

**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 CLAIM CONSTRUCTION AND PREHEARING STATEMENT**

Pursuant to Patent Rule 4-3, the parties file this Joint Claim Construction and Prehearing Statement.

(a) The parties have agreed on proposed constructions for the following claims terms, phrases, or clauses:

<b>Claim Term or Phrase</b>	<b>Agreed Construction</b>
<b>orthogonal codes</b>	codes that cross-correlate to zero
<b>selectively designate one or more of said traffic channels as locked channels</b>	make one or more data channels unavailable for transmission
<b>wireless link</b>	a radio connection between a central terminal and a particular subscriber terminal for communicating data items therebetween

(b) The parties' proposed constructions of each disputed claim term, phrase, or clause are provided in the table attached as Exhibit A. Wi-LAN's identification of references from the specification or prosecution history that support its constructions and extrinsic evidence on which it intends to rely is attached as Exhibit B. Wi-LAN further reserves the right to use any intrinsic or extrinsic evidence identified by the Defendants, in this filing or otherwise. The Defendants' identification of references from the specification or prosecution history that support their constructions and extrinsic evidence on which they intend to rely is attached as Exhibit C. Defendants further reserve the right to use any intrinsic or extrinsic evidence identified by Wi-LAN, in this filing or otherwise.

(c) The parties anticipate that the Claim Construction Hearing will require a total of three hours. This would allow each side 90 minutes to argue the disputed claim terms, phrases, and clauses.

(d) Neither party intends to call any witnesses live at the claim construction hearing.

(e) According to the Docket Control Order, there is no prehearing conference scheduled before the Claim Construction Hearing. The parties do not at this time have any other issues that might be appropriately taken up at either a prehearing conference before or at the Claim Construction Hearing.

Dated: February 6, 2012

Respectfully submitted,

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**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 6th day of February 2012.

*/s/ John A. Fedock*

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