

EXHIBIT A

**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.; <i>et al.</i>	§	JURY TRIAL DEMANDED
	§	
Defendants.	§	
	§	

**PLAINTIFF WI-LAN INC.'S REBUTTAL DESIGNATIONS AND OBJECTIONS TO
DEFENDANTS ALCATEL-LUCENT, ERICSSON AND SONY MOBILE
DEPOSITION DESIGNATIONS**

Please take notice that Plaintiff Wi-LAN Inc. ("Wi-LAN") hereby makes the following objections and rebuttal-designations to Defendants' trial deposition designations served February 13, 2013:

Witness	AL-E-SM Deposition Designations	Wi-LAN's Objections	Wi-LAN's Rebuttal Designations
Natalya Bezryadina	9:2-9:4		
11/7/2012	9:7-9:12		
	10:18-10:19		
	11:9-11:16	402 R/ 403	
	12:19-12:21	CS/ I	
	12:23-13:2	CS/ I	13:04-13:06
	14:4-14:4		
	14:6-14:8	BS/ 403/ CS	20:17-20:19; 20:21-20:21; 21:03-21:05
	21:15-22:4	BS/ 403	
	22:6-22:6	BS/ 403	
	22:8-22:11	BS/ 403	
	29:21-29:22	403	
	29:24-29:25	403	
	38:7-38:9	BS/ 402 R	
	38:11-38:11		

Witness	AL-E-SM Deposition Designations	Wi-LAN's Objections	Wi-LAN's Rebuttal Designations
David Brant	12:16-13:2		
6/29/2012	14:18-14:25		
	15:8-16:5		
	16:14-16:21		
	18:5-18:11		
	36:18-37:5	402 R/ 403	
	37:9-37:10	402 R/ 403	
	41:8-41:11	E/ BS/ 403	
	41:15-41:16	E/ BS/ 403	
	42:6-42:12		
	42:19-43:16		
	43:19-43:19		
	48:18-49:25		
	51:4-51:8	CS/ 403/ BS/ E/ L	15:08—16:17
	51:10-51:13	CS/ 403/ BS/ E/ L	
	56:23-57:1	402 R/ 403/ BS	
	64:18-64:24	CS/ 403/ BS/ E/ L	
	65:1-65:7	CS/ 403/ BS/ E/ L	
	66:9-66:12	403	66:20—67:23
	66:14-66:19	403	66:20—67:23
	71:4-71:17	403/ E/ L	72:24—73:03
	71:20-72:9	403/ E/ L	72:24—73:03
	72:11-72:23	403/ E/ L	72:24—73:03
	93:19-94:18	403/ E/ L	72:24—73:03
	94:20-94:20	403/ E/ L	72:24—73:03
	95:6-96:16	402 R/ 403	
	98:5-98:22	403	98:23—99:14
	101:14-101:16	402 R/ 403	
	101:18-101:24	402 R/ 403	
	102:2-102:16	402 R/ 403	
	105:7-105:15	106	20:05—25:04 (already designated)
	105:17-105:25	106	20:05—25:04 (already designated)
	106:3-106:4	106	20:05—25:04 (already designated)
	106:7-106:8	106	20:05—25:04 (already designated)
	108:4-108:18		
	109:20-111:22	402 R/ 403	
	111:24-112:3	402 R/ 403	
	112:17-113:14	402 R/ 403	
	114:22-114:24	402 R/ 403	
	115:2-115:3	402 R/ 403	
	115:6-115:13	402 R/ 403	

Witness	AL-E-SM Deposition Designations	Wi-LAN's Objections	Wi-LAN's Rebuttal Designations
	117:4-117:13	402 R/ 403/ 106	120:1—124:9
	119:5-119:8	402 R/ 403/ 106	120:1—124:9
	119:11-119:25	402 R/ 403/ 106	120:1—124:9
	122:8-122:24	402 R/ 403/ 106	120:1—124:9
	123:1-123:1	402 R/ 403/ 106	120:1—124:9
	127:22-128:9	402 R/ 403	
	128:11-128:13	402 R/ 403	
	128:15-128:19	402 R/ 403	
	128:22-129:4	402 R/ 403	
	129:10-129:15		
	129:18-129:23		
	129:25-130:4		
	130:6-130:6		
	130:16-130:19		
	130:25-131:3	402 R/ 403	
	131:6-131:16	402 R/ 403	
	131:18-131:23	402 R/ 403	
	131:25-132:3	402 R/ 403	
	132:5-132:5	402 R/ 403	
	133:13-133:17	106	132:15—133:20
	133:20-133:20		
	134:5-134:13	402 R/ 403	
	134:19-135:3	402 R/ 403	
	135:5-135:13	402 R/ 403	
	135:16-136:20	402 R/ 403	
	136:22-137:7	402 R/ 403	
	137:10-138:10	402 R/ 403	
	138:12-138:18	402 R/ 403	
	138:21-139:23	402 R/ 403	
	140:1-140:24	402 R/ 403	
	141:1-141:20	402 R/ 403	
	141:23-142:8	402 R/ 403	
	142:11-143:8	402 R/ 403	
	143:10-144:6	402 R/ 403	
	144:9-144:19	402 R/ 403	
	144:23-145:11	402 R/ 403	
	145:14-145:23	402 R/ 403	
	148:14-148:20	402 R/ 403/ ID	
	148:23-148:23	402 R/ 403/ ID	
	149:5-149:14	402 R/ 403/ ID	
	149:16-150:3	402 R/ 403/ ID	
	150:6-150:16	402 R/ 403/ ID	
	150:19-152:21	402 R/ 403/ ID	
	152:23-153:3	402 R/ 403/ ID	
	153:5-153:5	402 R/ 403/ ID	
	154:1-154:5	402 R/ 403/ ID	

Witness	AL-E-SM Deposition Designations	Wi-LAN's Objections	Wi-LAN's Rebuttal Designations
	154:8-154:24	402 R/ 403/ ID	
	155:1-155:1	402 R/ 403/ ID	
	155:3-156:11	402 R/ 403/ ID	
	156:20-157:16	402 R/ 403/ ID	
	157:19-157:20	402 R/ 403/ ID	
	157:23-157:23	402 R/ 403/ ID	
	157:25-158:11	402 R/ 403/ ID	
	158:13-158:16	402 R/ 403/ ID	
	158:19-158:23	402 R/ 403/ ID	
	159:1-159:1	402 R/ 403/ ID	
	161:14-161:17	402 R/ 403	
	161:19-161:25	402 R/ 403	
	162:13-163:3	402 R/ 403	
	163:5-164:5	402 R/ 403	
	164:8-164:9	402 R/ 403	
	167:19-168:2	106	167:19—168:11
	168:24-169:16	402 R/ 403	
	169:19-169:20	402 R/ 403	
	169:23-169:23	402 R/ 403	
	170:2-170:6	402 R/ 403	
	170:9-170:14	402 R/ 403	
	170:17-170:20	402 R/ 403	
	174:9-174:11	402 R/ 403	
	174:14-175:2	402 R/ 403	
	175:4-175:4	402 R/ 403	
	175:13-175:15	402 R/ 403	
	175:18-175:19	402 R/ 403	
	190:20-191:5	402 R/ 403/ BS	
	191:6-191:7	402 R/ 403/ BS	
	195:5-195:7	402 R/ 403/ BS	
	195:9-195:19	402 R/ 403/ BS	
	195:21-195:23	402 R/ 403/ BS	
	195:25-196:2	402 R/ 403/ BS	
	197:19-197:25	402 R/ 403/ BS	
	198:2-198:3	402 R/ 403/ BS	
	198:5-198:11	402 R/ 403/ BS	
	198:14-198:15	402 R/ 403/ BS	
	199:10-199:14	CS/ 402 R/ 403	
	199:17-199:19	CS/ 402 R/ 403	
	200:7-200:9	CS/ 402 R/ 403	
	200:12-200:14	CS/ 402 R/ 403	
	201:17-201:19	CS/ 402 R/ 403	
	201:22-201:22	CS/ 402 R/ 403	
	201:24-202:2	CS/ 402 R/ 403	
	202:5-202:9	CS/ 402 R/ 403	

Witness	AL-E-SM Deposition Designations	Wi-LAN's Objections	Wi-LAN's Rebuttal Designations
	212:22-213:6	402 R/ 403/ BS/ E/ L	210:11—210:14 (already designated) 236:9—237:8
	213:8-213:11	402 R/ 403/ BS/ E/ L	210:11—210:14 (already designated) 236:9—237:8
	213:13-213:18	402 R/ 403/ BS/ E/ L	210:11—14 (already designated) 236:9—237:8
	213:21-213:24	402 R/ 403/ BS/ E/ L	210:11—14 (already designated) 236:9—237:8
	214:1-214:5	402 R/ 403/ BS/ E/ L	210:11—14 (already designated) 236:9—237:8
	214:8-214:13	402 R/ 403/ BS/ E/ L	210:11—14 (already designated) 236:9—237:8
	214:24-215:1	402 R/ 403/ BS/ E/ L	210:11—14 (already designated) 236:9—237:8
	215:3-215:7	402 R/ 403/ BS/ E/ L	210:11—14 (already designated) 236:9—237:8
	215:9-215:9	402 R/ 403/ BS/ E/ L	210:11—14 (already designated) 236:9—237:8
	222:4-222:7	402 R/ 403/ BS	
	222:9-222:18	402 R/ 403/ BS	
	224:24-225:2	402 R/ 403/ BS	236:9—237:8
	225:4-225:9	402 R/ 403/ BS	236:9—237:8
	225:11-225:15	402 R/ 403/ BS	236:9—237:8
	225:18-225:22	402 R/ 403/ BS	236:9—237:8
	225:24-226:3	402 R/ 403/ BS	236:9—237:8
	226:5-226:20	402 R/ 403/ BS	236:9—237:8
	226:23-226:25	402 R/ 403/ BS	236:9—237:8
	230:14-230:17	402 R/ 403/ BS	
	230:19-230:19	402 R/ 403/ BS	

Witness	AL-E-SM Deposition Designations	Wi-LAN's Objections	Wi-LAN's Rebuttal Designations
Christian Dubuc	10:20-11:5		
8/22/2012	20:6-20:12		
	20:20-21:3		
	21:9-21:23		
	21:25-23:3		
	33:1-33:4	402 R/ 403	
	48:6-48:11	402 R/ 403	
	49:5-49:12	402 R/ 403	
	49:14-49:14	402 R/ 403	
	51:6-51:18	402 R/ 403	
	73:6-73:8	402 R/ 403	
	73:10-73:11	402 R/ 403	
	78:11-78:13	402 R/ 403	
	78:15-78:18	402 R/ 403	
	80:4-80:9	402 R/ 403/ E	
	80:15-80:22	402 R/ 403/ E	
	85:14-85:16	402 R/ 403/ E/ L	
	85:18-85:22	402 R/ 403/ E/ L	
	92:6-92:8	CS/ H/ 402 R/ 403/ BS/ E/ L	
	92:11-92:11	CS/ H/ 402 R/ 403/ BS/ E/ L	
	92:15-92:18	402 R/ 403/ E/ L	
	92:20-93:2	402 R/ 403/ E/ L	
	93:3-93:7	402 R/ 403/ BS/ E/ L	
	93:9-93:11	402 R/ 403/ BS/ E/ L	
	94:6-94:12	402 R/ 403/ E/ L	
	94:15-94:25	402 R/ 403/ E/ L	
	95:11-95:13	CS/ 402 R/ 403/ BS/ E/ L	
	95:15-96:4	CS/ 402 R/ 403/ BS/ E/ L	
	96:7-96:23	CS/ 402 R/ 403/ BS/ E/ L	
	97:9-98:17	CS/ 402 R/ 403/ BS/ E/ L	
	98:20-99:1	CS/ 402 R/ 403/ BS/ E/ L	
	105:9-105:10	402 R/ 403	
	105:12-105:22	402 R/ 403	
	107:3-107:8	402 R/ 403	
	107:22-107:24	402 R/ 403	
	108:1-108:12	402 R/ 403	
	108:14-108:16	CS/ 402 R/ 403/ BS	
	108:19-108:25	CS/ 402 R/ 403/ BS	
	109:3-109:4	402 R/ 403	
	109:7-109:11	402 R/ 403	
	117:19-119:2	402 R/ 403/ BS	

Witness	AL-E-SM Deposition Designations	Wi-LAN's Objections	Wi-LAN's Rebuttal Designations
	119:5-119:8	402 R/ 403/ BS	
	119:10-119:12	402 R/ 403/ BS	
	119:14-119:20	402 R/ 403/ BS	
	120:14-120:16	402 R/ 403	
	120:18-120:18	402 R/ 403	
	120:20-120:22	402 R/ 403/ BS	
	120:25-121:4	402 R/ 403/ BS	
	124:3-124:9	402 R/ 403/ BS	
	128:14-128:18	402 R/ 403	
	128:20-128:23	402 R/ 403	
	130:25-131:8	402 R/ 403	
	131:10-131:15	402 R/ 403	
	161:5-161:7	402 R/ 403/ E/ L/ ML	
	161:9-161:9	402 R/ 403/ E/ L/ ML	
	163:18-163:22	402 R/ 403/ ML	
	163:24-163:24	402 R/ 403/ ML	
	165:4-165:18	402 R/ 403/ E/ L	
	165:20-166:18	402 R/ 403/ E/ L	
	167:25-168:4	402 R/ 403	
	168:10-168:15	402 R/ 403	
	168:17-168:17	402 R/ 403	
	168:19-168:21	402 R/ 403	
	170:1-170:3	402 R/ 403/ P	
	170:9-170:11	402 R/ 403/ P	
	176:8-176:16	402 R/ 403/ BS	
	176:18-176:18	402 R/ 403/ BS	
	176:24-177:1	402 R/ 403	
	177:11-177:13	402 R/ 403/ ML	
	177:15-177:22	402 R/ 403/ ML	
	178:3-178:9	402 R/ 403	
	178:11-178:17	402 R/ 403	
	178:18-178:21	402 R/ 403	
	179:2-179:8	402 R/ 403	
	179:10-179:15	402 R/ 403	
	180:5-180:22	402 R/ 403/ BS	
	181:3-181:4	402 R/ 403/ BS	
	182:5-182:21	402 R/ 403	
	182:23-182:23	402 R/ 403	
	183:8-183:12	402 R/ 403	
	183:24-184:24	402 R/ 403	
	185:1-185:5	402 R/ 403	
	185:9-185:11	402 R/ 403	

Witness	AL-E-SM Deposition Designations	Wi-LAN's Objections	Wi-LAN's Rebuttal Designations
	185:20-185:22	402 R/ 403/ ML	
	185:24-185:24	402 R/ 403/ ML	
	188:10-188:11	402 R/ 403	
	188:13-188:19	402 R/ 403	
	191:1-191:7	402 R/ 403/ ML	
	191:13-191:16	402 R/ 403/ ML	
	191:18-191:22	402 R/ 403/ ML	
	191:25-192:2	402 R/ 403/ ML	
	192:4-192:6	402 R/ 403/ ML	
	193:13-193:16	402 R/ 403/ ML	
	193:18-194:14	402 R/ 403/ ML	
	195:3-195:7	402 R/ 403	
	195:14-195:16	402 R/ 403	
	195:18-196:4	402 R/ 403	
	196:8-196:9	402 R/ 403	
	197:18-197:24	CS/ 402 R/ 403	
	198:1-198:5	CS/ 402 R/ 403	
	201:9-201:13	402 R/ 403	
	201:19-201:24	402 R/ 403	
	202:13-202:14	402 R/ 403/ BS/ E/ L	
	202:17-202:18	402 R/ 403/ BS/ E/ L	
	204:17-204:22	402 R/ 403/ BS/ E/ L	
	205:3-205:10	402 R/ 403/ BS/ E/ L	
	209:4-209:7		
	209:10-209:16		
	210:3-210:9		
	210:12-210:17		
	210:21-211:6		
	213:4-213:7		
	213:10-213:11		
	213:13-213:18		
	213:21-213:25		
	214:4-214:8	402 R/ 403/ BS/ ML	
	214:12-214:23	402 R/ 403/ BS/ ML	
	215:1-215:1	402 R/ 403/ BS/ ML	
	221:12-221:13	402 R/ 403/ BS	
	221:15-221:15	402 R/ 403/ BS	
	225:4-225:23		
	226:1-226:2		
	227:14-228:10		
	228:12-229:17		
	229:19-230:25	402 R/ 403	

Witness	AL-E-SM Deposition Designations	Wi-LAN's Objections	Wi-LAN's Rebuttal Designations
	231:13-232:15	402 R/ 403/ BS	
	232:18-232:19	402 R/ 403/ BS	
	233:8-233:13	402 R/ 403/ BS	
	233:15-234:7	402 R/ 403/ BS	
	235:14-235:20	402 R/ 403	
	235:22-236:5	402 R/ 403	
	236:17-236:19	402 R/ 403/ BS	
	236:22-236:23	402 R/ 403/ BS	
	237:8-237:9	402 R/ 403/ BS	
	237:12-237:18	402 R/ 403/ BS	
	237:20-237:20	402 R/ 403/ BS	
	239:7-239:10	CS/ 402 R/ 403/ BS	
	239:13-239:20	CS/ 402 R/ 403/ BS	
	254:6-254:10	402 R/ 403/ BS	
	254:12-254:15	402 R/ 403/ BS	
	261:12-261:17		
	261:20-261:25		
	262:2-262:3		
	262:5-262:8		
	262:23-263:1		
	263:3-263:11	402 R/ 403/ BS	
	263:14-263:18	402 R/ 403/ BS	
	263:21-264:2	402 R/ 403/ BS	
	264:5-264:9	402 R/ 403/ BS	
	264:11-264:14	402 R/ 403/ BS	
	264:16-265:4	402 R/ 403/ BS	
	265:7-265:19	402 R/ 403/ BS	
	265:21-265:24	402 R/ 403/ BS	
	266:2-266:2	402 R/ 403/ BS	
	311:5-311:10	402 R/ 403/ BS	
	311:15-311:22	402 R/ 403/ BS	
	327:12-327:14	402 R/ 403/ BS	
	327:16-327:17		
	343:19-344:2		
	344:7-344:10	402 R/ 403/ ML	
	344:17-344:20	402 R/ 403/ ML	
	345:9-345:20	CS/ 402 R/ 403/ ML	
	346:17-346:19	CS/ 402 R/ 403/ ML	
	346:21-347:13	402 R/ 403	
	348:20-348:23	402 R/ 403	
	348:25-349:6	402 R/ 403/ ML	
	351:4-351:13	402 R/ 403/ ML	
	351:15-351:20	402 R/ 403/ ML	
	351:22-351:23	402 R/ 403/ ML	

Witness	AL-E-SM Deposition Designations	Wi-LAN's Objections	Wi-LAN's Rebuttal Designations
	351:25-353:2	402 R/ 403/ BS	
Martin Lysejko 6/28/2012	11:24-12:1		
	12:2-12:4		
	12:5-12:8		
	12:9-12:12		
	12:13-12:15		
	12:16-12:19		
	13:13-14:10		
	23:5-23:20	402 R/ 403	
	25:12-25:15	402 R/ 403	
	35:3-35:5	402 R/ 403	
	35:7-35:8	402 R/ 403	
	35:10-35:10	402 R/ 403	
	35:14-35:16	402 R/ 403	
	35:18-35:18	402 R/ 403	
	35:20-36:2	402 R/ 403	
	36:11-37:19	402 R/ 403	
	39:1-41:2	402 R/ 403	
	41:4-41:4	402 R/ 403/ E	
	41:9-41:9	402 R/ 403/ E	
	44:1-44:5	402 R/ 403	
	44:17-44:19	402 R/ 403	
	44:23-45:2	402 R/ 403	
	45:11-45:25	402 R/ 403	
	46:7-46:11	402 R/ 403	
	46:19-46:22	402 R/ 403	
	46:24-47:2	402 R/ 403	
	47:19-47:23	402 R/ 403	
	48:5-48:5	402 R/ 403	
	48:7-48:14	402 R/ 403	
	48:20-49:1	402 R/ 403	
	49:3-49:14	402 R/ 403	
	49:25-50:2	402 R/ 403	
	58:18-59:4	402 R/ 403	
	59:10-59:14	402 R/ 403	
	60:14-60:25	402 R/ 403	
	61:4-61:7	402 R/ 403	
	74:14-74:23	402 R/ 403	
	75:21-76:9	402 R/ 403	
	77:15-78:1	CS/ H/ 402 R/ 403/ E/ L	
	78:13-79:22	CS/ H/ 402 R/ 403/ E/ L	
	80:1-80:24	CS/ H/ 402 R/ 403/ E/ L	

Witness	AL-E-SM Deposition Designations	Wi-LAN's Objections	Wi-LAN's Rebuttal Designations
	82:4-86:8	CS/ H/ 402 R/ 403/ E/ L	
	98:8-99:7	CS/ H/ 402 R/ 403/ E/ L	
	99:11-99:11	CS/ H/ 402 R/ 403/ E/ L	
	99:13-99:18	CS/ H/ 402 R/ 403/ E/ L	
	100:22-100:25	CS/ H/ 402 R/ 403/ E/ L	
	101:3-101:4	CS/ H/ 402 R/ 403/ E/ L	
	105:3-105:4	CS/ 402 R/ 403/ L	
	105:9-105:11	CS/ 402 R/ 403/ L	
	106:23-107:16	CS/ 402 R/ 403/ L	
	108:9-108:11	CS/ 402 R/ 403/ L	
	108:13-108:23	CS/ 402 R/ 403/ L	
	112:11-112:17	402 R/ 403/ L	
	113:14-113:23	402 R/ 403/ L	
	113:25-114:8	402 R/ 403/ L	
	114:10-114:16	402 R/ 403/ L	
	114:18-114:18	402 R/ 403/ L	
	115:5-115:13	CS/ 402 R/ 403/ L	
	115:19-116:6	402 R/ 403/ L	
	116:24-117:2	402 R/ 403	
	117:15-117:17	402 R/ 403	
	117:19-117:21	402 R/ 403	
	119:7-119:21	402 R/ 403/ E/ L	
	120:13-120:21	402 R/ 403/ E/ L	
	120:22-120:24	402 R/ 403/ E/ L	
	123:18-123:20	402 R/ 403/ E/ L	
	127:2-127:6	402 R/ 403/ E/ L	
	127:9-127:12	402 R/ 403/ E/ L	
	128:20-130:2	402 R/ 403/ E/ L	
	130:22-131:12	402 R/ 403/ E/ L	
	133:21-133:22	402 R/ 403/ E/ L	
	133:24-134:9	402 R/ 403/ E/ L	
	134:12-134:15	402 R/ 403/ E/ L	
	134:17-134:19	402 R/ 403/ E/ L	
	134:21-134:22	402 R/ 403/ E/ L	
	134:24-135:1	402 R/ 403/ E/ L	
	135:4-135:5	402 R/ 403/ ID	
	145:9-145:23	402 R/ 403/ ID	
	145:25-145:25	402 R/ 403/ ID	
	146:11-146:13	402 R/ 403/ ID	
	146:16-146:20	402 R/ 403/ E/ L	
	155:17-155:20	402 R/ 403/ E/ L	
	155:23-156:17	402 R/ 403/ E/ L	
	156:19-156:19	402 R/ 403/ E/ L	

Witness	AL-E-SM Deposition Designations	Wi-LAN's Objections	Wi-LAN's Rebuttal Designations
	161:25-162:8	402 R/ 403/ E/ L	
	162:16-162:25	402 R/ 403/ E/ L	
	163:2-163:2	402 R/ 403/ E/ L	
	163:4-163:5	402 R/ 403/ E/ L	
	163:7-163:9	402 R/ 403/ E/ L	
	163:11-163:11	402 R/ 403/ E/ L	
	166:11-166:14	402 R/ 403/ E/ L	
	166:17-166:17	402 R/ 403/ E/ L	
	166:19-166:19	402 R/ 403/ E/ L	
	166:22-166:22	402 R/ 403/ E/ L	
	167:5-167:17	402 R/ 403/ E/ L	
	167:23-167:25	402 R/ 403/ E/ L	
	168:2-169:4	402 R/ 403/ E/ L	
	169:6-169:8	402 R/ 403/ E	
	169:25-170:2		
	172:2-172:4	402 R/ 403/ E/ L	
	173:13-173:13	402 R/ 403/ E/ L	
	173:15-174:3	402 R/ 403/ E/ L	
	174:25-175:2	402 R/ 403/ E/ L	
	175:5-175:9	402 R/ 403/ E/ L	
	175:11-175:14	402 R/ 403/ E/ L	
	175:16-175:17	402 R/ 403/ E/ L	
	175:20-176:8	402 R/ 403/ E/ L	
	186:2-186:4	402 R/ 403/ E/ L	
	186:7-186:9		
	187:1-187:3	402 R/ 403/ E/ L	
	187:19-187:21	402 R/ 403/ E/ L	
	187:24-188:6	402 R/ 403/ E/ L	
	188:23-188:25	402 R/ 403/ E/ L	
	189:2-189:5	402 R/ 403/ E/ L	
	189:7-189:10	402 R/ 403/ E/ L	
	189:13-189:15	402 R/ 403/ E/ L	
	189:17-191:5	402 R/ 403/ E/ L	
	191:9-191:9	402 R/ 403/ E/ L	
	191:11-191:13	402 R/ 403/ E/ L	
	191:16-191:17	402 R/ 403/ E/ L	
	191:19-191:21	402 R/ 403/ E/ L	
	191:23-192:1	402 R/ 403/ E/ L	
	192:3-192:5	402 R/ 403/ E/ L	
	192:7-192:9	402 R/ 403/ E/ L	
	192:15-192:16	402 R/ 403/ E/ L	
	192:18-192:19	402 R/ 403/ E/ L	

Witness	AL-E-SM Deposition Designations	Wi-LAN's Objections	Wi-LAN's Rebuttal Designations
	192:21-193:3	402 R/ 403/ E/ L	
	193:17-193:20	402 R/ 403/ E/ L	
	193:22-193:23	402 R/ 403/ E/ L	
	193:25-194:21	402 R/ 403/ E/ L	
	194:23-194:23	402 R/ 403/ E/ L	
	194:25-195:13	402 R/ 403/ E/ L	
	195:16-195:16	402 R/ 403	
	202:14-202:24	402 R/ 403	
	210:25-212:2	402 R/ 403	
	212:4-212:4	402 R/ 403	
	212:6-212:12	402 R/ 403	
	213:7-213:8	402 R/ 403	
	213:10-213:11	402 R/ 403	
	213:24-214:14	402 R/ 403	
	214:16-215:5	402 R/ 403	
	215:13-215:20	402 R/ 403	
	220:6-220:19	402 R/ 403	
	220:21-220:22	402 R/ 403	221:4—221:17; 227:17—228:14
	223:21-224:11	402 R/ 403	221:4—221:17; 227:17—228:14
	224:13-224:17	402 R/ 403	221:4—221:17; 227:17—228:14
	224:19-224:24	402 R/ 403	221:4—221:17; 227:17—228:14
	225:1-225:1	402 R/ 403	221:4—221:17; 227:17—228:14
	226:19-226:23	402 R/ 403	221:4—221:17; 227:17—228:14
	227:1-227:9	402 R/ 403	221:4—221:17; 227:17—228:14
	228:16-228:22	402 R/ 403	221:4—221:17; 227:17—228:14
Shaun McEwan	8:6-8:8		
10/19/2012	8:13-8:16		
	20:8-20:12		
	20:17-20:19	R	
	21:13-21:15	403/ 402 R	
	21:17-21:17	403/ 402 R	
	22:2-22:6	R	

Witness	AL-E-SM Deposition Designations	Wi-LAN's Objections	Wi-LAN's Rebuttal Designations
	25:9-25:11	403/ 402 R	
	25:13-25:13		
	26:8-26:9	403/ BS/ F/ CS	
	26:11-26:11	403/ BS/ F/ CS	
	26:13-26:15	403/ BS/ F/ CS	
	26:17-26:17	403/ BS/ F/ CS	
	33:11-33:15	403/ BS/ F/ CS	
	33:17-33:17	403/ BS/ F/ CS	
	45:2-45:5	403/ I	
	45:7-45:15		
	45:17-45:19		45:20-46:01; 46:03-46:09
	46:11-46:13		
	46:15-46:18		
	59:24-60:4		
	60:7-60:14		
	78:16-78:20	403/ I	78:21-79:05
	82:14-82:16	403/ BS/ CS/ 402 R	
	82:19-82:19	403/ BS/ CS/ 402 R	
	82:21-83:10	403/ BS/ CS/ 402 R	
	83:12-84:14	403/ BS/ CS/ 402 R	
	84:16-85:4	403/ BS/ CS/ 402 R	
	85:6-85:14	403/ BS/ CS/ 402 R	
	85:16-85:19	403/ BS/ CS/ 402 R	
	88:8-88:15	403/ BS/ CS/ 402 R/ ML	
	113:23-114:22		
	114:24-115:9		
	115:11-116:15	403/ CS	
	116:17-116:22	403/ CS	
	116:24-117:3	403/ CS	
	117:5-117:10	403/ CS	
	117:12-118:6	403/ CS/ 402 R	
	118:8-118:24		
	119:3-119:5	CS	

Witness	AL-E-SM Deposition Designations	Wi-LAN's Objections	Wi-LAN's Rebuttal Designations
	119:7-119:7	CS	
	127:3-127:11	BS/ CS/ F	
	128:24-129:19	403/ CS/ I	129:20-129:22; 129:24-129:24; 130:01-130:06
	130:7-130:10		
	130:13-131:2	403/ BS/ I	
	131:4-131:9	403/ BS/ I	
	131:11-131:22	403/ BS/ I	131:23-132:03; 132:06-132:06; 132:08-133:02
	133:4-133:7		
	133:9-133:10		
	133:20-133:25		
	134:3-134:5		
	134:7-135:3		
	135:5-135:16		
	135:18-135:24		
	137:7-137:9	403/ BS	
	137:11-137:16	403/ BS	
	166:21-166:25	402 R/ 403/ CS/ BS	
	167:6-168:6	402 R/ 403/ CS/ BS	
	168:8-168:16	402 R/ 403/ CS/ BS	
	168:18-168:18	402 R/ 403/ CS/ BS	
	170:11-170:13	402 R/ 403/ CS/ BS	
	170:15-170:16	402 R/ 403/ CS/ BS	
	170:22-171:7	402 R/ 403/ CS/ BS	
	171:12-171:17	402 R/ 403/ CS/ BS	
	172:6-172:23		
	173:22-174:5	CS/ BS	
	174:7-174:16	CS/ BS	
	174:18-174:20		
	174:22-174:23		
	174:25-175:2		
	175:22-176:5	402 R/ 403/ CS/ BS	
	183:20-183:23	402 R/ 403/ BS	
	183:25-184:2	402 R/ 403/ BS	
	184:4-184:17	402 R/ 403/ BS	
	184:19-184:20	402 R/ 403/ BS	
	191:20-193:3	402 R/ 403/ BS	
	194:14-194:22	402 R/ 403	
	195:4-195:14	402 R/ 403	
	195:20-196:7	402 R/ 403	
	200:14-200:17	403/ F/ BS/ CS/ L	

Witness	AL-E-SM Deposition Designations	Wi-LAN's Objections	Wi-LAN's Rebuttal Designations
	200:19-200:24	403/ F/ BS/ CS/ L	
	201:1-201:5	403/ F/ BS/ CS/ L	
	201:7-201:7	403/ F/ BS/ CS/ L	
	206:20-206:21	403/ MS/ML/ BS/ I	
	206:23-207:12	403/ MS/ML/ BS/ I	207:14-208:02
	208:3-208:11	403/ BS	
	208:12-209:21	403/ BS	
	209:23-209:23	403/ BS	
	229:4-229:21	402 R/ 403/ CS	
	251:12-251:24		
	252:1-252:1		
	253:16-254:6	402 R/ 403/ BS/ CS	
William Middleton	9:6-9:9		
9/28/2012	10:19-11:2	402 R/ 403	
	402 R/ 403	402 R/ 403	
	12:25-13:6	402 R/ 403/ I	
	13:11-13:14	402 R/ 403/ I	
	13:16-14:11	402 R/ 403/ I	
	14:13-14:18	402 R/ 403/ I	14:20-15:02
	15:3-15:5	402 R/ 403/ I	
	15:7-15:11	402 R/ 403/ I	
	19:4-19:8		
	26:17-27:16		
	32:13-33:14		
	35:8-35:11		
	35:24-36:4		
	36:6-36:13		
	39:8-39:14	402 R/ 403/ BS	
	40:11-40:14	402 R/ 403/ BS	
	41:3-41:7	402 R/ 403/ BS	
	41:14-41:16	402 R/ 403/ BS	
	47:12-48:4	402 R/ 403	
	48:6-49:2		
	49:4-50:20		
	50:22-51:22		
	51:25-52:10		
	52:16-52:24		
	69:2-69:4		
	69:6-69:19		
	70:15-71:8		
	71:10-72:2		

Witness	AL-E-SM Deposition Designations	Wi-LAN's Objections	Wi-LAN's Rebuttal Designations
	72:4-72:16	CS	
	78:2-78:25	CS	
	80:11-80:14	H	
	80:16-80:24		
	83:9-83:11	402 R/ 403/ CS	
	83:13-83:16	402 R/ 403/ CS	
	83:18-83:23	402 R/ 403/ CS	
	83:25-84:4	402 R/ 403/ CS	
	90:13-90:22	402 R/ 403	
	91:2-91:5	402 R/ 403	
	91:25-92:18	402 R/ 403	
	92:20-92:25	402 R/ 403	
	94:2-94:7	402 R/ 403	
	94:19-94:25	402 R/ 403	
	95:8-95:10	402 R/ 403	
	111:20-112:9	402 R/ 403/ I	
	112:12-112:12	402 R/ 403/ I	
	113:2-113:8	402 R/ 403/ I	
	113:10-113:15	402 R/ 403/ I	
	113:17-113:19	402 R/ 403/ I	113:21-113:22; 113:25-114:22
	115:9-115:13	402 R/ 403/ I	
	115:15-115:25	402 R/ 403/ I	
	116:7-116:7	402 R/ 403/ I	
	117:22-117:24	402 R/ 403/ I	
	117:25-118:13	402 R/ 403/ I	
	118:15-118:16	402 R/ 403/ I	
	127:10-127:13		
	127:15-127:19		
	128:1-128:3		
	128:5-128:9		
	128:11-128:11		
	128:22-128:25	I	
	129:2-129:3		
	130:18-130:20		130:01-130:02; 130:04-130:05; 130:07-130:10; 130:13-130:16
	130:22-130:24		
	135:5-135:9		
	135:11-135:16		
	137:5-137:11		

Witness	AL-E-SM Deposition Designations	Wi-LAN's Objections	Wi-LAN's Rebuttal Designations
	137:13-137:21		
	138:24-139:3	402 R/ 403/ CS	
	139:5-139:11	402 R/ 403/ CS	
	139:13-139:15	402 R/ 403/ CS	
	140:1-140:4		
	140:14-141:6		
	141:8-142:2		
	142:4-142:13	CS	
	146:1-146:12		
	155:22-156:5		
	156:8-156:15		
	156:22-157:11	403	
	157:13-157:23	403	
	157:25-158:6		
	162:20-163:3		
	163:4-163:8		
	163:9-163:11		
	163:13-163:16		
	164:16-164:20	402 R/ BS	
	165:2-165:8	BS/ I	165:09-165:12; 165:14-165:18; 166:9-166:12; 166:14-166:17
	187:20-187:22		
	188:19-189:3	402 R/ 403/ BS	
	190:21-191:10	402 R/ 403/ BS	
	191:12-191:13	402 R/ 403/ BS	
	191:16-191:16	402 R/ 403/ BS	
	192:2-192:7	402 R/ 403/ BS	
	192:9-192:10	402 R/ 403/ BS	
	192:12-192:17	402 R/ 403/ BS	
	192:19-192:23	402 R/ 403/ BS	
	192:25-193:1	402 R/ 403/ BS	
	193:3-193:4	402 R/ 403/ BS	
	195:9-195:12	402 R/ 403/ BS	
	195:19-195:23	402 R/ 403/ BS	
	196:9-196:12	402 R/ 403/ BS	
	196:16-197:4	402 R/ 403/ BS	
	197:9-197:10	402 R/ 403/ BS	
	197:24-198:2	402 R/ 403/ BS	
	198:4-198:12	402 R/ 403/ BS	
	198:15-198:17	402 R/ 403/ BS	
	199:14-199:17	402 R/ 403/ BS	

Witness	AL-E-SM Deposition Designations	Wi-LAN's Objections	Wi-LAN's Rebuttal Designations
	199:19-199:23	402 R/ 403/ BS	
	199:25-200:8	402 R/ 403/ BS	
	200:10-200:25	402 R/ 403/ BS	
	201:3-201:3	402 R/ 403/ BS	
	201:5-201:20	402 R/ 403/ BS	
	205:22-206:22	402 R/ BS	
	206:25-207:14	402 R/ BS	
	212:7-213:12	402 R/ 403/ BS	
	213:15-214:5	402 R/ 403/ BS	
	214:7-214:7	402 R/ 403/ BS	
	215:7-215:12	BS	
	215:15-215:17	BS	
	216:1-216:22	BS	
	216:24-216:25	BS	
	217:2-217:7	BS	
	217:9-217:20	BS	
	217:23-218:8	BS	219:23-220:01; 220:03-220:06
	220:8-220:10	403/ BS/ I	
	220:12-220:15	403/ BS/ I	221:14-221:16; 221:18-221:21; 222:09-222:19
	236:18-236:20	403/ BS/ I	
	236:22-236:23	403/ BS/ I	236:25-237:05
	240:12-240:15	BS	
	240:18-240:21	BS	
	254:13-254:17	401/ 403/ BS/ P	
	254:23-254:24	401/ 403/ BS/ P	
	267:17-267:23	403/ BS/ F	
	268:1-268:1	403/ BS/ F	
	268:3-268:9	403/ BS/ F	
	273:2-273:6	403/ BS/ F	
	273:9-273:10	403/ BS/ F	
	275:22-276:17	402 R/ 403/ BS	
	288:6-288:18	402 R/ 403/ BS	
	294:24-295:15	403/ BS/ ML	
	296:8-296:15	403/ BS/ ML	
	296:18-296:24	403/ BS/ ML	
	297:1-297:7	403/ BS/ ML	
	297:9-297:16	403/ BS/ ML	
	313:7-313:11	401/ 403/ BS	
	313:13-314:1	401/ 403/ BS	

Witness	AL-E-SM Deposition Designations	Wi-LAN's Objections	Wi-LAN's Rebuttal Designations
	320:15-320:20	403/ BS	319:18-319:20; 319:22-320:13
	320:22-320:22	403/ BS	
	320:24-321:4	403/ BS	
	321:7-321:16	403/ BS	
	321:19-321:23	403/ BS	
	322:1-322:13	403/ BS	
	322:15-322:16	403/ BS	
	345:12-345:13	403/ BS	
	345:15-345:19	403/ BS	
	345:21-346:4	403/ BS	
	353:1-353:4	401/ 402 R/ 403/ BS/ F	
	354:8-354:21	401/ 402 R/ 403/ BS/ F	
	354:24-355:5	401/ 402 R/ 403/ BS/ F	
	355:7-355:8	401/ 402 R/ 403/ BS/ F	
	355:10-355:21	401/ 402 R/ 403/ BS/ F	
	355:23-355:25	401/ 402 R/ 403/ BS/ F	
	367:20-367:25	401/ 403/ BS	
Andrew Parolin	9:3-9:6		
8/31/2012	9:9-9:20		
	11:10-12:2		
	12:4-12:10		
	25:25-26:1		
	26:3-26:7		
	26:14-26:20		
	39:1-39:7	403/ I	
	63:4-63:10		
	63:12-63:21	BS/ E	
	67:22-67:25		
	68:2-68:3		68:05-68:06; 68:08-68:15
	69:4-69:6	401	
	69:8-69:18	403	
	73:7-73:16	401/ 402 R/ 403	
	73:18-73:20	401/ 402 R/ 403	
	73:22-73:24	401/ 402 R/ 403	
	74:1-74:3	401/ 402 R/ 403	
	74:5-74:6	401/ 402 R/ 403	
	74:25-75:5	I	75:06-75:08; 75:10-75:11
	77:16-77:21		
	77:23-78:4		
	78:6-78:11		

Witness	AL-E-SM Deposition Designations	Wi-LAN's Objections	Wi-LAN's Rebuttal Designations
	81:7-81:17	403	
	81:19-81:19	403	
	82:8-82:13	401	
	83:21-83:22	403/ BS/ I/ E/ CS	
	83:24-84:3	403/ BS/ I/ E/ CS	
	84:6-84:11	403/ BS/ I/ E/ CS	84:12-84:17; 84:19-85:06
	87:13-87:20	403	
	87:22-87:23	403	
	89:25-90:2	402 R/ 403/ BS/ L	
	90:4-90:7	402 R/ 403/ BS/ L	
	90:9-90:10	402 R/ 403/ BS/ L	
	90:16-91:7	402 R/ 403/ BS/ L	
	105:9-105:10	401/ 402 R/ L/ F	
	105:13-105:17	401/ 402 R/ L/ F	
	111:23-112:8		
	112:11-112:11		
	112:13-113:16		
	113:18-113:25		
	114:2-114:11		
	115:18-115:20		
	115:22-115:25		
	117:5-117:6	403/ BS/ I/ ML	116:21-117:04
	117:9-117:9	403/ BS/ I/ ML	
	119:14-119:19	401/ 403	
	119:21-119:23	401/ 403	
	126:13-126:16	401/ 403	
	126:18-126:23	401/ 403	
	126:25-127:11	401/ 403	
	127:13-127:20	401/ 403	
	127:22-127:25	401/ 403	132:20-132:22; 132:25-133:03
	158:14-158:15	403	
	158:17-158:18	403	
	160:1-160:12	403/ ML	
	160:14-160:14	403/ ML	
	160:16-160:21	403/ ML	
	160:23-161:5	403/ ML	
	161:7-161:10	403/ ML	
	161:13-161:14	403/ ML	
	165:16-165:19	403	
	165:21-165:22	403	

Witness	AL-E-SM Deposition Designations	Wi-LAN's Objections	Wi-LAN's Rebuttal Designations
	188:21-188:24	402 R/ 403/ BS	
	189:2-189:6	402 R/ 403/ BS	
	189:9-189:11	402 R/ 403/ BS	
	206:2-206:5	403/ ML	
	206:7-206:15	403/ ML	
	206:21-206:21	403/ ML	
	206:23-207:5	403/ ML	
	207:7-207:20	403/ ML	
	207:22-207:24	403/ ML	
	215:20-215:21	401/ 403/ I	
	215:23-216:6	401/ 403/ I	
	216:8-216:18	401/ 403/ I	
	216:20-216:20	401/ 403/ I	216:22-216:22; 216:25-217:12
	219:2-219:6	E	
	219:8-219:9	E	
	220:11-220:13	402 R/ 403	
	220:15-220:24	402 R/ 403	
	221:1-221:10		
	221:12-221:14		
	230:20-231:24		
	232:1-232:12		
	234:7-234:14		
	237:18-238:1	402 R	
	239:2-240:15	401/ 403/ I	
	240:17-240:18		240:34-241:10; 241:12-241:13; 242:02-242:04; 242:06-242:11
	246:18-246:24		
	254:6-255:20		
	255:22-256:8	I	256:09-256:15; 256:17-256:18
	256:19-256:24		257:06-257:08; 257:10-257:10
	260:2-260:10	402 R/ 403	
	260:12-260:16	402 R/ 403	
	260:18-260:18	402 R/ 403	
	260:20-261:4	402 R/ 403	
	261:6-261:6	402 R/ 403	
	261:18-261:24	402 R/ 403	

Witness	AL-E-SM Deposition Designations	Wi-LAN's Objections	Wi-LAN's Rebuttal Designations
	262:1-262:7	402 R/ 403	
	262:9-262:11	402 R/ 403	
	262:13-262:20	402 R/ 403	
	262:22-263:1	402 R/ 403	
	263:3-263:8	402 R/ 403	
	263:10-263:12	402 R/ 403	
	265:3-266:2		
	266:4-266:9		
	266:11-266:16		
	266:18-266:23		
	266:25-267:7		
	267:9-267:11		
	267:13-267:22	401/ 403	
	267:24-268:4	401/ 403	
	268:6-268:12		
	272:21-272:24	402 R/ 403/ I	
	273:2-273:4	402 R/ 403/ I	
	273:6-273:9	402 R/ 403/ I	273:10-273:12; 273:14-273:15; 274:07-274:10
	274:13-274:15	401/ 402 R/ 403	
	274:17-274:17	401/ 402 R/ 403	
	274:19-274:20	401/ 402 R/ 403	
	274:22-275:3	401/ 402 R/ 403	
	275:5-275:8	401/ 402 R/ 403	
	277:13-277:15	401/ 402 R/ 403	
	277:17-277:17	401/ 402 R/ 403	
	278:4-278:7		
	278:9-278:11		
	278:13-278:17	403/ E	
	279:4-279:7	403/ E/ BS	
	279:10-279:14	403/ E/ BS	
	283:21-284:5	401/ 402 R/ 403	
	284:7-284:12	401/ 402 R/ 403	
	285:3-285:7		
	285:9-285:16		
	285:18-286:2		
	286:4-286:12		
	288:18-288:21		
	288:23-288:25		
	289:2-289:3		
	290:22-290:23	403/ ML	
	290:25-291:1	403/ ML	
	299:18-299:21	401/ 402 R/ 403	

Witness	AL-E-SM Deposition Designations	Wi-LAN's Objections	Wi-LAN's Rebuttal Designations
	299:23-299:25	401/ 402 R/ 403	
	300:2-300:5	401/ 402 R/ 403	
	300:7-300:8	401/ 402 R/ 403	
	300:10-300:13	401/ 402 R/ 403	
	300:15-300:15	401/ 402 R/ 403	
	300:17-300:20	401/ 402 R/ 403	
	300:22-300:22	401/ 402 R/ 403	
	300:24-301:1	401/ 402 R/ 403	
	302:17-302:19	403/ I	
	302:21-302:23	403/ I	
	302:25-303:5	403/ I	303:07-303:09; 303:11-303:14
	303:16-303:19		
	303:21-303:22		
	310:10-310:11		
	310:13-310:15		
	311:4-311:7		
	311:9-311:12		
	311:14-311:19	401/ 402 R/ 403	
	311:21-311:21	401/ 402 R/ 403	
	329:23-330:23		
	331:1-331:14		
	331:23-332:15		
	334:14-334:19		
	334:21-334:21		
	337:11-337:13		
	337:15-337:20		
	360:3-360:6	403/ BS/ E	
	360:9-360:9	403/ BS/ E	
	360:11-360:14	403/ BS/ E	
	360:17-360:17	403/ BS/ E	
	360:19-360:21	403/ BS/ E	
	360:24-360:24	403/ BS/ E	361:19-361:22
	361:23-362:5	403/ E/ I/ BS	
	362:7-362:7	403/ E/ I/ BS	
	398:7-398:10	402 R/ 403	
	398:12-399:8	402 R/ 403	
Douglas Pulley	6:5-6:8		
7/26/2012	6:15-6:17		
	6:21-7:1		
	7:4-7:5		
	7:12-7:18		
	102:12-102:15	403	
	102:18-102:24	403	

Witness	AL-E-SM Deposition Designations	Wi-LAN's Objections	Wi-LAN's Rebuttal Designations
	103:1-103:5	403	
	103:10-103:13	403	
	137:22-138:3	403/ I	138:4-11; 138:14-139:3; 203:19-204:18; 204:21-205:8; 205:11-21; 205:24-206:3
	203:8-203:10	403	
	203:13-203:17	403/ I	203:19-204:18; 204:21-205:8; 205:11-205: 21; 205:24-206:3
Paul Struhsaker	7:21-7:23		
<u>7/2/2012</u>	10:17-10:21		
	11:3-11:6		
	15:18-15:21	402 R/ 403	
	15:23-15:23	402 R/ 403	
	25:2-25:6		
	27:19-27:21		
	29:24-30:3	402 R/ 403/ E/ L	
	30:7-30:14	402 R/ 403/ E/ L	
	35:12-35:15		
	37:15-38:4	402 R/ 403	
	62:18-63:1		
	64:14-65:6		
	67:4-68:2	402 R/ 403/ E	
	68:5-68:11	402 R/ 403/ E	
	68:13-68:20	402 R/ 403/ E	
	70:2-70:23	402 R/ 403	
	78:15-78:19	402 R/ 403	
	83:14-83:19		
	84:10-84:14		
	85:4-85:5	402 R/ 403/ E/ L	
	85:8-85:12	402 R/ 403/ E/ L	
	87:19-88:6	402 R/ 403/ E/ L	
	88:8-88:10	402 R/ 403/ E/ L	
	90:22-91:5	402 R/ 403/ E/ L	
	95:4-95:9	402 R/ 403/ E/ L	
	115:17-115:22		
	116:3-116:16		
	117:15-117:18	402 R/ 403	

Witness	AL-E-SM Deposition Designations	Wi-LAN's Objections	Wi-LAN's Rebuttal Designations
	118:17-119:22	402 R/ 403	
	123:16-123:23	402 R/ 403	
	184:12-185:5	402 R/ 403	
	186:1-186:5	402 R/ 403	

Wi-LAN further objects to any testimony designated by any Defendant that violates any ruling of the Court/ including rulings related to the parties' forthcoming Motions in Limine. Wi-LAN further objections to Defendants' designations to the extent they exceed the length permitted by the Court's standing order. Wi-LAN reserves the right to amend its objections and deposition designations to respond to issues raised and/or resolved after the submission of this list. Wi-LAN also reserves the right to designate the depositions of any witnesses that any Defendant removes from its Witness List identified as "will call" and/or "may call." In making any designations above, Wi-LAN is not in any way waiving any objections to the admissibility of any of Defendant's designations.

OBJECTION KEY TO DEPOSITION DESIGNATIONS

Abbreviation	Objection
CS	Calls for Speculation
H	Hearsay
402/R	Irrelevant
403	Unduly Prejudicial / Confusing / Vague / Misleading / Cumulative / Out of Context/ Attorney Objection
BS	Improper 30(b)(6) testimony / Beyond Scope
E	Improper Expert Testimony
I or 106	Incomplete
P	Privileged
L	Call for Legal Conclusion
ID/WD	Inaccurate Description/Insufficient Identification of Exhibit
MS/ML	Subject to Motion to Strike or Motion in Limine
F	Lack of proper foundation
xxx	FRE xxx

Dated: February 25, 2013

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 and/or fax, on this the 25th day of February, 2013.

/s/ David B. Weaver

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