

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

ROCKSTAR CONSORTIUM US LP, INC. AND
NETSTAR TECHNOLOGIES LLC

Plaintiffs,

v.

GOOGLE INC.

Defendant.

Civil Action No. 13-cv-00893-RG

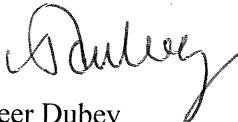
JURY TRIAL DEMANDED

**SECOND DECLARATION OF ABEER DUBEY IN SUPPORT OF GOOGLE INC.'S
MOTION TO TRANSFER VENUE TO THE NORTHERN DISTRICT OF CALIFORNIA**

I, Abeer Dubey, state and declare as follows:

1. I am an employee of Google Inc. ("Google") and I work at Google's headquarters in Mountain View, California. I have been a Google employee since 2006.
2. I provided a first declaration in support of Google's transfer motion dated January 9, 2014. In that declaration, I noted that Google had opened a temporary office in Frisco, Texas in April 2012 to house a handful of employees. None of those employees worked on any of the accused instrumentalities identified in Rockstar's Complaint.
3. I have since learned that Google's temporary office in Frisco has been vacant since November 2013, and that all Google hardware was removed December 2013. Google now has no offices or facilities in the Eastern District of Texas.

I declare under penalty of perjury that the foregoing is true and correct. Executed in Mountain View, California on Mar 6, 2014.


Abeer Dubey