EXHIBIT C

From: Shawn Blackburn [SBlackburn@susmangodfrey.com]

Sent: Thursday, September 25, 2014 7:44 AM

To: Lance Yang; 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; Max L. Tribble; Parker Folse; 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

Lance,

Rockstar will oppose Google's motion to amend. We are willing to discuss at the meet and confer.

Best,

Shawn

From: Lance Yang [mailto:lanceyang@quinnemanuel.com]

Sent: Monday, September 22, 2014 3:47 PM

To: Shawn Blackburn; 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; 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

Shawn,

By this Wednesday, please let us know if Rockstar will be opposing Google's motion to amend its invalidity contentions. If Rockstar opposes, we would like to add this item to the upcoming in-person meet and confer.

Best

From: Lance Yang

Sent: Wednesday, September 17, 2014 4:43 PM

To: 'Shawn Blackburn'; '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'; '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

Shawn,

It was nice speaking with you today. As discussed, Google would like to amend its invalidity contentions to add new charts for each of the references cited in my September 9 email as printed publications under sections 102 and 103. These charts would be in addition to the existing system charts in the invalidity contentions.

As we discussed, during the course of discovery, Google became aware of the possible relevance of the IPO filings to our system references. As a result, Google conducted a search on the SEC's online EDGAR service for these filings. Google produced the documents that were available on EDGAR on August 8, 2014. On July 24, while Google was preparing to produce the filings found on EDGAR, Google submitted a request to the SEC's FOIA office for older documents from the

SEC's archives that were not available on EDGAR. As previously mentioned, we received these documents on August 14, which we produced on August 24.

Let us know if Rockstar has any other questions.

Best

From: Shawn Blackburn [mailto:SBlackburn@susmangodfrey.com]

Sent: Friday, September 12, 2014 1:41 PM

To: Lance Yang; 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; 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

Lance,

11 am PT would be difficult, are you available at 2:30 PT?

From: Lance Yang [mailto:lanceyang@quinnemanuel.com]

Sent: Friday, September 12, 2014 2:34 PM

To: Shawn Blackburn; 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; 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

Sure. Does 11 am pacific on Wednesday work?

From: Shawn Blackburn [mailto:SBlackburn@susmangodfrey.com]

Sent: Friday, September 12, 2014 11:38 AM

To: Lance Yang; 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; 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

Lance,

Thank you for your email. We think a call would be helpful. Are you available on next Wednesday?

Best,

Shawn D. Blackburn

SUSMAN GODFREY LLP

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From: Lance Yang [mailto:lanceyang@quinnemanuel.com]

Sent: Tuesday, September 09, 2014 1:24 PM

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.

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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