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.	§	
	-	

DECLARATION OF WILLIAM MIDDLETON IN SUPPORT OF WI-LAN'S OPPOSITION TO HTC'S MOTION TO TRANSFER

I, William Middleton, declare as follows:

- 1. I am employed by Wi-LAN Inc. ("Wi-LAN") as Senior Vice President and General Counsel. I have personal knowledge of the matters set forth herein, and if called to testify, would truthfully testify thereto.
- 2. Attached hereto as Exhibit A is a true and correct copy of correspondence from Mark E. Strickland at Perkins Coie to counsel for Wi-LAN, Jason Blackstone at McKool Smith PC, dated January 12, 2011. The correspondence relates to document production in the matter of Wi-LAN, Inc. v. Research In Motion Corporation, et al., No. 2:08-cv-247-TJW. Specifically,

the letter discusses the production of documents from HTC America, Inc., to counsel for Wi-LAN during the course of litigation in the Eastern District of Texas.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 14, 2011

By: <u>/s/ William Middleton</u> William Middleton