

**Summary of Expert Testimony That
Wi-LAN May Offer at the Claim Construction Hearing**

Wi-LAN expects to submit supporting declarations from Alexander Haimovich, Ph.D. in support of its proposed constructions for the disputed claim terms/limitations of U.S. Patent No. 5,282,222 (“the ‘222 patent”) and Richard D. Gitlin, Ph.D. in support of its proposed constructions for the disputed claim terms/limitations of U.S. Patent No. RE37,802. Wi-LAN further expects that Dr. Haimovich will offer opinion with respect to those claim terms/limitations of the ‘222 patent identified in Exhibit B hereto that contain a reference to “Declaration of Alexander Haimovich, Ph.D” in the column entitled “Extrinsic Support.” Likewise, Wi-LAN expects that Dr. Gitlin will offer opinion with respect to those claim terms/limitations of the ‘802 patent identified in Exhibit B hereto that contain a reference to “Declaration of Richard D. Gitlin, Ph.D” in the column entitled “Extrinsic Support.” Wi-LAN also reserves the right to offer the opinions of Drs. Haimovich and Gitlin in rebuttal to any expert opinions that the Defendants may offer.