EXHIBIT B

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 ERICSSON; ERICSSON INC.; SONY MOBILE COMMUNICATIONS AB; SONY 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.	§ § § § § § § § § § § § § § § §	Civil Action No. 6:10-cv-521-LED JURY TRIAL DEMANDED

WI-LAN'S RESPONSES AND OBJECTIONS TO DEFENDANTS' FIRST SET OF COMMON INTERROGATORIES (NOS. 1-6)

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Wi-LAN Inc. ("Wi-LAN") hereby responds and objects to Defendants' First Set of Common Interrogatories (Nos. 1-6).

GENERAL OBJECTIONS AND INSTRUCTIONS

The responses provided herein are submitted on behalf of Wi-LAN and reflect Wi-LAN's continuing investigation of facts and discovery of information and documents relating to the claims and defenses at issue in this litigation. Accordingly, Wi-LAN's objections and responses to Defendants' interrogatories are based only upon Wi-LAN's current knowledge and reasonable beliefs. Wi-LAN expressly reserves the right to modify, amend, revise, correct and/or supplement any and all of its responses herein, and to assert additional objections to these interrogatories as necessary and/or appropriate.

Nothing in these responses shall be deemed an admission by Wi-LAN regarding the existence of any information, the relevance or admissibility of any information, for any purpose, or the truth or accuracy of any statement or characterization contained in any interrogatory.

Wi-LAN makes the following General Objections, whether or not separately set forth in each response to each instruction, definition, and request made in Defendants' First Set of Interrogatories:

1. Wi-LAN objects to Defendants' definitions and instructions to the extent they seek to expand the requirements of, or are inconsistent with, the Federal Rules of Civil Procedure or the Court's Local Rules.

2. Wi-LAN objects to the interrogatories to the extent they seek information that is properly the subject of expert testimony. Wi-LAN will provide expert testimony at the time and in the manner ordered by the Court.

3. Wi-LAN objects to the interrogatories to the extent they are not reasonably calculated to lead to the discovery of admissible evidence or seek information that is not relevant to the subject matter of the pending action.

4. Wi-LAN objects to the interrogatories to the extent they seek information that is just as easily available to Defendants.

5. Wi-LAN objects to the interrogatories to the extent they seek information that is publicly available.

6. Wi-LAN objects to the interrogatories to the extent they seek information that is not within Wi-LAN's possession, custody or control.

7. Wi-LAN objects to the interrogatories as overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent they are worded to seek "any" and "all" information or persons or "each" or "every" document or person.

8. Wi-LAN objects to the interrogatories as having multiple sub-parts, such that the combination of the interrogatories served herewith results in an effective number of interrogatories exceeding the 15 interrogatories that may be served by Defendants pursuant to the Court's Discovery Order.

9. Wi-LAN objects generally to each interrogatory to the extent that it seeks information protected from discovery by applicable privileges. In particular, Wi-LAN objects to each interrogatory to the extent that it seeks information protected from discovery by the attorney-client privilege, the work-product doctrine, the or common interest privilege, and/or any other privilege or exemption from discovery.

10. Wi-LAN objects to each interrogatory to the extent that it seeks confidential information of Wi-LAN or of a third party to whom a duty of confidentiality is owed, including confidential technical and/or financial information. Wi-LAN will produce such information only after any necessary consents have been obtained from any such third party.

11. Wi-LAN objects to all interrogatories that seek the disclosure of mental impressions, conclusions, opinions, or legal theories of the attorneys or other representatives of Wi-LAN concerning this litigation.

12. Wi-LAN objects to all interrogatories to the extent that they prematurely seek information that is the subject of expert discovery. Wi-LAN will disclose such information at the time and in the manner contemplated by the Docket Control Order and Discovery Order entered by the Court in this case.

13. Wi-LAN objects to the interrogatories as premature to the extent they seek subject matter dependent on claim construction. The Court has not yet construed any terms of any claims asserted in this action. Wi-LAN reserves the right to amend its responses to these interrogatories pursuant to the Court's claim construction.

14. Wi-LAN objects to the definition of the terms "you," "your," "Wi-LAN," and/or "Plaintiff" as overly broad and unduly burdensome to the extent the definition of these terms purports to include persons or entities that are not within Wi-LAN's direction or control. Wi-LAN will limit its interpretation of the terms "you," "your," "Wi-LAN," and "Plaintiff" to include only Wi-LAN, and natural persons and entities that are within Wi-LAN's direction and/or control.

15. Wi-LAN objects to the definition "identify" when used with respect to a document as overly broad and unduly burdensome to the extent it seeks to expand upon the requirements of the Federal Rules of Civil Procedure and Federal Rules of Evidence; to the extent it purports to seek information that is either publically available and/or not in Wi-LAN's possession, custody, or control; and also to the extent that they seek information that is neither relevant to any claim or defense at issue in this case, nor likely to lead to the discovery of evidence that is admissible in this case. When Wi-LAN is asked to "identify" a document, as that term is best understood by Wi-LAN, Wi-LAN will interpret the request as seeking the Bates number of that document and/or any other reasonable description of that document.

Without waiving or limiting in any manner any of the foregoing statements, responses or General Objections, but rather incorporating-by-reference each of them into each of the following responses to the extent possible, Wi-LAN will also state specific objections to the interrogatories where appropriate, including objections that are not generally applicable to all of the specific interrogatories. By setting forth such specific objections, Wi-LAN does not intend to limit or restrict the statements, responses or General Objections set forth above to the extent Wi-LAN responds to the specific interrogatory. Stated objections are not waived by providing a response.

SPECIFIC OBJECTIONS AND RESPONSES

Wi-LAN incorporates by reference its general objections set forth above into the specific objections set forth below. Wi-LAN may repeat a general objection for emphasis or some other reason, but the failure to repeat any general objection does not waive any general objection to that interrogatory.

INTERROGATORY NO. 1:

Separately, for each claim of each Patent-in-Suit, identify all facts and legal bases for when, where, how, and by whom the subject matter described by that claim was first conceived, actually reduced to practice, constructively reduced to practice, any alleged diligence (or lack thereof) from conception to actual reduction to practice, and any alleged diligence from conception to constructive reduction to practice, and identify all documents relating to the conception, any diligence to reduce the subject matter to practice, and the actual and/or constructive reduction to practice, and identify any person who participated in, contributed to, or witnessed the diligence, actual reduction to practice, or constructive reduction to practice.

ANSWER:

Wi-LAN incorporates by reference each of its general objections as if fully set forth herein. Wi-LAN objects to this interrogatory to the extent it seeks information protected by the attorney-client privilege, work product doctrine, common interest doctrine, joint defense privilege, or any other applicable privilege or immunity. Wi-LAN further objects to this interrogatory to the extent it seeks information in possession of third parties.

Discovery in this matter is ongoing and Wi-LAN has not yet concluded its investigation and, as such, subject to the objections stated above, Wi-LAN will supplement its responses as additional facts and documents are discovered.

Subject to these objections, and to the general objections recited above, Wi-LAN responds: The various inventions disclosed in U.S. Patent Nos. 6,088,326, 6,222,819, and 6,381,211 were conceived and reduced to practice by Martin Lysejko and Paul Struhsaker at least as early as October 1995 while they were working on an improved wireless

communications system capable of efficiently sending different types of data (e.g., fax, voice, etc.) over a cellular network for a predecessor to Airspan Communications Corporation. The inventions disclosed in U.S. Patent No. 6,195,327 were conceived and reduced to practice by Martin Lysejko, Paul Struhsaker and Joemanne Chi Cheung Yeung at least as early as October 1995 while they were working on an improved wireless communications system capable of efficiently sending different types of data (e.g., fax, voice, etc.) over a cellular network for a predecessor to Airspan Communications Corporation. Pursuant to Fed. R. Civ. P. 33(d), Wi-LAN identifies the following documents relating to the conception, diligence to reduction to practice and from which additional information responsive to this interrogatory can be derived: AS00001—AS01486. Wi-LAN also identifies U.S. Patent Nos. 6,088,326, 6,222,819, 6,381,211, and 6,195,327, and their respective publicly-available prosecution histories as further evidence of conception and/or constructive reduction to practice.

INTERROGATORY NO. 2:

Separately, for each Patent-in-Suit, identify all prior art known or believed by you to be relevant to the subject matter of the patent, or that has been asserted by any person or entity (including any patent office) to be relevant to the patent, or any prior art that was located during a search relating to the Patents-in-Suit (whether or not you contend the results are relevant to the validity of Patents-in-Suit) and describe when, by whom, and under what circumstances each such prior art reference was first discovered or identified.

ANSWER:

Wi-LAN incorporates by reference each of its general objections as if fully set forth herein. Wi-LAN objects to this interrogatory to the extent it seeks information protected by the attorney-client privilege, work product doctrine, joint defense privilege, or any other applicable privilege or immunity. Wi-LAN further objects to this interrogatory to the extent it seeks information in possession of third parties.

Discovery in this matter is ongoing and Wi-LAN has not yet concluded its investigation and, as such, subject to the objections stated above, Wi-LAN will supplement its responses as additional facts and documents are discovered.

Subject to these objections, and to the general objections recited above, a list of references known to Wi-LAN that have been asserted to be relevant prior art to the Patents-in-Suit is provided below. Wi-LAN specifically disputes that certain of these references are: (1) prior art to the Patents-in-Suit; and (2) relevant to the subject matter of the identified Patents-in-Suit. *See* Wi-LAN's Response and Objections to Telefonaktiebolaget LM Ericsson's First Set of Interrogatories to Plaintiff (identifying references asserted by Defendants that are not prior art to the inventions claimed in the Patents-in-Suit). Wi-LAN also identifies U.S. Patent Nos. 6,088,326, 6,222,819, 6,381,211, and 6,195,327, and their respective publicly-available prosecution histories as providing further evidence of when, by whom and under what circumstances prior art references were first discovered or identified.

U.S. Patent No. 6,222,819:

- United States, 5471497, Zehavi, Ephraim, Nov. 28, 1995
- United States, 5995497, Gerakoulis, D., Nov. 30, 1999
- United States, 5559790, Yano, Takashi et al., Sept. 24, 1996
- Japan, H8-125604, Sawahashi, Mamoru et al., May 17, 1996
- United States, 5956345, Allpress, Stephen et al., Sept. 21, 1999
- United States, 5737327, Ling, Fuyun et al., Apr. 7, 1998
- United States, 5621723, Walton, Jay et al., Apr. 15, 1997
- United States, 5896368, Dahlman, Erik et al., Apr. 20, 1999
- United States, 5103459, Gilhousen, Klein et al., Apr. 7, 1992
- United States, 5915216, Lysejko, Martin, June 22, 1999
- United States, 5966377, Murai, Hideshi, Oct. 12, 1999
- United States, 5870378, Huang, Howard et al., Feb. 9, 1999
- Jan Eriksen et al., Code Division Multiple Access – Hot Topic in Mobile Communications, Telenor Telektronikk, 1995
- I.W. Band et al., Convolutional Coding Strategies for Code Division Multiple Access Cellular Communications, IEEE, Aug. 1996

- Craig Teuscher et al., Design and Implementation Issues for a Wideband, Indoor, DS-CDMA System Providing Multimedia Access, in Proc. 34th Allerton Conf. Communications, Control, and Computing, Urbana-Champaign, IL, 1996, pp. 623-632
- Telecommunications Industry Ass'n, TIA/EIA/IS-95-A Interim Standard, May 1995
- F. Adachi et al., Coherent Multicode DS-CDMA Mobile Radio Access, IEICE Trans. Communications, Vol. E79-B, Sept. 9, 1996
- Code Time Division Multiple Access: CDMA and TDMA — A Marriage Made in Heaven?, ETSI STC SMG 2/20, Sophi Antipolis, France, Dec. 16, 1996
- FRAMES Multiple Access Scheme Proposal for the UMTS Radio Interface — SMG2 Workshop on UMTS Radio Interface Technologies, ETSI STG SMG 2/20, Sophia Antipolis, France, Dec. 16, 1996
- Qualcomm CDMA systems
- U.S. Patent No. 5764630, Natali et al., June 9, 1998
- U.S. Patent No. 5603095, Uola, Risto, February 11, 1997
- U.S. Patent No. 5239682, Strawcynski, et al., August 24, 1993
- U.S. Patent No. 5659598, Byrne, et al., August 19, 1997
- United States 5373502, Turban, December 1994
- United States 5414728, Zehavi, May 1995
- United States 5764630, Natali et al., June 1998
- United States 5793759, Rakib et al., August 1998
- United States 5956345, Allpress et al., September 1999
- EP0633676, Jan. 1995
- EP0652650, May. 1995
- EP0730356, Sep. 1996
- GB2267627, Dec. 1993
- GB2301744, Dec. 1996
- WO9314588, Jul. 1993
- WO9503652, Feb. 1995
- WO9637066, Nov. 1996

U.S. Patent No. 6,088,326

- European Patent Office, EP0600713A2, Leppanen, Pentti, June 8, 1994
- United States, 5533013, Leppanen, Pentti, July 2, 1996
- United States, 5402413, Dixon, Robert, March 28, 1995
- United States, 6272168, Lomp, Gary et al., Aug. 7, 2001
- United States, 6134215, Agrawal, Avneesh et al., Oct. 17, 2000
- United States, 6535503, Toskala, Antti et al., Mar. 18, 2003
- United States, 5673260, Umeda, Narumi et al., Sept. 30, 1997
- United States, 6064662, Gitlin, Richard et al., May 16, 2000
- United States, 6018528, Gitlin, Richard et al., Jan. 25, 2000
- United States, 6052365, Bhagalia, S. et al., Apr. 18, 2000
- United States, 5991627, Honkasalo, Zin-Chun et al., Nov. 23, 1999

- Japan, H8-125604, Sawahashi, Mamoru et al., May 17, 1996
- Japan, H6-237214, Onishi, Hiroshi et al., Aug. 23, 1994
- Japan, H7-336767, Sekine, Kiyoki et al., Dec. 22, 1995
- United States, 5896368, Dahlman, Erik et al., Apr. 20, 1999
- United States, 6112080, Anderson, Gary et al., Aug. 29, 2000
- United States, 5539730, Dent, Paul, July 23, 1996
- United States, 5793757, Uddenfeldt, Jan, Aug. 11, 1998
- United States, 5103459, Gilhousen, Klein et al., April 7, 1992
- United States, 5915216, Lysejko, Martin, June 22, 1999
- United States, 5966377, Murai, Hideshi, Oct. 12, 1999
- PCT/GB93/00199, Millicom Holdings, Aug. 5, 1993
- R. Prasad, et al., Hybrid TDMA/CDMA Multiple Access Protocol for Multi-Media
- Communications, IEEE ICPWC'96, 1996
- R. Sahota, Feasibility of a Narrow Band DS–CDMA Overlay on a TDMA System, Univ. of South Australia, Sept. 1996
- Telecommunications Industry Ass'n, TIA/EIA/IS-95-A Interim Standard, May 1995
- Code Time Division Multiple Access: CDMA and TDMA — A Marriage Made in Heaven?, ETSI STC SMG 2/20, Sophi Antipolis, France, Dec. 16, 1996
- FRAMES Multiple Access Scheme Proposal for the UMTS Radio Interface — SMG2 Workshop on UMTS Radio Interface Technologies, ETSI STG SMG 2/20, Sophia Antipolis, France, Dec. 16, 1996
- FRAMES Detailed Description of Mode 1: Wideband TDMA/CDMA
- NEC Technologies (UK) Ltd. and NEC Corporation, Proposed Wide-band Coherent DSCDMA/ FDD with Time-Slot Structure for UMTS, June 12, 1996, and NEC Technologies (UK) Ltd., A Wideband Coherent DS-CDMA/FDD with Time-Slot Structure for UMTS, Dec. 16, 1996
- King's College, Multidimensional PRMA (MD PRMA) – A Versatile Medium Access Strategy for the UMTS Mobile to Base Station Channel" Centre for Telecommunications Research, King's College, Dec. 16, 1996
- Qualcomm CDMA systems
- U.S. Patent No. 5764630, Natali et al., June 9, 1998
- U.S. Patent No. 5603095, Uola, Risto, February 11, 1997
- U.S. Patent No. 5239682, Strawcynski, et al., August 24, 1993
- U.S. Patent No. 5659598, Byrne, et al., August 19, 1997
- United States 4688210, Eizenhoffer et al., August 1987
- United States 4799252, Eizenhoffer et al., January 1989
- United States 5373502, Turban, December 1994
- United States 5592469, Szabo, January 1997
- United States 6005854, Xu et al., December 1999
- EP0652650, May. 1995
- EP0730356, Sep. 1996
- GB2301744, Dec. 1996
- WO9314590, Jul., 1993
- WO9315573, Aug., 1993

- WO9523464, Aug., 1995

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- United States, 5428818, Meidan, Reuven et al., June 27, 1995
- United States, 5295138, Greenberg, A. et al., Mar. 15, 1994
- United States, 5864549, Honkasalo, Harry et al., Jan. 26, 1999
- United States, 4794635, Hess, Garry et al., Dec. 27, 1988
- United States, 4777653, Bonnerot, Georges et al., Oct. 11, 1988
- United States, 5056109, Leppanen, Pentti, July 2, 1996
- United States, 5093840, Schilling, Donald, Mar. 2, 1992
- United States, 4228538, Scharla-Nielsen, Hans et al., Oct. 14, 1980
- United States, 5838671, Ishikawa, Y. et al., Nov. 17, 1998
- United States, 5734646, I, Chih-Lin et al., Mar. 31, 1998
- United States, 7146174, Gardner, William et al., Dec. 5, 2006
- United States, 5042082, Dahlin, Jan, Aug. 20, 1991
- United States, 5701585, Kallin, Harald et al., Dec. 23, 1997
- United States, 5590399, Matsumoto, T. et al., Dec. 31, 1996
- United States, 5410737, Jones, J., Apr. 25, 1995
- United States, 6018528, Gitlin, Richard et al., Jan. 25, 2000
- United States, 5442625, Gitlin, Richard et al., Aug. 15, 1995
- WIPO, 1996002979, Andersson, Claes et al., Feb. 1, 1996
- WIPO, 1996002980, Andersson, Claes et al., Feb. 1, 1996
- Andrea Baiocchi et al., Near-Optimality of Distributed Load-Adaptive Dynamic Channel Allocation Strategies for Cellular Mobile Network, Wireless Networks 2, 129-42 1996
- Branko Bjelajac, CIR Based Dynamic Channel Allocation Schemes and Handover Strategies for Mobile Satellite Systems, Proceedings of the 1995 IEEE Wireless Communication System Symposium, Nov. 1995
- U.S. Patent No. 5764630, Natali et al., June 9, 1998
- U.S. Patent No. 5603095, Uola, Risto, February 11, 1997
- U.S. Patent No. 5239682, Strawcynski, et al., August 24, 1993
- U.S. Patent No. 5659598, Byrne, et al., August 19, 1997
- United States 5148548, Meche et al., September 1992
- United States 5471650, Vexler et al., November 1995
- United States 5596570, Soliman, January 1997
- United States 5697056, Tayloe, December 1997
- United States 5761429, Thompson, June 1998
- GB2288517, Oct., 1995
- GB2300091, Oct., 1996
- GB2302481, Jan., 1997
- WO9109474, Jun., 1991
- WO9526593, Oct., 1995
- WO9637054, Nov., 1996

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U.S. Patent No. 6,381,211

- European Patent Office, EP0600713A2, Leppanen, Pentti, June 8, 1994
- United States, 5533013, Leppanen, Pentti, July 2, 1996
- United States, 5402413, Dixon, Robert, March 28, 1995
- United States, 6272168, Lomp, Gary et al., Aug. 7, 2001
- United States, 6134215, Agrawal, Avneesh et al., Oct. 17, 2000
- United States, 6535503, Toskala, Antti et al., Mar. 18, 2003
- United States, 5673260, Umeda, Narumi et al., Sept. 30, 1997
- United States, 6064662, Gitlin, Richard et al., May 16, 2000
- United States, 6018528, Gitlin, Richard et al., Jan. 25, 2000
- United States, 6052365, Bhagalia, S. et al., Apr. 18, 2000
- United States, 5991627, Honkasalo, Zin-Chun et al., Nov. 23, 1999
- Japan, H8-125604, Sawahashi, Mamoru et al., May 17, 1996
- Japan, H6-237214, Onishi, Hiroshi et al., Aug. 23, 1994
- Japan, H7-336767, Sekine, Kiyoki et al., Dec. 22, 1995
- United States, 5896368, Dahlman, Erik et al., Apr. 20, 1999
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- United States, 5539730, Dent, Paul, July 23, 1996
- United States, 5793757, Uddenfeldt, Jan, Aug. 11, 1998
- United States, 5103459, Gilhousen, Klein et al., April 7, 1992
- United States, 5915216, Lysejko, Martin, June 22, 1999
- United States, 5966377, Murai, Hideshi, Oct. 12, 1999
- PCT/GB93/00199, Millicom Holdings, Aug. 5, 1993
- R. Prasad, et al., Hybrid TDMA/CDMA Multiple Access Protocol for Multi-Media
- Communications, IEEE ICPWC'96, 1996
- R. Sahota, Feasibility of a Narrow Band DS–CDMA Overlay on a TDMA System, Univ. of South Australia, Sept. 1996
- Telecommunications Industry Ass'n, TIA/EIA/IS-95-A Interim Standard, May 1995
- Code Time Division Multiple Access: CDMA and TDMA — A Marriage Made in Heaven?, ETSI STC SMG 2/20, Sophi Antipolis, France, Dec. 16, 1996
- FRAMES Multiple Access Scheme Proposal for the UMTS Radio Interface — SMG2 Workshop on UMTS Radio Interface Technologies, ETSI STG SMG 2/20, Sophia Antipolis, France, Dec. 16, 1996
- FRAMES Detailed Description of Mode 1: Wideband TDMA/CDMA
- NEC Technologies (UK) Ltd. and NEC Corporation, Proposed Wide-band Coherent DSCDMA/ FDD with Time-Slot Structure for UMTS, June 12, 1996, and NEC Technologies (UK) Ltd., A Wideband Coherent DS-CDMA/FDD with Time-Slot Structure for UMTS, Dec. 16, 1996

- King's College, Multidimensional PRMA (MD PRMA) – A Versatile Medium Access Strategy for the UMTS Mobile to Base Station Channel" Centre for Telecommunications Research, King's College, Dec. 16, 1996
- Qualcomm CDMA systems
- U.S. Patent No. 5764630, Natali et al., June 9, 1998
- U.S. Patent No. 5603095, Uola, Risto, February 11, 1997
- U.S. Patent No. 5239682, Strawcynski, et al., August 24, 1993
- U.S. Patent No. 5659598, Byrne, et al., August 19, 1997
- United States 5373502, Turban, December 1994
- United States 5414728, Zehavi, May 1995
- United States 5481533, Honing et al., January 1996
- United States 5572516, Miya et al., November 1996
- United States 5805581, Uchida et al., September 1998
- United States 5894473, Dent, April 1999
- EP633 676, Jan., 1995
- EP652 650, May., 1995
- EP730 356, Sep., 1996
- GB2 267 627, Dec., 1993
- GB2 301 744, Dec., 1996
- WO93/14590, Jul., 1993
- WO93/15573, Aug., 1993
- WO95/23464, Aug., 1995
- WO 96/37066, Nov., 1996

INTERROGATORY NO. 3:

Separately, for each Patent-in-Suit, identify each instrumentality that practices, has ever practiced, or is contemplated by You for future practice of, any of the Patents-in-Suit (including without limitation any Wi-LAN or Airspan products or services or any products or services of any Licensee of the Patents-in-Suit) by product name, trade designation, and any other description known by You, as well as by manufacturer, licensee, user, and source, specify in claim charts where each element of each claim is found within such instrumentality, and identify all persons with knowledge that any such instrumentalities practice any of the Patents-in-Suit and all documents and things referring or relating to any such instrumentalities.

ANSWER:

Wi-LAN incorporates by reference each of its general objections as if fully set forth herein. Wi-LAN objects to this interrogatory as overly broad, unduly burdensome and as seeking information that is not reasonably calculated to lead to the discovery of admissible evidence. Wi-LAN objects to this interrogatory to the extent it seeks information protected by the attorney-client privilege, work product doctrine, joint defense privilege, or any other applicable privilege

or immunity. Wi-LAN further objects to this interrogatory to the extent it calls for expert testimony to the extent it seeks information regarding Defendants' infringement. Wi-LAN further objects to this interrogatory as premature to the extent it seeks expert testimony prior to the dates set forth in the Court's Docket Control Order. Wi-LAN will provide its expert reports according to the schedule set forth in this case by the Court.

Discovery in this matter is ongoing and Wi-LAN has not yet concluded its investigation and, as such, subject to the objections stated above, Wi-LAN will supplement its responses as additional facts and documents are discovered.

Subject to these objections, and to the general objections recited above, Wi-LAN responds: The accused products, as identified in Wi-LAN's P.R. 3-1 disclosure, practice one or more of the Patents-in-Suit. Wi-LAN incorporates by reference its P.R. 3-1 disclosure served to the Defendants on June 13, 2011, and any supplements or amendments thereof. Airspan Network's AS-4000 may also practice one or more claims of one or more of the Patents-in-Suit. Wi-LAN does not sell a product that practices the Patents-in-Suit.

INTERROGATORY NO. 4

Separately, for each Patent-in-Suit, identify all entities and instrumentalities (whether or not such entities and instrumentalities are involved in this case) that Wi-LAN has asserted, suggested, or alleged infringe one or more claims of the Patents-in-Suit by product name, trade designation, and other appropriate description, by manufacturer, licensee, user, and source, specify in claim charts where each element of each claim is allegedly found within such instrumentality, and identify all persons with knowledge that any such instrumentalities practice any of the Patents-in-Suit and all documents and things referring or relating to any such instrumentalities and assertions, suggestions, or allegations.

ANSWER:

Wi-LAN incorporates by reference each of its general objections as if fully set forth herein. Wi-LAN objects to this interrogatory as overly broad, unduly burdensome to the extent it requests claim charts for products that are not accused in this litigation, and as seeking

information that is not reasonably calculated to lead to the discovery of admissible evidence. Wi-LAN objects to this interrogatory to the extent it seeks information protected by the attorney-client privilege, work product doctrine, joint defense privilege, or any other applicable privilege or immunity.

Discovery in this matter is ongoing and Wi-LAN has not yet concluded its investigation and, as such, subject to the objections stated above, Wi-LAN will supplement its responses as additional facts and documents are discovered.

Subject to these objections, and to the general objections recited above, Wi-LAN incorporates by reference the claim charts provided with Wi-LAN's P.R. 3-1 disclosures. Wi-LAN also identifies the following products as infringing the Patents-in-Suit:

Alcatel-Lucent: 9300 W-CDMA Node B Products, 9311 Macro Node B, 9326 Digital 2U Base Band Unit, 9360 Small Cell, 9926 Digital 2U Node B, and all other products which are reasonably similar in structure and/or operation. Additional Alcatel-Lucent products known to Wi-LAN at this time that are similar in structure and/or operation to the above-identified products, and therefore also infringe the claims of the Patents-in-Suit asserted in Wi-LAN's P.R. 3-1 disclosures, include the: 9764 Metro Cell, 9362 Enterprise Cell 2100, 9362 Enterprise Cell, 9361 Home Cell, 9363 Metro Cell Indoor and 9364 Metro Cell Outdoor.

Ericsson: RBS-3000; RBS-6000; W30; W35; and all other products which are reasonably similar in structure and/or operation. Additional Ericsson products known to Wi-LAN at this time that are similar in structure and/or operation to the above-identified products, and therefore also infringe the claims of the Patents-in-Suit asserted in Wi-LAN's P.R. 3-1 disclosures, include the: W37, W40 and L21.

Sony Mobile: Vivaz; Xperia X10; Equinox; W518a; Satio; Xperia X2a; Xperia Pureness; Aino; Naite; and all other products which are reasonably similar in structure and/or operation. Additional Sony Mobile products known to Wi-LAN at this time that are similar in structure and/or operation to the above-identified products, and therefore also infringe the claims of the Patents-in-Suit asserted in Wi-LAN's P.R. 3-1 disclosures, include the: Xperia Play 4G, Live with Walkman, Xperia pro, Xperia neo V, Xperia active, Xperia arc, Xperia ray, Xperia mini, Xperia mini pro, Aino, Aspen, Cedar, Equinox, G705a, Naite, Satio, T707, Vivaz, Vivaz Pro, W508, W518a, Xperia arc S, Xperia ion, Xperia neo, Xperia Play, Xperia Pureness, Xperia X10, Xperia X10 mini, Xperia X10 mini pro, Xperia X2a, Xperia X8, and Yari.

HTC: Aria; HD2; Imagio; Pure; Tilt 2; Touch Cruise; G1; G2, myTouch 3G; myTouch 3G Slide; Dash 3G; Freestyle; Inspire 4G; Surround; myTouch 4G; Touch Pro2; and all other products which are reasonably similar in structure and/or operation. Additional HTC products known to Wi-LAN at this time that are similar in structure and/or operation to the above-identified products, and therefore also infringe the claims of the Patents-in-Suit asserted in Wi-LAN's P.R. 3-1 disclosures, include the: Amaze 4G, Evo Design 4G, HD7, HD7S, Hero S, myTouch 4G Slide, One S, Radar, Radar 4G, Sensation, Status, Titan, Vivid, Wildfire S and One X.

INTERROGATORY NO. 5:

Separately, for each instrumentality identified in response to Interrogatory No. 3, state the period of time during which each such instrumentality was sold, state whether (and if so, how) each such instrumentality was marked with the patent number of any of the Patents-in-Suit, state the period of time during which each such instrumentality, if any, was marked with the patent number of any of the Patents-in-Suit, and identify all persons most knowledgable thereof and all documents and things referring or relating thereto.

ANSWER:

Wi-LAN incorporates by reference each of its general objections as if fully set forth herein. Wi-LAN objects to this interrogatory as overly broad, unduly burdensome and as seeking information that is not reasonably calculated to lead to the discovery of admissible evidence to the extent it requests information on products sold without Wi-LAN's authorization. Wi-LAN objects to this interrogatory to the extent it requests information from a third-party. Wi-LAN will respond only to the extent the products sold were licensed by Wi-LAN. Wi-LAN further objects to this interrogatory to the extent it calls for information in the possession of third party(s).

Discovery in this matter is ongoing and Wi-LAN has not yet concluded its investigation and, as such, subject to the objections stated above, Wi-LAN will supplement its responses as additional facts and documents are discovered.

Subject to these objections, and to the general objections recited above, Wi-LAN responds: The period of time in which each of Defendants' infringing products has been sold is known to Defendants. To Wi-LAN's knowledge, none of Defendants' infringing products have been marked with the patent number of the Patents-in-Suit. Discovery into the marking of Airspan's AS-4000 product to the extent that product practices one or more of the Patents-in-Suit is on-going.

INTERROGATORY NO. 6:

Describe in detail each patent license to which you or Airspan are a party that covers or relates to the Patents-in-Suit and identify (i) the date of the agreement; (ii) the parties involved; (iii) the patent(s) involved; (iv) the product(s) covered; (v) the geographic and temporal scope of the license; (vi) the amount paid and/or consideration exchanged, including any applicable royalty rate, upfront/lump-sum payments, royalty payments made, or technology/patents transferred; (vii) the person(s) who are most knowledgeable about each license and the negotiations leading up to the execution of each license; (viii) each such patent license by Bates number; and (ixviii) (sic) any documents that support Your answer or to which You referred in preparing Your answer.

ANSWER:

Wi-LAN incorporates by reference each of its general objections as if fully set forth herein. Wi-LAN objects to this interrogatory as overly broad, unduly burdensome and as seeking information that is not reasonably calculated to lead to the discovery of admissible evidence. Wi-LAN objects to this interrogatory to the extent it seeks information protected by the attorney-client privilege, work product doctrine, joint defense privilege, or any other applicable privilege or immunity.

Subject to these objections, and to the general objections recited above, Wi-LAN identifies Andrew Parolin as the person most knowledgeable about Wi-LAN's licenses. Pursuant to FED. R. CIV. P. 33(d), Wi-LAN also identifies the following documents from which information responsive to this interrogatory can be derived:

WIL184772–WIL184799, WIL62732–WIL62752, WIL97617–WIL97628, WIL60206–WIL60226, WIL54500–WIL54529, WIL168420–WIL168434, WIL168453–WIL168468, WIL69460–WIL69473, WIL84546–WIL84565, WIL154133–WIL154160, WIL69855–WIL69871, WIL177424–WIL177440, WIL154207–WIL154215, WIL177594–WIL177611, WIL177699–WIL177715, WIL63281–WIL63293, WIL174464–WIL174478, WIL70554–WIL70569, WIL70434–WIL70450, WIL186815–WIL186830, WIL185072–WIL185090, WIL84447–WIL84465, WIL173784–WIL173798, WIL185224–WIL185234, WIL76503–WIL76525, WIL179387– WIL179416, WIL79211–WIL79240, WIL185658–WIL185671, WIL181921–WIL181937, WIL182181–WIL182200, WIL181007–WIL181027, WIL185713–WIL185715, WIL183862–WIL183878, WIL192859–WIL192877, WIL184737–WIL184741.

Discovery in this matter is ongoing and Wi-LAN has not yet concluded its investigation and, as such, subject to the objections stated above, Wi-LAN will supplement its responses as additional facts and documents are discovered.

Dated: May 10, 2012

Respectfully submitted,

By: /s/ *Syed K. Fareed*

David B. Weaver – LEAD ATTORNEY
Texas State Bar No. 00798576
Michael A. Valek
Texas State Bar No. 24044028
Avelyn M. Ross
Texas State Bar No. 24027817
Ajeet P. Pai
Texas State Bar No. 24060376
Syed K. Fareed
Texas State Bar No. 24065216
Jeffrey T. Han
Texas State Bar No. 24069870
Seth A. Lindner
Texas State Bar No. 24078862
VINSON & ELKINS LLP
2801 Via Fortuna, Suite 100
Austin, TX 78746
Tel: (512) 542-8400
dweaver@velaw.com
mvalek@velaw.com
aross@velaw.com
apai@velaw.com
sfareed@velaw.com
jhan@velaw.com
slindner@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.

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

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). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), 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 10th day of May, 2012.

/s/ Syed K. Fareed

Counsel for Defendants: **Alcatel-Lucent USA Inc.**		
Local Counsel Michael E. Jones, Lead Attorney Allen F. Gardner POTTER MINTON PC 110 N. College, Suite 500 P.O. Box 359 Tyler, TX 75710-0359 Tel: (903) 597-8311 Fax: (903) 593-0846 mikejones@potterminton.com allengardner@potterminton.com		Robert A. Appleby Gregory S. Arovas Akshay S. Deoras KIRKLAND & ELLIS LLP 601 Lexington Avenue New York, NY 10022 Tel: (212) 446-4800 Fax: (212) 446-4900 Alcatel-Lucent-Wi-LAN-Defense@kirkland.com

Ericsson Inc. **Sony Mobile Communications (USA) Inc.** **Sony Mobile Communications AB** **Telefonaktiebolaget LM Ericsson**		
		Bruce S. Sostek, Lead Attorney Matthew P. Harper Richard L. Wynne, Jr. THOMPSON & KNIGHT LLP 1722 Routh Street, Suite 1500 Dallas, TX 75201-2533 Tel: (214) 969-1700 Fax: (214) 969-1751 Ericsson-Wi-LAN-Defense@tklaw.com
HTC Corporation **HTC America, Inc. and** **Exedea Inc.**		
Local Counsel Eric Hugh Findlay, Lead Attorney Brian Craft FINDLAY CRAFT 6760 Old Jacksonville Hwy, Suite 101 Tyler, TX 75703 Tel: (903) 534-1100 Fax: (903) 534-1137 efindlay@findlaycraft.com bcraft@findlaycraft.com		Daniel N. Yannuzzi Stephen S. Korniczky Inge Larish Martin R. Bader SHEPPARD MULLIN 12275 El Camino Real, Suite 200 San Diego, CA 92130-2006 Tel: (858) 720-8900 Fax: (858) 509-3691 LegalTm-WiLAN-Alcatel@sheppardmullin.com

/s/ *Syed K. Fareed*
Syed K. Fareed