

**UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF TEXAS
 TYLER DIVISION**

WI-LAN, INC.

Plaintiff,

v.

ALCATEL-LUCENT USA INC.;
 TELEFONAKTIEBOLAGET LM
 ERICSSON; ERICSSON INC.; SONY
 ERICSSON MOBILE COMMUNICATIONS
 AB; SONY ERICSSON MOBILE
 COMMUNICATIONS (USA) INS.; HTC
 CORPORATION; HTC AMERICA, INC.;
 EXEDEA INC.; LG ELECTRONICS, INC.;
 LG ELECTRONICS MOBILECOMM U.S.A.,
 INC.; LG ELECTRONICS U.S.A., INC.

Defendants.

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Civil Action No. 6:10-cv-521

**DECLARATION OF JON MARON
 IN SUPPORT OF DEFENDANTS' MOTION TO SEVER**

I, Jon Maron, state and declare as follows:

1. I am an employee of HTC America, Inc. ("HTC America"), a defendant in this action. I am the Vice-President responsible for all marketing activities of HTC products in North America. I have personal knowledge of the following facts or access to HTC Corp. and HTC America employees' corporate information and/or records allowing me to confirm these facts. If called as a witness, I could and would competently testify thereto.

2. HTC Corp. manufactures cell phones in China and Taiwan. HTC Corp.'s operations in the United States are managed by and coordinated through HTC America's headquarters in Bellevue, Washington.

3. HTC Corp., HTC America, and/or Exedea (collectively "HTC") are not related to any of the other defendants named in this lawsuit. The largest concentration of HTC America employees in the United States work in Bellevue, Washington. HTC Corp., HTC America and Exedea have no offices in the Eastern District of Texas.

4. It is my understanding that Wi-LAN has accused nine HTC cell phone devices of infringing: the Aria, HD2, Imagio, Pure, Tilt 2, Touch Cruise, G1, myTouch3G, and Dash 3GPP. These devices were developed by HTC and were developed independent of the other defendants in this litigation. The other defendants that make or sell handsets compete with HTC on the most if not all of the HTC handsets Wi-LAN is accusing of infringement.

5. To the best of my knowledge, the persons with knowledge of the technical aspects of the Qualcomm chipsets in the accused HTC devices are Qualcomm employees.

I declare under penalty of perjury under the laws of the United States of America, that the foregoing facts are true and correct based on my own personal knowledge. Executed on January

24, 2011.


JON MARON