2014.

12. Attached as **Exhibit 10** is a true and correct copy of an email from counsel for Plaintiffs (Lahad) to counsel for Defendant (Roberts) dated April, 18 2014.

13. Attached as **Exhibit 11** is a true and correct copy of an email from counsel for Defendant (Roberts) to counsel for Plaintiffs (Bonn) dated July 3, 2014.

14. Attached as **Exhibit 12** is a true and correct copy of an email from counsel for Plaintiffs (Bonn) to counsel for Defendant (Roberts) dated July 8, 2014.

15. Attached as **Exhibit 13** is a true and correct copy of an email from counsel for Defendant (Roberts) to counsel for Plaintiffs (All Counsel) dated July 24, 2014.

16. Attached as **Exhibit 14** is a true and correct copy of an email from counsel for Plaintiffs (Bonn) to counsel for Defendant (Roberts) dated August 27, 2014.

17. Attached as **Exhibit 15** is a true and correct copy of a letter from counsel for Defendant (Roberts) to counsel for Plaintiffs (Nelson and Lahad) dated June 23, 2014.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Signed this 29th day of August, 2014, at Houston, Texas

/s/ Shawn D. Blackburn
Shawn D. Blackburn

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record, who are deemed to have consented to electronic service are being served this 29th day of August, 2014 with a copy of this document and Exhibits 1-5 hereto via the Court's CM/ECF system per Local Rule CD-5(a)(3).

/s/ Shawn D. Blackburn
Shawn D. Blackburn