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8 *Attorneys for Plaintiff,*  
9 *Wi-LAN Inc.*

10 **UNITED STATES DISTRICT COURT**  
11 **SOUTHERN DISTRICT OF CALIFORNIA**  
12 **SAN DIEGO**

13 WI-LAN INC.,

14 *Plaintiff,*

15 vs.

16 APPLE INC.,

17 *Defendant.*

18 ) No. 3:14-cv-1507-DMS-BLM; (Lead Case  
19 ) No. 3:14-cv-2235-DMS-BLM)  
20 ) DEMAND FOR JURY TRIAL

21 ) **WI-LAN'S MOTIONS *IN LIMINE* AND**  
22 ) **MOTION TO STRIKE**

23 ) **REDACTED FOR PUBLIC FILING**

24 ) **Department: 13A**

25 ) **Judge: Hon. Dana M. Sabraw**

26 ) **Magistrate: Hon. Barbara L. Major**

27 ) **Hearing Date: July 20, 2018**

28 ) **Time: 1:30 pm**  
29 )  
30 )

**TABLE OF CONTENTS**

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

I. WI-LAN MOTION IN LIMINE NO. 1: NO ARGUMENT, EVIDENCE, TESTIMONY, REFERENCE, OR SUGGESTION PERTAINING TO ANY OF APPLE’S EQUITABLE DEFENSES OF UNCLEAN HANDS, WAIVER & ESTOPPEL, EQUITABLE ESTOPPEL, PROMISSORY ESTOPPEL, COLLATERAL ESTOPPEL, AND INEQUITABLE CONDUCT, INCLUDING BUT NOT LIMITED TO ANY ARGUMENT OR SUGGESTION CONCERNING WI-LAN’S PURPORTED FAILURE TO DECLARE THE PATENTS-IN-SUIT TO ETSI AS POTENTIALLY ESSENTIAL TO LTE AND/OR ANY ARGUMENT OR SUGGESTION THAT THE PARTIES’ PRIOR LITIGATION HISTORY SUGGESTS THAT WI-LAN BROUGHT THIS ACTION IN BAD FAITH..... 1

A. Apple’s Equitable Defenses Were Bifurcated and Should Be Excluded..... 1

II. WI-LAN MOTION IN LIMINE NO. 2: NO ARGUMENT, EVIDENCE, TESTIMONY, REFERENCE, OR SUGGESTION PERTAINING TO WIMAX (OR 802.16) OR THAT THE CLAIMS ARE LIMITED TO FIXED DEVICES/CPES AND EXCLUDE MOBILE DEVICES ..... 3

A. WiMAX Is Not Relevant to the Background of the Art ..... 5

B. Mr. Lanning’s WiMAX Opinions on the ’145 Patent Are Irrelevant..... 5

C. Apple’s Expert for the ’757 Patent Admits WiMAX Is Not Relevant ..... 7

D. Mr. Tocher’s Opinions Are Not Relevant..... 7

III. WI-LAN MOTION IN LIMINE NO. 3: NO ARGUMENT, EVIDENCE, TESTIMONY, REFERENCE, OR SUGGESTION PERTAINING TO EVIDENCE FROM OTHER LITIGATIONS BETWEEN WI-LAN AND APPLE OR TO CLAIMS, ALLEGATIONS, OR INFRINGEMENT THEORIES DROPPED AND/OR DISMISSED IN THIS CASE ..... 8

A. Prior Litigations Involving Other Patents/Products are Immaterial and Highly Prejudicial..... 8

B. Prior Litigations Are Improper Character Evidence ..... 10

C. Dropped/Dismissed Claims and Defenses Are Irrelevant..... 11

D. Conclusion..... 12

1 IV. WI-LAN MOTION IN LIMINE NO. 4: NO ARGUMENT, EVIDENCE,  
2 TESTIMONY, REFERENCE, OR SUGGESTION FROM APPLE OR ITS  
3 TECHNICAL EXPERTS ON PRIOR ART OR THE PURPORTED STATE OF  
4 THE ART..... 13  
5 A. Apple’s Invalidation Expert Mr. Lanning..... 14  
6 B. Apple’s Invalidation Expert Dr. Fuja..... 14  
7 V. WI-LAN MOTION IN LIMINE NO. 5: NO ARGUMENT, EVIDENCE,  
8 TESTIMONY, REFERENCE OR SUGGESTION THAT WI-LAN SHOULD  
9 HAVE SUED QUALCOMM, THAT QUALCOMM IS INDEMNIFYING  
10 APPLE, OR TO QUALCOMM’S ALLEGED INNOVATIVENESS ..... 15  
11 VI. MOTION TO STRIKE LATE-DISCLOSED FACT WITNESSES..... 18  
12 A. Introduction ..... 18  
13 B. Statement of Relevant Facts ..... 18  
14 C. Apple’s Untimely Disclosure of Chuah and Doshi is Prejudicial..... 19  
15 D. Testimony from Chuah and Doshi is Not Relevant. .... 21  
16 E. Conclusion..... 22

17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**TABLE OF AUTHORITIES**

**Page(s)**

**CASES**

1

2

3

4 *Abbott Point of Care, Inc. v. Epocal, Inc.*,

5 868 F. Supp. 2d 1310 (N.D. Ala. 2012)..... 17

6 *Advanced Cardiovascular Sys., Inc. v. Medtronic, Inc.*,

7 265 F.3d 1294 (Fed. Cir. 2001) ..... 9, 17

8 *Amgen Inc. v. Hoechst Marion Roussel, Inc.*,

9 314 F.3d 1313 (Fed. Cir. 2003) ..... 3

10 *Apple Inc. v. Motorola, Inc.*,

11 No. 1:11-cv-08540, ECF No. 874 at 1-2 ..... 9

12 *AVM Techs LLC v. Intel Corp.*,

13 No. 15-33-RGA, 2017 WL 2938191 (D. Del. Apr. 19, 2017) ..... 10

14 *Bio-Tech. Gen. Corp. v. Genentech, Inc.*,

15 80 F.3d 1553 (Fed. Cir. 1996) ..... 16

16 *Classical Silk, Inc. v. Dolan Grp., Inc.*,

17 No. CV 14-09224, 2016 WL 7638112 (C.D. Cal. Mar. 21, 2016)..... 21

18 *Cytologix Corp. v. Ventana Med. Sys., Inc.*,

19 424 F.3d 1168 (Fed. Cir. 2005) ..... 4

20 *Dig. Reg of Tex., LLC v. Adobe Sys.*,

21 No. C 12-1971, 2014 WL 4090550 (N.D. Cal. Aug. 19, 2014)..... 22

22 *Douglas Dynamics, LLC v. Buyers Prods. Co.*,

23 No. 09-cv-261-wmc, 2014 WL 1350720 (W.D. Wis. Apr. 4, 2014) ..... 13

24 *E. I. Du Pont de Nemours & Co. v. Berkley & Co.*,

25 620 F.2d 1247 (8th Cir. 1980) ..... 13

26 *Endo Pharms. Inc. v. Mylan Pharms.*,

27 No. 11-cv-00717 (RMB/RW), 2014 WL 334178 (D. Del. Jan. 26, 2014)..... 5

28 *EZ Dock, Inc. v. Schafer Sys., Inc.*,

29 No. CIV. 98-2364, 2003 WL 1610781 (D. Minn. Mar. 8, 2003)..... 11, 13

1 *Finjan, Inc. v. Proofpoint, Inc.*,  
 No. 3:13-cv-05808, 2015 WL 9900617 (N.D. Cal. Oct. 26, 2015)..... 20, 21

2

3 *Finjan, Inc. v. Sophos, Inc.*,  
 2016 WL 4560071 ..... 10, 13, 22

4

5 *Forbes v. Cty. of Orange*,  
 No. SACV111330JGBANX, 2013 WL 12165672 (C.D. Cal. Aug. 4,  
 6 2013) ..... 10

7 *Glaros v. H.H. Robertson Co.*,  
 797 F.2d 1564 (Fed. Cir. 1986) ..... 12

8

9 *In re Homestore.com, Inc.*,  
 No. CV 01-11115..... 8

10

11 *Innogenetics, N.V. v. Abbott Labs.*,  
 512 F.3d 1363 (Fed. Cir. 2008) ..... 22

12

13 *Moleski v. M.J. Cable, Inc.*,  
 481 F.3d 724 (9th Cir. 2007) ..... 8

14

15 *Multimedia Patent Tr. v. Apple Inc.*,  
 No. 10-CV-2618-H (KSC), 2012 WL 12868264 (S.D. Cal. Nov. 20,  
 16 2012) ..... 2, 11

17 *Ollier v. Sweetwater Union High Sch. Dist.*,  
 267 F.R.D. 339 (S.D. Cal. 2010) ..... 21

18

19 *Presidio Components, Inc. v. American Technical Ceramics Corp.*,  
 No. 14-CV-2061-H, 2016 WL 10933024 (S.D. Cal. Mar. 25, 2016) ..... 2, 11

20

21 *Radware, Ltd. v. F5 Networks, Inc.*,  
 No. 13-CV-02024-RMW, 2016 WL 590121 (N.D. Cal. Feb. 13, 2016) ..... 11

22

23 *Seals v. Mitchell*,  
 No. CV 04-3764 NJV, 2011 WL 1399245 (N.D. Cal. Apr. 13, 2011) ..... 11

24

25 *SSL Servs., LLC v. Citrix Sys., Inc.*,  
 No. 2:08-CV-158-JRG, 2012 WL 4092449 (E.D. Tex. Sept. 17, 2012),  
 26 *aff'd in relevant part*, 769 F.3d 1073 (Fed. Cir. 2014)..... 9

27

28

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