

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

WI-LAN INC.,	§	
	§	
Plaintiff,	§	
	§	Civil Action No. 6:10-cv-521-LED
v.	§	Civil Action No. 6:13-cv-252-LED
	§	
ALCATEL-LUCENT USA INC. <i>et al.</i>	§	JURY TRIAL DEMANDED
	§	
Defendants.	§	
	§	

PLAINTIFF WI-LAN INC.’S AMENDED TRIAL WITNESS LIST

Pursuant to agreement of this parties, Plaintiff Wi-LAN Inc. (“Wi-LAN”) provides this Amended Trial Witness List containing (a) an identification of each previously-listed witness expected to be called live on direct examination during trial and (b) a good-faith narrowing of all other previously-listed witnesses. Wi-LAN files this amended list subject to and without waiver of its motions in limine, motions to exclude certain evidence, and challenges to experts (if any). Wi-LAN reserves the right to amend or supplement this list, including to identify third-party rebuttal witnesses, in response to Defendants’ disclosures. Wi-LAN also identifies as potential witnesses or rebuttal witnesses all witnesses identified in Defendants’ witness lists.

Subject to the foregoing, at this time, Plaintiff identifies the following witnesses for trial:

	WITNESS	(A) PROBABLY WILL CALL ¹	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
1.	Jonathan Wells (Wi-LAN expert: liability, validity)	√ (live)		
2.	John Jarosz (Wi-LAN expert: damages)	√ (live)		
3.	Andrew Parolin (Wi-LAN: corporate rep.)	√ (live)		

¹ At this time, and without prejudice to its rights to call other witnesses as necessary, Wi-LAN expects witness numbers 1–4 to be called live on direct examination during trial.

	WITNESS	(A) PROBABLY WILL CALL¹	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
4.	Paul Struhsaker (Cablevision: inventor)	√ (live)		
5.	Martin Lysejko (Airspan: inventor)	√		
6.	David Brant (Airspan: Airspan)		√	
7.	Bill Middleton (IP Licensing Consulting: past agreements)			√
8.	Christian Dubuc (Wi-LAN: corporate rep.)			√
9.	Mark Lanning (Defendants' expert: invalidity)			√
10.	James Olivier (Ericsson/Sony Mobile expert: liability)			√
11.	Robert Akl (HTC expert: liability)			√
12.	Stephen Wicker (Alcatel-Lucent expert: liability)			√
13.	Stephen Becker (Ericsson/Sony Mobile expert: damages)			√
14.	W. Christopher Bakewell (Alcatel-Lucent/HTC expert: damages)			√
15.	Alcatel-Lucent Corporate Representative		√	
16.	LME/Ericsson Corporate Representative		√	
17.	Sony Mobile Corporate Representative		√	
18.	HTC / Exedeia Corporate Representative		√	
19.	David Irving (Alcatel-Lucent: damages)	√		
20.	Emad Farag (Alcatel-Lucent: technical)	√		
21.	Susan Miller (Alcatel-Lucent: technical)	√		
22.	Malek Shahid (Alcatel-Lucent: technical)			√
23.	Said Tatesh (Alcatel-Lucent: technical/standards)		√	
24.	Deborah Butler (Alcatel-Lucent: damages)		√	
25.	Matthew Hodulik (Alcatel-Lucent: licensing)	√		

	WITNESS	(A) PROBABLY WILL CALL¹	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
26.	Asok Chatterjee (Ericsson: standards)			√
27.	Helmut Hansen (Ericsson: technical)			√
28.	Mathias Akervik (Ericsson: technical)			√
29.	Fredrik Gessler (Ericsson: damages)	√		
30.	Per Beming (Ericsson: technical)			√
31.	Luke McLeroy (Ericsson: licensing)	√		
32.	Jan Derksen (Ericsson: marketing)	√		
33.	Frank Vecella (Ericsson: willfulness, licensing)			√
34.	Lennart Marten Henry Pehrson (Ericsson: technical)	√		
35.	Frank Wu (HTC: technical)	√		
36.	Wan Lin (Lyn) Yu (HTC: licensing)	√		
37.	Marcia Markovich (HTC: marketing)	√		
38.	Hsiu Fen Lai (HTC: sales)			√
39.	Peter Karlsson (Sony Mobile: technical)			√
40.	Michael Cromie (Sony Mobile: damages)			√
41.	Stephen Sneed (Sony Mobile: damages)			√
42.	Timothy Hernquist (Sony Mobile: financial/marketing)	√		
43.	Albert Lee Hill (Sony Mobile: licensing)			√
44.	James Mahon (Alston & Bird: past agreements)			√
45.	Douglas Pulley (Mindspeed Technologies: technical)			√
46.	Nate Chizgi (Qualcomm: technical)			√
47.	Ming-Chieh Kuo (Qualcomm: technical)	√		
48.	Yan Liu (Qualcomm: technical)	√		

	WITNESS	(A) PROBABLY WILL CALL¹	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
49.	Mike Woodward (HTC: Sales & marketing) ²			√
50.	Jason Mackenzie (HTC: Sales & marketing)			√
51.	Shaun McEwan (Wi-LAN: corporate)		√	
52.	Natalya Bezryadina (Wi-LAN: corporate)			√
53.	Janne Peisa (Ericsson)			√
54.	Michael Begley (Ericsson: corporate rep.)			√
55.	Roger Burleigh (Ericsson: corporate rep.)			√
56.	Fredrik Ovesjo (Ericsson: technical)			√
57.	Mikael Rylander (Ericsson: technical)	√		
58.	Joseph Tarallo (Alcatel-Lucent)		√	
59.	William Zucker (Alcatel-Lucent)	√		

² Wi-LAN does not waive its right to object to untimely disclosed witnesses.

Dated: July 6, 2013

Respectfully submitted,

By: /s/ Ajeet P. Pai

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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 on this the 6th day of July, 2013.

/s/ Ajeet P. Pai

Ajeet P. Pai