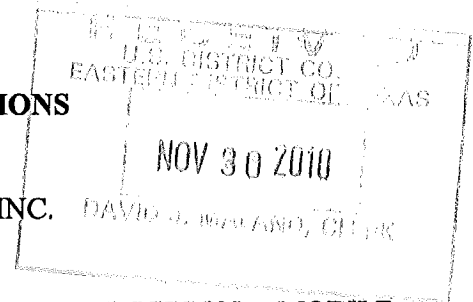


WAIVER OF SERVICE OF SUMMONS

TO: Juliet M. Dirba, attorney of record for Plaintiff WI-LAN INC.

I, Richard L. Wynne, Jr., attorney for SONY ERICSSON MOBILE COMMUNICATIONS AB, acknowledge receipt of your request that I waive service of summons in the action of *Wi-LAN Inc. v. Alcatel-Lucent USA Inc., et al.*, which is case number 6:10-cv-00521-LED in the United States District Court for the Eastern District of Texas, Tyler Division.

On behalf of SONY ERICSSON MOBILE COMMUNICATIONS AB, I have also received a copy of the complaint in the action, two copies of this instrument, and a means by which I can return the signed waiver to you without cost to SONY ERICSSON MOBILE COMMUNICATIONS AB.

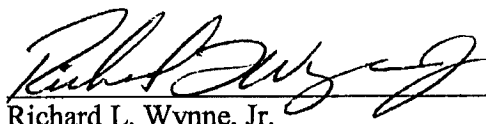
SONY ERICSSON MOBILE COMMUNICATIONS AB agrees to save the cost of service of a summons and an additional copy of the complaint in this lawsuit by not requiring that it be served with judicial process in the manner provided by Rule 4.

SONY ERICSSON MOBILE COMMUNICATIONS AB will retain all defenses or objections to the lawsuit or to the jurisdiction or venue of the court except for objections based on a defect in the summons or in the service of the summons.

I understand that a judgment may be entered against SONY ERICSSON MOBILE COMMUNICATIONS AB if an answer or motion under Rule 12 is not served upon WI-LAN INC. by January 23, 2011.

Dated: _____

11/23/10



Richard L. Wynne, Jr.
Texas Bar No. 24003214
THOMPSON & KNIGHT LLP
One Arts Plaza
1722 Routh Street, Suite 1500
Dallas, Texas 75201
214.969.1386
214.880.3267 (facsimile)

ATTORNEY FOR DEFENDANT
SONY ERICSSON MOBILE COMMUNICATIONS AB

Duty to Avoid Unnecessary Costs of Service of Summons

Rule 4 of the Federal Rules of Civil Procedure requires certain defendants to cooperate in saving unnecessary expenses of serving a summons and complaint. A defendant who is located in the United States and who fails to return a signed waiver of service requested by a plaintiff located in the United States will be required to pay the expenses of service, unless the defendant shows good cause for the failure.

“Good cause” does not include a belief that the lawsuit is groundless, or that it has been brought in an improper venue, or that the court has no jurisdiction over this matter or over the defendant or the defendant’s property.

If the waiver is signed and returned, you can still make these and all other defenses and objections, but you cannot object to the absence of a summons or of service.

If you waive service, then you must, within the time specified on the waiver form, serve an answer or a motion under Rule 12 on the plaintiff and file a copy with the court. By signing and returning the waiver form, you are allowed more time to respond than if a summons had been served.

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