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

WI-LAN INC.,	<b>§</b>	
	§	
Plaintiff,	§	
	§	
v.	§	
	§	
ALCATEL-LUCENT USA INC., et	al. §	
	§	Civil Action No. 6:10-cv-521-LED
Defendants.	§	
	§	JURY TRIAL DEMANDED
	§	
	§	
	§	
	§	
	§	
	§	
	§	
	§	

# PLAINTIFF Wi-LAN INC.'S MOTION FOR LEAVE TO FILE LETTER BRIEFS UNDER SEAL

In accordance with the Court's Standing Orders, Plaintiff Wi-LAN Inc.("Wi-LAN") seeks an order permitting Wi-LAN to file under seal responses to the letter briefs filed by 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") (Dkt. Nos. 132 and 133).

Because the letter briefs contain highly confidential information concerning the parties, Wi-LAN requests leave to file these responsive letter briefs under seal. Counsel for Wi-LAN has conferred with counsel for Ericsson and Sony Ericsson, and they do not oppose this motion. Public disclosure of this information would be harmful to the parties involved.

By: /s/ David B. Weaver

## Dated: November 18, 2011

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Attorneys for Plaintiff, Wi-LAN Inc.

### **CERTIFICATE OF CONFERENCE**

I hereby certify that I conferred with counsel for Ericsson and Sony Ericsson regarding the merits of this motion, and counsel informed me that they do not oppose the motion.

/s/ David B. Weaver
David B. Weaver

#### **CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). All other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email and/or fax, on this the 18th day of November 2011.

/s/ David B. Weaver

David B. Weaver

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