

**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 AMENDED TRIAL WITNESS LIST**

Plaintiff Wi-LAN Inc. (“Wi-LAN”) files this Amended Trial Witness List. Wi-LAN files this amended 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)		√	

	<b>WITNESS</b>	<b>(A) PROBABLY WILL CALL</b>	<b>(B) MAY CALL</b>	<b>(C) MAY, BUT PROBABLY WILL NOT CALL</b>
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)			√

	<b>WITNESS</b>	<b>(A) PROBABLY WILL CALL</b>	<b>(B) MAY CALL</b>	<b>(C) MAY, BUT PROBABLY WILL NOT CALL</b>
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)	√		
48.	Yan Liu (Qualcomm: technical)		√	

Dated: January 18, 2013

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 18th day of January, 2013.

*/s/ Ajeet Pai*

\_\_\_\_\_  
Ajeet P. Pai