

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

ROCKSTAR CONSORTIUM US LP
AND NETSTAR TECHNOLOGIES
LLC,

Plaintiff,

v.

GOOGLE INC.,

Defendant.

Civil Action No. 2:13-cv-893

JURY TRIAL DEMANDED

**DECLARATION OF AMANDA K. BONN IN SUPPORT OF
PLAINTIFFS' SUPPLEMENTAL BRIEF IN RESPONSE TO
GOOGLE'S MOTION TO TRANSFER**

I, Amanda K. Bonn, declare as follows:

1. I am a member in good standing of the California State Bar.
2. I am an attorney at the law firm Susman Godfrey LLP and I am one of the attorneys serving as counsel for Plaintiffs Rockstar Consortium US LP and NetStar Technologies LLC (collectively "Plaintiffs") in this action. I submit this declaration in support of Plaintiffs' Supplemental Brief in Response to Google's Motion to Transfer, which is lodged herewith.
3. Attached hereto as **Exhibit 1** is a true and correct copy of a chart summarizing the inventors, assignees, and apparent location for prior art references A1 through A29 charted by Defendant Google Inc.
4. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from Defendant Google Inc.'s Invalidity Contentions.

5. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts from Patent Application No. WO1997021183A1, charted by Defendant Google Inc. as a prior art reference and as evidence of the AdaptX prior art reference.

6. Attached hereto as **Exhibit 4** is a true and correct copy of a PR Newswire release titled “DoubleClick Named Advertising Sales and Distribution Partner for Alta Vista Search Site; Leading Internet Ad Network Teams with Net’s Largest Search Engine,” charted by Defendant Google Inc. as a prior art reference.

7. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from Buckley, C., “Implementation of the SMART Information Retrieval System,” charted by Defendant Google Inc. as a prior art reference.

8. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts from U.S. Patent No. 5,901,287 (“Bull”), charted by Defendant Google Inc. as a prior art reference.

9. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts from U.S. Patent No. 5,761,662 (“Dasan”), charted by Defendant Google Inc. as a prior art reference.

10. Attached hereto as **Exhibit 8** is a true and correct copy of excerpts from Dedrick, R., “Interactive Electronic Advertising,” charted by Defendant Google Inc. as a prior art reference.

11. Attached hereto as **Exhibit 9** is a true and correct copy of excerpts from Dedrick, R., “A Consumption Model for Targeted Electronic Advertising,” Defendant Google Inc. as a prior art reference.

12. Attached hereto as **Exhibit 10** is a true and correct copy of excerpts from U.S. Patent No. 5,710,884 (“Dedrick”), charted by Defendant Google Inc. as a prior art reference.

13. Attached hereto as **Exhibit 11** is a true and correct copy of excerpts from U.S. Patent No. 5,948,061 (“Merriman I”), charted by Defendant Google Inc. as evidence of the DoubleClick prior art reference.

14. Attached hereto as **Exhibit 12** is a true and correct copy of excerpts from U.S. Patent No. 7,844,488 (“Merriman II”), charted by Defendant Google Inc. as evidence of the DoubleClick prior art reference.

15. Attached hereto as **Exhibit 13** is a true and correct copy of excerpts from “Short History of Early Search Engines,” charted by Defendant Google Inc. as evidence of various search engine prior art references.

16. Attached hereto as **Exhibit 14** is a true and correct copy of excerpts from U.S. Patent No. 7,072,849 (“Filepp”), charted by Defendant Google Inc. as a prior art reference.

17. Attached hereto as **Exhibit 15** is a true and correct copy of excerpts from Mooney, G. “Library & Information Research News,” charted by Defendant Google Inc. as a prior art reference.

18. Attached hereto as **Exhibit 16** is a true and correct copy of excerpts from Fox, E., “Development of the Coder System: A Testbed for Artificial Intelligence Methods in Information Retrieval,” charted by Defendant Google Inc. as a prior art reference.

19. Attached hereto as **Exhibit 17** is a true and correct copy of excerpts from Gallagher, K. & Parsons, J., “A Framework for Targeting Banner Advertising On the Internet,” charted by Defendant Google Inc. as a prior art reference.

20. Attached hereto as **Exhibit 18** is a true and correct copy of excerpts from HealthGate Data Corp.’s Form S-1, charted by Defendant Google Inc. as evidence of the Healthgate.com prior art reference.

21. Attached hereto as **Exhibit 19** is a true and correct copy of excerpts from U.S. Patent No. 5,751,956 (“Kirsch”), charted by Defendant Google Inc. as evidence of the Infoseek.com prior art reference.

22. Attached hereto as **Exhibit 20** is a true and correct copy of a news article titled “Autonomy Made 80% Less UK Profit Than Stated, Hewlett-Packard Finds,” accessed online at <http://www.theguardian.com> on June 20, 2014.

23. Attached hereto as **Exhibit 21** is a true and correct copy of excerpts from Kohda, Y. & Endo, S., “Ubiquitous Advertising on the WWW: Merging Advertisement on the Browser,” charted by Defendant Google Inc. as a prior art reference.

24. Attached hereto as **Exhibit 22** is a true and correct copy of U.S. Patent No. 7,136,853 (“Kohda”), charted by Defendant Google Inc. as a prior art reference.

25. Attached hereto as **Exhibit 23** is a true and correct copy of Larsen, H. & Yager, R., “Query Fuzzification for Internet Information Retrieval,” charted by Defendant Google Inc. as a prior art reference.

26. Attached hereto as **Exhibit 24** is a true and correct copy of Myaeng, S. & Korfhage, R., “Integration of User Profiles: Models and Experiments in Information Retrieval,” charted by Defendant Google Inc. as a prior art reference.

27. Attached hereto as **Exhibit 25** is a true and correct copy of Myaeng, S. & Korfhage, R., “Towards an Intelligent and Personalized Retrieval System,” charted by Defendant Google Inc. as a prior art reference.

28. Attached hereto as **Exhibit 26** is a true and correct copy of a web-bio of Professor Sung-Hyon Myaeng accessed online at <http://ir.kaist.ac.kr/member/professor> on June 20, 2014.

29. Attached hereto as **Exhibit 27** is a true and correct copy of an obituary for Professor Korfhage accessed online at <http://old.post-gazette.com/regionstate/19981122korf9.asp> on June 20, 2014.

30. Attached hereto as **Exhibit 28** is a true and correct copy of a news article titled “NetGravity AdServer Chosen by GNN to Standardize WebCrawler Advertising Management,” charted by Defendant Google Inc. as evidence of various prior art references.

31. Attached hereto as **Exhibit 29** is a true and correct copy of a news article titled “Engine Sells Results, Draws Fire,” charted by Defendant Google Inc. as evidence of the Open Text prior art reference.

32. Attached hereto as **Exhibit 30** is a true and correct copy of excerpts from Open Text Corporation’s most recent 8-K filing.

33. Attached hereto as **Exhibit 31** is a true and correct copy of U.S. Patent No. 6,119,101 (“Peckover”), charted by Defendant Google Inc. as a prior art reference.

34. Attached hereto as **Exhibit 32** is a true and correct copy of “Study: Search Engine Vendors Adopt New Strategies,” (“Phillips Business Information Article”), charted by Defendant Google Inc. as a prior art reference.

35. Attached hereto as **Exhibit 33** is a true and correct copy of the About Webpage for Access Intelligence, accessed online at <http://www.accessintel.com/aboutus/history.html> on June 20, 2014.

36. Attached hereto as **Exhibit 34** is a true and correct copy of the Contact Webpage for Access Intelligence, accessed online at <http://www.accessintel.com/contactus> on June 20, 2014.

37. Attached hereto as **Exhibit 35** is a true and correct copy of a PR News release titled “Make Sure Search Engines Find Your Site,” charted by Defendant Google Inc. as a prior art reference.

38. Attached hereto as **Exhibit 36** is a true and correct copy of the About Webpage for PR News, accessed online at <http://www.prnewsonline.com/about> on June 20, 2014.

39. Attached hereto as **Exhibit 37** is a true and correct copy of excerpts from Radecki, T., “Fuzzy Set Theoretical Approach to Document Retrieval,” charted by Defendant Google Inc. as a prior art reference.

40. Attached hereto as **Exhibit 38** is a true and correct copy of excerpts from U.S. Patent No. 6,374,237 (“Reese”), charted by Defendant Google Inc. as a prior art reference.

41. Attached hereto as **Exhibit 39** is a true and correct copy of excerpts from a news release titled “Microsoft Acquires LinkExchange to Greatly Expand Small-Business Services from MSN,” accessed online at <http://www.microsoft.com/en-us/news/press/1998/nov98/linkpr.aspx> on June 20, 2014.

42. Attached hereto as **Exhibit 40** is a true and correct copy of a Submit-It! Company Overview Page, charted by Defendant Google Inc. as a prior art reference.

43. Attached hereto as **Exhibit 41** is a true and correct copy of excerpts from U.S. Patent No. 5,886,683 (“Tognazzini”), charted by Defendant Google Inc. as a prior art reference.

44. Attached hereto as **Exhibit 42** is a true and correct copy of excerpts from Turpeinen, M. et al., “Architecture for Agent-Mediated Personalised News Services,” charted by Defendant Google Inc. as a prior art reference.

45. Attached hereto as **Exhibit 43** is a true and correct copy of a news release titled “Ybrant buys Lycos for \$36 Million,” accessed online at <http://www.ybrantdigital.com/corpmages/ybrant-buys-lycos.pdf> on June 20, 2014.

46. Attached hereto as **Exhibit 44** is a true and correct copy of a news article titled “Blucora Disputes Claims of Illicit Search Traffic,” accessed online at http://seattletimes.com/html/business/technology/2022939043_blucoragothamxml.html on June 20, 2014.

47. Attached hereto as **Exhibit 45** is a true and correct copy of Wilms, G., “A Natural Language Interface for Intelligent Document Information and Retrieval System,” charted by Defendant Google Inc. as a prior art reference.

48. Attached hereto as **Exhibit 46** is a true and correct copy of excerpts from a Notice of Subpoena directed to Bruce E. Garlick, Esq., served by Defendant Google Inc. on June 5, 2014.

49. Attached hereto as **Exhibit 47** is a true and correct copy of excerpts from a Notice of Subpoena directed to Garlick & Markison, served by Defendant Google Inc. on June 5, 2014.

50. Attached hereto as **Exhibit 48** is a true and correct copy of excerpts from a Notice of Subpoena directed to Vernon E. Williams, served by Defendant Google Inc. on June 5, 2014.

51. Attached hereto as **Exhibit 49** is a true and correct copy of excerpts from a Notice of Subpoena directed to Frederick Caldwell Livermore, served by Defendant Google Inc. on June 6, 2014.

52. Attached hereto as **Exhibit 50** is a true and correct copy of excerpts from a Notice of Subpoena directed to Richard Prescott Skillen, served by Defendant Google Inc. on June 6, 2014.

53. Attached hereto as **Exhibit 51** is a true and correct copy of excerpts from a Notice of Subpoena directed to Blucora, served by Defendant Google Inc. on June 10, 2014.

54. Attached hereto as **Exhibit 52** is a true and correct copy of excerpts from a Notice of Subpoena directed to Conde Nast Publications, served by Defendant Google Inc. on June 10, 2014.

55. Attached hereto as **Exhibit 53** is a true and correct copy of excerpts from a Notice of Subpoena directed to The Walt Disney Company, served by Defendant Google Inc. on June 10, 2014.

56. Attached hereto as **Exhibit 54** is a true and correct copy of excerpts from a Notice of Subpoena directed to Healthgate Data Corp., served by Defendant Google Inc. on June 10, 2014.

57. Attached hereto as **Exhibit 55** is a true and correct copy of excerpts from a Notice of Subpoena directed to Hewlett-Packard Co., served by Defendant Google Inc. on June 10, 2014.

58. Attached hereto as **Exhibit 56** is a true and correct copy of excerpts from a Notice of Subpoena directed to IAC/InterActiveCorp, served by Defendant Google Inc. on June 10, 2014.

59. Attached hereto as **Exhibit 57** is a true and correct copy of excerpts from a Notice of Subpoena directed to Open Text Corp., served by Defendant Google Inc. on June 10, 2014.

60. Attached hereto as **Exhibit 58** is a true and correct copy of excerpts from a Notice of Subpoena directed to Bloomberg LP, served by Defendant Google Inc. on June 20, 2014.

61. Attached hereto as **Exhibit 58** is a true and correct copy of excerpts from a Notice of Subpoena directed to Bloomberg LP, served by Defendant Google Inc. on June 20, 2014.

62. Attached hereto as **Exhibit 59** is a true and correct copy of excerpts from a Notice of Subpoena directed to Film Scouts LLC, served by Defendant Google Inc. on June 20, 2014.

63. Attached hereto as **Exhibit 60** is a true and correct copy of excerpts from a Notice of Subpoena directed to Fishing Network Inc., served by Defendant Google Inc. on June 20, 2014.

64. Attached hereto as **Exhibit 61** is a true and correct copy of excerpts from a Notice of Subpoena directed to the New York Times Company, served by Defendant Google Inc. on June 20, 2014.

65. Attached hereto as **Exhibit 61** is a true and correct copy of excerpts from a Notice of Subpoena directed to the New York Times Company, served by Defendant Google Inc. on June 20, 2014.

66. Attached hereto as **Exhibit 62** is a true and correct copy of excerpts from a Notice of Subpoena directed to PennWell Corp., served by Defendant Google Inc. on June 20, 2014.

67. Attached hereto as **Exhibit 63** is a true and correct copy of excerpts from a Notice of Subpoena directed to Playboy Enterprises, Inc., served by Defendant Google Inc. on June 20, 2014.

68. Attached hereto as **Exhibit 64** is a true and correct copy of excerpts from a Notice of Subpoena directed to Ryman Hospitality Properties, Inc., served by Defendant Google Inc. on June 20, 2014.

69. Attached hereto as **Exhibit 65** is a true and correct copy of excerpts from a Notice of Subpoena directed to Turner Broadcasting System, Inc., served by Defendant Google Inc. on June 20, 2014.

70. Attached hereto as **Exhibit 66** is a true and correct copy of the web-bio of Professor G. Jan Wilms, accessed online at <http://www.uu.edu/dept/compscience/wilms.cfm> on June 20, 2014.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Signed this 20th day of June, 2014, at Los Angeles, California

/s/ *Amanda K. Bonn*
Amanda K. Bonn

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record, who are deemed to have consented to electronic service are being served this 20th 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/ Amanda K. Bonn

Amanda K. Bonn