

I, Inge Larish, state and declare as follows:

1. I am an attorney at law duly licensed to practice law before the Courts of the State of Texas. I am an attorney with the law firm of Sheppard Mullin Richter & Hampton LLP, attorneys of record for HTC Corporation, HTC America, Inc. and Exedea Inc. I submit this declaration upon personal knowledge and following a reasonable investigation. If called as a witness, I could competently testify thereto to all facts within my personal knowledge except where stated upon information and belief.

2. Attached hereto as Exhibit A is a true and correct copy of docket no. 144-2, in Civil Action No. 2:08-cv-247, Stipulation For Supplemental Protective Order Governing Discovery From Non-Party Qualcomm in this case.

3. Attached hereto as Exhibit B is a true and correct copy of docket nos. 1,9, in Civil Action No. 10-cv-0859, Wi-LAN Motion to Compel Third Party Qualcomm Inc. to Produce Documents, Information and Objects & Response thereto.

4. On or about December 3, 2010, I obtained contact information from Airspan Networks, Inc. (“Airspan”) in Boca Raton, Florida for Martin Lysejko. On December 3, 2010, I phoned Mr. Lysejko in England at the phone number I was given by the Airspan office in Florida for Mr. Lysejko’s Airspan Communications office in England. Mr. Lysejko confirmed that he was the person that appeared named as the first inventor on the face of United States Patent Nos. 6,222,819 (the “‘819 patent”) and 6,381,211 (the “‘211 patent”). Mr. Lysejko indicated that the core research and development concerning the subject matter of the ‘819 and ‘211 patents occurred in the United Kingdom and that most of the documentation regarding the research and development was in the Airspan offices in the United Kingdom, including “log books” which he indicated were like inventor notebooks. Mr. Lysejko indicated he would be willing to file a

declaration confirming this information if the declaration was so limited and his company approved. On December 17, 2010, I called Mr. Lysejko to follow-up concerning his declaration. Mr. Lysejko again indicated that he would be willing to file a declaration and sent his contact information via an email so that I could forward a draft declaration based on the information he had previously disclosed. Exhibit C hereto is a true and correct copy of the email Mr. Lysejko forwarded to me with his contact information on December 17, 2010. Exhibit D is a true and correct copy of the December 17, 2010 email and attached declaration I forwarded to Mr. Lysejko at the email address he provided. Exhibit E is Mr. Lysejko's response referring HTC to the CFO of Airspan, Mr. David Brant, for approval. Exhibit F is a true and correct copy of Mr. Brant's email indicating Airspan would not permit Mr. Lysejko to file a declaration. I have not had further communications with Mr. Lysejko or Mr. Brant.

5. Attached as Exhibit G is a true and correct copy of online search results obtained on January 7, 2011 showing flight information for Seattle, Washington, San Diego, Taipei, Seoul, and London to DFW International Airport & Tyler, Texas, as well as for San Diego, California.

6. Attached as Exhibit H is a true and correct copy of online search results obtained on January 3, 2011, showing distance information from San Diego, California to Tyler, Texas.

7. Attached as Exhibit J is a true and correct copy of online search results obtained on January 7, 2011, showing flight information for travel from Seattle, Washington (Seatac Airport) to San Diego, California.

8. Attached as Exhibit K is a true and correct copy of online search results obtained on January 7, 2011, showing flight information for travel from San Diego, California to Tyler, Texas.

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 25, 2011, at San Diego, California.

/s/ Inge Larish
Inge Larish