

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

WI-LAN INC., <p style="text-align: center;">Plaintiff,</p>	§ § § § § § § § § §	Civil Action No. 6:10-cv-521-LED JURY TRIAL DEMANDED
v. ALCATEL-LUCENT USA INC. <i>et al.</i> Defendants.		

PLAINTIFF WI-LAN INC.’S TRIAL WITNESS LIST

Pursuant to the Court’s Docket Control Order entered in this case, Plaintiff Wi-LAN Inc. (“Wi-LAN”) files this Trial Witness List. Wi-LAN files this list subject to and without waiver of its motions in limine, motions to exclude certain evidence, and challenges to experts (if any). Wi-LAN reserves the right to amend or supplement this list, including to identify third-party rebuttal witnesses, in response to Defendants’ expert and pretrial disclosures. Wi-LAN also identifies as potential witnesses all witnesses identified in Defendants’ witness lists.

Subject to the foregoing, at this time, Plaintiff identifies the following witnesses for trial:

	WITNESS	(A) PROBABLY WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
1.	Jonathan Wells (Wi-LAN expert: liability, validity)	√		
2.	John Jarosz (Wi-LAN expert: damages)	√		
3.	Andrew Parolin (Wi-LAN: corporate rep.)	√		
4.	Martin Lysejko (Airspan: inventor)	√		
5.	Paul Struhsaker (Arrasar: inventor)		√	
6.	David Brant (Airspan: Airspan)		√	
7.	Bill Middleton (IP Licensing Consulting: past agreements)		√	

	WITNESS	(A) PROBABLY WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
8.	Christian Dubuc (Wi-LAN: corporate rep.)		√	
9.	Mark Lanning (Defendants' expert: invalidity)		√	
10.	James Olivier (Ericsson/Sony Mobile expert: liability)		√	
11.	Robert Akl (HTC expert: liability)		√	
12.	Stephen Wicker (Alcatel-Lucent expert: liability)		√	
13.	Stephen Becker (Ericsson/Sony Mobile expert: damages)		√	
14.	W. Christopher Bakewell (Alcatel-Lucent/HTC expert: damages)		√	
15.	Alcatel-Lucent Corporate Representative		√	
16.	LME/Ericsson Corporate Representative		√	
17.	Sony Mobile Corporate Representative		√	
18.	HTC / Exedeia Corporate Representative		√	
19.	David Irving (Alcatel-Lucent: damages)	√		
20.	Emad Farag (Alcatel-Lucent: technical)	√		
21.	Susan Miller (Alcatel-Lucent: technical)	√		
22.	Malek Shahid (Alcatel-Lucent: technical)	√		
23.	Said Tatesh (Alcatel-Lucent: technical/standards)			√
24.	Deborah Butler (Alcatel-Lucent: damages)	√		
25.	Matthew Hodulik (Alcatel-Lucent: licensing)	√		
26.	Asok Chatterjee (Ericsson: standards)			√
27.	Helmut Hansen (Ericsson: technical)	√		
28.	Mathias Akervik (Ericsson: technical)			√
29.	Fredrik Gessler (Ericsson: damages)	√		
30.	Per Beming (Ericsson: technical)			√

	WITNESS	(A) PROBABLY WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
31.	Luke McLeroy (Ericsson: licensing)	√		
32.	Jan Derksen (Ericsson: marketing)	√		
33.	Frank Vecella (Ericsson: willfulness, licensing)		√	
34.	Lennart Marten Henry Pehrson (Ericsson: technical)			√
35.	Frank Wu (HTC: technical)	√		
36.	Wan Lin (Lyn) Yu (HTC: licensing)	√		
37.	Marcia Markovich (HTC: marketing)	√		
38.	Hsiu Fen Lai (HTC: sales)		√	
39.	Peter Karlsson (Sony Mobile: technical)	√		
40.	Michael Cromie (Sony Mobile: damages)	√		
41.	Stephen Sneed (Sony Mobile: damages)	√		
42.	Timothy Hernquist (Sony Mobile: financial/marketing)	√		
43.	Albert Lee Hill (Sony Mobile: licensing)	√		
44.	James Mahon (Alston & Bird: past agreements)		√	
45.	Douglas Pulley (Mindspeed Technologies: technical)		√	
46.	Nate Chizgi (Qualcomm: technical)		√	
47.	Ming-Chieh Kuo (Qualcomm: technical)	√		

Dated: November 20, 2012

Respectfully submitted,

By: /s/ Ajeet Pai

Local Counsel

Johnny Ward (TX Bar No. 00794818)
Wesley Hill (TX Bar No. 24032294)
WARD & SMITH LAW FIRM
P.O. Box 1231
1127 Judson Rd., Ste. 220
Longview, TX 75606-1231
Tel: (903) 757-6400
Fax: (903) 757-2323
jw@jwfirm.com
wh@jwfirm.com

David B. Weaver (TX Bar No. 00798576)
Lead Attorney
Avelyn M. Ross (TX Bar No. 24027817)
Ajeet P. Pai (TX Bar No. 24060376)
Syed K. Fareed (TX Bar No. 24065216)
Jeffrey T. Han (TX Bar No. 24069870)
Janice Ta (TX Bar No. 24075138)
Seth A. Lindner (TX Bar No. 24078862)
VINSON & ELKINS LLP
2801 Via Fortuna, Suite 100
Austin, TX 78746
Tel: (512) 542-8400
Fax: (512) 236-3476
dweaver@velaw.com
aross@velaw.com
apai@velaw.com
sfareed@velaw.com
jhan@velaw.com
jta@velaw.com
slindner@velaw.com

Chuck P. Ebertin (CA Bar No. 161374)
VINSON & ELKINS LLP
525 University Avenue, Suite 410
Palo Alto, CA 94301-1918
Tel: (650) 687-8204
Fax: (650) 618-8508
cebertin@velaw.com

Steve R. Borgman (TX Bar No. 02670300)
VINSON & ELKINS LLP
1001 Fannin Street, Suite 2500
Houston, TX 77002-6760
Tel: (713) 758-2222
Fax: (713) 758-2346
sborgman@velaw.com

Wi-LAN@velaw.com

Attorneys for Plaintiff Wi-LAN Inc.

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 on this the 20th day of November, 2012.

/s/ Ajeet Pai

Ajeet P. Pai