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

WI-LAN INC., Plaintiff, § § v. § § ALCATEL-LUCENT USA INC.; § TELEFONAKTIEBOLAGET LM Civil Action No. 6:10-cv-521-LED § ERICSSON; ERICSSON INC.; SONY § ERICSSON MOBILE COMMUNICATIONS JURY TRIAL DEMANDED § AB; SONY ERICSSON MOBILE § COMMUNICATIONS (USA) INC.; HTC CORPORATION; HTC AMERICA, INC.; § EXEDEA INC.; LG ELECTRONICS, INC.; § LG ELECTRONICS MOBILECOMM U.S.A., § INC.; LG ELECTRONICS U.S.A., INC. Defendants.

PLAINTIFF'S UNOPPOSED MOTION TO SEAL PLEADINGS AND FOR CONFIDENTIALITY ORDER

Plaintiff, Wi-LAN, Inc., respectfully requests that the Court seal Plaintiff's reply to Defendants Ericsson, Inc. and Sony Ericsson Mobile Communications (USA), Inc.'s counterclaims (Dkt.# 56 & 57) and for an order that the sealed documents be kept confidential. Because this case is in its early stages and no protective order has been entered, Plaintiff requests that the documents be ordered sealed until a protective order is entered and the materials can be designated under its terms. Plaintiff also requests that the Court order that access to Dkt.# 56 & 57 be restricted by Plaintiff and any other party to outside counsel only until a designation under a protective order can be made. Counsel for Defendants

Ericsson, Inc and Sony Ericsson Mobile Communications (USA), Inc. do not oppose this motion.

An order reflecting the relief requested herein is attached for the Court's convenience.

Respectfully submitted,

/s/ Wesley Hill

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Attorneys for Plaintiff, Wi-LAN Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically in

compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel

who are deemed to have consented to electronic service on January 17, 2011. 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 the same date.

/s/ Wesley Hill

Wesley Hill

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