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.		§	
		§	Civil Action No. 6:10-cv-521-LED
	Defendants.	§	
		§	JURY TRIAL DEMANDED
		§	
		§	
		§	
		§	
		§	
		§	
		§	

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

ş

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. Dated: November 17, 2011

Respectfully submitted,

By: <u>/s/ David B. Weaver</u>

Johnny Ward Texas State Bar No. 00794818 Wesley Hill Texas State Bar No. 24032294 WARD & SMITH LAW FIRM 111 W. Tyler Street Longview, TX 75601 Tel: (903) 757-6400 Fax: (903-757-2323 jw@jwfirm.com wh@jwfirm.com

David B. Weaver – LEAD ATTORNEY Texas State Bar No. 00798576 Juliet M. Dirba Texas State Bar No. 24051063 Jeffrey T. Han Texas State Bar No. 24069870 John A. Fedock Texas State Bar No. 24059737 Syed K. Fareed Texas State Bar No. 24065216 Avelyn M. Ross Texas State Bar No. 24027817 **VINSON & ELKINS LLP** 2801 Via Fortuna, Suite 100 Austin, TX 78746 Tel: (512) 542-8400 dweaver@velaw.com jdirba@velaw.com jhan@velaw.com ifedock@velaw.com sfareed@velaw.com aross@velaw.com WI-LAN@velaw.com

Charles P. Ebertin VINSON & ELKINS LLP 525 University Avenue, Suite 410 Palo Alto, CA 94301-1918 Tel: (650) 617-8400 cebertin@velaw.com

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

US 1156430v.1