

JURISDICTION AND VENUE

4. This is an action for patent infringement arising under the provisions of the Patent Laws of the United States of America, Title 35, United States Code.

5. Subject-matter jurisdiction over Corydoras' claims is conferred upon this Court by 28 U.S.C. §§ 1331 and 1338(a).

6. Huawei has solicited business in the State of Texas, transacted business within the State of Texas and attempted to derive financial benefit from residents of the State of Texas, including benefits directly related to the instant patent infringement cause of action set forth herein.

7. Huawei has made, used, sold, offered for sale, and/or imported mobile phones and/or have placed such phones into the stream of commerce, which phones have been offered for sale, sold, and/or used in the State of Texas.

8. At the time of filing of this Complaint, Huawei's mobile phones are available for purchase by consumers in Texas, including within this District.

9. On information and belief, Huawei has made, used, sold, offered for sale, and/or imported wireless mobile phones that are alleged herein to infringe one or more of the patents set forth herein, and/or have placed such phones into the stream of commerce, which phones have been made, offered for sale, sold, and/or used in the State of Texas.

10. Huawei Technologies Co., Ltd. is identified on the label of the packaging materials of Huawei phones, such as the Honor 6X. Huawei Technologies Co., Ltd. claims trademark rights in the United States associated with Huawei phones, such as the Honor 6X.

11. Huawei Device USA, Inc. is identified on the label of the packaging materials of Huawei phones, such as the Honor 6X.

12. Huawei Technologies Co., Ltd. has voluntarily submitted itself to the jurisdiction of courts in the Eastern District of Texas by commencing litigation in this District.

13. Huawei's U.S. headquarters is located in Plano, Texas.

14. Huawei's U.S. customers include AT&T, Cricket Communications, Metro PCS, Sprint, T-Mobile and Verizon, and retail stores such as Best Buy.

15. This Court has personal jurisdiction over Huawei.

16. Huawei is subject to personal jurisdiction in Texas and this judicial district, and is doing business in this judicial district.

17. Venue is proper in this judicial district under 28 U.S.C. §§ 1391(b), (c), and (d) and 1400(b).

SUMMARY

18. The facts set forth in this Complaint that precede the seven Counts of infringement are incorporated into each Count.

19. Huawei manufactures, has sold and/or sells mobile phones that include a front camera. The front camera is depicted in User Guides that describe and instruct the use and operation of Huawei mobile phones.

20. Huawei's mobile phones with a front camera are capable of displaying a mirror image of an object in the view of the front camera.

21. Huawei phones with a front facing camera are capable of storing an image of an object in the view of the front camera.

22. Huawei mobile phones, such as the Honor 6X, are capable of storing a mirror image of an object in the view of the front camera by activating the "Mirror reflection."

23. Huawei makes, uses, sells, offers for sale and/or imports in the United States mobile phones that include a front camera that display a mirror image of an object in the view of the front camera and that include a second camera, sound caller ID (such as a personal ringtone), voice dialing of a phone number, email, capability to display the phone's location, caller rejection (such as "All calls to voicemail"), and/or video phone capability. Such mobile phones are accused of infringement in this action (collectively "Accused Phones"). Examples of Huawei's Accused Phones, include Huawei's Honor series of phones (such as the Honor 6X and Honor 8), Huawei's Ascend series of phones (such as the Ascend XT), and Huawei's Mate series of phones (such as the Mate 9 and Mate 9 Porsche) and all reasonably similar phones of Huawei that include a front camera that displays a mirror image of an object in the view of the front camera.

24. On information and belief, Huawei has made, used, sold, offered for sale, and/or imported phones reasonably similar to the specifically identified examples of phones in paragraph 24 within the 6 years preceding the filing of this complaint.

25. On information and belief, Huawei is designing and/or manufacturing phones reasonably similar in capability, structure and function to the phones specifically identified in paragraph 24. On information and belief, Huawei will release such reasonably similar phones in the future.

26. Corydoras will rely on a reasonable opportunity for discovery of information regarding reasonably similar phones of Huawei that Huawei made, used, sold, offered for sale, and/or imported in the U.S. within 6 years preceding the filing of this Complaint.

27. Corydoras will rely on a reasonable opportunity for discovery of information regarding reasonably similar phones of Huawei that Huawei makes, uses, sells, offers for sale, and/or imports in the U.S. subsequent to the filing of the Complaint.

28. Huawei's Accused Phones are capable of being used for voice communication.
29. Huawei's Accused Phones are capable of being used for audiovisual communication.
30. Huawei's Accused Phones have two cameras.
31. Huawei's Accused Phones have a camera and display on the same side of the phone.
32. Huawei's Accused Phones have a rear camera with a lens located on the side of the phone that is opposite of the display.
33. Huawei refers to the camera located on the same side of the display as the "front camera".
34. Huawei's Accused Phones include a "front camera" and are capable of displaying a mirror image of an object in the view of the front camera.
35. An Accused Phone can be used in an audiovisual call. During such an audio-visual call, the Accused Phone is capable of displaying a mirror image of the user of the Accused Phone and is capable of wirelessly transmitting an image of the user that is not a mirror image of the user.
36. One or more of Huawei's Accused Phones include a feature referred to as "Mirror." Such feature is described in Huawei User Guides as "Your phone can double as a mirror."
37. Huawei's Accused Phones include a microphone and speaker for use during voice communication.
38. Huawei's Accused Phones include capability identified as "All calls to voicemail."
39. Huawei's "All calls to voicemail," when activated on an Accused Phone, prevents an incoming caller from conducting a voice communication with said Accused Phone.
40. An Accused Phone is capable of displaying its location on its display.
41. Huawei's Accused Phones include capability for authoring and transmitting email.

42. Huawei's Accused Phones include voice dialing capability.

43. Huawei's Accused Phones include capability to identify an incoming call with a specifically designated ringtone.

44. Huawei's Accused Phones are wireless communication phones.

COUNT I – INFRINGEMENT OF THE '664 PATENT

45. On August 17, 2010, U.S. Patent No. 7,778,664 ("the '664 patent"), entitled "Communication Device" was duly and legally issued to the inventor, Iwao Fujisaki. The '664 patent has been assigned to Corydoras. Corydoras owns all right, title, and interest in the '664 patent, including the right to sue for and recover all past, present and future damages for infringement of the '664 patent.

46. The '664 patent is presumed valid.

47. Huawei's Accused Phones are capable of voice communication. For example, the Accused Phones are made and sold with the capability to be used in telephone calls.

48. Huawei's Accused Phones include a camera on the same side as the display. Huawei refers to this camera as the "front camera." Huawei's Accused Phones are capable of displaying a mirror image of the object, such as a person, that is in the view of this camera.

49. On information and belief, the Huawei Accused Phones and/or their use are covered by one or more of the following claims of the '664 patent: 1, 3, 6-10, and/or 15-18.

50. On information and belief, Huawei, either alone or in conjunction with others, has in the past and continues to infringe and/or induce infringement of at least claims 1, 3, 6-10, and/or 15-18 of the '664 patent by making, using, selling, offering to sell, and/or importing, and/or causing others to make, use, sell, or offer to sell, and/or import, in this judicial district and/or

elsewhere in the United States, Accused Phones that alone or in use are covered by such claims of the '664 patent.

51. On information and belief, consumers purchase and use Huawei's Accused Phones and are instructed by Huawei to use such Accused Phones to infringe one or more claims of the '664 patent.

52. On information and belief, Huawei provides instructions, such as User Guides, that instruct consumers on how to use the Accused Phones in such infringing manner, specifically intending such consumers will operate these Accused Phones in such a manner, and knowing of such actions, which constitutes infringement of one or more claims of the '664 patent.

53. On information and belief, Huawei indirectly infringes one or more claims of the '664 patent in violation of 35 U.S.C. 271(b) by inducing consumers of the Accused Phones to directly infringe one or more claims of the '664 patent through their use of such Accused Phones in accordance with Huawei's instructions.

54. For example, on information and belief, Huawei induces direct infringement of the '664 patent by providing User Guides and instructions for the Accused Phones that instruct users how to use and operate the Accused Phones such that, by following Huawei's instructions, the users of the Accused Phones directly infringe one or more claims of the '664 patent. Huawei engages in such inducement knowingly and from the time of receipt of the Complaint, has done so with knowledge that such activity encourages consumers of its Accused Phones to directly infringe the '664 patent.

55. Huawei is liable for infringement of the '664 patent pursuant to 35 U.S.C. § 271.

56. Huawei's acts of infringement have caused damage to Corydoras, and Corydoras is entitled to recover from Huawei the damages sustained by Corydoras as a result of Huawei's wrongful acts in an amount subject to proof at trial.

COUNT II – INFRINGEMENT OF THE '236 PATENT

57. On May 17, 2011, U.S. Patent No. 7,945,236 ("the '236 patent"), entitled "Communication Device" was duly and legally issued to the inventor, Iwao Fujisaki. The '236 patent has been assigned to Corydoras. Corydoras owns all right, title, and interest in the '236 patent, including the right to sue for and recover all past, present and future damages for infringement of the '236 patent.

58. The '236 patent is presumed valid.

59. Huawei's Accused Phones are capable of voice communication. For example, the Accused Phones are made and sold with the capability to be used in telephone calls

60. Huawei's Accused Phones include a camera on the same side as the display. Huawei refers to this camera as the "front camera." Huawei's Accused Phones are capable of displaying a mirror image of the object, such as a person, that is in the view of this camera.

61. Each of Huawei's Accused Phones is capable of displaying its geographic location on its display. Each of Huawei's Accused Phones is capable of displaying its geographic location on its display based, at least in part, on GPS data.

62. On information and belief, the Huawei Accused Phones and/or their use are covered by one or more of the following claims of the '236 patent: 1-3, 5, 8-11, and/or 16-18.

63. On information and belief, Huawei, either alone or in conjunction with others, has in the past and continues to infringe and/or induce infringement of at least claims 1-3, 5, 8-11, and/or 16-18 of the '236 patent by making, using, selling, offering to sell, and/or importing, and/or

causing others to make, use, sell, or offer to sell, and/or import, in this judicial district and/or elsewhere in the United States, Accused Phones that alone or in use are covered by such claims of the '236 patent.

64. On information and belief, consumers purchase and use Huawei's Accused Phones and are instructed by Huawei to use such Accused Phones and to perform methods that infringe one or more claims of the '236 patent.

65. On information and belief, Huawei provides instructions, such as User Guides, that instruct consumers on how to use Huawei's Accused Phones in such infringing manner, specifically intending such consumers will operate these Accused Phones in such a manner, and knowing of such actions, which constitutes infringement of one or more claims of the '236 patent.

66. On information and belief, Huawei indirectly infringes one or more claims of the '236 patent in violation of 35 U.S.C. 271(b) by inducing consumers of Huawei's Accused Phones to directly infringe one or more claims of the '236 patent through their use of such Accused Phones in accordance with Huawei's instructions.

67. For example, on information and belief, Huawei induces direct infringement of the '236 patent by providing User Guides and instructions for the Accused Phones that instruct users how to use and operate the Accused Phones such that, by following Huawei's instructions, the users of the Accused Phones directly infringe one or more claims of the '236 patent. Huawei engages in such inducement knowingly and from the time of receipt of the Complaint, has done so with knowledge that such activity encourages consumers of its Accused Phones to directly infringe the '236 patent.

68. Huawei is liable for infringement of the '236 patent pursuant to 35 U.S.C. § 271.

69. Huawei's acts of infringement have caused damage to Corydoras, and Corydoras is entitled to recover from Huawei the damages sustained by Corydoras as a result of Huawei's wrongful acts in an amount subject to proof at trial.

COUNT III – INFRINGEMENT OF THE '287 PATENT

70. On May 17, 2011, U.S. Patent No. 7,945,287 ("the '287 patent"), entitled "Communication Device" was duly and legally issued to the inventor, Iwao Fujisaki. The '287 patent has been assigned to Corydoras. Corydoras owns all right, title, and interest in the '287 patent, including the right to sue for and recover all past, present and future damages for infringement of the '287 patent.

71. The '287 patent is presumed valid.

72. Huawei's Accused Phones are capable of voice communication. For example, the Accused Phones are made and sold with the capability to be used in telephone calls.

73. Huawei's Accused Phones include a camera on the same side as the display. Huawei refers to this camera as the "front camera." Huawei's Accused Phones are capable of displaying a mirror image of the object, such as a person, that is in the view of this camera.

74. Huawei's Accused Phones are manufactured and sold with multiple ringtones preloaded on each Accused Phone. Each Accused Phone is capable of associating an incoming call with a preloaded ringtone designated by the user of the Accused Phone.

75. On information and belief, the Huawei's Accused Phones and/or their use are covered by one or more of the following claims of the '287 patent: 1-3, 5, 8-11, and/or 16-18.

76. On information and belief, Huawei, either alone or in conjunction with others, has in the past and continues to infringe and/or induce infringement of at least claims 1-3, 5, 8-11, and/or 16-18 of the '287 patent by making, using, selling, offering to sell, and/or importing, and/or

causing others to make, use, sell, or offer to sell, and/or import, in this judicial district and/or elsewhere in the United States, Accused Phones that alone or in use are covered by such claims of the '287 patent.

77. On information and belief, consumers purchase and use Huawei's Accused Phones and are instructed by Huawei to use such Accused Phones and to perform methods that infringe one or more claims of the '287 patent.

78. On information and belief, Huawei provides instructions, such as User Guides, that instruct consumers on how to use Huawei's Accused Phones in such infringing manner, specifically intending such consumers will operate these Accused Phones in such a manner, and knowing of such actions, which constitutes infringement of one or more claims of the '287 patent.

79. On information and belief, Huawei indirectly infringes one or more claims of the '287 patent in violation of 35 U.S.C. 271(b) by inducing consumers of Huawei's Accused Phones to directly infringe one or more claims of the '287 patent through their use of such Accused Phones in accordance with Huawei's instructions.

80. For example, on information and belief, Huawei induces direct infringement of the '287 patent by providing User Guides and instructions for the Accused Phones that instruct users how to use and operate the Accused Phones such that, by following Huawei's instructions, the users of the Accused Phones directly infringe one or more claims of the '287 patent. Huawei engages in such inducement knowingly and from the time of receipt of the Complaint, has done so with knowledge that such activity encourages consumers of its Accused Phones to directly infringe the '287 patent.

81. Huawei is liable for infringement of the '287 patent pursuant to 35 U.S.C. § 271.

82. Huawei's acts of infringement have caused damage to Corydoras, and Corydoras is entitled to recover from Huawei the damages sustained by Corydoras as a result of Huawei's wrongful acts in an amount subject to proof at trial.

COUNT IV – INFRINGEMENT OF THE '037 PATENT

83. On August 9, 2011, U.S. Patent No. 7,996,037 ("the '037 patent"), entitled "Communication Device" was duly and legally issued to the inventor, Iwao Fujisaki. The '037 patent has been assigned to Corydoras. Corydoras owns all right, title, and interest in the '037 patent, including the right to sue for and recover all past, present and future damages for infringement of the '037 patent.

84. The '037 patent is presumed valid.

85. Huawei's Accused Phones are capable of voice communication. For example, the Accused Phones are made and sold with the capability to be used in telephone calls.

86. Huawei's Accused Phones include a camera on the same side as the display. Huawei refers to this camera as the "front camera." Huawei's Accused Phones are capable of displaying a mirror image of the object, such as a person, that is in the view of this camera.

87. Huawei's Accused Phones are capable of initiating a phone call using voice commands. By way of example, Huawei's "quick calling" provides the capability to initiate a phone call in response to a voice command.

88. On information and belief, the Accused Phones and/or their use are covered by one or more of the following claims of the '037 patent: 1-3, 5, 8-11, and/or 16-18.

89. On information and belief, Huawei, either alone or in conjunction with others, has in the past and continues to infringe and/or induce infringement of at least claims 1-3, 5, 8-11, and/or 16-18 of the '037 patent by making, using, selling, offering to sell, and/or importing, and/or

causing others to make, use, sell, or offer to sell, and/or import, in this judicial district and/or elsewhere in the United States, Accused Phones that alone or in use are covered by such claims of the '037 patent.

90. On information and belief, consumers purchase and use Huawei's Accused Phones and are instructed by Huawei to use such Accused Phones and to perform methods that infringe one or more claims of the '037 patent.

91. On information and belief, Huawei provides instructions, such as User Guides, that instruct consumers on how to use Huawei's Accused Phones in such infringing manner, specifically intending such consumers will operate these Accused Phones in such a manner, and knowing of such actions, which constitutes infringement of one or more claims of the '037 patent.

92. On information and belief, Huawei indirectly infringes one or more claims of the '037 patent in violation of 35 U.S.C. 271(b) by inducing consumers of Huawei's Accused Phones to directly infringe one or more claims of the '037 patent through their use of such Accused Phones in accordance with Huawei's instructions.

93. For example, on information and belief, Huawei induces direct infringement of the '037 patent by providing User Guides and instructions for the Accused Phones that instruct users how to use and operate the Accused Phones such that, by following Huawei's instructions, the users of the Accused Phones directly infringe one or more claims of the '037 patent. Huawei engages in such inducement knowingly and from the time of receipt of the Complaint, has done so with knowledge that such activity encourages consumers of its Accused Phones to directly infringe the '037 patent.

94. Huawei is liable for infringement of the '037 patent pursuant to 35 U.S.C. § 271.

95. Huawei's acts of infringement have caused damage to Corydoras, and Corydoras is entitled to recover from Huawei the damages sustained by Corydoras as a result of Huawei's wrongful acts in an amount subject to proof at trial.

COUNT V – INFRINGEMENT OF THE '009 PATENT

96. On September 20, 2011, U.S. Patent No. 8,024,009 (“the ‘009 patent”), entitled “Communication Device” was duly and legally issued to the inventor, Iwao Fujisaki. The ‘009 patent has been assigned to Corydoras. Corydoras owns all right, title, and interest in the ‘009 patent, including the right to sue for and recover all past, present and future damages for infringement of the ‘009 patent.

97. The ‘009 patent is presumed valid.

98. Huawei's Accused Phones are capable of voice communication. For example, the Accused Phones are made and sold with the capability to be used in telephone calls.

99. Huawei's Accused Phones include a camera on the same side as the display. Huawei refers to this camera as the “front camera.” Huawei's Accused Phones are capable of displaying a mirror image of the object, such as a person, that is in the view of this camera.

100. Huawei's Accused Phones include capability to reject an unwanted caller. For example, one such capability provided by Huawei is identified as “All calls to voicemail.” If “All calls to voicemail” is enabled on an Accused Phone, an incoming call from a caller that has been designated as “All calls to voicemail” will be rejected and it will not be connected to conduct a voice communication with the Accused Phone.

101. On information and belief, the Accused Phones and/or their use are covered by one or more of the following claims of the ‘009 patent: 1-3, 5, 8-11, and/or 16-18.

102. On information and belief, Huawei, either alone or in conjunction with others, has in the past and continues to infringe and/or induce infringement of at least claims 1-3, 5, 8-11, and/or 16-18 of the '009 patent by making, using, selling, offering to sell, and/or importing, and/or causing others to make, use, sell, or offer to sell, and/or import, in this judicial district and/or elsewhere in the United States, Accused Phones that alone or in use are covered by such claims of the '009 patent.

103. On information and belief, consumers purchase and use Huawei's Accused Phones and are instructed by Huawei to use such Accused Phones and to perform methods that infringe one or more claims of the '009 patent.

104. On information and belief, Huawei provides instructions, such as User Guides, that instruct consumers on how to use Huawei's Accused Phones in such infringing manner, specifically intending such consumers will operate these Accused Phones in such a manner, and knowing of such actions, which constitutes infringement of one or more claims of the '009 patent.

105. On information and belief, Huawei indirectly infringes one or more claims of the '009 patent in violation of 35 U.S.C. 271(b) by inducing consumers of Huawei's Accused Phones to directly infringe one or more claims of the '009 patent through their use of such Accused Phones in accordance with Huawei's instructions.

106. For example, on information and belief, Huawei induces direct infringement of the '009 patent by providing User Guides and instructions for the Accused Phones that instruct users how to use and operate the Accused Phones such that, by following Huawei's instructions, the users of the Accused Phones directly infringe one or more claims of the '009 patent. Huawei engages in such inducement knowingly and from the time of receipt of the Complaint, has done

so with knowledge that such activity encourages consumers of its Accused Phones to directly infringe the '009 patent.

107. Huawei is liable for infringement of the '009 patent pursuant to 35 U.S.C. § 271.

108. Huawei's acts of infringement have caused damage to Corydoras, and Corydoras is entitled to recover from Huawei the damages sustained by Corydoras as a result of Huawei's wrongful acts in an amount subject to proof at trial.

COUNT VI – INFRINGEMENT OF THE '540 PATENT

109. On May 20, 2014, U.S. Patent No. 8,731,540 ("the '540 patent"), entitled "Communication Device" was duly and legally issued to the inventor, Iwao Fujisaki. The '540 patent has been assigned to Corydoras. Corydoras owns all right, title and interest in the '540 patent, including the right to sue for and recover all past, present and future damages for infringement of the '540 patent.

110. The '540 patent is presumed valid.

111. Huawei's Accused Phones are capable of voice communication. For example, the Accused Phones are made and sold with the capability to be used in telephone calls.

112. Huawei's Accused Phones include a camera on the same side as the display. Huawei refers to this camera as the "front camera." Huawei's Accused Phones are capable of displaying a mirror image of the object, such as a person, that is in the view of this camera.

113. Huawei's Accused Phones are capable of sending and receiving email. Huawei's Accused Phones are capable of authoring an email based on input from a user and wirelessly transmitting such email to a recipient.

114. On information and belief, the Accused Phones and/or their use are covered by one or more of the following claims of the '540 patent: 1-6, 8-11, 13-16 and/or 18.

115. On information and belief, Huawei, either alone or in conjunction with others, has in the past and continues to infringe and/or induce infringement of at least claims 1-6, 8-11, 13-16 and/or 18 of the '540 patent by making, using, selling, offering to sell, and/or importing, and/or causing others to make, use, sell, or offer to sell, and/or import, in this judicial district and/or elsewhere in the United States, Accused Phones that alone or in use are covered by such claims of the '540 patent.

116. On information and belief, consumers purchase and use Huawei's Accused Phones and are instructed by Huawei to use such Accused Phones and to perform methods that infringe one or more claims of the '540 patent.

117. On information and belief, Huawei provides instructions, such as User Guides, that instruct consumers on how to use Huawei's Accused Phones in such infringing manner, specifically intending such consumers will operate these Accused Phones in such a manner, and knowing of such actions, which constitutes infringement of one or more claims of the '540 patent.

118. On information and belief, Huawei indirectly infringes one or more claims of the '540 patent in violation of 35 U.S.C. 271(b) by inducing consumers of Huawei's Accused Phones to directly infringe one or more claims of the '540 patent through their use of such Accused Phones in accordance with Huawei's instructions.

119. For example, on information and belief, Huawei induces direct infringement of the '540 patent by providing User Guides and instructions for the Accused Phones that instruct users how to use and operate the Accused Phones such that, by following Huawei's instructions, the users of the Accused Phones directly infringe one or more claims of the '540 patent. Huawei engages in such inducement knowingly and from the time of receipt of the Complaint, has done

so with knowledge that such activity encourages consumers of its Accused Phones to directly infringe the '540 patent.

120. Huawei is liable for infringement of the '540 patent pursuant to 35 U.S.C. § 271.

121. Huawei's acts of infringement have caused damage to Corydoras, and Corydoras is entitled to recover from Huawei the damages sustained by Corydoras as a result of Huawei's wrongful acts in an amount subject to proof at trial.

COUNT VII – INFRINGEMENT OF THE '741 PATENT

122. On November 24, 2015, U.S. Patent No. 9,197,741 ("the '741 patent"), entitled "Communication Device" was duly and legally issued to the inventor, Iwao Fujisaki. The '741 patent has been assigned to Corydoras. Corydoras owns all right, title, and interest in the '741 patent, including the right to sue for and recover all past, present and future damages for infringement of the '741 patent.

123. The '741 patent is presumed valid.

124. Huawei's Accused Phones are capable of voice communication. For example, the Accused Phones are made and sold with the capability to be used in telephone calls.

125. Huawei's Accused Phones include a camera on the same side as the display. Huawei refers to this camera as the "front camera." Huawei's Accused Phones are capable of displaying a mirror image of the object, such as a person, that is in the view of this camera.

126. Huawei's Accused Phones display a mirror image of an object in the view of the front camera. Huawei's Accused Phones are capable of wirelessly transmitting video of that object during an audiovisual call.

127. Huawei's Accused Phones include a second camera that faces opposite the direction of the front camera.

128. Each of Huawei's Accused Phones are capable of associating a specific ringtone with a specific incoming phone number.

129. On information and belief, the Accused Phones and/or their use are covered by one or more of the following claims of the '741 patent: 1, 2, 4, and/or 9.

130. On information and belief, Huawei, either alone or in conjunction with others, has in the past and continues to infringe and/or induce infringement of at least claims 1, 2, 4, and/or 9 of the '741 patent by making, using, selling, offering to sell, and/or importing, and/or causing others to make, use, sell, or offer to sell, and/or import, in this judicial district and/or elsewhere in the United States, Accused Phones that alone or in use are covered by such claims of the '741 patent.

131. On information and belief, consumers purchase and use Huawei's Accused Phones and are instructed by Huawei to use such Accused Phones in a manner that infringes one or more claims of the '741 patent.

132. On information and belief, Huawei provides instructions, such as User Guides, that instruct consumers on how to use Huawei's Accused Phones in such infringing manner, specifically intending such consumers will operate these Accused Phones in such a manner, and knowing of such actions, which constitutes infringement of one or more claims of the '741 patent.

133. On information and belief, Huawei indirectly infringes one or more claims of the '741 patent in violation of 35 U.S.C. 271(b) by inducing consumers of Huawei's Accused Phones to directly infringe one or more claims of the '741 patent through their use of such Accused Phones in accordance with Huawei's instructions.

134. For example, on information and belief, Huawei induces direct infringement of the '741 patent by providing User Guides and instructions for the Accused Phones that instruct users

how to use and operate the Accused Phones such that, by following Huawei's instructions, the users of the Accused Phones directly infringe one or more claims of the '741 patent. Huawei engages in such inducement knowingly and from the time of receipt of the Complaint, has done so with knowledge that such activity encourages consumers of its Accused Phones to directly infringe the '741 patent.

135. Huawei is liable for infringement of the '741 patent pursuant to 35 U.S.C. § 271.

136. Huawei's acts of infringement have caused damage to Corydoras, and Corydoras is entitled to recover from Huawei the damages sustained by Corydoras as a result of Huawei's wrongful acts in an amount subject to proof at trial.

PRAYER FOR RELIEF

WHEREFORE, Corydoras prays for entry of judgment that:

A. Huawei has directly infringed and/or induced infringement of the '664, '236, '287, '037, '009, '540 and '741 patents;

B. Huawei accounts for and pays to Corydoras all damages caused by Huawei's infringement of the '664, '236, '287, '037, '009, '540 and '741 patents;

C. Corydoras be granted pre-judgment and post-judgment interest on the damages caused to it by reason of Huawei's patent infringement;

D. Corydoras be granted its reasonable attorneys' fees;

E. Costs be awarded to Corydoras; and,

G. Corydoras be granted such other and further relief as the Court may deem just and proper under the circumstances.

DEMAND FOR JURY TRIAL

Corydoras demands trial by jury on all claims and issues so triable.

Respectfully submitted,

Dated: September 20, 2017

By: /s/ John T. Polasek
John T. Polasek
Texas Bar. No. 16088590
tpolasek@pqelaw.com
C. Dale Quisenberry
Texas Bar No. 24005040
dquisenberry@pqelaw.com
POLASEK, QUISENBERRY & ERRINGTON, L.L.P.
6750 West Loop South, Suite 920
Bellaire, Texas 77401
Telephone: (832) 778-6000
Facsimile: (832) 778-6010

Otis W. Carroll
State Bar No. 03895700
otiscarroll@icklaw.com
Deborah Race
State Bar No. 16448700
drace@icklaw.com
IRELAND, CARROLL & KELLEY, P.C
6101 S. Broadway, Suite 500
P.O. Box 7879
Tyler, Texas 75711
Telephone: (903) 561-1600
Facsimile: (903) 581-1071

Elizabeth L. DeRieux
State Bar No. 05770585
ederieux@capshawlaw.com
D. Jeffrey Rambin
State Bar No. 00791478
jrambin@capshawlaw.com
CAPSHAW DERIEUX, LLP
114 East Commerce Avenue
Gladewater, Texas 75647
Telephone: (903) 845-5770

Counsel for Corydoras Technologies, LLC

CERTIFICATE OF SERVICE

I certify that the foregoing document was filed electronically on the 20th day of September, 2017, pursuant to Local Rule CV-5(a) and has been served on all counsel whom have consented to electronic service. Any other counsel of record will be served by first class U.S. mail on this same date.

/s/ John T. Polasek
John T. Polasek