

EXHIBIT 11

From: Andrea P Roberts <andreaproberts@quinnemanuel.com>
Sent: Thursday, July 03, 2014 5:27 PM
To: Amanda Bonn
Cc: QE-Google-Rockstar; Max L. Tribble; Justin A. Nelson; Alexander L. Kaplan; Shawn Blackburn; John Lahad; Parker Folse; claire@wsfirm.com; jw@wsfirm.com; ccapshaw@capshawlaw.com; Elizabeth DeRieux; Jeff Rambin; Mark Mann; atindel@andytindel.com; blake@themannfirm.com; John Dolan; Cyndi Obuz; Stacy Schulze
Subject: RE: Rockstar v. Google: Expert Disclosures

Amanda,

Initially, we are still reviewing Rockstar's disclosure of experts. We have a few follow up questions in that regard:

Jay Bhatia - Can you please confirm that the listed cases on his CV cover all of his work in the last four years? It is not clear from the title of that section of his CV. Please also confirm that he does not have any publications in the last 8 years, and is not an inventor or applicant in any patents or patent applications.

Kevin Almeroth – Can you please confirm that he is not an inventor or applicant on any patents or patent applications?

Vivek Shinde – Can you please confirm that he has no publications in the last 8 years, and that he is not an inventor or applicant in any patents or patent applications?

Additionally, Dai and Shinde both reside outside of the U.S. As you know, pursuant to paragraph 21 of the Protective Order “[n]o DESIGNATED MATERIAL may leave the territorial boundaries of the United States of America. Without limitation, this prohibition extends to DESIGNATED MATERIAL (including copies) in physical and electronic form. The viewing of DESIGNATED MATERIAL through electronic means outside the territorial limits of the United States of America is similarly prohibited.” Given Dai and Shinde's residences, we are concerned about potential violations of the Protective Order. Can you please explain how Rockstar anticipates ensuring compliance with this provision of the Protective Order for these two consultants that do not reside in the U.S.?

As for the request to have Jay Bhatia review source code on July 9-11, 2014, Google is diligently collecting the relevant source code to make it available for inspection, but it will not be available for inspection by July 9. The deadline for Google to substantially complete its document production is September 16. While Google is endeavoring to make the relevant source code available for inspection before that, it will not be available by July 9. We will let Rockstar know when it is available for inspection as soon as it is. We currently anticipate that, when ready, it will be made available for inspection in Quinn Emanuel's LA office.

With respect to the source code that Rockstar expects Google to produce, please explain why Rockstar believes that “all source code relating to functionalities identified in Plaintiffs' infringement contentions, including but not limited to source code relating to AdWords, AdSense, Ad Server (release software), GWS (Google Web Server), GFE (Google Front End), Google Search Request and Google Search Response Objections, Google and Double-Click cookies, and search ranking, and any other source code relating to functionalities identified in

Plaintiffs' infringement contentions" is relevant? There is no basis for Rockstar to demand "all" code in these broad categories. We are collecting the source code for the functionalities accused of infringement based on our understanding of what is accused as best we can. However, as we have been telling Rockstar since April, Rockstar's infringement contentions do not put Google on sufficient notice of what is actually accused. Thus, it would be beneficial to both parties if Rockstar would supplement its infringement contentions to provide more specificity; Google would then know which source code to make available for inspection, and that source code would be made available for inspection by Rockstar without the need for lengthy and costly correspondence between the parties regarding what should be produced.

As for the review computers, I can confirm that they each have 8 GB of memory. For the review tools, please provide us with a CD or DVD containing the software tools Rockstar is requesting, as required by paragraph 11(b) of the Protective Order. You can direct the delivery of the CD or DVD(s) to Lance Yang in our LA office.

Thanks,
Andrea

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