

EXHIBIT 2015

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

ERICSSON INC., et al.,

Plaintiffs,

vs.

D-LINK CORPORATION, et al.,

Defendants.

)
)
)
)
)
)
)
)
)
)
)

Civil Action No. 6:10-cv-473

JURY TRIAL DEMANDED

DEFENDANTS' AMENDED DISCLOSURE OF TRIAL WITNESSES

Pursuant to the Court's November 15, 2012 Order (D.I. 297), Defendants D-Link Systems, Inc., NETGEAR, Inc., Acer, Inc., Acer America Corporation, Gateway, Inc., Dell Inc., Toshiba America Information Systems, Inc., Toshiba Corporation and Belkin International, Inc., and Intervenor Intel Corporation (collectively, "Defendants") hereby identify the trial witnesses they may call live or by deposition to plaintiffs Ericsson Inc. and Telefonaktiebolaget LM Ericsson (collectively, "Ericsson").

Defendants' identification of witnesses is based on their assessment of the case at this time, without the benefit of the Court's rulings on various matters, including on *Daubert* challenges, motions *in limine*, and claim construction. Defendants also do not know the nature and/or scope of the testimony and evidence that Ericsson intends to present to support its claims and defenses. Accordingly, Defendants reserve the right to: (1) not call some or all of the witnesses identified below; (2) call live or by deposition at trial any witness identified on the witness lists provided by Ericsson, as well as any witnesses necessary to authenticate or lay the foundation for the introduction of documents to which any opposing party objects (including but not limited to custodians of records); (3) disclose additional witnesses to testify live or by deposition; and/or (4) introduce deposition testimony as impeachment evidence. Defendants further note that their identification of any witness herein is not an admission that the witness's testimony would be admissible if proffered by Ericsson. Defendants reserve the right to cross-examine any witness called to testify by any opposing party or any other party, regardless of whether they are disclosed on this witness list, including without limitation by counter-designation of proffered deposition testimony.

1. Witnesses Defendants Will Call Live or Via Deposition

Witness Name	Address, Telephone No. and Employer	Topic(s) of Testimony
J. David Cabello	Wong, Cabello, Lutsch, Rutherford & Bruceleri, LLP Chasewood Bank Bldg. 20333 SH 249 Suite 600 Houston, TX 77070 +1.832.446.2400	Non-willfulness.
Jerry Gibson, PhD	Department of Electrical and Computer Engineering University of California, Santa Barbara Santa Barbara, CA 93106 +1.805.893.6187	Non-infringement; prior art to the patents-in-suit; invalidity; non-infringing alternatives.
Chris Heegard, PhD	17197 La Brisa Ct. Sugarloaf, FL 33042 and 79873 Sears Rd. Cottage Grove, OR 97424 +1.305.454.8203 +1.541.946.3325	Non-infringement; prior art to the patents-in-suit; invalidity; non-infringing alternatives..
Jim Johnson	Intel Corp. 2200 Mission College Blvd. Santa Clara, CA 95054 +1.408.765.8080	Structure, operation, marketing and sales of accused 802.11 products; participation in IEEE and development of 802.11 standards; development of accused products; Intel IP related to the accused standards.
Gregory Leonard, PhD	Edgeworth Economics 333 Bush Street Suite 1450 San Francisco, CA 94104 +1.415.606.3220	Damages; RAND.
Brett McAnally	Dell Inc. 1 Dell Way	Marketing of accused products

Witness Name	Address, Telephone No. and Employer	Topic(s) of Testimony
	Round Rock, TX 78682 +1.800.289.3355	
William McFarland	Qualcomm Atheros 1700 Technology Drive San Jose, CA 95110 +1.408.773.5200	Structure, operation, marketing and sales of accused 802.11 products; participation in IEEE and development of 802.11 standards; development of accused products; prior art to the patents-in-suit.
David Milne	Broadcom Corporation 5300 California Ave. Irvine, CA 92617 +1.949.926.5000	Structure, operation, marketing and sales of accused 802.11 products; participation in IEEE and development of 802.11 standards; development of accused products; prior art to the patents-in-suit.
M. Ray Perryman, PhD	The Perryman Group 510 N. Valley Mills Drive, Suite 300 Waco, TX 75710 +1.254.751.9595	Damages; RAND.
Matthew B. Shoemake	Biscotti, Inc. 5900 S. Lake Forest Drive Suite 290 McKinney, TX 75090	IEEE standards development; IEEE patent policies and practices; RAND; patents and royalty stacking regarding 802.11.
Joel Williams	Williams Consulting 1240 Mckendrie Street San Jose, CA 95126 +1.408.249.5574	Testing.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.