

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

JOINT MOTION TO AMEND DOCKET CONTROL ORDER

Plaintiff Wi-LAN Inc. ("Wi-LAN") and Defendants Alcatel-Lucent USA Inc., Telefonaktiebolaget LM Ericsson, Ericsson Inc., Sony Mobile Communications AB, Sony Mobile Communications (USA) Inc., HTC Corporation, HTC America, Inc., and Exedeia Inc. jointly move the Court to amend the Docket Control Order (dkt. no. 99) and would respectfully show the following:

The proposed modifications are necessary to permit the parties to complete certain discovery (including 30(b)(6) and individual depositions in foreign countries) so that it can be incorporated in initial expert reports. With the exception of dates shown below, all other dates currently specified by the Docket Control Order would remain unchanged, with the relevant pre-trial and trial dates unaffected. Accordingly, the parties respectfully request that the Court enter the attached proposed Order effecting the above modifications as follows:

Event	Current	Revised
Parties with burden of proof designate expert witnesses (nonconstruction issues). Expert witness reports due. Refer to Local Rules for required information.	Aug. 24, 2012	Sept. 21, 2012
Parties designate rebuttal expert witnesses (non-construction issues), Rebuttal expert witness reports due. Refer to Local Rules for required information.	Sept. 21, 2012	Oct. 19, 2012
Discovery deadline.	Oct. 19, 2012	Nov. 16, 2012
Parties to Identify Trial Witnesses; Amend Pleadings (after Markman Hearing).	Nov. 2, 2012	Nov. 20, 2012
Parties to Identify Rebuttal Trial Witnesses.	Nov. 13, 2012	Nov. 30, 2012
Dispositive Motions due from all parties and any other motions that may require a hearing (including Daubert motions) due.	Nov. 16, 2012	Dec. 7, 2012
Response to Dispositive Motions (including Daubert motions) due.	Dec. 17, 2012	Jan. 18, 2013

Dated: August 2, 2012

Respectfully submitted,

/s/ Akshay S. Deoras (with permission)

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Mobile Communications (USA) Inc., and  
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**CERTIFICATE OF CONFERENCE**

The undersigned certifies that Plaintiff Wi-LAN, Inc. has complied with the requirements of Local Rule CV-7(h), and no party opposes the relief sought herein.

*/s/ Ajeet Pai*

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Ajeet P. Pai

**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, on August 2, 2012.

*/s/ Ajeet Pai*

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