

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

TECHNOLOGIES PROPERTIES LIMITED, LLC,

Plaintiff,

v.

ACTION ELECTRONICS CO., LTD., AMERICA ACTION, INC., AIPTEK INTERNATIONAL, INC., AIPTEK, INC., ALURATEK, INC., AUDIOVOX CORPORATION, CEIVA LOGIC, INC., CIRCUS WORLD DISPLAYS LTD., COBY ELECTRONICS CORPORATION, CURTIS INTERNATIONAL, LTD., DIGITAL SPECTRUM SOLUTIONS, INC., EASTMAN KODAK COMPANY, MUSTEK SYSTEMS, INC., MUSTEK, INC., NEXTAR INC., PANDIGITAL, INC., ROYAL CONSUMER INFORMATION PRODUCTS, INC., SONY CORPORATION, SONY CORPORATION OF AMERICA, TRANSCEND INFORMATION, INC., TRANSCEND USA, VIEWSONIC CORPORATION, WIN ACCORD, LTD. and WINACCORD USA, INC.,

Defendants.

CASE NO.:

**COMPLAINT FOR PATENT  
INFRINGEMENT**

**DEMAND FOR JURY TRIAL**

Plaintiff Technologies Properties Limited, LLC hereby alleges for its Complaint against Defendants Action Electronics Co., Ltd., America Action, Inc., Aiptek International, Inc., Aiptek, Inc., Aluratek, Inc., Audiovox Corporation, CEIVA Logic, Inc., Circus World Displays Ltd., Coby Electronics Corporation, Curtis International, Ltd., Digital Spectrum Solutions, Inc., Eastman Kodak Company, Mustek Systems, Inc., Mustek, Inc., Nextar, Inc., Pandigital, Inc., Royal Consumer Information Products, Inc., Sony Corporation, Sony Corporation of America, Transcend Information, Inc., Transcend USA, Viewsonic Corporation, Win Accord, Ltd. and WinAccord USA, Inc. (collectively the “Defendants”) on personal knowledge as to its own actions and on information and belief as to the actions of others, as follows:

## **THE PARTIES**

1. Plaintiff Technologies Properties Limited, LLC (“TPL”) is a California limited liability company with a principal place of business at 20883 Stevens Creek Blvd., Suite 100, Cupertino, California 95014.

2. On information and belief, Defendant Action Electronics Co., Ltd. (“Action”) is a Taiwanese corporation with a principal place of business at No. 198, Zhongyuan Rd., Zhongli City, Taoyuan County 320, Taiwan. On further information and belief, Defendant America Action, Inc. (“America Action”) is a California Corporation with its principal place of business at 100 Exchange Place, Pomona, CA 91768. Action and America Action will be referred to herein individually and collectively as the “Action Defendants.”

3. On information and belief, Defendant AIPTEK International, Inc. is a Taiwanese corporation with a principal place of business at No.19, Industry E. Rd IV., Science Park, Hsinchu 300, Taiwan. On further information and belief, Defendant AIPTEK, Inc. is a California Corporation with its principal place of business at 51 Discovery, Ste. 100, Irvine, CA 92618. AIPTEK International, Inc., and AIPTEK, Inc. will be referred to herein individually and collectively and the “AIPTEK Defendants.”

4. On information and belief, Defendant Aluratek, Inc. (“Aluratek”) is a California corporation with a principal place of business at 14831 Myford Road, Tustin, California 92780.

5. On information and belief, Defendant Audiovox Corporation (“Audiovox”) is a Delaware corporation with a principal place of business at 180 Marcus Blvd., Happaage, New York 11788.

6. On information and belief, Defendant CEIVA Logic Inc. (“CEIVA”), is a Delaware corporation with a principal place of business at 214 E. Magnolia Blvd., Burbank, California 91502.

7. On information and belief, Defendant Circus World Displays Ltd. (“CWD”) is a Canadian corporation with a principal place of business at 4080 Montrose Road, Niagara Falls, L2H 1J9, Canada.

8. On information and belief, Defendant Coby Electronics Corporation (“Coby”) is a New York corporation with a principal place of business at 1991 Marcus Ave., Suite 301, Lake Success, New York 11042.

9. On information and belief, Defendant Curtis International, Ltd. (“Curtis”) is a Canadian corporation with a principal place of business at 315 Attwell Drive, Etobicoke, Ontario, M9W 5C1, Canada.

10. On information and belief, Defendant Digital Spectrum Solutions, Inc. (“DSS”) is a California corporation with a principal place of business at 17821 Mitchell N, Irvine, California 92614.

11. On information and belief, Defendant Eastman Kodak Company (“Kodak”) is a New Jersey corporation with a principal place of business at 343 State Street, Rochester, New York, 14650.

12. On information and belief, Defendant Mustek Systems, Inc. (“Mustek”) is a Taiwanese corporation with a principal of business at 25, R&D Road II, Science-Based Industrial Park, Hsin Chu, Taiwan. On further information and belief, Defendant Mustek, Inc. is a California Corporation with its principal place of business at 14751 Franklin Unit B, Tustin, CA 92780. Mustek and Musket, Inc. will be referred to herein individually and collectively as the “Mustek Defendants.”

13. On information and belief, Defendant Nextar, Inc. (“Nextar”) is a California corporation with a principal place of business at 1661 Fairplex Drive, La Verne, California 91750.

14. On information and belief, Defendant Pandigital, Inc. (“Pandigital”) is a Delaware corporation with a principal place of business at 6375 Clark Ave Suite 100, Dublin, California 94568.

15. On information and belief, Defendant Royal Consumer Information Products, Inc. (“Royal”) is a Delaware corporation with a principal place of business at 379 Campus Drive Somerset, New Jersey 08875.

16. On information and belief, Defendant Sony Corporation is a Japanese corporation with a principal place of business at 1-7-1 Konan, Minato-ku, Tokyo 108-0075, Japan. On further information and belief, Defendant Sony Corporation of America (“SCA,” and collectively with Sony Corporation, “Sony”) is a New York corporation with a principal place of business at 1 550 Madison Avenue, New York, New York 10022.

17. On information and belief, Defendant Transcend Information, Inc. (“Transcend”) is a Taiwanese corporation with a principal place of business at No.70, XingZhong Rd., NeiHu Dist., Taipei, Taiwan. On further information and belief, Defendant Transcend USA (“Transcend USA”) is a California Corporation with its principal place of business at 1645 North Brian Street, Orange, CA 92867. Transcend and Transcend USA will be referred to herein individually and collectively as the “Transcend Defendants.”

18. On information and belief, Defendant ViewSonic Corporation (“ViewSonic”) is a Delaware corporation with a principal place of business at 381 Brea Canyon Road, Walnut, California 91789.

19. On information and belief, Defendant Win Accord, Ltd. (“Win Accord TW”) is a Taiwanese corporation with a principal place of business at 12F, No. 225, Sec. 5, Nan Jing E. Road, Song Shan District, Taipei, Taiwan 105. On further information and belief, Defendant WinAccord USA, Inc. (“WinAccord USA”) is a California Corporation, with its principal place of business at 2526 Qume Drive, Suite 24, San Jose, California, 95131. Win Accord TW and WinAccord USA will be referred to herein collectively as the “WinAccord Defendants.”

### **JURISDICTION AND VENUE**

20. This action arises under the patent laws of the United States, Title 35 of the United States Code, §§ 271 and 281, *et seq.* because each of the Defendants has committed acts of patent infringement within the United States and this judicial district. Accordingly, this Court has subject matter jurisdiction of this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

21. Personal jurisdiction and venue are proper in this Court pursuant to 28 U.S.C. §§ 1391(b), 1391(c) and 1400(b), in that the defendants are subject to personal jurisdiction in this

district. At a minimum, each of the defendants has delivered infringing products into the stream of commerce with the expectation that they will be purchased by consumers in Texas, including consumers in the Eastern District of Texas.

### **THE '623 PATENT**

22. On December 20, 2005, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 6,976,623 (“the ’623 Patent”), entitled “Flash Juke Box,” to Sreenath Mambakkam, et al. A copy of the ’623 Patent is attached to the Complaint as Exhibit A.

23. The ’623 Patent discloses a memory card reader having a number of interfaces to read at least two different types of memory cards, and to provide parallel read/write access to both cards to enable the transfer of data from one card to the other. The invention permits faster data transfer between flash cards by providing parallel read/write access to both while transferring data between cards.

24. TPL is the exclusive licensee of the ’623 Patent.

### **THE '549 PATENT**

25. On January 9, 2007, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 7,162,549 (“the ’549 Patent”) entitled “Multimode Controller For Intelligent And ‘Dumb’ Flash Cards,” to Sreenath Mambakkam, et al. A copy of the ’549 Patent is attached to the Complaint as Exhibit B.

26. The ’549 Patent discloses a controller chip that interfaces with a flash storage system where the flash storage system may have a controller for error correction. Using firmware, the controller chip conducts bad block mapping in the event that the controller of the flash storage system does not have a controller for error correction. This permits the flash adapter to conduct bad block mapping in the adapter rather than in, for example, a host computer. This invention is especially key for consumers that use xD-Picture Cards or Smart Media cards, as these card types do not include an error correction controller.

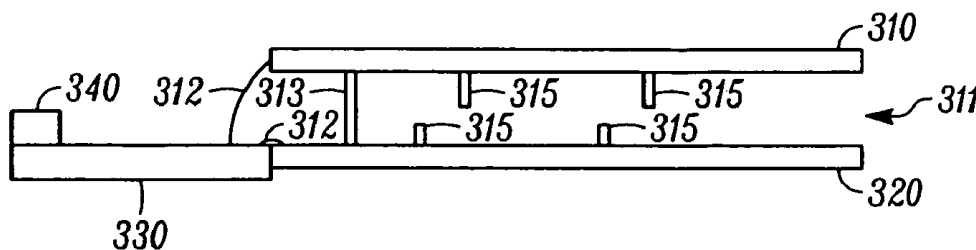
27. TPL is the exclusive licensee of the ’549 Patent in the United States.

### **THE '443 PATENT**

28. On November 13, 2007, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 7,295,443 entitled “Smartconnect Universal Flash Media Card Adapters,” to Sreenath Mambakkam, et al. A copy of the '443 Patent is attached to the Complaint as Exhibit C.

29. The '443 Patent discloses a multi-media memory adapter that has two planar elements defining a port between them for receiving multi-memory media cards. At least one of the planar elements has flash card contact pins integrated in molded plastic. The adapter has a controller that maps a set of signal lines to a subset of the contact pins based upon the identified type of memory media card inserted into the reader.

30. The invention allows a single-slot molded plastic flash card reader to use a single controller to interface with multiple types of multi-media cards, including without limitation CompactFlash (CF), MultiMediaCard (MMC) and Secure Digital (SD). Figure 3 (reproduced below), illustrates one embodiment of the '443 Patent:



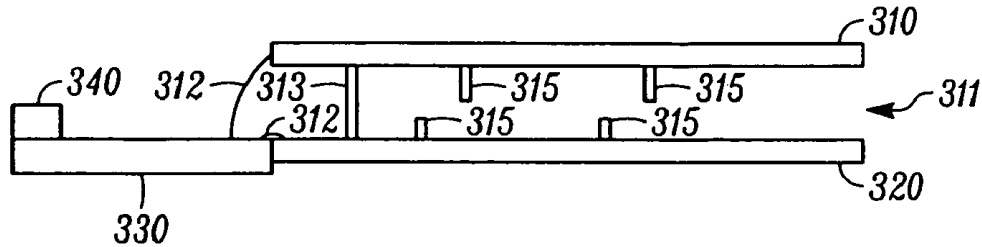
31. TPL is the exclusive licensee of the '443 Patent in the United States.

### **THE '424 PATENT**

32. On April 21, 2009, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 7,522,424 entitled “Smartconnect Universal Flash Media Card Adapters,” to Sreenath Mambakkam, et al. A copy of the '424 Patent is attached to the Complaint as Exhibit D.

33. The '424 Patent discloses a single-slot flash card reader that has a number of sets of contact pins mounted in a single slot reader at locations adapted to interface with the electrical

contacts of different types of memory media cards. The patent discloses a set of interconnection pins, 312 as illustrated in Figure 3, reproduced below. A controller maps power, ground and/or data signals between the interconnection pins and the proper contact pins, depending on the type of card in the slot.



34. The invention further permits the use of a single controller in a single-slot reader that accepts multiple flash card types, including MultiMediaCard, Secure Digital and others.

35. TPL is the exclusive licensee of the '424 Patent in the United States.

**FIRST CAUSE OF ACTION**  
**(Infringement of the '623 Patent)**  
**(35 U.S.C. § 271)**

36. Plaintiff repeats and incorporates by reference each of the allegations contained in Paragraphs 1 through 35 above, and further alleges as follows:

37. On information and belief, without a license or permission from Plaintiff, Defendant Aluratek has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 1, 2, 9, 10, 17 and 18 of the '623 Patent. Defendant Aluratek did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief Defendant Aluratek was provided notice of the '623 patent on April 2, 2008. On information and belief, Defendant Aluratek provides instructions to its users with the intent to induce infringement of the '623 patent. Without limitation, an example of Defendant Aluratek's infringing products is the ADMPF315F and related families of products. Defendant Aluratek's infringement of the '623 Patent has caused substantial damage to Plaintiff. On information and

belief, Aluratek's infringement of the '623 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

38. On information and belief, without a license or permission from Plaintiff, Defendant Coby has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 1, 2, 9, 10, 17 and 18 of the '623 Patent. Defendant Coby did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, Defendant Coby was provided notice of the '623 patent on February 21, 2008. On information and belief, Defendant Coby provides instructions to its users with the intent to induce infringement of the '623 patent. Without limitation, an example of Defendant Coby's infringing products is the DP1052 and related families of products. Defendant Coby's infringement of the '623 Patent has caused substantial damage to Plaintiff. On information and belief, Coby's infringement of the '623 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

39. On information and belief, without a license or permission from Plaintiff, Defendant Pandigital has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 1, 2, 9, 10, 17, and 18 of the '623 Patent. Defendant Pandigital did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief Defendant Pandigital was provided notice of the '623 patent on February 21, 2008. On information and belief, Defendant Pandigital provides instructions to its users with the intent to induce infringement of the '623 patent. Without limitation, an example of Defendant Pandigital's infringing products is the PI1002DW and related families of products. Defendant Pandigital's infringement of the '623 Patent has caused substantial damage to Plaintiff. On information and belief, Pandigital's infringement of the '623 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.



40. On information and belief, without a license or permission from Plaintiff, Defendant Royal has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 1, 2, 9, 10, 17 and 18 of the '623 Patent. Defendant Royal did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief Defendant Royal was provided notice of the '623 patent on August 27, 2009. On information and belief, Defendant Royal provides instructions to its users with the intent to induce infringement of the '623 patent. Without limitation, an example of Defendant Royal's infringing products is the PF120 256 12" and related families of products. Defendant Royal's infringement of the '623 Patent has caused substantial damage to Plaintiff. On information and belief, Royal's infringement of the '623 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

**SECOND CAUSE OF ACTION**  
**(Infringement of the '549 Patent)**  
**(35 U.S.C. § 271)**

41. Plaintiff repeats and incorporates by reference each of the allegations contained in Paragraphs 1 through 40 above, and further alleges as follows:

42. On information and belief, without a license or permission from Plaintiff, Defendant Aluratek has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 1, 7, 11, 17, 19, and 21 of the '549 Patent. Defendant Aluratek did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief Defendant Aluratek was provided notice of the '549 patent on April 2, 2008. On information and belief, Defendant Aluratek provides instructions to its users with the intent to induce infringement of the '549 patent. Without limitation, an example of Defendant Aluratek's infringing products is the ADMPF315F and related families of products. Defendant Aluratek's infringement of the '549 Patent has caused substantial damage to Plaintiff. On information and

belief, Aluratek's infringement of the '549 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

43. On information and belief, without a license or permission from Plaintiff, Defendant Audiovox has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 1, 7, 11, 17, 19 and 21 of the '549 Patent. Defendant Audiovox did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief Defendant Audiovox was provided notice of the '549 patent on October 15, 2008. On information and belief, Defendant Audiovox provides instructions to its users with the intent to induce infringement of the '549 patent. Without limitation, an example of Defendant Audiovox's infringing products is the DPF808 and related families of products. Defendant Audiovox's infringement of the '549 Patent has caused substantial damage to Plaintiff. On information and belief, Audiovox's infringement of the '549 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

44. On information and belief, without a license or permission from Plaintiff, Defendant Coby has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 1, 7, 11, 17, 19 and 21 of the '549 Patent. Defendant Coby did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, Defendant Coby was provided notice of the '549 patent on February 21, 2008. On information and belief, Defendant Coby provides instructions to its users with the intent to induce infringement of the '549 patent. Without limitation, an example of Defendant Coby's infringing products is the DP1052 and related families of products. Defendant Coby's infringement of the '549 Patent has caused substantial damage to Plaintiff. On information and belief, Coby's infringement of the '549 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

45. On information and belief, without a license or permission from Plaintiff, Defendant DSS has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 1, 7, 11, 17, 19 and 21 of the '549 Patent. Defendant DSS did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief Defendant DSS was provided notice of the '549 patent on November 21, 2008. On information and belief, Defendant DSS provides instructions to its users with the intent to induce infringement of the '549 patent. Without limitation, an example of Defendant DSS's infringing products is the MF-801 and related families of products. Defendant DSS's infringement of the '549 Patent has caused substantial damage to Plaintiff. On information and belief, DSS's infringement of the '549 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

46. On information and belief, without a license or permission from Plaintiff, the Mustek Defendants have infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 1, 7, 11, 17, 19 and 21 of the '549 Patent. The Mustek Defendants did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, the Mustek Defendants were provided notice of the '549 patent on November 21, 2008. On information and belief, the Mustek Defendants provide instructions to their users with the intent to induce infringement of the '549 patent. Without limitation, an example of the Mustek Defendants' infringing products is the PF-A720BM and related families of products. The Mustek Defendants' infringement of the '549 Patent has caused substantial damage to Plaintiff. On information and belief, the Mustek Defendants' infringement of the '549 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

47. On information and belief, without a license or permission from Plaintiff, Defendant Pandigital has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 1, 7, 11, 17, 19 and 21 of the '549

Patent. Defendant Pandigital did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief Defendant Pandigital was provided notice of the '549 patent on February 21, 2008. On information and belief, Defendant Pandigital provides instructions to its users with the intent to induce infringement of the '549 patent. Without limitation, an example of Defendant Pandigital's infringing products is the PI8004W01 and related families of products. Defendant Pandigital's infringement of the '549 Patent has caused substantial damage to Plaintiff. On information and belief, Pandigital's infringement of the '549 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

48. On information and belief, without a license or permission from Plaintiff, Defendant Royal has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 1, 7, 11, 17, 19 and 21 of the '549 Patent. Defendant Royal did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief Defendant Royal was provided notice of the '549 patent on August 27, 2009. On information and belief, Defendant Royal provides instructions to its users with the intent to induce infringement of the '549 patent. Without limitation, an example of Defendant Royal's infringing products is the PF120 256 12" and related families of products. Defendant Royal's infringement of the '549 Patent has caused substantial damage to Plaintiff. On information and belief, Royal's infringement of the '549 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

49. On information and belief, without a license or permission from Plaintiff, the WinAccord Defendants have infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 1, 7, 11, 17, 19, and 21 of the '549 Patent. The WinAccord Defendants did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, the WinAccord Defendants were provided notice of the '549 patent on

August 22, 2011. On information and belief, the WinAccord Defendants provide instructions to their users with the intent to induce infringement of the '549 patent. Without limitation, an example of the WinAccord Defendants' infringing products is the Orion Seven.O-7" Slim (OR17D-05) and related families of products. The WinAccord Defendants' infringement of the '549 Patent has caused substantial damage to Plaintiff. On information and belief, the WinAccord Defendants' infringement of the '549 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

**THIRD CAUSE OF ACTION**  
**(Infringement of the '443 Patent)**  
**(35 U.S.C. § 271)**

50. Plaintiff repeats and incorporates by reference each of the allegations contained in Paragraphs 1 through 49 above, and further alleges as follows:

51. On information and belief, without a license or permission from Plaintiff, the Action Defendants have infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 9 and 14 of the '443 Patent. The Action Defendants did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, the Action Defendants were provided notice of the '443 patent on August 27, 2009. Without limitation, an example of the Action Defendants' infringing products is the Home 7" DPF - 1600018 and related families of products. The Action Defendants' infringement of the '443 Patent has caused substantial damage to Plaintiff. On information and belief, the Action Defendants' infringement of the '443 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

52. On information and belief, without a license or permission from Plaintiff, the AIPTEK Defendants have infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 9, 11, and 12 of the '443 Patent. The AIPTEK Defendants did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, the

AIPTEK Defendants were provided notice of the '443 patent on July 27, 2011. Without limitation, an example of the AIPTEK Defendants' infringing products is the P8i26 and related families of products. The AIPTEK Defendants' infringement of the '443 Patent has caused substantial damage to Plaintiff. On information and belief, the AIPTEK Defendants' infringement of the '443 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

53. On information and belief, without a license or permission from Plaintiff, Defendant Aluratek has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 9, 11, 12, and 14 of the '443 Patent. Defendant Aluratek did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, Defendant Aluratek was provided notice of the '443 patent on April 2, 2008. Without limitation, an example of Defendant Aluratek's infringing products is the ADMPF315F and related families of products. Defendant Aluratek's infringement of the '443 Patent has caused substantial damage to Plaintiff. On information and belief, Defendant Aluratek's infringement of the '443 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

54. On information and belief, without a license or permission from Plaintiff, Defendant Audiovox has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 9, 11, 12 and 14 of the '443 Patent. Defendant Audiovox did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, Defendant Audiovox was provided notice of the '443 patent on October 15, 2008. Without limitation, an example of Defendant Audiovox's infringing products is the DPF808 and related families of products. Defendant Audiovox's infringement of the '443 Patent has caused substantial damage to Plaintiff. On information and belief, Defendant Audiovox's infringement

of the '443 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

55. On information and belief, without a license or permission from Plaintiff, Defendant CEIVA has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 9, 11, 12 and 14 of the '443 Patent. Defendant CEIVA did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, Defendant CEIVA was provided notice of the '443 patent on October 31, 2008. Without limitation, an example of Defendant CEIVA's infringing products is the CEIVA Pro 80 and related families of products. Defendant CEIVA's infringement of the '443 Patent has caused substantial damage to Plaintiff. On information and belief, Defendant CEIVA's infringement of the '443 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

56. On information and belief, without a license or permission from Plaintiff, Defendant CWD has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 9 and 14 of the '443 Patent. Defendant CWD did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, Defendant CWD was provided notice of the '443 patent on June 27, 2011. Without limitation, an example of Defendant CWD's infringing products is the MAG-PF0901M and related families of products. Defendant CWD's infringement of the '443 Patent has caused substantial damage to Plaintiff. On information and belief, Defendant CWD's infringement of the '443 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

57. On information and belief, without a license or permission from Plaintiff, Defendant Coby has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 9, 11, 12 and 14 of the '443 Patent. Defendant Coby did so by importing, making, using, offering to sell, and/or selling products and

devices that embody and/or practice the patented invention. On information and belief, Defendant Coby was provided notice of the '443 patent on February 21, 2008. Without limitation, an example of Defendant Coby's infringing products is the DP1052 and related families of products. Defendant Coby's infringement of the '443 Patent has caused substantial damage to Plaintiff. On information and belief, Defendant Coby's infringement of the '443 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

58. On information and belief, without a license or permission from Plaintiff, Defendant Curtis has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 9 and 14 of the '443 Patent. Defendant Curtis did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, Defendant Curtis was provided notice of the '443 patent on November 3, 2009. Without limitation, an example of Defendant Curtis' infringing products is the Sylvania SPDF752 and related families of products. Defendant Curtis' infringement of the '443 Patent has caused substantial damage to Plaintiff. On information and belief, Defendant Curtis' infringement of the '443 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

59. On information and belief, without a license or permission from Plaintiff, Defendant DSS has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 9, 11, 12 and 14 of the '443 Patent. Defendant DSS did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, Defendant DSS was provided notice of the '443 patent on November 21, 2008. Without limitation, an example of Defendant DSS's infringing products is the MF-801 and related families of products. Defendant DSS's infringement of the '443 Patent has caused substantial



damage to Plaintiff. On information and belief, Defendant DSS's infringement of the '443 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

60. On information and belief, without a license or permission from Plaintiff, Defendant Kodak has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 9 and 14 of the '443 Patent. Defendant Kodak did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, Defendant Kodak was provided notice of the '443 patent by no later than November 2008. Without limitation, an example of Defendant Kodak's infringing products is the P730M and related families of products. Defendant Kodak's infringement of the '443 Patent has caused substantial damage to Plaintiff. On information and belief, Defendant Kodak's infringement of the '443 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

61. On information and belief, without a license or permission from Plaintiff, the Mustek Defendants have infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 9 and 14 of the '443 Patent. The Mustek Defendants did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, the Mustek Defendants were provided notice of the '443 patent on November 21, 2008. Without limitation, an example of the Mustek Defendants infringing products is the PF-A720BM and related families of products. The Mustek Defendants infringement of the '443 Patent has caused substantial damage to Plaintiff. On information and belief, the Mustek Defendants' infringement of the '443 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

62. On information and belief, without a license or permission from Plaintiff, Defendant Nextar has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 9 and 14 of the '443 Patent.

Defendant Nextar did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, Defendant Nextar was provided notice of the '443 patent on March 11, 2009. Without limitation, an example of Defendant Nextar's infringing products is the N3-504-CST and related families of products. Defendant Nextar's infringement of the '443 Patent has caused substantial damage to Plaintiff. On information and belief, Defendant Nextar's infringement of the '443 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

63. On information and belief, without a license or permission from Plaintiff, Defendant Pandigital has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 9, 11, 12 and 14 of the '443 Patent. Defendant Pandigital did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, Defendant Pandigital was provided notice of the '443 patent on February 21, 2008. Without limitation, an examples of Defendant Pandigital's infringing products is the PI8004W01 and related families of products. Defendant Pandigital's infringement of the '443 Patent has caused substantial damage to Plaintiff. On information and belief, Defendant Pandigital's infringement of the '443 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

64. On information and belief, without a license or permission from Plaintiff, Defendant Royal has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, 9, 11, 12 and 14 claims of the '443 Patent. Defendant Royal did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, Defendant Royal was provided notice of the '443 patent on August 27, 2009. Without limitation, an examples of Defendant Royal's infringing products is the PF120 256 12" and related families of products. Defendant Royal's infringement of the '443 Patent has caused substantial damage

to Plaintiff. On information and belief, Defendant Royal's infringement of the '443 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

65. On information and belief, without a license or permission from Plaintiff, Defendant Sony has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 1, 3, 4, 7, 9, 11, 12, and 14 of the '443 Patent. Defendant Sony did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, Defendant Sony had notice of the '443 patent as of November 30, 2009. Without limitation, an example of Defendant Sony's infringing products is the DPF-D710 and related families of products. Defendant Sony's infringement of the '443 Patent has caused substantial damage to Plaintiff. On information and belief, Defendant Sony's infringement of the '443 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

66. On information and belief, without a license or permission from Plaintiff, the Transcend Defendants have infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 9, 11, 12, and 14 of the '443 Patent. The Transcend Defendants did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, the Transcend Defendants were provided notice of the '443 patent on September 25, 2009. Without limitation, an example of the Transcend Defendants' infringing products is the PF730 and related families of products. The Transcend Defendants' infringement of the '443 Patent has caused substantial damage to Plaintiff. On information and belief, the Transcend Defendants' infringement of the '443 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

67. On information and belief, without a license or permission from Plaintiff, Defendant ViewSonic has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 9, 11, 12 and 14 of the '443 Patent.

Defendant ViewSonic did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, Defendant ViewSonic was provided notice of the '443 patent on September 25, 2009. Without limitation, an examples of Defendant ViewSonic's infringing products is the DPF8-CAM and related families of products. Defendant ViewSonic's infringement of the '443 Patent has caused substantial damage to Plaintiff. On information and belief, Defendant ViewSonic's infringement of the '443 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

68. On information and belief, without a license or permission from Plaintiff, the WinAccord Defendants have infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 9, 11, 12 and 14 of the '443 Patent. The WinAccord Defendants did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, the WinAccord Defendants were provided notice of the '443 patent on August 22, 2011. Without limitation, an example of the WinAccord Defendants infringing products is the Orion Seven.O-7" Slim (OR17D-05) and related families of products. The WinAccord Defendants infringement of the '443 Patent has caused substantial damage to Plaintiff. On information and belief, the WinAccord Defendants' infringement of the '443 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

**FOURTH CAUSE OF ACTION**  
**(Infringement of the '424 Patent)**  
**(35 U.S.C. § 271)**

69. Plaintiff repeats and incorporates by reference each of the allegations contained in Paragraphs 1 through 68 above, and further alleges as follows:

70. On information and belief, without a license or permission from Plaintiff, the Action Defendants have infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 25, 26, 28, and 29 of the '424 Patent.

The Action Defendants did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, the Action Defendants were provided notice of the '424 patent on July 1, 2009. Without limitation, an example of the Action Defendants' infringing products is Home 7" DPF - 1600018 and related families of products. The Action Defendants' infringement of the '424 Patent has caused substantial damage to Plaintiff. On information and belief, the Action Defendants' infringement of the '424 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

71. On information and belief, without a license or permission from Plaintiff, the AIPTEK Defendants have infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 25, 26, 28, and 29 of the '424 Patent. The AIPTEK Defendants did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, the AIPTEK Defendants were provided notice of the '424 patent on June 27, 2011. Without limitation, an example of the AIPTEK Defendants' infringing products is the P8i26 and related families of products. The AIPTEK Defendants' infringement of the '424 Patent has caused substantial damage to Plaintiff. On information and belief, the AIPTEK Defendants' infringement of the '424 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

72. On information and belief, without a license or permission from Plaintiff, Defendant Aluratek has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 25, 26, 28, and 29 of the '424 Patent. Defendant Aluratek did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. Without limitation, an example of Defendant Aluratek's infringing products is the ADMPF315F and related families of products. Defendant Aluratek's infringement of the '424 Patent has caused substantial damage to Plaintiff.

73. On information and belief, without a license or permission from Plaintiff, Defendant Audiovox has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 25, 26, 28 and 29 of the '424 Patent. Defendant Audiovox did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. Without limitation, an example of Defendant Audiovox's infringing products is the DPF808 and related families of products. Defendant Audiovox's infringement of the '424 Patent has caused substantial damage to Plaintiff.

74. On information and belief, without a license or permission from Plaintiff, Defendant CEIVA has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 25, 26, 28 and 29 of the '424 Patent. Defendant CEIVA did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, Defendant CEIVA had notice of the '424 patent at least as of July 14, 2011. Without limitation, an example of Defendant CEIVA's infringing products is the CEIVA Pro 80 and related families of products. Defendant CEIVA's infringement of the '424 Patent has caused substantial damage to Plaintiff. On information and belief, Defendant CEIVA's infringement of the '424 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

75. On information and belief, without a license or permission from Plaintiff, Defendant CWD has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 25, 26, 28 and 29 of the '424 Patent. Defendant CWD did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, Defendant CWD was provided notice of the '424 patent on June 27, 2011. Without limitation, an example of Defendant CWD's infringing products is the MAG-PF0901M and related families of products. Defendant CWD's infringement of the '424 Patent has caused substantial damage to

Plaintiff. On information and belief, Defendant CWD's infringement of the '424 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

76. On information and belief, without a license or permission from Plaintiff, Defendant Coby has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 25, 26, 28 and 29 of the '424 Patent. Defendant Coby did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. Without limitation, an example of Defendant Coby's infringing products is the DP1052 and related families of products. Defendant Coby's infringement of the '424 Patent has caused substantial damage to Plaintiff.

77. On information and belief, without a license or permission from Plaintiff, Defendant Curtis has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 25, 26, 28 and 29 of the '424 Patent. Defendant Curtis did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, Defendant Curtis was provided notice of the '424 patent on November 3, 2009. Without limitation, an example of Defendant Curtis's infringing products is the Sylvania SPDF752 and related families of products. Defendant Curtis's infringement of the '424 Patent has caused substantial damage to Plaintiff. On information and belief, Defendant Curtis' infringement of the '424 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

78. On information and belief, without a license or permission from Plaintiff, Defendant DSS has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 25, 26, 28 and 29 of the '424 Patent. Defendant DSS did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. Without limitation, an example of Defendant DSS's infringing products is the MF-801 and related families of products. Defendant DSS's infringement of the '424 Patent has caused substantial damage to Plaintiff.

79. On information and belief, without a license or permission from Plaintiff, Defendant Kodak has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 25, 26, 28 and 29 of the '424 Patent. Defendant Kodak did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. Without limitation, an example of Defendant Kodak's infringing products is the P730M and related families of products. Defendant Kodak's infringement of the '424 Patent has caused substantial damage to Plaintiff.

80. On information and belief, without a license or permission from Plaintiff, the Mustek Defendants have infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 25, 26, 28, and 29 of the '424 Patent. The Mustek Defendants did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. Without limitation, an example of the Mustek Defendants' infringing products is the PF-A720BM and related families of products. The Mustek Defendants' infringement of the '424 Patent has caused substantial damage to Plaintiff.

81. On information and belief, without a license or permission from Plaintiff, Defendant Nextar has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 25, 26, 28 and 29 of the '424 Patent. Defendant Nextar did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. Without limitation, an example of Defendant Nextar's infringing products is the N3-504-CST and related families of products. Defendant Nextar's infringement of the '424 Patent has caused substantial damage to Plaintiff.

82. On information and belief, without a license or permission from Plaintiff, Defendant Pandigital has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least 25, 26, 28 and 29 claims of the '424 Patent. Defendant Pandigital did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. Without limitation, an example



of Defendant Pandigital's infringing products is the PI8004W01 and related families of products. Defendant Pandigital's infringement of the '424 Patent has caused substantial damage to Plaintiff.

83. On information and belief, without a license or permission from Plaintiff, Defendant Royal has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 25, 26, 28 and 29 of the '424 Patent. Defendant Royal did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, Defendant Royal was provided notice of the '424 patent on August 27, 2009. Without limitation, an example of Defendant Royal's infringing products is the PF120 256 12" and related families of products. Defendant Royal's infringement of the '424 Patent has caused substantial damage to Plaintiff. On information and belief, Defendant Royal's infringement of the '424 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

84. On information and belief, without a license or permission from Plaintiff, Defendant Sony has infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 25, 26, 28 and 29 of the '424 Patent. Defendant Sony did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, Defendant Sony had notice of the '424 patent at least as early as November 30, 2009. Without limitation, an example of Defendant Sony's infringing products is the DPF-D710 and related families of products. Defendant Sony's infringement of the '424 Patent has caused substantial damage to Plaintiff. On information and belief, Defendant Sony's infringement of the '424 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees. On information and belief, Defendant Sony's infringement of the '424 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

85. On information and belief, without a license or permission from Plaintiff, the Transcend Defendants have infringed, induced others to infringe, and/or contributorily infringed,

literally or under the doctrine of equivalents, at least claims 25, 26, 28, and 29 of the '424 Patent. The Transcend Defendants did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, the Transcend Defendants were provided notice of the '424 patent on September 25, 2009. Without limitation, an example of the Transcend Defendants' infringing products is the PF730 and related families of products. The Transcend Defendants' infringement of the '424 Patent has caused substantial damage to Plaintiff. On information and belief, the Transcend Defendants' infringement of the '424 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

86. On information and belief, without a license or permission from Plaintiff, Defendant ViewSonic have infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 25, 26, 28, and 29 of the '424 Patent. Defendant ViewSonic did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, the Defendant ViewSonic was provided notice of the '424 patent on September 25, 2009. Without limitation, an example of Defendant ViewSonic's infringing products is DPF8-CAM and related families of products. Defendant ViewSonic' infringement of the '424 Patent has caused substantial damage to Plaintiff. On information and belief, Defendant ViewSonic's infringement of the '424 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys' fees.

87. On information and belief, without a license or permission from Plaintiff, the WinAccord Defendants have infringed, induced others to infringe, and/or contributorily infringed, literally or under the doctrine of equivalents, at least claims 25, 26, 28, and 29 of the '424 Patent. The WinAccord Defendants did so by importing, making, using, offering to sell, and/or selling products and devices that embody and/or practice the patented invention. On information and belief, the WinAccord Defendants were provided notice of the '424 patent on August 22, 2011. Without limitation, an example of the WinAccord Defendants' infringing

products is the Orion seven.O-7” slim (OR17D-05) and related families of products. The WinAccord Defendants’ infringement of the ’424 Patent has substantially to Plaintiff. On information and belief, the WinAccord Defendants’ infringement of the ’424 Patent has been willful and deliberate, entitling Plaintiff to enhanced damages and attorneys’ fees.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff Technologies Properties Limited, LLC prays for relief as follows:

- A. Declaring that the Patent-in-Suit is valid and enforceable, and that each Defendant has infringed one or more claims of the Patent-in-Suit;
- B. Awarding Plaintiff damages in an amount adequate to compensate Plaintiff for each defendant’s infringement, in accordance with 35 U.S.C. § 284;
- C. Awarding Plaintiff its costs of suit, including reasonable attorney fees, because this is an exceptional case under 35 U.S.C. § 285; and
- D. Granting such other and further relief as this Court may deem just and appropriate.

**DEMAND FOR JURY TRIAL**

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff Technologies Properties Limited, LLC demands a trial by jury of this action.

Dated: August 24, 2011

Respectfully submitted,

By: /s/ Andrew W. Spangler  
Andrew W. Spangler  
State Bar No. 24941960  
[spangler@spanglerlawpc.com](mailto:spangler@spanglerlawpc.com)  
Spangler Law PC  
208 N. Green St., Suite 300  
Longview, TX 75601  
Bus: (903) 753-9300  
Fax: (903) 553-0403

**Co-Counsel:**

James C. Otteson  
CA Bar No. 157781  
(Admitted E.D. Texas)  
[jim@agilityiplaw.com](mailto:jim@agilityiplaw.com)

David A. Caine  
CA Bar No. 218074  
(Admitted E.D. Texas)  
[dacaine@agilityiplaw.com](mailto:dacaine@agilityiplaw.com)

Thomas T. Carmack  
CA Bar No. 229324  
(Admitted E.D. Texas)  
[tom@agilityiplaw.com](mailto:tom@agilityiplaw.com)

Agility IP Law  
1900 University Circle, Suite 201  
East Palo Alto, CA 94303  
Bus: 650-227-4800  
Fax: 650-318-3483

Attorneys for Plaintiff  
Technologies Properties Limited, LLC