

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

WI-LAN INC.,	§	
	§	
Plaintiff,	§	
	§	
v.	§	
	§	
ALCATEL-LUCENT USA INC.;	§	
TELEFONAKTIEBOLAGET LM	§	Civil Action No. 6:10-cv-521-LED
ERICSSON; ERICSSON INC.; SONY	§	
ERICSSON MOBILE COMMUNICATIONS	§	JURY TRIAL DEMANDED
AB; SONY ERICSSON MOBILE	§	
COMMUNICATIONS (USA) INC.; HTC	§	
CORPORATION; HTC AMERICA, INC.;	§	
EXEDEA INC.; LG ELECTRONICS, INC.;	§	
LG ELECTRONICS MOBILECOMM U.S.A.,	§	
INC.; LG ELECTRONICS U.S.A., INC.	§	
	§	
Defendants.	§	

JOINT MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER

Plaintiff Wi-LAN Inc. and Defendants Alcatel-Lucent USA Inc.; Telefonaktiebolaget LM Ericsson; Ericsson Inc.; Sony Ericsson Mobile Communications AB; Sony Ericsson Mobile Communications (USA) Inc.; HTC Corporation; HTC America, Inc., and Exedeia Inc. have met and conferred, and hereby jointly move the Court to enter the Protective Order attached hereto as Exhibit A.

Dated: December 15, 2011

By: /s/ Akshay S. Deoras
Michael E. Jones – LEAD ATTORNEY
(TX Bar 10929400)
Allen F. Gardner (TX Bar 24043679)
POTTER MINTON PC
110 N. College Avenue
Tyler, TX 75702
Tel: (903) 597-8311
Fax: (903) 593-0846
mike.jones@potterminton.com
allen.gardner@pottenminton.com

Gregory S. Arovas (*pro hac vice*)
Robert A. Appleby (*pro hac vice*)
Akshay S. Deoras (*pro hac vice*)
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, NY 10022
Tel: (212) 446-4800
Fax: (212) 446-4900
robert.appleby@kirkland.com
greg.arovas@kirkland.com
akshay.deoras@kirkland.com
Alcatel-Lucent-Wi-LAN-Defense@kirkland.com

Attorneys for Defendant Alcatel-Lucent USA Inc.

By: /s/ Richard L. Wynne, Jr.
Bruce S. Sostek – LEAD ATTORNEY
(TX Bar 18855700)
Richard L. Wynne, Jr. (TX Bar 24003214)
Matthew P. Harper (TX Bar 24037777)
THOMPSON KNIGHT LLP
1722 Routh Street, Suite 1500
Dallas, TX 75201
Tel: (214) 969-1700
Fax: (214) 969-1751
bruce.sostek@tklaw.com
richard.wynne@tklaw.com
matt.harper@tklaw.com

Respectfully submitted,

By: /s/ John A. Fedock
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
jfedock@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 Defendants Ericsson Inc.,
Telefonaktiebolaget LM Ericsson, Sony
Ericsson Mobile Communications (USA)
Inc., and Sony Ericsson Mobile
Communications AB***

Attorneys for Plaintiff, Wi-LAN Inc.

By: /s/ Martin R. Bader

Eric Findlay (TX Bar 00789886)
Brian Craft (TX Bar 04972020)
FINDLAY CRAFT LLP
6760 Old Jacksonville Highway, Suite 101
Tyler, TX 75703
Tel: (903) 534-1100
Fax: (903) 534-1137
efindlay@findlaycraft.com
bcraft@findlaycraft.com

Stephen S. Korniczky (*pro hac vice*)
Martin R. Bader (*pro hac vice*)
SHEPPARD MULLIN RICHTER & HAMPTON LLP
12275 El Camino Real, Suite 200
San Diego, CA 92130
Tel: (858) 720-8924
Fax: (858) 847-4892
skorniczky@sheppardmullin.com
mbader@sheppardmullin.com

***Attorneys for Defendants HTC
Corporation, HTC America Inc., and
Exede Inc.***

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 counsel for Plaintiff Wi-LAN Inc. and Defendants Alcatel-Lucent USA Inc.; Telefonaktiebolaget LM Ericsson; Ericsson Inc.; Sony Ericsson Mobile Communications AB; Sony Ericsson Mobile Communications (USA) Inc.; HTC Corporation; HTC America, Inc., and Exedea Inc., who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record for all parties 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 15th day of December, 2011.

/s/ John A. Fedock

John A. Fedock