

EXHIBIT C

From: Lance Yang
Sent: Monday, June 02, 2014 5:02 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,

Google confirms that those are the correct charts. The disclosures are not identical, but do rely on some of the same underlying documents.

Regarding the highlighted references in your attachment, several of the references are charted in Exhibit B. Any references not charted may be used, if at all, for different purposes, such as to establish the state of the art or for background.

Best,

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From: John Lahad [<mailto:jlahad@SusmanGodfrey.com>]
Sent: Friday, May 30, 2014 3:19 PM
To: 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; John Lahad; Justin A. Nelson; Kristin Malone; Max L. Tribble; Parker Folse; Shawn Blackburn; Stacy Schulze; Tammie J. DeNio
Subject: Rockstar v. Google: Google's Invalidity Contentions

Counsel,

I write regarding Google's May 23, 2014 invalidity contentions. First, it appears that there are several duplicate charts. For example, even though it is titled differently, A-1 is the same as A-23. Both rely on the Naqvi WO. Likewise A-12 is the same as A-21 (Mooney), A-22 is the same as A26 (Myaeng and Khorfage), and A3 is the same as A32 (Buckley). Please confirm my understanding.

Second, Eastern District of Texas Patent Local Rule 3-3 requires each party opposing a claim of patent infringement to serve invalidity contentions that must include "a chart identifying where

specifically in each alleged item of prior art each element of each asserted claim is found, including for each element that such party contends is governed by 35 U.S.C. § 112(6), the identity of the structure(s), act(s), or material(s) in each item of prior art that performs the claimed function[.]”

On May 23, 2014 Google served its invalidity contentions and included 39 charts for prior art references. It also served an Exhibit C, which according to Google, lists references on which it intends to rely. However, Google failed to provide charts for several of the references identified in Exhibit C. Those uncharted references are highlighted in the attached. If Google does in fact intend to rely on these references as prior art, please provide charts in accordance with Local Rule 3-3 by the close of business Monday.

Thanks in advance,
John

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