

**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.	)	
_____	)	
WI-LAN INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 6:13-CV-252-LED
	)	
HTC CORPORATION, <i>et al.</i> ,	)	
	)	
Defendants.	)	
_____	)	

**DEFENDANTS’ NOTICE OF TRIAL WITNESS LIST**

Defendants in the above captioned matter, pursuant to the Joint Pretrial Order (D.I. 311), file this Notice of Trial Witness List for identification and categorization of trial witnesses. Defendants reserve the right to call any witness appearing on any opening or rebuttal trial witness lists of Wi-LAN Inc.; Alcatel-Lucent USA Inc., Telefonaktiebolaget LM Ericsson; Ericsson Inc.; Sony Mobile Communications AB; Sony Mobile Communications (USA) Inc.; HTC Corporation; HTC America, Inc.; or Exedea Inc. Defendants include in this Trial Witness List individuals who may be listed on Wi-LAN’s opening and rebuttal witness lists without waiving any right to object to Wi-LAN’s presentation of such witnesses at trial, without waiving any objections to the admissibility of any such testimony, and without waiving the right to move

for the exclusion of any testimony. Defendants reserve the right to amend and/or supplement this list to the extent permitted by the Federal Rules of Civil Procedure, by the Local Rules, or by other Order of this Court.

At this time, Defendants identify the following witnesses who are expected to be called live for trial:

<b>Witnesses</b>
Robert Akl
W. Christopher Bakewell
Stephen L. Becker, Ph.D.
Mike Cromie
Fredrik Gessler, Ph.D.
Mark Lanning
Jason MacKenzie
James L. Olivier, Ph.D.
Joseph Tarallo
Said Tatesh, Ph.D.
Stephen Wicker, Ph.D.

Defendants also note the following revised witness lists:

Alcatel-Lucent USA Inc.:

	<b>WITNESS</b>	<b>(A) WILL CALL LIVE</b>	<b>(B) MAY CALL LIVE OR BY DEPOSITION</b>	<b>(C) MAY, BUT PROBABLY WILL NOT, CALL LIVE OR BY DEPOSITION</b>
<b>1.</b>	<b>W. Christopher Bakewell</b> Employer: Duff and Phelps Topic: Expert testimony - Damages	√		
<b>2.</b>	<b>Mark Lanning</b> Employer: Reticle Consulting, Inc.; Telecom Architects, Inc. Topic: Expert testimony - Invalidity	√		

<b>3.</b>	<b>Stephen Wicker</b> Employer: Cornell University Topic: Expert testimony - Noninfringement	√		
<b>4.</b>	<b>William Zucker</b> Employer: Alcatel-Lucent Topic: Alcatel-Lucent corporate testimony; Corporate background; Background of the accused products			√
<b>5.</b>	<b>Joseph Tarallo</b> Employer: Alcatel-Lucent Topic: Alcatel-Lucent corporate testimony; Corporate background; Background of the accused products	√		
<b>6.</b>	<b>Natalya Bezryadina</b> Employer: Wi-LAN Topic: Wi-LAN corporate testimony			√
<b>7.</b>	<b>David Brant</b> Employer: Airspan Networks, Inc. Topic: Airspan corporate testimony		√	
<b>8.</b>	<b>Debora Butler</b> Employer: Alcatel-Lucent Topic: Sales		√	
<b>9.</b>	<b>Christian Dubuc</b> Employer: Wi-LAN Topic: Wi-LAN corporate testimony		√	
<b>10.</b>	<b>Emad Farag</b> Employer: Alcatel-Lucent Topic: Technical		√	
<b>11.</b>	<b>Matthew Hodulik</b> Employer: Alcatel-Lucent Topic: Licensing		√	
<b>12.</b>	<b>David Irving</b> Employer: Alcatel-Lucent Topic: Marketing and technical		√	

<b>13.</b>	<b>Martin Lysejko</b> Employer: Airspan Networks, Inc. Topic: Patents-in-suit; invention; prior art		√	
<b>14.</b>	<b>Shaun McEwan</b> Employer: Wi-LAN Topic: Wi-LAN corporate testimony		√	
<b>15.</b>	<b>William Middleton</b> Employer: IP Licensing Consulting, Inc. Topic: Wi-LAN corporate testimony		√	
<b>16.</b>	<b>Andrew Parolin</b> Employer: Wi-LAN Topic: Wi-LAN corporate testimony		√	
<b>17.</b>	<b>Douglas Pulley</b> Employer: Mindspeed Technologies, Inc. Topic: Technical		√	
<b>18.</b>	<b>Malek Shahid</b> Employer: Alcatel-Lucent Topic: Marketing and technical		√	
<b>19.</b>	<b>Paul Struhsaker</b> Employer: Consultant Topic: Patents-in-suit; invention; prior art		√	
<b>20.</b>	<b>Said Tatesh</b> Employer: Alcatel-Lucent Topic: Standards	√		
<b>21.</b>	<b>Per Beming</b> Employer: Ericsson Topic: Standards		√	
<b>22.</b>	<b>Susan Miller</b> Employer: Alcatel-Lucent Topic: Technical			√

Telefonaktiebolaget LM Ericsson; Ericsson Inc.; Sony Mobile Communications AB;

Sony Mobile Communications (USA) Inc.:

<b>WITNESS</b>	<b>Employer</b>	<b>(A) WILL CALL</b>	<b>(B) MAY CALL</b>	<b>(C) MAY, PROB. NOT CALL</b>	<b>Subject Matter</b>
Stephen L. Becker, Ph.D.	(Expert Witness)	√			Expert Testimony Damages
Mark Lanning	(Expert Witness)	√			Expert Testimony Technical
James L. Olivier, Ph.D.	(Expert Witness)	√			Expert Testimony Technical
Michael Begley	Ericsson			√	Corporate Testimony
Per Beming	Ericsson		√		Corporate Testimony
David Brandt	Airspan Networks, Inc.	√			Corporate Testimony (depo)
Mike Cromie	Sony Mobile	√			Corporate Testimony
Christian Dubuc	Wi-LAN Inc.		√		Corporate Testimony (depo)
Fredrik Gessler	Ericsson	√			Corporate Testimony
Helmut Hansen	Ericsson			√	Corporate Testimony
Tim Hernquist	Sony Mobile			√	Corporate Testimony
Jim Mahon	Andrews Kurth, LLP			√	Corporate Testimony
Martin Lysejko	Airspan Networks, Inc.	√			Invention, Patent Prosecution, Prior Art (depo)
Bill Middleton	Wi-LAN, Inc.		√		Corporate Testimony (depo)
Andrew Parolin	Wi-LAN, Inc.		√		Corporate Testimony
Paul F. Struhsaker	Consultant		√		Invention, Patent Prosecution, Prior Art (depo)
Frank Vecella	Ericsson			√	Corporate Testimony
Wi-LAN Corporate Representative	Wi-LAN, Inc.		√		Corporate Testimony
Shawn McEwan	Wi-LAN Inc.		√		Corporate Testimony (depo)

HTC Corporation; HTC America, Inc.; or Exedea Inc.:

<b>No.</b>	<b>Witness</b>	<b>Employer</b>	<b>Topic</b>	<b>Likelihood</b>
1	Robert Akl	University of North Texas	Non-infringement	Will Call
2	Chris Bakewell	Duff & Phelps	Damages	Will Call
3	Mark Lanning	Reticle Consulting, Inc.; Telecom Architects, Inc.	Invalidity	Will Call
4	Hsiu Lai Fen	HTC	Sales and marketing	May, But Probably Will Not Call
5	Jason Mackenzie	HTC	Corporate, Sales and Marketing	Will Call
6	Marcia Markovich	HTC	Marketing	May Call
7	Mike Woodward	HTC	Sales and marketing	May, But Probably Will Not Call
8	Frank Wu	HTC	Technical	May, But Probably Will Not Call
9	Lynn Yu	HTC	Licensing	May, But Probably Will Not Call
10	Nate Chizgi	Qualcomm	Technical and Corporate	May, But Probably Will Not Call
11	Ming-Chieh Kuo	Qualcomm	Technical and corporate	May, But Probably Will Not Call
12	David Brandt	Airspan	Airspan corporate	May Call
13	Martin Lysejko	Airspan	Patents-in-suit, invention, prior art	May Call
14	Paul Struhsaker	Airspan	Patents-in-suit, invention, prior art	May Call

<b>No.</b>	<b>Witness</b>	<b>Employer</b>	<b>Topic</b>	<b>Likelihood</b>
15	Joemanne Chi Cheung Yeung	Airspan	Patents-in-suit, invention, prior art	May, But Probably Will Not Call
16	Charles Fish	Baker Botts	Patent prosecution	May, But Probably Will Not Call
17	Natalya Bezryadina	Wi-LAN	Wi-LAN corporate and royalties	May Call
18	Christian Dubuc	Wi-LAN	Wi-LAN corporate	May Call
19	Shaun McEwan	Wi-LAN	Wi-LAN corporate	May Call
20	William Middleton	Consulting	Wi-LAN corporate and licensing	May Call
21	Andrew Parolin	Wi-LAN	Wi-LAN corporate	May Call
22	Yan Liu	Qualcomm	Technical and Corporate	May, But Probably Will Not Call

Dated: July 3, 2013

Respectfully submitted,

By: /s/ Akshay S. Deoras (w/ permission)

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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 3rd day of July, 2013. Any other counsel of record will be served by first class U.S. mail on this same date.

*/s/ Richard L. Wynne, Jr.*

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Richard L. Wynne, Jr.