

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. 13-cv-00893-RG

JURY TRIAL DEMANDED

**DECLARATION OF ANDREA PALLIOS ROBERTS IN SUPPORT OF GOOGLE
INC.'S OPPOSITION TO PLAINTIFFS' MOTION FOR LEAVE TO FILE A
SUPPLEMENTAL BRIEF IN RESPONSE TO GOOGLE'S MOTION TO TRANSFER,
AND, IN THE ALTERNATIVE, CROSS-MOTION TO STAY CASE PENDING
RESOLUTION OF GOOGLE'S TRANSFER MOTION**

I, Andrea Pallios Roberts, declare as follows:

1. I am an attorney at the law firm of Quinn Emanuel Urquhart & Sullivan, LLP, counsel for Defendant Google Inc. ("Google") in this matter. I have personal knowledge of the facts stated herein and if called to testify could and would competently testify thereto.

2. On June 18, 2014, Rockstar's counsel sent Google's counsel an email asking if Google would consent to Rockstar seeking leave to file a supplemental brief regarding Google's Motion to Change Venue ("Transfer Motion") to reference Google's invalidity contentions that were served on May 23, 2014.

3. The parties met and conferred regarding Rockstar's request on June 20. I participated in the meet and confer. Google's counsel explained to Rockstar's counsel that it is concerned that Rockstar's requested relief would delay resolution of the pending Transfer Motion. Rockstar's counsel responded that it would not do so because it will only take the Court "45 seconds" to review the supplemental brief. Google's counsel asked Rockstar's counsel if Rockstar would agree to stay the litigation pending resolution of the Transfer Motion to alleviate the prejudice to Google. Rockstar did not agree.

4. Attached as Exhibit A is a true and correct copy of cited excerpts of Google's Initial Disclosures, which were served on April 28, 2014.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed June 24, 2014 in Redwood Shores, California.



Andrea Pallios Roberts