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

ROCKSTAR CONSORTIUM US LP AND NETSTAR TECHNOLOGIES LLC,

Plaintiffs,

Civil Action No. 2:13-cv-893

v.

**GOOGLE INC.,** 

**JURY TRIAL DEMANDED** 

Defendant.

# 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. On May 13, 2014, the court granted a second Joint Motion for an Extension of Time to File a Proposed Protective Order. On May 28, 2014, the court granted a third 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 28, 2014. By this motion the parties request one last short extension. Good cause exists to grant the requested extension. The parties are and have been diligently conferring and preparing the Proposed Protective Order for submission to the Court. Since the beginning of this process, the parties have made

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substantial progress in resolving the majority of their disputes, but certain issues remain. In order to further narrow the issues that will be submitted to the court, lead and local counsel for the parties will meet and confer prior to filing the Proposed Protective Order. The parties agree that this meet and confer will help resolve certain issues and ready the Proposed Protective Order for the Court's review. Accordingly, the parties respectfully request an extension, through and including May 30, 2014, to submit to the Court the Proposed Protective Order

DATED: May 28, 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 28<sup>th</sup> 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