

**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 JUSTIN A. NELSON IN SUPPORT OF
PLAINTIFFS' RESPONSE TO DEFENDANT GOOGLE'S OBJECTIONS (Dkt. 188)
TO THE MAGISTRATE'S MEMORANDUM OPINION AND ORDER (Dkt. 165)
DENYING GOOGLE'S MOTION TO TRANSFER**

I, Justin A. Nelson, declare as follows:

1. I am a partner at the law firm of Susman Godfrey L.L.P. and I am counsel of record for Plaintiffs Rockstar Consortium US LP and NetStar Technologies LLC (collectively "Plaintiffs") in this action. I submit this declaration in support of Plaintiffs' Response to Defendant Google's Objections (Dkt. 188) to the Magistrate's Memorandum Opinion and Order (Dkt. 165) Denying Google's Motion to Transfer.

2. Filed separately under seal as **Exhibit 1** is a true and correct copy of Defendant Google Inc.'s Responses to Plaintiffs' Third Set of Interrogatories dated August 18, 2014.

3. Attached as **Exhibit 2** is a true and correct copy of a printout of the address of the Ericsson North American headquarters as reflected on its website.

4. Attached as **Exhibit 3** is a true and correct copy of a printout from Google Maps showing the location of Ericsson's headquarters along with an illustration of the border of the Eastern District of Texas and a circle around Ericsson's location demonstrating that its headquarters are located within the Eastern District of Texas.

5. Attached as **Exhibit 4** is a true and correct copy of a Notice of a Subpoena served on Raj Krishnan dated August 4, 2014.

6. Attached as **Exhibit 5** is a true and correct copy of a Notice of a Subpoena served on Bruce E. Garlick dated June 5, 2014

7. Attached as **Exhibit 6** is a true and correct copy of a Notice of a Subpoena served on Garlick & Markison dated June 5, 2014

8. Attached as **Exhibit 7** is a true and correct copy of a Notice of a Subpoena served on Ericsson dated July 22, 2014

9. Attached as **Exhibit 8** is a true and correct copy of a Notice of a Subpoena served on Art Fisher dated September 8, 2014

10. Attached as **Exhibit 9** is a true and correct copy of a Notice of a Subpoena served on Richard Weiss dated September 8, 2014

11. Attached as **Exhibit 10** is a true and correct copy of Defendant Google Inc.'s Second Notice of Rule 30(b)(6) Deposition to Plaintiff Rockstar Consortium US LP dated September 30, 2014.

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

Dated this 23rd day of October, 2014, in Seattle, Washington.

/s/ Justin A. Nelson
Justin A. Nelson