

**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 STAY ALL DEADLINES AND NOTICE OF
SETTLEMENT**

Pursuant to the Court's June 3, 2014 Standing Order regarding notification of settlements, Plaintiffs report that on November 12, 2014 a binding Term Sheet was executed that settles, in principle, all matters in controversy between the parties. Accordingly, Plaintiffs Rockstar Consortium US LP and NetStar Technologies LLC ("Rockstar"), pursuant to the terms of the Term Sheet, request that the Court order that the deadlines in case be stayed 45 days, until December 29, 2014, while the Term Sheet is reduced to a definitive agreement. This period (45 days from the Term Sheet) is necessary due to the complexity of the transaction and the number of additional parties whose claims are concurrently being resolved. Google does not oppose this request. Rockstar does not believe that the trial date should be moved at this point. Google believes that, given the current trial date and the remaining schedule, the requested stay would make the current trial date not practicable. (*See e.g.* Dkt., 266.) Thus, it is Google's position that, should the stay be granted, all remaining dates, including the trial date in this action, should be either vacated, or moved 45 days.

DATED: November 17, 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 17th day of November, 2014 and counsel for Defendants are unopposed as to the disposition of the matters raised in this motion.

/s/ 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 17th day of November, 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 _____