

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.)	
_____)	

DECLARATION OF AKSHAY S. DEORAS IN SUPPORT OF
ALCATEL-LUCENT AND HTC’S OPPOSITION TO
WI-LAN, ERICSSON, AND SONY MOBILE’S PARTIALLY OPPOSED JOINT
MOTION TO SEAL CERTAIN TRIAL EXHIBITS

I, Akshay S. Deoras, declare that:

1. I am an associate at the law firm of Kirkland & Ellis LLP and counsel for Alcatel-Lucent USA Inc. in the present action. I make this Declaration based on personal knowledge.
2. Attached hereto as **Exhibit 1** is a true and correct copy of *IP Innovation L.L.C. v. Red Hat, Inc.*, No. 2:07-cv-447-RRR, Dkt. No. 271 (E.D. Tex. Sept. 21, 2010).
3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the Trial Transcript in *Wi-LAN Inc., v. Alcatel-Lucent USA, Inc., et al*, No. 6:10-cv-521-LED (E.D. Tex. July 10, 2013).

4. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts from the Trial Transcript in *Wi-LAN Inc., v. Alcatel-Lucent USA, Inc., et al*, No. 6:10-cv-521-LED (E.D. Tex. July 11, 2013).

5. Attached hereto as **Exhibit 4** is a true and correct copy of *Ironclad, L.P. v. Poly-Am., Inc.*, No 3:98-cv-2600, 2000 WL 1400762 (N.D. Tex. July 28, 2000).

6. Attached hereto as **Exhibit 5** is a true and correct copy of *Fractus, S.A. v. Samsung Elecs. Co.*, No. 6:09-cv-203-LED-JDL, Dkt. No. 1155 (E.D. Tex. Dec. 7, 2012).

Dated: September 9, 2013

/s/ Akshay S. Deoras

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