

EXHIBIT A

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. 13-cv-00893-RG
v.)
)
GOOGLE INC.)
)
Defendant.)
)
)

INITIAL DISCLOSURE STATEMENT OF DEFENDANT GOOGLE INC.

Pursuant to Rule 26(a)(1)(A) of the Federal Rules of Civil Procedure and Paragraphs 1(a) through (g) and 3(b) and (c) of this Court’s Discovery Order, Defendant Google Inc. (“Google”) provides this Initial Disclosure Statement. Google makes these disclosures based on its current knowledge, without the benefit of formal discovery in this action, and without waiver of attorney-client privilege, work product, common interest privilege, or any other privilege. Google’s investigations are continuing and Google expressly reserves the right to amend or modify these disclosures in accordance with Rule 26 based on additional information obtained through formal discovery, continued investigation, or other means. Google further reserves the right to object on any applicable basis to the production of documents and things from the categories identified herein or the obtaining of testimony from the witnesses identified herein.

Subject to the foregoing, Google provides the following information and disclosures based on Plaintiffs Rockstar Consortium US LP and NetStar Technologies LLC’s (collectively, “Plaintiffs”) Complaint and Disclosure of Asserted Claims and Infringement Contentions Pursuant to Patent Rule 3-1 (“Infringement Contentions”), which allege infringement of U.S.

inventors, the prosecuting attorney, and/or other persons owing a duty of candor to the PTO. Google has provided details of its unenforceability allegations in its Answer to Plaintiffs' Complaint, dated January 10, 2014.

4. Unclean Hands

Plaintiffs' claims against Google are barred under the doctrine of unclean hands, including for the reasons set for in paragraphs 45 – 231 of Google's Answer to Rockstar's Complaint.

5. Limitation on Patent Damages

On information and belief, any claim for damages based on the alleged infringement of the claims of the patents-in-suit must be limited according to 35 U.S.C. §§ 286, 287, and/or 288.

(d) Persons Having Knowledge of Relevant Facts

Based on information currently available to Google after reasonable investigation, the following entities and individuals may have discoverable information that Google may use to support its claims or defenses in this action. Google provides the following list without any concession, agreement, admission, or waiver of any ultimate determination of relevance or admissibility of particular information for any purpose, and without waiver of attorney-client privilege or work-product immunity, or any other privilege or immunity. Google reserves the right to amend or supplement this list of persons based on facts that may be disclosed during discovery.

Name	Contact Information	Connection to Case	Knowledge
Adam Juda	May be reached through counsel for Google. Quinn Emanuel Urquhart & Sullivan, LLP 50 California St., 22 nd Flr. San Francisco, CA 94111 (415) 875-6387	Google employee	Structure, characteristics, operation, and/or business aspects of the accused features of Search Ads.

Name	Contact Information	Connection to Case	Knowledge
Jonathan Alferness	<p>May be reached through counsel for Google.</p> <p>Quinn Emanuel Urquhart & Sullivan, LLP 50 California St., 22nd Flr. San Francisco, CA 94111 (415) 875-6387</p>	Google employee	Structure, characteristics, operation, and/or business aspects of the accused features of Search Ads.
Amin Charaniya	<p>May be reached through counsel for Google.</p> <p>Quinn Emanuel Urquhart & Sullivan, LLP 50 California St., 22nd Flr. San Francisco, CA 94111 (415) 875-6387</p>	Google employee	Structure, characteristics, operation, and/or business aspects of the accused features of Local Ads.
Myles Sussman	<p>May be reached through counsel for Google.</p> <p>Quinn Emanuel Urquhart & Sullivan, LLP 50 California St., 22nd Flr. San Francisco, CA 94111 (415) 875-6387</p>	Google employee	Structure, characteristics, operation, and/or business aspects of the accused features of Search Ads.
Dandapandi Sivakumar	<p>May be reached through counsel for Google.</p> <p>Quinn Emanuel Urquhart & Sullivan, LLP 50 California St., 22nd Flr. San Francisco, CA 94111 (415) 875-6387</p>	Google employee	Structure, characteristics, operation, and/or business aspects of accused advertising features of Google's personalized search.
Graham Spencer	<p>May be reached through counsel for Google.</p> <p>Quinn Emanuel Urquhart & Sullivan, LLP 50 California St., 22nd Flr. San Francisco, CA 94111 (415) 875-6387</p>	Co-Founder of Excite; current Google employee	Prior art relevant to the patents-in-suit.

Name	Contact Information	Connection to Case	Knowledge
Ben Lutch	<p>May be reached through counsel for Google.</p> <p>Quinn Emanuel Urquhart & Sullivan, LLP 50 California St., 22nd Flr. San Francisco, CA 94111 (415) 875-6387</p>	Co-Founder of Excite; current Google employee	Prior art relevant to the patents-in-suit.
Martin Reinfried	Incredible Labs San Francisco, CA	Co-Founder of Excite	Prior art relevant to the patents-in-suit.
Michael Burrows	<p>May be reached through counsel for Google.</p> <p>Quinn Emanuel Urquhart & Sullivan, LLP 50 California St., 22nd Flr. San Francisco, CA 94111 (415) 875-6387</p>	Principal developer of AltaVista search engine; current Google employee	Prior art relevant to the patents-in-suit.
Louis Monier	Kyron 139 Forest Ave. Palo Alto, CA	Principal developer of AltaVista search engine	Prior art relevant to the patents-in-suit.
Jerry Yang	Los Altos Hills, CA	Co-Founder of Yahoo! Inc.	Prior art relevant to the patents-in-suit.
David Filo	Yahoo! Inc. 701 First Avenue, Sunnyvale, CA 94089	Co-Founder of Yahoo! Inc.	Prior art relevant to the patents-in-suit.
Representative of Yahoo! Inc.	Yahoo! Inc. 701 First Avenue, Sunnyvale, CA 94089	Yahoo! Inc.	Prior art relevant to the patents-in-suit
Brian Pinkerton	A9 130 Lytton Ave Palo Alto, California, 94301	Founder of WebCrawler	Prior art relevant to the patents-in-suit.
Steve Kirsch	OneID 156 2nd Street San Francisco, CA 94107	Founder of InfoSeek Corporation	Prior art relevant to the patents-in-suit.
Danny Sullivan	Search Engine Land Orange County, CA	Editor-in-chief, Search Engine Land	Prior art relevant to the patents-in-suit.

Name	Contact Information	Connection to Case	Knowledge
Tim Bray	Vancouver, Canada	Former Open Text employee; former Google employee	Prior art relevant to the patents-in-suit
Lilly Buchwitz	May be reached through counsel for Google. Quinn Emanuel Urquhart & Sullivan, LLP 50 California St., 22 nd Flr. San Francisco, CA 94111 (415) 875-6387	Former Open Text employee	Prior art relevant to the patents-in-suit
Robert Carl Barrett	Unknown	Named inventor of U.S. Patent No. 5,727,129	Prior art relevant to the patents-in-suit
Daniel Clark Kellem	Unknown	Named inventor of U.S. Patent No. 5,727,129	Prior art relevant to the patents-in-suit
Paul Philip Maglio	Unknown	Named inventor of U.S. Patent No. 5,727,129	Prior art relevant to the patents-in-suit
Youji Kohda	Unknown	Prior art author	Prior art relevant to the patents-in-suit
Sesumu Endo	Unknown	Prior art author	Prior art relevant to the patents-in-suit
Richard Prescott Skillen	Contact information or last known contact information is believed to be in possession of Plaintiffs.	Named inventor of the patents-in-suit	Conception and reduction to practice of the patents-in-suit; prior art.
Frederick Caldwell Livermore	Contact information or last known contact information is believed to be in possession of Plaintiffs.	Named inventor of the patents-in-suit	Conception and reduction to practice of the patents-in-suit; prior art.
Bruce Garlick	Contact information or last known contact information is believed to be in possession of Plaintiffs	Attorney responsible for prosecution of the patents-in-suit	Prosecution of the applications resulting in issuance of the patents-in-suit.

DATED: April 28, 2014

QUINN EMANUEL URQUHART & SULLIVAN, LLP

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