

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

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

**PLAINTIFF Wi-LAN INC.’S UNOPPOSED MOTION FOR LEAVE
TO FILE MOTION FOR PARTIAL SUMMARY JUDGMENT UNDER SEAL**

In accordance with Local Rule CV-5(a)(7) and the Court’s Standing Orders, Plaintiff Wi-LAN Inc. (“Wi-LAN”) seeks an order permitting Wi-LAN to file under seal its Motion for Partial Summary Judgment filed under Dkt. 171, regarding Defendants Telefonaktiebolaget LM Ericsson’s (“LME”), Ericsson Inc.’s (“EUS”), Sony Mobile Communications AB’s, (“SAB”), and Sony Mobile Communications (USA) Inc.’s (“SUS”) (collectively, the “Ericsson Defendants”) respective affirmative defenses of covenant not to sue and counterclaims for breach of contract.

Because the Motion for Partial Summary Judgment contains highly confidential information belonging to Wi-LAN and the Ericsson Defendants, Wi-LAN requests leave to file this motion under seal. Counsel for Wi-LAN has conferred with counsel for Ericsson Defendants, and they do not oppose this motion. Public disclosure of this information would be harmful to the parties involved.

Dated: March 30, 2012

Respectfully submitted,

By: /s/ John A. Fedock

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Attorneys for Plaintiff, Wi-LAN Inc.

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(h), movant has contacted opposing counsel and no party opposes the relief requested herein.

/s/ John A. Fedock

John A. Fedock

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 30th day of March 2012.

/s/ John A. Fedock

John A. Fedock

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