

1 JOHN ALLCOCK (Bar No. 98895)
john.allcock@dlapiper.com
2 SEAN C. CUNNINGHAM (Bar No. 174931)
sean.cunningham@dlapiper.com
3 ERIN GIBSON (Bar No. 229305)
erin.gibson@dlapiper.com
4 ROBERT WILLIAMS (Bar No. 246990)
robert.williams@dlapiper.com
5 TIFFANY MILLER (Bar No. 246987)
tiffany.miller@dlapiper.com
6 DLA PIPER LLP (US)
401 B Street, Suite 1700
7 San Diego, California 92101-4297
Tel: 619.699.2700
8 Fax: 619.699.2701

9 ROBERT BUERGI (Bar No. 242910)
robert.buergi@dlapiper.com
10 AMY WALTERS (Bar No. 286022)
amy.walters@dlapiper.com
11 DLA PIPER LLP (US)
2000 University Avenue
12 East Palo Alto, CA 94303-2215
Tel: 650.833.2000
13 Fax: 650.833.2001

14 Attorneys for Plaintiff
15 APPLE INC.

MARK C. SCARSI (Bar No.
183926)
mscarsi@milbank.com
ASHLEE N. LIN (Bar No.
275267)
anlin@milbank.com
MILBANK, TWEED, HADLEY &
MCCLOY LLP
2029 Century Park East, 33rd Floor
Los Angeles, CA 90067
Tel: 424.386.4000
Fax: 213.629.5063

CHRISTOPHER J. GASPAR
(admitted pro hac vice)
cgaspar@milbank.com
MILBANK, TWEED, HADLEY
& MCCLOY LLP
28 Liberty Street
New York, NY 10005
Tel: 212.530.5000
Fax: 212.822.5019

16 UNITED STATES DISTRICT COURT
17 SOUTHERN DISTRICT OF CALIFORNIA

18 APPLE INC.,
19 Plaintiff,
20 v.
21 WI-LAN, INC.,
22 Defendant.

CASE NO. 3:14-cv-02235-DMS-BLM
(lead case);
CASE NO. 3:14-cv-1507-DMS-BLM
(consolidated)

**APPLE INC.'S MEMORANDUM OF
POINTS AND AUTHORITIES IN
OPPOSITION TO DEFENDANT WI-LAN
INC.'S OMNIBUS MOTION TO
EXCLUDE TESTIMONY OF APPLE
EXPERTS**

[FILED UNDER SEAL]

25 AND RELATED
26 COUNTERCLAIMS

Date: June 1, 2018
Time: 1:30 p.m.
Dept.: 13A
Judge: Hon. Dana M. Sabraw
Magistrate Judge: Hon. Barbara L. Major

28