

# EXHIBIT 11

**From:** Lance Yang  
**Sent:** Tuesday, September 09, 2014 11:24 AM  
**To:** John Lahad; Amanda Bonn; 'jrambin@capshawlaw.com'; 'ederieux@capshawlaw.com'; 'ccapshaw@capshawlaw.com'; 'jw@wsfirm.com'; 'claire@wsfirm.com'; Alexander L. Kaplan; Max L. Tribble; Cyndi Obuz; John Dolan; Justin A. Nelson; Kristin Malone; Max L. Tribble; Parker Folse; Shawn Blackburn; Stacy Schulze; Tammie J. DeNio  
**Cc:** QE-Google-Rockstar; 'Mark Mann'; 'blake@themannfirm.com'; 'Andy Tindel'  
**Subject:** RE: Rockstar v. Google: Motion to Amend Invalidity Contentions

Resending to correct the subject line.

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**From:** Lance Yang  
**Sent:** Tuesday, September 09, 2014 11:23 AM  
**To:** John Lahad; Amanda Bonn; 'jrambin@capshawlaw.com'; 'ederieux@capshawlaw.com'; 'ccapshaw@capshawlaw.com'; 'jw@wsfirm.com'; 'claire@wsfirm.com'; Alexander L. Kaplan; Max L. Tribble; Cyndi Obuz; John Dolan; Justin A. Nelson; Kristin Malone; Max L. Tribble; Parker Folse; Shawn Blackburn; Stacy Schulze; Tammie J. DeNio  
**Cc:** QE-Google-Rockstar; 'Mark Mann'; 'blake@themannfirm.com'; 'Andy Tindel'  
**Subject:** Rockstar v. Google: Motion to Strike Obviousness Combinations

Counsel,

Google intends to move for leave to amend its invalidity contentions for good cause under P.R. 3-6(b) to add certain SEC filings as printed publications under §§102 and 103, which were produced as GOOG-WRD-00871928, 872006, 872370, 872549, 872923, 873726, 874328, 874418, and OT03652. Google intends to amend its invalidity contentions to include an additional anticipatory chart for each reference as a printed publication under §102 (the “A-\_\_” charts in Google’s invalidity contentions). Google also intends to add each reference as a secondary § 103 reference to the “B\_\_” charts in its invalidity contentions. These documents consist of IPO filings for the Excite, Infoseek, Lycos, Open Text, and Yahoo systems that were previously identified in Google’s May 23, 2014 invalidity contentions.

Google received most of these documents, which were not available through the SEC online website, from the SEC on August 14, 2014 and subsequently produced these documents on August 26, 2014. Google received OT03652 from Open Text on September 5 and served Rockstar with Open Text’s production on September 8, 2014.

Please let us know if Google can file the motion unopposed. We are happy to discuss on a call.

Best,

**Lance Yang**  
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