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*Attorneys for Defendant,  
Wi-LAN Inc.*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
SAN DIEGO**

APPLE INC.,

*Plaintiff,*

vs.

WI-LAN INC.,

*Defendant.*

No. 3:14-cv-2235-DMS-BLM (Lead Case); Consolidated with 3:14-cv-01507-DMS-BLM  
DEMAND FOR JURY TRIAL

**NOTICE OF DEFENDANT WI-LAN INC.'S OMNIBUS MOTION TO EXCLUDE TESTIMONY OF APPLE EXPERTS**

WI-LAN INC.,

*Plaintiff,*

vs.

APPLE INC.,

*Defendant.*

**Department: 13A  
Judge: Hon. Dana M. Sabraw  
Magistrate: Hon. Barbara L. Major**

**NOTICE OF MOTION**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT Defendant Wi-LAN Inc. (“Wi-LAN”) will and hereby does move for an order excluding: (I) all evidence, testimony, and argument on WiMAX or that WiLAN’s patent claims are limited to fixed devices, including the expert reports and opinions of Messrs. Lanning and Tocher; (II) Dr. Walker’s testimony on ETSI; (III) Certain evidence, testimony, and argument regarding non-infringing alternatives; and (IV) certain testimony from Mr. Gunderson.

The Omnibus Motion to Exclude follows this notice.

Dated: May 1, 2018

Respectfully submitted,

By: /s/ Allison Goddard  
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**PROOF OF SERVICE**

I hereby certify that on May 1, 2018, I caused a copy of this pleading to be delivered via CM/ECF on the counsel of record.

Dated: May 1, 2018

By: /s/ Allison Goddard  
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