

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

WI LAN, INC.,

Plaintiff,

v.

ALCATEL-LUCENT USA INC., *et al.*,

Defendants.

§
§
§
§
§
§
§
§
§
§
§

Civil Action No. 6:10-CV-521

JURY TRIAL REQUESTED

**DEFENDANTS HTC CORPORATION, HTC AMERICA, INC., AND EXEDEA, INC.’S
UNOPPOSED MOTION FOR LEAVE TO SEAL EXHIBIT**

NOW COME, Defendants HTC Corporation, HTC America, Inc., and Exedea, Inc. (collectively “HTC”) and hereby file this Unopposed Motion for Leave to Seal Exhibit A to Wi-Lan Inc.’s Unopposed Motion to Compel Production of License Agreements from HTC Corporation, HTC America, and Exedea Inc. (Dkt. No. 207).

On July 12, 2012, Plaintiff Wi-LAN Inc. filed an Unopposed Motion to Compel Production of License Agreements from HTC Corporation, HTC America, and Exedea Inc. (Dkt. No. 207). HTC believes that Exhibit A to Plaintiff’s Motion contains confidential business information and thus requests that the Court seal Exhibit A. Wi-LAN Inc. is unopposed to this request.

WHEREFORE, HTC respectfully requests that the Court enter the attached order sealing Exhibit A to Wi-LAN Inc.’s Unopposed Motion to Compel Production of License Agreements from HTC Corporation, HTC America, and Exedea Inc. (Dkt. No. 207).

Dated: September 13, 2012

Respectfully submitted,

By: /s/ Brian Craft

Brian Craft

State Bar No. 04972020

Eric H. Findlay

State Bar No. 00789886

Findlay Craft, LLP

6760 Old Jacksonville Hwy., Suite 101

Tyler, TX 75703

903/534-1100

Fax: 903/534-1137

Email: efindlay@findlaycraft.com

Stephen S. Korniczky

Daniel N. Yannuzzi

Martin Bader

Sheppard Mullin Richter & Hampton LLP

12275 El Camino Real, Suite 200

San Diego, California 92130

Telephone: (858) 720-8900

Facsimile: (858) 509-3691

skorniczky@sheppardmullin.com

dyannuzzi@sheppardmullin.com

mbader@sheppardmullin.com

Attorneys for Defendants

**HTC CORPORATION, HTC AMERICA, INC. and
EXEDEA, INC.**

CERTIFICATE OF SERVICE

The undersigned certifies that on September 13, 2012, 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(b)(1).

/s/ Brian Craft
Brian Craft

CERTIFICATE OF CONFERENCE

Counsel for Plaintiff and counsel for Defendants participated in a meet and confer *via* e-mail and discussed the subject motion. Plaintiff is not opposed to this motion.

/s/ Brian Craft
Brian Craft