

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

| | | |
|--------------------------------------|---|----------------------------------|
| WI-LAN INC., |) | |
| |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | |
| |) | Civil Action No. 6:10-CV-521-LED |
| ALCATEL-LUCENT USA INC.; |) | |
| TELEFONAKTIEBOLAGET LM |) | JURY TRIAL DEMANDED |
| ERICSSON; ERICSSON INC.; SONY MOBILE |) | |
| COMMUNICATIONS AB; SONY MOBILE |) | |
| COMMUNICATIONS (USA) INC.; HTC |) | |
| CORPORATION; HTC AMERICA, INC.; |) | |
| EXEDEA INC. |) | |
| |) | |
| Defendants. |) | |
| |) | |

**DEFENDANTS’ UNOPPOSED MOTION FOR LEAVE
TO DESIGNATE ADDITIONAL EXHIBITS FOR TRIAL**

Defendants hereby file their Unopposed Motion for Leave to Designate Additional Exhibits for Trial. Plaintiff Wi-LAN Inc. (“Wi-LAN”) does not oppose this motion.

Defendants respectfully move for leave to increase the number of exhibits the parties may designate for trial. This case involves four separate Defendants, each accused of infringing multiple claims of the four patents-in-suit, and over 80 accused products. Moreover, two of the Defendants have raised breach-of-contract counterclaims. The parties have been working together diligently to narrow the number of exhibits needed to be designated for trial. Defendants now respectfully request leave for each side to designate 400 exhibits for trial. This Motion is not intended to burden the Court but is rather intended to allow the parties to fully and fairly present their case and reduce the number of issues which must be brought before the Court during trial. The parties will continue to endeavor to reduce the number of trial exhibits and

objections as trial approaches. Good cause exists to increase the exhibit limits here based on the number of Defendants, the number of asserted claims and accused products, and the overall complexity of this case.

Dated: February 14, 2013

Respectfully submitted,

By: /s/ Akshay S. Deoras

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CERTIFICATE OF CONFERENCE

I hereby certify that on February 6, 2013, and February 13, 2013, counsel for Defendants conferred with Ajeet Pai, counsel for Plaintiff, regarding this motion. Counsel for Plaintiff stated that Plaintiff does not oppose the motion.

/s/ Akshay S. Deoras

Akshay S. Deoras

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a) on this the 14th day of February, 2013. As such, this document was served on all counsel who are deemed to have consented to electronic service.

/s/ Akshay S. Deoras

Akshay S. Deoras