

**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

UNOPPOSED MOTION TO SET HEARING ON OUTSTANDING ISSUES

Rockstar respectfully requests that this Court set a hearing within the next 2-3 weeks on the numerous outstanding discovery issues between the parties. Rockstar has conferred with Google on a date, and Google does not oppose this request. The parties are at the convenience of the Court on a hearing date.

The parties have agreed on briefing schedules for the open discovery issues, and will shortly be filing agreed motions to expedite briefing schedules. The outstanding discovery issues that will be briefed and ripe for the hearing include:

- The scope of Google's search for senior executive custodial non-email. (Dkt. Nos. 202 and 203)
- The parties' respective open issues regarding the other side's discovery issues, for which opening briefs were filed on October 24 and where the parties intend to submit an agreed schedule to complete briefing by next week. (Dkt. Nos. 222 and 224).
- Google's Motion to Amend Invalidity Contentions (Dkt. No. 220).

- Rockstar's Motion to Extend the Fact Discovery Deadline (Dkt. No. 233).

Accordingly, Rockstar respectfully requests a hearing on these issues within the next 2-3 weeks in order to expeditiously resolve these issues.

DATED: October 30, 2014

Respectfully submitted,

By: /s/ Justin A. Nelson

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CERTIFICATE OF CONFERENCE

I hereby certify that the parties have met and conferred on the 30th day of October, 2014 and counsel for Defendants are unopposed as to the disposition of the matters raised in this motion.

/s/ Justin A. Nelson
Justin A. Nelson

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record, who are deemed to have consented to electronic service are being served this 30th day of October, 2014 with a copy of this document via the Court's CM/ECF system per Local Rule CD-5(a)(3).

/s/ Justin A. Nelson
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