

**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 ENTRY OF PROTECTIVE ORDER

Plaintiffs Rockstar Consortium US LP and Netstar Technologies LLC (“Plaintiffs”), and Defendant Google Inc. (“Google”) jointly submit a proposed Protective Order, attached hereto as Exhibit A. In the process of negotiating this Protective Order, the parties met and conferred several times, including on May 29, 2014 when lead and local counsel participated in a meet and confer. The parties, however, were not able to agree on all aspects of this Proposed Order. Where the parties disagree, the proposed order reflects the parties' competing provisions. Rockstar's briefing on disputed issues is attached hereto as Exhibit B. Google's briefing on disputed issues is attached hereto as Exhibit C.

DATED: May 30, 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 30th 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
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