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11 ATTORNEYS FOR SPECIALLY APPEARING  
12 DEFENDANT WI-LAN INC.

13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

15 INTEL CORPORATION,

16 Plaintiff,

17 v.

18 WI-LAN INC., WI-LAN TECHNOLOGIES  
19 CORPORATION, WI-LAN TECHNOLOGIES,  
INC., and WI-LAN V-CHIP CORP.,

20 Defendants.  
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Case No. 5:08-cv-4555 JW (HRL)

**DECLARATION OF MICHAEL G.  
MCMANUS IN SUPPORT OF WI-  
LAN'S MOTION FOR  
ADMINISTRATIVE RELIEF TO FILE  
UNDER SEAL EXHIBIT 2 TO WI-  
LAN'S NOTICE OF SUPPLEMENTAL  
INFORMATION IN SUPPORT OF WI-  
LAN'S MOTION TO DISMISS FOR  
LACK OF SUBJECT MATTER  
JURISDICTION AND/OR TO  
TRANSFER TO FIRST-FILED  
FORUM**

Date: May 4, 2009  
Time: 9:00 a.m.  
Courtroom: 8, 4th Floor  
Judge: Hon. James Ware

1 I, Michael G. McManus, hereby declare as follows:

2 1. I am a partner at the law firm McKool Smith, P.C., 1700 K Street NW, Suite 740,  
3 Washington, DC 20006, and a member in good standing of the Bar of the District of Columbia  
4 and of the State of Georgia. I am admitted *pro hac vice* to practice in the United States District  
5 Court for the Northern District of California. McKool Smith, P.C. has been retained as trial  
6 counsel for Defendant Wi-LAN, Inc. (“Wi-LAN”) in the present action. I am making this  
7 declaration in support of Wi-LAN’s Administrative Motion to File Under Seal Exhibit 2 to Wi-  
8 LAN’s Notice of Supplemental Information in Support of Wi-LAN’s Motion to Dismiss for  
9 Lack of Subject Matter Jurisdiction and/or to Transfer to First-filed Forum.

10 2. The contents of the following document contain or discuss information designated  
11 by the Interim Stipulated Protective Order as “Confidential,” “Highly Confidential – Attorneys’  
12 Eyes Only,” or “Attorneys’ Eyes Only” under the terms of the Interim Stipulated Protective  
13 Order:

14 Exhibit 2: Defendants’ Opposition to Wi-LAN’s Motion for Leave to Supplement Its  
15 First Amended Complaint.

16 I declare under penalty of perjury under the laws of the United States and the State of  
17 California that the foregoing is true and correct and that this declaration was executed on May 4,  
18 2009.

19 Dated: May 4, 2009.

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By: \_\_\_\_\_ /s/ Michael G. McManus  
Michael G. McManus

**CERTIFICATE OF SERVICE**

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The undersigned certifies that on this 4th day of May 2009, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document through the Court's CM/ECF system. Any other counsel of record will be served by facsimile transmission and/or first class mail.

By: /s/ Michael G. McManus  
Michael G. McManus