

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

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

Plaintiffs,

v.

GOOGLE INC.,

Defendant.

Case No. 2:13-cv-00893-JRG-RSP

JURY TRIAL DEMANDED

DECLARATION OF JONATHAN SOLOMON

I, Jonathan Solomon, declare as follows:

1. I am over 18 years of age and I submit this declaration in support of Plaintiffs in the above-captioned action.
2. I am an employee of Complete Discovery Source (CDS) New York, NY.
3. I am the Acting Project Manager for Plaintiffs' Relativity database.
4. The total number of documents and pages produced by Defendant Google Inc. in this matter as of September 24, 2014 equaled 159,442 documents and 957,501 pages.
5. The number of documents and pages produced by Defendant Google Inc. from a prior case in this matter as of September 24, 2014 equaled 102,309 documents and 621,460 pages.
6. The number of documents produced by Defendant Google Inc. from a prior case in this matter as of September 24, 2014 with custodian information equaled 102,309 documents.
7. The remaining number of documents produced by Defendant Google Inc. in this matter as of September 24, 2014 with custodian information equaled 0 documents.

8. As of September 24, 2014, the only documents produced by Google Inc. in this matter with custodian information were from the prior case. Based on my review of the metadata, it appears that Google has not provided any custodial documents from its productions and searches in this case. Rather, all documents from custodians were re-produced from the previous case.

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

Signed this 26th day of September, 2014, in New York, New York.



JONATHAN SOLOMON