

**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-LED

THE ERICSSON AND SONY MOBILE DEFENDANTS’ JOINT REBUTTAL TRIAL WITNESS LIST

Defendants Ericsson Inc., Telefonaktiebolaget LM Ericsson, Sony Mobile Communications AB and Sony Mobile Communications (USA) Inc., in accordance with the Court’s Docket Control Order entered in this case, file this Rebuttal Trial Witness List for identification and categorization of rebuttal trial witnesses.

Defendants reserve the right to provide supplemental witnesses and to identify additional documents and/or witnesses upon receiving further guidance from the Court regarding the trial schedule, or upon receipt of further disclosures from Plaintiff as a result of any order from the Court regarding trial planning.

At this time and in addition to the witnesses identified in Defendants’ Trial Witness List, Defendants identify the following rebuttal witnesses for trial:

WITNESS	Employer	(A) WILL CALL	(B) MAY CALL	(C) MAY, PROB. NOT CALL
Natalya Bezryadina	Wi-LAN Inc.		√	
Shawn McEwan	Wi-LAN Inc.		√	
Mikael Gudmundson	Ericsson		√	

In addition to the witnesses listed herein, Defendants reserve the right to call witnesses designated by any other party on their respective witness lists and rebuttal witness lists. Defendants reserve the right to amend their lists of trial witnesses as appropriate. Specifically, Defendants reserve the right to amend their list of trial witnesses to include: (1) any persons identified on Plaintiff's or any of the other Defendants' Pretrial Disclosures; (2) any persons identified in or related to any documents produced by Plaintiffs after the close of fact discovery; (3) any persons identified in or related to documents produced by Plaintiff after the filing of this identification of rebuttal witnesses; and (4) any person identified during any deposition or related to any deposition testimony provided after the filing of this identification of witnesses. In addition, Defendants reserve the right to elicit testimony from any witness or representative of Plaintiff or other Defendants who appears at trial at any time, regardless of whether Defendants indicated that they would present a witness or representative live or by deposition. Additionally, Defendants reserve the right, should the need arise, to call additional rebuttal witnesses that are not identified above.

Defendants reserve the right to present any of the witnesses live and/or by deposition. Defendants reserve the right to present deposition testimony of individuals designated by any other party. Defendants further reserve the right to amend their designations of testimony as appropriate including at least for the reasons specifically enumerated above. Finally, Defendants reserve the right to designate and/or counter-designate deposition testimony from any witness or representative of Plaintiff or other Defendants who are presented by deposition at trial.

Dated: November 30, 2012

Respectfully submitted,

/s/ Richard L. Wynne, Jr.
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SONY MOBILE COMMUNICATIONS (USA) INC.

CERTIFICATE OF SERVICE

On November 30, 2012, a true and correct copy of the foregoing document was served in compliance with Local Rule 5.1 and have been served on all counsel who have consented to electronic service and all other counsel by regular mail

/s/ Richard L. Wynne, Jr.
Richard L. Wynne, Jr.