## 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-cy-00893-JRG-RSP

JURY TRIAL DEMANDED

## JOINT MOTION FOR ENTRY OF DOCKET CONTROL ORDER AND DISCOVERY ORDER AND NOTICE OF COMPLIANCE WITH COURT ORDER

On April 29, 2104, Plaintiffs Rockstar Consortium US LP and Netstar Technologies LLC ("Plaintiffs"), and Defendant Google Inc. ("Google") jointly submitted a proposed Docket Control Order and Discovery Order. Docs. 57 and 58. At the time, the parties were not able to agree on all aspects of the proposed Orders.

On May, 1, 2014, this Court denied the joint motions without prejudice and ordered "the Parties to meet and confer in person with lead and local counsel on their remaining disputes in the Docket Control and Discovery Orders and to file Proposed Docket Control and Discovery Orders, certifying the results of such in-person meet and confer to the Court, within 7 days." Doc. 62.

The Parties certify that on May 8, 2014, lead and local counsel for Plaintiffs and Defendant met and conferred in person in Houston, Texas and were able to reach agreement on the remaining disputes in both Proposed Orders. Accordingly, the Parties jointly move for entry

of their proposed Docket Control Order and Discovery Order, attached as Exhibit A and Exhibit

B, respectively.

DATED: May 8, 2014 Respectfully submitted,

/s/ John Lahad

Max L. Tribble, Jr. – Lead Counsel State Bar No. 20213950 Alexander L. Kaplan, State Bar No. 24046185 John P. Lahad, State Bar No. 24068095 Shawn Blackburn, NY State Bar No. 5017249 SUSMAN GODFREY L.L.P.

1000 Louisiana Street, Suite 5100

Houston, Texas 77002 Telephone: (713) 651-9366 Facsimile: (713) 654-6666 mtribble@susmangodfrey.com akaplan@susmangodfrey.com ilahad@susmangodfrey.com

sblackburn@susmangodfrey.com

Justin A. Nelson, State Bar No. 24034766 Parker C. Folse, III, WA State Bar No. 24895 Kristin Malone, WA State Bar No. 46251 SUSMAN GODFREY L.L.P.

1201 Third Ave, Suite 3800 Seattle, Washington 98101 Telephone: (206) 516-3880 Facsimile: (206) 516-3883 jnelson@susmangodfrey.com pfolse@susmangodfrey.com kmalone@susmangodfrey.com

T. John Ward, Jr., State Bar No. 00794818 Claire Abernathy Henry, State Bar No. 24053063

WARD & SMITH LAW FIRM

P.O. Box 1231

Longview, TX 75606-1231 Telephone: (903) 757-6400 Facsimile: (903) 757-2323

jw@wsfirm.com claire@wsfirm.com

S. Calvin Capshaw, State Bar No. 03783900 Elizabeth L. DeRieux, State Bar No. 05770585 D. Jeffrey Rambin, State Bar No. 00791478 CAPSHAW DERIEUX, LLP 114 E. Commerce Ave. Gladewater, TX 75647 Telephone: (903) 236-9800 Facsimile: (903) 236-8787 ccapshaw@capshawlaw.com ederieux@capshawlaw.com jrambin@capshawlaw.com

## Attorneys for Rockstar Consortium US LP and NetStar Technologies LLC

/s/ James Mark Mann
James Mark Mann
mark@themannfirm.com
Andy Tindel
atindel@andytindel.com
Gregory Blake Thompson
blake@themannfirm.com
Mann Tindel & Thompson
300 W. Main
Henderson, TX 75652
903-657-8540

Charles K. Verhoeven
<a href="mailto:charlesverhoeven@quinnemanuel.com">charlesverhoeven@quinnemanuel.com</a>
David A. Perlson
<a href="mailto:davidperlson@quinnemanuel.com">davidperlson@quinnemanuel.com</a>
Sean Pak
<a href="mailto:seanpak@quinnemanuel.com">seanpak@quinnemanuel.com</a>
Quinn Emanuel Urquhart & Sullivan
50 California Street, 22nd Floor
San Francisco, CA 94111
415-875-6600

Robert Wilson robertwilson@quinnemanuel.com
Quinn Emanuel Urquhart & Sullivan
51 Madison Ave., 22<sup>nd</sup> Floor
New York, NY 10010
212-849-7145

Attorneys for Google Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record, who are deemed to have consented to electronic service are being served this 8th day of May, 2014 with a copy of this document via the Court's CM/ECF system per Local Rule CD-5(a)(3).

|--|