

**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 E-DISCOVERY 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 E-Discovery Order.

The original deadline for the parties to submit a Proposed E-Discovery Order was May 28, 2014. On May 30, 2014, the Court granted a Joint Motion for an Extension of Time to File a Proposed E-Discovery Order. On June 11, 2014, the Parties jointly requested an extension of time for the parties to jointly submit a Proposed E-Discovery Order by two days, from June 11, 2014 to June 13, 2014. Finally, the Court granted the parties an additional extension until June 16, 2014. With this motion, the Parties jointly and respectfully request an extension of time for the parties to jointly submit a Proposed E-Discovery Order, from June 16, 2014 to June 17, 2014. The request is supported by good cause because the parties have been discussing each other’s proposals with respect to the E-Discovery Order throughout the day today, with the hope

of resolving final disputes and narrowing the issues that may need to be presented to the Court. With these final negotiations, the parties have narrowed their disputes and have put the proposed order in condition for submission to the Court with as few disputed issues as possible. This final one-day extension will allow the parties time to prepare a joint motion with its attendant briefs for submission to the Court tomorrow. A proposed order granting the requested relief is filed concurrently herewith.

DATED: June 16, 2014

Respectfully submitted,

/s/ Shawn D. Blackburn

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
jlahad@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

/s/ David A. Perlson

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
charlesverhoeven@quinnemanuel.com
David A. Perlson
davidperlson@quinnemanuel.com
Sean Pak
seanpak@quinnemanuel.com
Quinn Emanuel Urquhart & Sullivan
50 California Street, 22nd Floor
San Francisco, CA 94111
415-875-6600

Robert Wilson
robertwilson@quinnemanuel.com

pfolse@susmangodfrey.com
kmalone@susmangodfrey.com

T. John Ward, Jr., State Bar No. 00794818
Claire Abernathy Henry, ST. 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 PLAINTIFFS
ROCKSTAR CONSORTIUM US LP AND
NETSTAR TECHNOLOGIES LLC

Quinn Emanuel Urquhart & Sullivan
51 Madison Ave., 22nd Floor
New York, NY 10010
212-849-7145

Andrea Pallios Roberts
andreaproberts@quinnemanuel.com
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
555 Twin Dolphin Dr., 5th Floor
Redwood Shores, CA 94065
Telephone: (650) 801-5000
Facsimile: (650) 801-5100

ATTORNEYS FOR DEFENDANT
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 16th day of June, 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