

Compls. Br. at 436-38 (citing CX-1313C (Brezski WS) at Q58).

InterDigital provides a “conservative” estimate that it spent approximately [] on compensation-related investments in its 3G licensing activities from 2008 through 2011. Compls. Br. at 438 (citing CX-1313C (Brezski WS) at Q58). InterDigital characterizes this estimate as conservative “because InterDigital also spent approximately [] over that time period on associated payroll taxes and other benefits that are not captured by the [] figure representing InterDigital’s investments in 3G licensing.” Compls. Br. at 438 (citing CX-1313C (Brezski WS) at Q60-61).

During the time period 2008 through 2011, InterDigital also invested approximately [] in pro-rated facilities-related expenses allocable to InterDigital’s 3G licensing activities. CX-1313C (Brezski WS) at Q62-74; *see also* CX-1285C (compilation of facilities expenses) at IDC-ITC-300001558. Those facilities-related expenses are for 3G licensing expenses related to only InterDigital’s King of Prussia, Pennsylvania facility, and no other facility. CX-1313C (Brezski WS) at Q75-77.

In summary, InterDigital estimates that it invested approximately [] in its activities related to 3G licensing. CX-1313C (Brezski WS) Q58-60, Q71-74. As mentioned previously, Mr. Brezski’s analysis, on which this estimate is based, was not cross-examined at the hearing. *See* Brezski Tr. 630 (forgoing cross-examination of Mr. Brezski).

2. Alleged Investments in the Asserted Patents

As discussed above, InterDigital alleges that its estimated investment of [] “represents InterDigital’s compensation-related expenses which can be directly tied to 3G licensing activities [] plus its facility-related expenses attributable to 3G licensing (about [].” *See* CX-1311C (Putnam WS) at Q59. From that calculation,

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