

**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 FILE LETTER BRIEFS UNDER SEAL

In accordance with the Court's Standing Orders, Defendants Telefonaktiebolaget LM Ericsson and Ericsson Inc. (collectively, "Ericsson") and Sony Ericsson Mobile Communications AB and Sony Ericsson Mobile Communications (USA) Inc. (collectively, "Sony Ericsson") are filing letter briefs requesting permission to file summary-judgment motions on their affirmative defenses that Plaintiff's claims are barred by provisions of prior agreements with Plaintiff.

Because these letter briefs contain confidential information of the parties, Ericsson and Sony Ericsson request leave to file these briefs under seal. Counsel for Ericsson and Sony Ericsson has conferred with counsel for Plaintiff, and Plaintiff does not oppose this motion for leave to file under seal.

Accordingly, Ericsson and Sony Ericsson respectfully request that their letter briefs filed under seal from the public court records.

Respectfully submitted,

/s/ Richard L. Wynne, Jr.

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ERICSSON MOBILE COMMUNICATIONS AB

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with counsel for Plaintiff regarding the merits of this motion, and counsel informed me that Plaintiff does not oppose the motion.

/s/ Richard L. Wynne, Jr.

Richard L. Wynne, Jr.

CERTIFICATE OF SERVICE

On November 4, 2011, true and correct copies of the foregoing document were served in compliance with Local Rule 5.1 and have been served on all counsel who have consented to electronic service and all other counsel by regular mail.

/s/ Richard L. Wynne, Jr.

Richard L. Wynne, Jr.