

**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’ OBJECTIONS TO PLAINTIFF WI-LAN’S
FIRST AMENDED TRIAL EXHIBIT LIST**

PLEASE TAKE NOTICE THAT Defendants Alcatel-Lucent USA Inc., Telefonaktiebolaget LM Ericsson, Ericsson Inc., Sony Mobile Communications AB, Sony Mobile Communications (USA) Inc., HTC Corporation, HTC America, Inc., and Exedeia Inc. (“Defendants”) hereby attach as Exhibit A the following objections to Wi-LAN’s trial exhibits served March 4, 2013 and March 11, 2013.

Defendants object to the admission of one Defendant’s documents against any other Defendant. One party’s admissions are not admissible against any other party to prove any disputed issue in this case and such evidence is irrelevant and prejudicial against any other co-defendant.

OBJECTION KEY

R = Lacks Relevance (FRE 401/402)	MIL = Subject to motion <i>in limine</i>
H = Hearsay (FRE 802)	901 or A = lacks authentication (FRE 901)
O = Improper Opinion (FRE 701/702)	NT = contains text in a foreign language that is not translated into English
F = Lacks Foundation/Speculative (FRE 602)	26(a) = Exhibit inadmissible during expert testimony where expert did not disclose document in expert opinion served pursuant to Fed. R Civ. P 26(a)(2)(B)
V = Vague/Ambiguous	I = Improper/Incomplete Document
P = Privilege	S = Speculation
408 = Settlement (FRE 408)	403 = Unduly prejudicial/confusion/waste of time (FRE 403)
LC = Legal Conclusion	AF = Assumes facts not in evidence
C or D = Cumulative/Duplicated Exhibit	M = contains more than one documents or is an improper collection of documents
BE = Best Evidence (FRE 1001-1008)	703 = relied upon by expert, but otherwise inadmissible (FRE 703)
ILL = Illegible	U = Untimely (<i>e.g.</i> , not produced in discovery)
ID = Incorrect Description	

Dated: March 11, 2013

Respectfully submitted,

By: /s/ Akshay S. Deoras

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 13th day of March, 2013. Any other counsel of record will be served by first class U.S. mail on this same date.

/s/ Akshay S. Deoras _____
Akshay S. Deoras