

# EXHIBIT 1

**From:** Justin A. Nelson [jnelson@SusmanGodfrey.com]  
**Sent:** Monday, September 22, 2014 10:39 AM  
**To:** David Perlson; Shawn Blackburn; John Lahad; Cyndi Obuz; John Dolan; Max L. Tribble; Parker Folse; Stacy Schulze; Tammie J. DeNio; 'jrambin@capshawlaw.com'; 'Elizabeth DeRieux'; 'ccapshaw@capshawlaw.com'; 'jw@wsfirm.com'; 'claire@wsfirm.com'; Meng Xi; Amanda Bonn  
**Cc:** QE-Google-Rockstar; 'Mark Mann'; 'blake@themannfirm.com'; 'Andy Tindel'  
**Subject:** RE: October 9 Hearing

David – We do oppose because we believe it is up to the Court to add any topics to the hearing. To the extent that the Court adds your motions, we would want our motions as well, but absent direction from the Court we do not think it is appropriate to set additional items for a hearing on a third party protective order. I am at my desk now if you would like to meet and confer by phone.

Best Regards,

Justin A. Nelson  
Susman Godfrey  
1201 Third Avenue  
Suite 3800  
Seattle, WA 98101  
206-516-3867

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**From:** David Perlson [<mailto:davidperlson@quinnemanuel.com>]  
**Sent:** Monday, September 22, 2014 10:23 AM  
**To:** David Perlson; Shawn Blackburn; John Lahad; Justin A. Nelson; Cyndi Obuz; John Dolan; Max L. Tribble; Parker Folse; Stacy Schulze; Tammie J. DeNio; 'jrambin@capshawlaw.com'; 'Elizabeth DeRieux'; 'ccapshaw@capshawlaw.com'; 'jw@wsfirm.com'; 'claire@wsfirm.com'; Meng Xi; Amanda Bonn  
**Cc:** QE-Google-Rockstar; 'Mark Mann'; 'blake@themannfirm.com'; 'Andy Tindel'  
**Subject:** RE: October 9 Hearing

Following up my email from Friday. Can we please get Rockstar's position? We would like to file our motion today so please provide a time we can have a meet and confer on this today if Rockstar opposes.

Thanks,

David

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**From:** David Perlson  
**Sent:** Friday, September 19, 2014 11:30 AM  
**To:** 'Shawn Blackburn'; 'John Lahad'; 'Justin A. Nelson'; 'Cyndi Obuz'; 'John Dolan'; 'Max L. Tribble'; 'Parker Folse'; 'Stacy Schulze'; 'Tammie J. DeNio'; 'jrambin@capshawlaw.com'; 'Elizabeth DeRieux'; 'ccapshaw@capshawlaw.com'; 'jw@wsfirm.com'; 'claire@wsfirm.com'; 'Meng Xi'; 'Amanda Bonn'

**Cc:** QE-Google-Rockstar; 'Mark Mann'; 'blake@themannfirm.com'; 'Andy Tindel'

**Subject:** October 9 Hearing

Counsel,

Google intends to move pursuant to Local Rule CV-7(g) to set the following motions for hearing at the October 9 hearing already set on the Nortel Motions for Protective Order:

- Google's Motion To Transfer (Dkt. 18), Google's Cross-Motion, in the Alternative, To Stay Pending Resolution of Its Transfer Motion (Dkt. 97)
- Google's Motion for the Court To Enter Its Model Order (Dkt. 105)
- Google's Motion To Strike Plaintiffs' Infringement Contentions (Dkt. 122)
- Google's Motion To Compel Complete Interrogatory Responses (Dkt. 136)

Please let us know if Plaintiff consents to this motion. If Plaintiff would like to add any of its pending motions to a joint motion to set these matters for hearing that is acceptable to Google.

Please let us know your position. We would like to get the motion on file as soon as possible.

Thanks,

David

**David Perlson**

*Partner,*

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