

**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.	)	
	)	

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**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. Two of the Defendants have raised breach-of-contract counterclaims. The Court previously granted Defendants’ unopposed motion for permission for each side to designate 400 exhibits for trial. (Dkt. No. 315.) In March, after Defendants submitted their trial exhibit list, Wi-LAN produced additional documents. In light of this production, Defendants respectfully request permission for each side to designate 425 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 above.

Dated: May 24, 2013

Respectfully submitted,

By: /s/ Akshay S. Deoras

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**CERTIFICATE OF CONFERENCE**

I hereby certify that on the 23rd and 24th of May, 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*  
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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 24th day of May, 2013. As such, this document was served on all counsel who are deemed to have consented to electronic service.

*/s/ Akshay S. Deoras*  
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Akshay S. Deoras