

**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. 2:13-cv-893

JURY TRIAL DEMANDED

**JOINT MOTION FOR EXTENSION OF TIME
TO FILE A PROPOSED PROTECTIVE ORDER**

Plaintiffs Rockstar Consortium US LP and Netstar Technologies LLC (“Plaintiffs”), and Defendant Google Inc. (“Google”) respectfully submit this Joint Motion for an Extension of Time to File a Proposed Protective Order.

The original deadline for the parties to submit a Proposed Protective Order was April 28, 2014. On April 30, 2014, the Court granted a Joint Motion for an Extension of Time to File a Proposed Protective Order. The current deadline for the submission of the Proposed Protective Order is May 9, 2014. The parties are diligently conferring and preparing the Proposed Protective Order for submission to the Court, but respectfully request a short extension of time in order to finalize the proposed order. Good cause exists to grant the requested extension. On May 8, 2014, lead and local counsel for the parties met in person to resolve disputed issues regarding the Proposed Discovery and Docket Control Orders. At this meeting, counsel also discussed outstanding issues regarding the Proposed Protective Order. The parties made

substantial progress in resolving their disputes, but certain issues remain. The parties agree that additional time and discussion will help narrow the number of potential issues for review by the Court should any such review be necessary. Accordingly, the parties respectfully request an extension, through and including May 23, 2014, to submit to the Court the Proposed Protective Order

DATED: May 9, 2014

Respectfully submitted,

/s/ Shawn D. Blackburn

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record, who are deemed to have consented to electronic service are being served this 9th day of May, 2014 with a copy of this document via the Court's CM/ECF system per Local Rule CD-5(a)(3).

/s/ Shawn D. Blackburn

Shawn D. Blackburn