

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

WI-LAN INC.,

Plaintiff,

v.

ALCATEL-LUCENT USA INC., *et al.*,

Defendants.

CIVIL ACTION NO. 6:10-CV-521-LED

**UNOPPOSED MOTION FOR LEAVE TO SUPPLEMENT
DEFENDANTS' INVALIDITY CONTENTIONS**

Defendants Alcatel-Lucent USA Inc., Ericsson Inc., Telefonaktiebolaget LM Ericsson, Sony Ericsson Mobile Communications AB, Sony Ericsson Mobile Communications (USA) Inc., HTC Corporation, HTC America, Inc, and Exedeia, Inc. hereby file their Unopposed Motion for Leave to Supplement Defendants' Invalidation Contentions. Defendants request leave to add additional prior art references discovered after service of their Invalidation Contentions. Plaintiff does not oppose this Motion.

In accordance with Local Patent Rules 3-3 and 3-4 as well as the Court's Docket Control Order, Defendants served their Invalidation Contentions on September 2, 2011. After that date, Defendants discovered additional prior art they believe is relevant to this action. Defendants notified Plaintiff of their intention to seek leave to supplement their Invalidation Contentions, and Plaintiff does not oppose this Motion. Therefore, Defendants respectfully request the Court to grant their Unopposed Motion for Leave to Supplement Defendants' Invalidation Contentions.

Respectfully submitted,

/s/ Richard L. Wynne, Jr.

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CERTIFICATE OF CONFERENCE

I hereby certify that on October 17, 2011, counsel for Defendants conferred with John Fedock, counsel for Plaintiff, regarding this motion. Counsel for Plaintiff stated that Plaintiff does not oppose the motion.

/s/ Richard L. Wynne, Jr.

Richard L. Wynne, Jr.

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 21st day of October, 2011. Any other counsel of record will be served by first class U.S. mail on this same date.

/s/ Richard L. Wynne, Jr. _____

Richard L. Wynne, Jr.