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11 ATTORNEYS FOR DEFENDANT WI-LAN INC.

12
 13 UNITED STATES DISTRICT COURT
 14 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

15 BROADCOM CORPORATION ET AL.,

16 Plaintiffs,

17 v.

18 WI-LAN, INC.,

19 Defendant.

Case No. 5:08-cv-5543
 Case No. 5:08-cv-5544
 Case No. 5:08-cv-5624

**DECLARATION OF MICHAEL G.
 MCMANUS IN SUPPORT OF
 DEFENDANT WI-LAN'S
 MISCELLANEOUS
 ADMINISTRATIVE REQUEST
 PURSUANT TO CIVIL L.R. 7-11 AND
 79-5(d) TO FILE UNDER SEAL
 WI-LAN'S REPLY IN SUPPORT
 OF ITS MOTION TO TRANSFER
 REMAINING DECLARATORY
 JUDGMENT CLAIMS, SECOND
 DECLARATION OF MICHAEL G.
 MCMANUS IN SUPPORT AND
 EXHIBITS ATTACHED THERETO**

Date: September 28, 2009
 Time: 9:00 a.m.
 Courtroom: 8, 4th Floor
 Judge: Hon. James Ware

27 AND RELATED ACTIONS

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

2 1. I am a principal at the law firm McKool Smith, P.C., 1700 K Street NW, Suite
3 740, Washington, DC 20006, and a member in good standing of the Bar of the District of
4 Columbia and of the State of Georgia. McKool Smith, P.C. has been retained as trial counsel for
5 Defendant Wi-LAN, Inc. (“Wi-LAN”) in the present action. I am making this declaration in
6 support of Wi-LAN’s Miscellaneous Administrative Request Pursuant to Civil L.R. 7-11 and 79-
7 5(d) to File Under Seal Wi-LAN’s Motion to Transfer Remaining Declaratory Judgment
8 Claims (the “Motion”), Second Declaration of Michael G. McManus in Support and Exhibits
9 Attached Thereto.

10 2. The contents of the Motion and exhibits contain or discuss information designated
11 as “Highly Confidential” under the terms of the Interim Stipulated Protective Order. Exhibit A is
12 a document filed under seal by opposing counsel and therefore is being filed under seal with this
13 reply.

14 I declare under penalty of perjury under the laws of the United States and the State of
15 California that the foregoing is true and correct and that this declaration was executed on
16 September 14, 2009.

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

19
20 **CERTIFICATE OF SERVICE**

21 The undersigned certifies that on this 14th day of September 2009, all counsel of record
22 who are deemed to have consented to electronic service are being served with a copy of this
23 document through the Court’s CM/ECF system. Any other counsel of record will be served by
24 facsimile transmission and/or first class mail.

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