

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. 13-cv-00893-RG

JURY TRIAL DEMANDED

**DECLARATION OF LANCE YANG IN SUPPORT OF GOOGLE INC.'S REPLY IN
SUPPORT OF ITS MOTION TO AMEND INVALIDITY CONTENTIONS**

I, Lance Yang, declare as follows:

1. I am an attorney at the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Defendant Google Inc. (“Google”) in this matter. I have personal knowledge of the facts stated herein and if called to testify could and would competently testify thereto.

2. Rockstar Consortium US LP and NetStar Technologies LLC served the complaint on October 31, 2013. Shortly after and prior to serving its Invalidity Contentions, Google began its prior art search, which included conducting third-party interviews to locate prior art.

3. Attached as Exhibit A is true and correct copy of a Menteso webpage located at <http://www.menteso.com/pages/29/services/prior-art-searches>. The highlighted portions were added to the Exhibit A. I accessed this page on November 13, 2014.

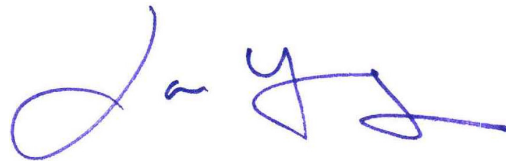
4. Attached as Exhibit B is a true and correct copy of the first 10 search results pages (*i.e.*, first 100 search results) returned on Google.com for the search query “infoseek” on November 13, 2014.

5. Attached as Exhibit C is a true and correct copy of an email correspondence between Lance Yang and Shawn Blackburn of Susman Godfrey, including emails dated September 9, 12, 17, 22, and 25, 2014.

6. Attached as Exhibit D is a true and correct copy of an email from Andrea Roberts of Quinn Emanuel to Justin Nelson of Susman Godfrey dated October 23, 2014.

7. Attached as Exhibit E is a document prepared for this Motion that contains true and correct copies of passages from Excite’s Prospectus, which were also provided in Exhibit 4 (Dkt. No. 220-4) to the Declaration of Lance Yang in Support of Google Inc.’s Motion To Amend Invalidity Contentions, as well as claim 1 of U.S. Patent No. 7,236,969.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed November 13, 2014 in Los Angeles, California.

A handwritten signature in blue ink, appearing to read 'Lance Yang', written in a cursive style.

Lance Yang