

**EXHIBIT 2015**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

ERICSSON INC., et al.,

Plaintiffs,

vs.

D-LINK CORPORATION, et al.,

Defendants.

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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**

<b>Witness Name</b>	<b>Address, Telephone No. and Employer</b>	<b>Topic(s) of Testimony</b>
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

<b>Witness Name</b>	<b>Address, Telephone No. and Employer</b>	<b>Topic(s) of Testimony</b>
	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.

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