

**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.	§	
	§	

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**DECLARATION OF JEFFREY T. HAN IN SUPPORT OF  
WI-LAN'S OPENING CLAIM CONSTRUCTION BRIEF**

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I, Jeffrey T. Han, do hereby declare as follows:

1. I am an attorney with Vinson & Elkins, LLP, and one of the attorneys representing Wi-LAN Inc. ("Wi-LAN") in the above-captioned action.
2. Attached hereto as Exhibit A is a true and correct copy of U.S. Patent No. 6,088,326.
3. Attached hereto as Exhibit B is a true and correct copy of U.S. Patent No. 6,195,327.
4. Attached hereto as Exhibit C is a true and correct copy of U.S. Patent No. 6,222,819.
5. Attached hereto as Exhibit D is a true and correct copy of U.S. Patent No. 6,381,211.

6. Attached hereto as Exhibit E is a true and correct copy of *The IEEE Standard Dictionary of Electrical and Electronics Terms* (6th ed. 1996), as abridged and produced by Defendants and Bates numbered DEFS0011211 – DEFS0011216.
7. Attached hereto as Exhibit F is a true and correct copy of Alan Freedman, *The Computer Glossary* (7th ed. 1995), as abridged and produced by Defendants and Bates numbered DEFS0011157 – DEFS0011161.
8. Attached hereto as Exhibit G is a true and correct copy of Harry Newton, *Newton's Telecom Dictionary* (11th ed. 1996), as abridged and produced by Defendants and Bates numbered DEFS0011198 – DEFS0011202.
9. Attached hereto as Exhibit H is a true and correct copy of Ramjee Prasad, *CDMA for Wireless Personal Communications* (1996), as abridged and produced by Defendants and Bates numbered DEFS0011193 – DEFS0011197.
10. Attached hereto as Exhibit I is a true and correct copy of Theodore S. Rappaport, *Wireless Communications* (1996), as abridged and produced by Defendants and Bates numbered DEFS0011162 – DEFS0011169.
11. Attached hereto as Exhibit J is a true and correct abridged copy of Shing-Fong Su, *The UMTS Air-Interface in RF Engineering* (2007), previously produced by Wi-LAN and Bates numbered WIL-0192767 – WIL-0192770.
12. Attached hereto as Exhibit K is a true and correct abridged copy of 3GPP TS 25.211, v.6.10.0 (Release 6), previously produced by Wi-LAN and Bates numbered WIL-0001837 – WIL-0001845.
13. Attached hereto as Exhibit L is a true and correct copy of Jean Conan & Rolando Oliver, *Hardware and Software Implementation of the Viterbi Decoding Algorithm for*

*Convolutional Codes, in MIMI 76: Proceedings of the International Symposium on Mini and Micro Computers* (M.H. Hamza ed., 1977), Bates numbered WIL-0192844 – WIL-0192852.

14. Attached hereto as Exhibit M is a true and correct copy of Definition of Overlay, Oxford Dictionaries Online, <http://oxforddictionaries.com/definition/overlay?q=overlay>, as produced by Defendants and Bates numbered DEFS0011210.
15. Attached hereto as Exhibit N is a true and correct abridged copy of the *Manual of Patent Examining Procedure* (6th ed. rev. 3, July 1997), obtained from the website of the U.S. Patent and Trademark Office and Bates numbered WIL-0192853 – WIL-0192858.
16. I declare under penalty of perjury under the laws of the United States that every statement contained in this declaration is within my personal knowledge and is true and correct.

Executed on this 16th day of March, 2012.

/s/ Jeffrey T. Han  
Jeffrey T. Han