

**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.

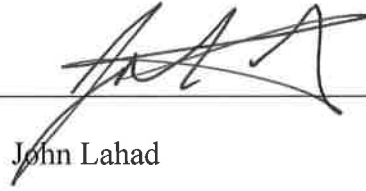
Civil Action No. 2:13-cv-893

JURY TRIAL DEMANDED

DECLARATION OF JOHN LAHAD

1. My name is John Lahad. I am an attorney for Plaintiffs in this case and a member in good standing of the Texas State Bar.
2. I attended the in-person meet and confer on July 10, 2014.
3. Before the meet and confer, my colleague Amanda Bonn sent Google's counsel an email discussing Google's failure to produce documents from custodians. Attached as Exhibit 1 is an email exchange that Ms. Bonn and I had with Google's counsel both before and after the in-person meet and confer.
4. At the meet and confer itself, we specifically discussed Google's disagreement that documents from its senior leadership would be responsive and not cumulative.

I declare under penalty of perjury that the foregoing is true and correct. Executed September 26, 2014 in Houston, Texas.



John Lahad