

**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 REBUTTAL TRIAL WITNESS LIST

Pursuant to the Court’s Docket Control Order entered in this case, Plaintiff Wi-LAN Inc. (“Wi-LAN”) files this Rebuttal 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 rebuttal witnesses all witnesses identified in Defendants’ witness lists.

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

	WITNESS	(A) PROBABLY WILL CALL IN REBUTTAL	(B) MAY CALL IN REBUTTAL
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)		√

	WITNESS	(A) PROBABLY WILL CALL IN REBUTTAL	(B) MAY CALL IN REBUTTAL
5.	Paul Struhsaker (Arrasar: inventor)		√
6.	David Brant (Airspan: Airspan)		√
7.	Bill Middleton (IP Licensing Consulting: past agreements)		√
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 / Exedea 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:		√

	WITNESS	(A) PROBABLY WILL CALL IN REBUTTAL	(B) MAY CALL IN REBUTTAL
	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)		√
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 (Lynn) Yu (HTC: licensing)		√
37.	Marcia Markovich (HTC: marketing)		√
38.	Hsiu Lai Fen (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)		√

	WITNESS	(A) PROBABLY WILL CALL IN REBUTTAL	(B) MAY CALL IN REBUTTAL
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)		√
48.	Mike Woodward (HTC: Sales & marketing) ¹		√
49.	Jason Mackenzie (HTC: Sales & marketing)		√
50.	Shaun McEwan (Wi-LAN: corporate)		√
51.	Natalya Bezryadina (Wi-LAN: corporate)		√
52.	Janne Peisa (Ericsson)		√
53.	Michael Begley (Ericsson: corporate rep.)		√
54.	Roger Burleigh (Ericsson: corporate rep.)		√
55.	Ashok Chatterjee (Ericsson: standards)		√
56.	Fredrik Ovesjo (Ericsson: technical)		√
57.	Mikael Rylander (Ericsson: technical)		√

¹ Wi-LAN does not waive its right to object to untimely disclosed witnesses.

Dated: November 30, 2012

Respectfully submitted,

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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 30th day of November, 2012.

/s/ Ajeet P. Pai

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