

EXHIBIT D

Ajeet P. Pai apai@velaw.com
Tel +1 512 542 8798 Fax +1 512 236 3317

May 31, 2012

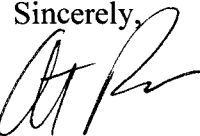
Via Email

Richard L. Wynne, Jr.
Thompson & Knight LLP
1722 Routh Street, Suite 1500
Dallas, Texas 75201

Re: *Wi-LAN v. Alcatel-Lucent USA et al.* (10-cv-521) (E.D. Tex.)
Infringement Contentions / Sony and Ericsson Productions

Dear Rich:

As you will recall, Wi-LAN's preliminary infringement contentions include "all other [Sony/Ericsson] products which are reasonably similar in structure and/or operation" to the listed products. The products identified in Wi-LAN's response to Defendants' Common Interrogatory No. 4 (many of which were released by Sony or Ericsson after Wi-LAN's preliminary infringement contentions were served) are such products and indeed infringe because they implement the same functionality described in the standards listed in those contentions. Accordingly, all these products are already included within Wi-LAN's preliminary infringement contentions. That said, we reserve our right to supplement those contentions as appropriate under P.R. 3-6(a) without leave of Court.

Sincerely,


Ajeet P. Pai

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