

EXHIBIT F

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July 16, 2012

David B. Weaver
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VIA EMAIL

Re: *Wi-LAN v. Alcatel-Lucent et al.*, Case No. 6:10-CV-521 (E.D. Tex.)

Dear Mr. Weaver:

I write to follow up on the meet-and-confer between Wi-LAN and Sony Mobile on July 9, 2012, with respect to Wi-LAN's purported amendment of its infringement contentions. As you know, on May 11, 2012, Wi-LAN requested that Sony Mobile produce various documents and information regarding a number of products that were not listed as Accused Instrumentalities in Wi-LAN's infringement contentions. Sony Mobile had previously produced technical documents for the vast majority of these products showing the features of the products. Accordingly, Sony Mobile requested, on May 25th, whether Wi-LAN intended to seek leave to amend its infringement contentions to add these products. Sony Mobile also requested that Wi-LAN explain its delay in requesting leave to amend.

Rather than providing this information, Wi-LAN asserted that the boilerplate language in its infringement contentions eliminated any need for leave to amend. In addition, Wi-LAN asserted that it had the right to amend its infringement contentions to add those products under P.R. 3-6(a). And that's what Wi-LAN has purported to do. Indeed, on June 14th, Wi-LAN served amended infringement contentions under P.R. 3-6(a), purporting to add a large number of Sony Mobile products that were not identified in its original infringement contentions. Sony Ericsson objected to the purported amendment because P.R. 3-6(a) does not permit amendment to add additional products.¹

During the July 9th meet-and-confer, Wi-LAN indicated that it would seek leave to amend its infringement contentions to add the additional accused products. Sony Mobile agreed to provide a list of the products for which Sony Mobile would oppose or not oppose amendment.

In that regard, Sony Mobile produced technical information for each of the following models at least as early as January 20, 2012, and in many cases on September 21, 2011. That technical information provided a listing of information as to the features of these various products, including the extent to which the products implemented High Speed Packet Access

¹ Sony Mobile also noted that Wi-LAN's amended infringement contentions — like its original contentions — failed to comply with P.R. 3-1(c)'s requirement for "[a] claim chart identifying specifically where each element of each asserted claim is found within each Accused Instrumentality."

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("HSPA"). In addition, at the time of these disclosures, there was considerable detailed information available on the Internet, including the Sony Ericsson (n/k/a Sony Mobile) website, regarding the features and functionality of these products. Notwithstanding these facts, Wi-LAN has delayed until a month before the expert-report deadline to request leave to amend. This is improper.

In fact, nearly two months have passed since Sony Mobile requested that Wi-LAN explain the reasons for its delay in seeking leave to amend its infringement contentions, but Wi-LAN has refused to provide that information. Accordingly, Sony Mobile opposes amendment of Wi-LAN's infringement contentions at this late date as to the following products:

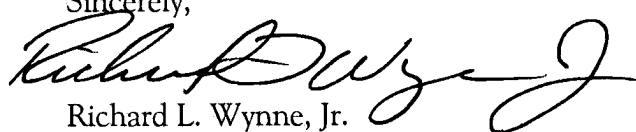
Xperia pro	Xperia neo V	Xperia active	Xperia arc
Xperia ray	Xperia mini	Xperia mini pro	Aspen
Cedar	Xperia X8	Vivaz Pro	W508
Xperia arc S	Xperia neo	Xperia Play ²	Xperia Play 4G
Xperia X10 mini	Xperia X10 mini pro		

The Sony Mobile T707 is a version of the Sony Mobile Equinox, which was identified in Wi-LAN's original infringement contentions, and thus, is already in the case. Accordingly, Sony Mobile does not believe that amendment of the infringement contentions is necessary to add this product.

Sony Mobile does not oppose the amendment of Wi-LAN's infringement contentions to add the following products for which Sony Mobile did not provide technical information at least as early as January 2012:

G705a Xperia ion Yari

Please let me know if you have any questions.

Sincerely,

Richard L. Wynne, Jr.

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² As discussed during the meet-and-confer, one version of the Xperia Play, namely the Sony Mobile R800x, was sold to Verizon for use in a CDMA2000 network. That version does not implement HSPA.