

**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> <p style="text-align: center;">Defendants.</p>		

PLAINTIFF WI-LAN INC.’S NOTICE OF PRETRIAL DISCLOSURE

Pursuant to Paragraph 6 of the Court’s July 6, 2011 Discovery Order (Dkt. No. 98), Plaintiff Wi-LAN Inc. hereby notifies the Court that it has complied with the Docket Control Order (Dkt. No. 99, as amended by Dkt. Nos. 216, 226, 230, 232, 238, 242, 246–248, 273, and 293) and with Paragraph 6 of the Discovery Order by serving its Pretrial Disclosures. Wi-LAN’s trial witness list, opening deposition transcript designations, and trial exhibit list are attached to the Proposed Joint Pretrial Order filed as Dkt. No. 311.

Dated: February 14, 2013

Respectfully submitted,

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

By: /s/ Ajeet P. Pai
 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)
 Seth A. Lindner (TX Bar No. 24078862)
 Janice Ta (TX Bar No. 24075138)
 VINSON & ELKINS LLP
 2801 Via Fortuna, Suite 100

Austin, TX 78746
Tel: (512) 542-8400
Fax: (512) 542-8612
dweaver@velaw.com
aross@velaw.com
apai@velaw.com
sfareed@velaw.com
jhan@velaw.com
slindner@velaw.com
jta@velaw.com

Steve R. Borgman (TX Bar No. 02670300)
Gwendolyn J. Samora
(TX Bar No. 00784899)
VINSON & ELKINS LLP
1001 Fannin Street, Suite 2500
Houston, TX 77002-6760
Tel: (713) 758-2222
Fax: (713) 758-2346
sborgman@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
cebertain@velaw.com

Constance S. Huttner
(NY Bar No. 1722024)
VINSON & ELKINS LLP
666 5th Avenue, 26th Floor
New York, NY 10103-0040
Tel: (212) 237-0040
Fax: (917) 849-5339
chuttner@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 and/or fax, on this the 14th day of February, 2013.

/s/ Ajeet P. Pai

Ajeet P. Pai