

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

WI-LAN INC.,

Plaintiff,

v.

ALCATEL-LUCENT USA INC., *et al.*,

Defendants.

Civil Action No. 6:10-cv-521-LED

JURY TRIAL DEMANDED

STIPULATION

Plaintiff Wi-LAN, Inc. ("Wi-LAN") hereby agrees and stipulates, solely for this lawsuit and for the purpose of resolving a discovery dispute between the parties, as follows with respect to the November 1, 2007, Patent and Conflict Resolution Agreements between Wi-LAN and Telefonaktiebolaget LM Ericsson and between Wi-LAN and Sony Ericsson Mobile Communications (USA) Inc.:

Wi-LAN believes that HSPA-compliant products infringe one or more of the patents listed in Schedule A to the Patent and Conflict Resolution Agreements.

Dated: September 21, 2012

Respectfully submitted,

By: 

David B. Weaver (TX Bar No. 00798576)

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