

EXHIBIT 10

**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

**ROCKSTAR CONSORTIUM US LP AND NETSTAR TECHNOLOGIES LLC'S
INITIAL DISCLOSURES PURSUANT TO PARAGRAPH 1 OF THE DEFAULT
PROTECTIVE ORDER**

Plaintiffs Rockstar Consortium US LP (“Rockstar”) and NetStar Technologies LLC (“NetStar”) make the following initial disclosures pursuant to paragraph 1 of the Court’s default Discovery Order and the deadline set in the Court’s default Docket Control Order.

A. The correct names of the parties

The correct names of the Plaintiffs are Rockstar Consortium US LP and NetStar Technologies LLC. The correct name of the Defendant is Google, Inc.

B. The name, address, and telephone number of any potential parties

Plaintiffs are currently unaware of any additional potential parties.

C. The legal theories and, in general, the factual bases of the disclosing party’s claims or defenses

Rockstar is the owner of United States Patent Nos. 6,098,065 (“the ’065 patent”); 7,236,969 (“the ’969 patent”); 7,469,245 (“the ’245 patent”); 7,672,970 (“the ’970 patent”); 7,895,178 (“the ’178 patent”); 7,895,183 (“the ’183 patent”); and 7,933,883 (“the ’883 patent”) (collectively, “the patents-in-suit”). NetStar is the exclusive licensee of the patents-in-suit. Defendant Google, Inc. (“Google”) has infringed and continues to infringe certain claims of the patents-in-suit. Additionally, Google’s infringement has been willful and deliberate. As a result of Google’s infringement of the patents in suit, Rockstar and NetStar have been and continue to be damaged. Rockstar and NetStar also seek enhanced damages and recovery of their costs and reasonable attorneys’ fees incurred in this action as provided by 35 U.S.C. §§ 284 and 285.

Additional information under this category was provided in Plaintiffs’ Disclosure of Asserted Claims and Infringement Contentions served on Google on March 24, 2014.

D. The name, address, and telephone number of persons having knowledge of relevant facts, a brief statement of each identified person’s connection with the case, and a brief, fair summary of the substance of information known by any such person

Plaintiffs submit that the following individuals are likely to have knowledge of relevant facts:

1. Richard Prescott Skillen

Mr. Skillen may be contacted through Counsel for Plaintiffs, Susman Godfrey.

Mr. Skillen is a named inventor of the patents-in-suit and as such is likely to have information concerning the development of the inventions disclosed in the patents-in-suit.

2. Frederick Caldwell Livermore

Mr. Livermore may be contacted through Counsel for Plaintiffs, Susman Godfrey.

Mr. Livermore is a named inventor of the patents-in-suit and as such is likely to have

information concerning the development of the inventions disclosed in the patents-in-suit.

3. Bruce E. Garlick, Esq.
Garlick & Markison
P.O. Box 160727
Austin, Texas 78716
(512) 751-5682

Mr. Garlick can be contacted through Counsel for Plaintiffs, Susman Godfrey.

Mr. Garlick served as outside patent prosecution counsel to Nortel Networks Corporation (“Nortel”) for the ’969, ’245, ’970, ’178, ’183, and ’883 patents, and as such is likely to have information related to the prosecution of those patents.

4. Vernon E. Williams

Mr. Williams is former Senior Intellectual Property Counsel at Nortel and was patent prosecution counsel for the ’065 patent. As such, he is likely to have information related to the prosecution of that patent. Because he has privileged information, he should not be contacted without counsel for Plaintiffs present.

5. Ron Steeves
Rockstar Consortium, Inc.
515 Legget Drive, Suite 300
Ottawa, Ontario K2K 3G4
(613) 576-1017

Mr. Steeves can be contacted through Counsel for Plaintiffs, Susman Godfrey.

Mr. Steeves is an employee at Rockstar Consortium, Inc. and was formerly employed by Nortel. Mr. Steeves is likely to have information related to the monetization of the patents-in-suit.

6. Raj Krishnan, Esq.
STMicroelectronics, Inc.
1310 Electronics Drive
Carrollton, Texas 75006

Mr. Krishnan is a former employee of Rockstar US LP and Nortel. Mr. Krishnan is likely to have relevant information related to the prosecution and monetization of the patents-in-suit. Because he has privileged information, he should not be contacted without counsel for Plaintiffs present.

7. Bill Junkin
Rockstar Consortium, Inc.

515 Legget Drive, Suite 300
Ottawa, Ontario K2K 3G4

Mr. Junkin can be contacted through Counsel for Plaintiffs, Susman Godfrey.

Mr. Junkin works for Rockstar Consortium, Inc. and was formerly employed by Nortel. Mr. Junkin is likely to have information concerning Nortel's preparation and analysis related to the auction of Nortel's intellectual property assets.

8. Danny Lingman
Digital Matrix, Inc.
13 Roberta Crescent
Ottawa, Ontario K2J 1G5
(613) 825-1216

Mr. Lingman can be contacted through Counsel for Plaintiffs, Susman Godfrey.

Mr. Lingman is a former employee of Rockstar Consortium US LP and Nortel. Mr. Lingman is likely to have information related to the monetization of the patents-in-suit, including the 2010 meeting between Nortel and Google regarding the patents-in-suit.

9. Gillian McColgan
Legacy Town Center 1
7160 North Dallas Parkway
Suite No. 250
Plano, Texas 75024

Ms. McColgan can be contacted through Counsel for Plaintiffs, Susman Godfrey.

Ms. McColgan is Chief Technology Officer of Rockstar, with information related to Rockstar's and NetStar's respective business activities, technologies, patents, acquisitions, and licensing activities. She is also a former Nortel employee and has knowledge of Nortel's previous business activities, technologies, patents, acquisitions, licensing activities, as well as information relating to the auction of Nortel's patent assets.

10. Bernard Tiegerman
Rockstar Consortium US LP
Legacy Town Center 1
7160 North Dallas Parkway
Suite No. 250
Plano, Texas 75024

Mr. Tiegerman can be contacted through Counsel for Plaintiffs, Susman Godfrey.

Mr. Tiegerman is an attorney and Senior Patent Counsel at Rockstar, with information related to Rockstar's and NetStar's respective patents, acquisitions, and licensing activities. He is also a former Nortel patent attorney and has knowledge of Nortel Networks' previous patent-related activities, policies, and procedures.

11. Mark Hearn, Esq.
Rockstar Consortium US LP
Legacy Town Center 1
7160 North Dallas Parkway
Suite No. 250
Plano, Texas 75024

Mr. Hearn can be contacted through Counsel for Plaintiffs, Susman Godfrey.

Mr. Hearn is a Licensing Attorney at Rockstar Consortium US LP and was formerly employed by Nortel. Mr. Hearn is likely to have information related to the monetization of the patents-in-suit, including Nortel's 2010 meeting with Google, Inc. regarding the licensing of the patents-in-suit.

12. John Veschi
Rockstar Consortium US LP
Legacy Town Center 1
7160 North Dallas Parkway
Suite No. 250
Plano, Texas 75024

Mr. Veschi can be contacted through Counsel for Plaintiffs, Susman Godfrey.

Mr. Veschi is an attorney and Chief Executive Officer of Rockstar, with information related to Rockstar's and NetStar's respective business activities, patents, acquisitions, and licensing activities. He is also a former Nortel employee and has knowledge of Nortel Networks' previous business activities, technologies, patents, acquisitions, and licensing activities.

13. Hinta Chambers
Rockstar Consortium, Inc.
515 Legget Drive, Suite 300
Ottawa, Ontario K2K 3G4

Ms. Chambers can be contacted through Counsel for Plaintiffs, Susman Godfrey.

Ms. Chambers is the Chief Financial Officer of Rockstar Consortium, Inc. and was formerly employed by Nortel. Ms. Chambers is likely to have information related to the auction of Nortel's intellectual property assets.

14. Christopher J. Cianciolo, Esq.
Tyco International
6 Technology Park Drive
Westford, Massachusetts 01886
(978) 577-4198

Mr. Cianciolo is former General and Intellectual Property Counsel to Rockstar Consortium US LP and was formerly employed by Nortel. Mr. Cianciolo is likely to have information related to the auction of Nortel's intellectual property assets.

15. Chad Hilyard, Esq.
Rockstar Consortium US LP
Legacy Town Center 1
7160 North Dallas Parkway
Suite No. 250
Plano, TX 75024

Mr. Hilyard can be contacted through Counsel for Plaintiffs, Susman Godfrey.

Mr. Hilyard is an attorney and Chief Intellectual Property Counsel at Rockstar, with information related to Rockstar's and NetStar's respective patents, acquisitions, and licensing activities.

16. Don Powers, Esq.
Rockstar Consortium US LP
Legacy Town Center 1
7160 North Dallas Parkway
Suite No. 250
Plano, Texas 75024

Mr. Powers can be contacted through Counsel for Plaintiffs, Susman Godfrey.

Mr. Powers is an attorney and Litigation Counsel at Rockstar. He is also a former Nortel employee and has knowledge of Nortel's previous business activities, technologies, patents, acquisitions, and licensing.

17. Shival Virmani
Rockstar Consortium US LP
Legacy Town Center 1
7160 North Dallas Parkway
Suite No. 250
Plano, Texas 75024

Mr. Virmani can be contacted through Counsel for Plaintiffs, Susman Godfrey.

Mr. Virmani is Vice President of Patent Licensing for Rockstar Consortium US LP. He is likely to have information related to the monetization of the patents-in-suit.

18. Art Fisher
Patent Dominion Partnership, LP
6103 Twin Oaks Circle
Dallas, Texas 75240

Mr. Fisher can be contacted through Counsel for Plaintiffs, Susman Godfrey.

Mr. Fisher is a former Nortel Networks employee and likely has information related to Nortel Networks' past patent holdings and IP licensing activities, policies, and procedures.

19. Richard Weiss
McKinney, Texas

Mr. Weiss can be contacted through Counsel for Plaintiffs, Susman Godfrey.

Mr. Weiss is a former Nortel Networks employee and likely has information related to Nortel Networks' past patent holdings and IP licensing activities, policies, and procedures.

20. John LaBarre, Esq.
Google, Inc.
1600 Amphitheatre Parkway
Mountain View, California 94043

Mr. LaBarre is likely to have information related to Nortel's June 2010 discussions with Google regarding the patents-in-suit.

21. David Whalan
Google, Inc.
(further contact information unknown)

Mr. Whalan is likely to have information related to Nortel's June 2010 discussions with Google regarding the patents-in-suit.

22. David Descoteaux
Lazard
30 Rockefeller Plaza
New York, NY 10112
(212) 632-6000

Mr. Descoteaux advised Nortel in the auction of its intellectual property assets, and as such is likely to have information related to Nortel's valuation and analysis of its patent assets and to the sale of the patents-in-suit.

23. Lazard
30 Rockefeller Plaza
New York, NY 10112
(212) 632-6000

Lazard advised Nortel in the auction of its intellectual property assets, and as such is likely to have information related to Nortel's valuation and analysis of its patent assets and to the sale of the patents-in-suit.

24. Global IP Law Group
233 S. Wacker Drive
Chicago, Illinois 60606

Global IP Law Group advised Nortel in the auction of its intellectual property assets, and as such is likely to have information related to Nortel's valuation and analysis of its patent assets and to the sale of the patents-in-suit.

25. Justin Lux
Portfolio Advisors LLC
9 Old Kings Highway South
Darien, CT 06820
(203) 662-3456

Mr. Lux advised Nortel in the auction of its intellectual property assets, and as such is likely to have information related to Nortel's valuation and analysis of its patent assets and to the sale of the patents-in-suit.

26. Colin Keenan
Brightwood Capital Advisors, LLC
1540 Broadway, 23rd Floor
New York, NY 10036-4039
(646) 368-8901

Mr. Keenan advised Nortel in the auction of its intellectual property assets, and as such is likely to have information related to Nortel's valuation and analysis of its patent assets and to the sale of the patents-in-suit.

27. Edouard Gueyffier
Estin & Co.
Berkeley Square House
Berkeley Square
London W1J 6BD
United Kingdom
44 2 07 887 45 95

Mr. Gueyffier advised Nortel in the auction of its intellectual property assets, and as

such is likely to have information related to Nortel's valuation and analysis of its patent assets and to the sale of the patents-in-suit.

28. Kshitij Bhatia
Warburg Pincus India Pvt. Ltd.
7th Floor, Express Towers
Nariman Point
Mumbai 400 021, India
(91) 22 6650 0000

Mr. Bhatia advised Nortel in the auction of its intellectual property assets, and as such is likely to have information related to Nortel's valuation and analysis of its patent assets and to the sale of the patents-in-suit.

29. BlackBerry Ltd.
5000 Riverside Drive
Irving, Texas 75039
(972) 373-1700

Blackberry Ltd. is a shareholder of Rockstar and is likely to have relevant information related to the 2011 auction of Nortel's patent assets.

30. Ericsson
6300 Legacy Drive
Plano, Texas 75024
(972) 583-0000

Ericsson is a shareholder of Rockstar and is likely to have relevant information related to the 2011 auction of Nortel's patent assets.

31. Microsoft Corporation
One Microsoft Way
Redmond, WA 98502-7329
(425) 882-8080

Microsoft Corporation is a shareholder of Rockstar and is likely to have information related to the 2011 auction of Nortel's patent assets.

32. Apple Inc.
1 Infinite Loop
Cupertino, California 95014
(408) 996-1010

Apple Inc. is a shareholder of Rockstar and is likely to have relevant information related to the 2011 auction of Nortel's patent assets.

33. Sony Corporation of America
1 Sony Drive
Park Ridge, New Jersey 07450

Sony Corporation of America is a shareholder of Rockstar and is likely to have relevant information related to the 2011 auction of Nortel's patent assets.

34. Rockstar Bidco
c/o Paul Weiss Rifkind Wharton & Garrison
1285 Avenue of the Americas
New York, New York 10019
Attention: Marilyn Sobel

Rockstar Bidco purchased Nortel's patent portfolio in the 2011 auction. Rockstar Bidco is likely to have information related to the valuation, analysis, and acquisition of Nortel's patent assets, including the patents-in-suit.

35. Rockstar Consortium LLC
c/o LaBarge Weinstein LLP
800-515 Legget Drive
Ottawa, Ontario
Canada K2K 3G4
Attention: Michael Dunleavy

Rockstar Consortium LLC is Rockstar Consortium US LP's General Partner. Rockstar Consortium LLC is likely to have information relevant to the corporate structure and formation of Rockstar Consortium US LP, NetStar, and affiliated entities.

36. Rockstar Consortium Inc.
515 Legget Drive, Suite 300
Ottawa, Ontario K2K 3G4

Rockstar Consortium Inc. can be contacted through Counsel for Plaintiffs, Susman Godfrey.

Rockstar Consortium Inc. contracts with Rockstar Consortium US LP to provide technical and other services. Rockstar Consortium Inc. is likely to have information relevant to Rockstar's analysis, valuation, monetization, and assertion of the patents-in-suit, as well as to the corporate structure of Rockstar Consortium US LP, NetStar, and affiliated entities.

37. Nortel Networks Corporation
5945 Airport Road
Suite 360
Mississauga, Ontario

Canada L4V 1R9

Nortel Networks Corporation, Nortel's Canadian entity, is likely to have relevant information regarding the 2011 auction of Nortel's patent assets and information regarding the patents-in-suit as the original assignee of the patents-in-suit.

38. Nortel Networks, Inc.
c/o Cleary Gottlieb
One Liberty Plaza
New York, NY 10006
(212) 225-2000

Nortel Networks, Inc., Nortel's United States entity, is likely to have relevant information regarding the 2011 auction of Nortel's patent assets and of Nortel-related information as the United States entity whose sister corporations held the patents-in-suit.

39. Google, Inc.
1600 Amphitheatre Parkway
Mountain View, California 94043
(650) 253-0000

Google, Inc., the defendant in this suit, is likely to have information relevant to the development, testing, functionality, creation, implementation, analysis, marketing, advertising, licensing, promotion, and/or sale of the Accused Instrumentalities, including but not limited to Google Ads, Google AdWords, and Google AdWords Express or similar functionality used in conjunction with google.com, the Google Search app, the Android search bar, Google custom search, Google premium search services, youtube.com; Google search services provided to third-party websites such as Custom Search Services or AdSense for Search; and other Google-owned property that matches advertisements based in part on a received search term, along with Google's search algorithm and Google's algorithm for providing advertisements with search results.

Based on the June 2010 meeting between Nortel and Google, Google is likely to have information relevant to Nortel's licensing activities related to the patents-in-suit. Google also is likely to have information related to the 2011 auction of Nortel's patent assets, including its own preparation for and bidding during the auction and its analyses of the portfolio and specifically the patents-in-suit.

40. David Nagle
Google, Inc.
111 8th Avenue
New York, New York 10011
(212) 565-0000

Mr. Nagle is Google's Director of Display Ads and Storage technology. He is likely to have information related to how Google selects and displays search results and advertisements.

41. Nikesh Arora
Google, Inc.
1600 Amphitheatre Parkway
Mountain View, California 94043
(650) 253-0000

Mr. Arora is the Chief Business Officer of Google and as such is likely to have information regarding Google's customer operations, marketing, partnerships, and revenue.

42. Salar Kamangar
Google, Inc.
1600 Amphitheatre Parkway
Mountain View, California 94043
(650) 253-0000

Mr. Kamangar is the Senior Vice President of Products at Google. Mr. Kamangar is likely to have information related to the Accused Instrumentalities and their importance to Google's products and business.

43. Sridhar Ramaswamy
Google, Inc.
1600 Amphitheatre Parkway
Mountain View, California 94043
(650) 253-0000

Mr. Ramaswamy is Google's Senior Vice President for Ads and Commerce. He is likely to have relevant information related to how Google identifies and delivers search results and how Google prices, selects, and serves advertisements.

44. Alan Eustace
Google, Inc.
1600 Amphitheatre Parkway
Mountain View, California 94043
(650) 253-0000

Mr. Eustace is Google's Senior Vice President for Knowledge. He is likely to have relevant information related to how Google identifies and delivers search results.

45. Vic Gundotra
Google, Inc.
1600 Amphitheatre Parkway

Mountain View, California 94043
(650) 253-0000

Mr. Gundotra is Google's Senior Vice President for Social. Mr. Gundotra is likely to have relevant information related to how Google uses user profile and preference data from Google's social platforms, including Google+, to customize search results and advertisements.

46. Larry Page
Google, Inc.
1600 Amphitheatre Parkway
Mountain View, California 94043
(650) 253-0000

Mr. Page is the CEO and Co-Founder of Google. He is likely to have relevant information related to the importance of the Accused Instrumentalities to Google, the development of the search algorithm, the importance of Google AdWords to the company, and the auction for the patents-in-suit.

47. Sergey Brin
Google, Inc.
1600 Amphitheatre Parkway
Mountain View, California 94043
(650) 253-0000

Mr. Brin is a Co-Founder of Google. He is likely to have relevant information related to the importance of the Accused Instrumentalities to Google, the development of the search algorithm, the importance of Google AdWords to the company, and the auction for the patents-in-suit.

48. Michelle Lee
United States Patent and Trademark Office
600 Dulany Street
Alexandria, Virginia 22314
(571) 272-8200

Ms. Lee is former General Counsel for Intellectual Property to Google, Inc. She is likely to have information related to Google's analysis, assessment and valuation of the patents-in-suit, in addition to information related to the auction of Nortel's patent assets.

49. Attorneys, patent agents, or other individuals involved in the prosecution of the Patents or related patents and patent applications may have relevant information regarding, among other things, the prosecution of the Patents and related patents and patent applications.

50. Individuals possessing any information related to Google's defenses and any future counterclaims are likely to have information relevant to this case.
51. Individuals named as authors of any of the prior art references cited on the face of any of the patents-in-suit and any related patents may have relevant information related to the prior art references and related patents.

Rockstar and NetStar also counter-designate those witnesses identified in Google's initial disclosures and subsequent disclosures. In addition, Rockstar and NetStar identify the document custodians for Google and the individuals identified in Google's Initial Disclosures as persons with knowledge of relevant facts. Rockstar and NetStar will supplement their disclosures, as appropriate, in accordance with the Federal Rules of Civil Procedure, the Local Rules, and the Court's Docket Control Order.

E. Any indemnity and insuring agreements under which any person or entity may be liable to satisfy part or all of a judgment entered in this action or to indemnify or reimburse for payments made to satisfy the judgment

Plaintiffs do not have any agreements in this category.

F. Any settlement agreements relevant to the subject matter of this action

Plaintiffs do not have any agreements in this category.

G. Any statement of any party to the litigation

Plaintiffs do not have any documents in this category.

DATED: April 28, 2014

Respectfully submitted,

By: /s/ Kristin M. Malone
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jw@wsfirm.com
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***Attorneys for Rockstar Consortium US LP and
NetStar Technologies LLC***

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record, who are deemed to have consented to electronic service are being served this 28th day of April, 2014 with a copy of this document via email.

/s/ Kristin M. Malone
