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5 Attorneys for Plaintiff
6 INNOVATIVE WIRELESS SOLUTIONS,
LLC
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE CENTRAL DISTRICT OF CALIFORNIA
10 WESTERN DIVISION

11 INNOVATIVE WIRELESS
SOLUTIONS, LLC,

12 Plaintiff,

13 v.

14 TRENDNET, INC.,

15 Defendant.
16

Civil Case No. LA CV 13-8545

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY TRIAL DEMANDED

17 **COMPLAINT FOR PATENT INFRINGEMENT**

18 Plaintiff Innovative Wireless Solutions, LLC (“IWS” or “Plaintiff”), by way
19 of its Complaint for Patent Infringement (“Complaint”) against Defendant
20 TRENDnet, Inc. (“TRENDnet” or “Defendant”) alleges as follows:

21 **JURISDICTION AND VENUE**

22 1. This is a civil action for patent infringement arising under the patent
23 laws of the United States, 35 U.S.C. § 1 *et seq.* This Court has subject matter
24 jurisdiction over such Federal Question claims pursuant to 28 U.S.C. §§ 1331 and
25 1338(a).

26 2. Venue is proper in this Judicial District under 28 U.S.C. §§ 1391 and
27 1400(b).
28

1 3. On information and belief, Defendant is subject to the jurisdiction of
2 this Court by virtue of the fact that it is organized under the laws of the State of
3 California. On information and belief, Defendant is also subject to the jurisdiction
4 of this Court by reason of its acts of patent infringement which have been
5 committed in this Judicial District, and by virtue of its regularly conducted and
6 systematic business contacts in this State. As such, Defendant has purposefully
7 availed itself of the privilege of conducting business within this Judicial District,
8 has established sufficient minimum contacts with this Judicial District such that it
9 should reasonably and fairly anticipate being haled into court in this Judicial
10 District, has purposefully directed activities at residents of this State, and at least a
11 portion of the patent infringement claims alleged herein arise out of or are related to
12 one or more of the foregoing activities.

13 **THE PARTIES**

14 4. Plaintiff Innovative Wireless Solutions, LLC (“IWS”) is a Texas
15 limited liability company with a place of business at 555 Republic Drive, Suite 200,
16 Plano, Texas 75074.

17 5. On information and belief, Defendant TRENDnet is a corporation
18 organized under the laws of the State of California. On information and belief
19 Defendant has a place of business at 20675 Manhattan Place, Torrance, California
20 90501.

21 **THE PATENT-IN-SUIT**

22 6. The allegations set forth in the foregoing paragraphs 1 through 5 are
23 hereby realleged and incorporated herein by reference.

24 7. On June 15, 1999, U.S. Patent Number 5,912,895 (the “’895 Patent”),
25 entitled “INFORMATION NETWORK ACCESS APPARATUS AND METHODS
26 FOR COMMUNICATING INFORMATION PACKETS VIA TELEPHONE
27 LINES,” was duly and legally issued by the United States Patent and Trademark
28

1 Office. A true and correct copy of the '895 Patent is attached as Exhibit A to this
2 Complaint.

3 8. On December 4, 2001, U.S. Patent Number 6,327,264 (the "'264
4 Patent"), entitled "INFORMATION NETWORK ACCESS APPARATUS AND
5 METHODS FOR COMMUNICATING INFORMATION PACKETS VIA
6 TELEPHONE LINES," was duly and legally issued by the United States Patent and
7 Trademark Office. A true and correct copy of the '264 Patent is attached as Exhibit
8 B to this Complaint.

9 9. On July 1, 2003, U.S. Patent Number 6,587,473 (the "'473 Patent"),
10 entitled "INFORMATION NETWORK ACCESS APPARATUS AND METHODS
11 FOR COMMUNICATING INFORMATION PACKETS VIA TELEPHONE
12 LINES," was duly and legally issued by the United States Patent and Trademark
13 Office. A true and correct copy of the '473 Patent is attached as Exhibit C to this
14 Complaint.

15 10. IWS is the assignee and owner of the right, title and interest in and to
16 the '895, '264 and '473 Patents (collectively, the "patents-in-suit"), including the
17 right to assert all causes of action arising under said patents and the right to any
18 remedies for infringement.

19 **COUNT I**

20 **(INFRINGEMENT OF U.S. PATENT NO. 5,912,895)**

21 11. The allegations set forth in the foregoing paragraphs 1 through 10 are
22 hereby realleged and incorporated herein by reference.

23 12. IWS provided actual notice to Defendant of its infringement of the
24 '895 Patent in a letter dated October 18, 2013 from IWS to Defendant. In this
25 letter, IWS informed Defendant that it was infringing the '895 Patent by making,
26 using, offering for sale, selling, and/or importing wireless access points and/or
27 routers capable of connecting to an Ethernet network and an IEEE 802.11 wireless
28 network (the "'895 Patent Accused Products") to provide wireless Internet access.

1 13. IWS's letter further informed Defendant that its wireless network
2 satisfied all of the limitations of at least claim 48 of the '895 Patent in at least the
3 following manner:

4 a. The '895 Patent Accused Products provide communication with
5 a CSMA/CD network (an Ethernet network) via a bidirectional
6 communications path (the wireless path).

7 b. The '895 Patent Accused Products are located at a first end of
8 the wireless path and include an Ethernet interface to an Ethernet network.
9 Ethernet is a CSMA/CD technology. The '895 Patent Accused Products
10 include a buffer for buffering information packets received from the Ethernet
11 network via the Ethernet interface for supply to the wireless path. The '895
12 Patent Accused Products also include a buffer for buffering information
13 packets received from the wireless path for supply to the Ethernet network
14 via the Ethernet interface. The '895 Patent Accused Products also include a
15 controller that implements the control protocol as defined in IEEE 802.11.

16 c. A station is connected at a second end of the wireless path. The
17 station includes a buffer for buffering information packets received from the
18 wireless path, a buffer for buffering information packets to be supplied to the
19 wireless path, and a controller.

20 d. The controller in the '895 Patent Accused Products and the
21 controller in the station are arranged to exchange control information over
22 the wireless path so as to allow information packets to be communicated bi-
23 directionally over the wireless path between the buffers of the '895 Patent
24 Accused Products and the station in a half-duplex manner.

25 14. IWS's letter further informed Defendant that it was inducing
26 infringement of the '895 Patent under 35 U.S.C. § 271(b) by actively aiding and
27 abetting others to engage in the following actions that constitute direct
28 infringement: (1) performing the steps of the method claims in connection with use

1 of the '895 Patent Accused Products; (2) using the '895 Patent Accused Products;
2 and (3) combining the '895 Patent Accused Products with other components to
3 form the claimed invention. This letter further explained that such other entities
4 include, for example, Defendant's partners, customers and end users of the '895
5 Patent Accused Products. This letter further explained that Defendant's acts of
6 inducement include but are not limited to advertising, offering for sale, and selling
7 the '895 Patent Accused Products, and providing user manuals, product
8 documentation, and other instructions regarding the use of the wireless networking
9 features of the '895 Patent Accused Products.

10 15. IWS's letter also informed Defendant that it was contributing to
11 infringement of the '895 Patent under 35 U.S.C. § 271(c) by providing the '895
12 Patent Accused Products to others, including its partners, customers, and end users,
13 because the '895 Patent Accused Products constitute a material part of the
14 invention, were especially made or especially adapted for use in an infringement of
15 the '895 Patent, and have no substantial non-infringing uses. IWS further identified
16 within this letter that, for example, the '895 Patent Accused Products constitute a
17 material part of the claimed invention at least because they contain the components
18 that interface a wireless network to an Ethernet network and provide control
19 information to the wireless devices as claimed in the '895 Patent. Further, IWS
20 explained that the '895 Patent Accused Products were made or especially adapted
21 for use in an infringement of the '895 Patent and have no substantial non-infringing
22 uses at least because they contain components whose only purpose is to interface a
23 wireless network to an Ethernet network and provide control information to the
24 wireless devices as claimed in the '895 Patent.

25 16. Defendant has had actual knowledge of the '895 Patent and its
26 infringement of that patent since at least the date that Defendant received the
27 October 18, 2013 notice letter from IWS.
28

1 17. In violation of 35 U.S.C. § 271(a), Defendant has directly infringed
2 and continues to directly infringe, both literally and under the doctrine of
3 equivalents, the '895 Patent by making, using, offering to sell, and selling in the
4 United States, and importing into the United States, products that practice the
5 subject matter claimed in one or more claims of the '895 Patent, including but not
6 limited to claim 48, without the authority of IWS. The '895 Patent Accused
7 Products include, but are not limited to, Defendant's wireless base stations, wireless
8 access points and wireless routers including, but not limited to, Defendant's IEEE
9 802.11 compliant wireless access points and wireless routers such as its N450
10 Wireless Access Point.

11 18. Upon information and belief, Defendant has induced and continues to
12 induce others to infringe the '895 Patent under 35 U.S.C. § 271(b) by, and with
13 specific intent or willful blindness, actively aiding and abetting others to engage in
14 the following actions that constitute direct infringement: (1) performing the steps
15 of the method claims in connection with use of the '895 Patent Accused Products;
16 (2) using the '895 Patent Accused Products; and (3) combining the '895 Patent
17 Accused Products with other components to form the claimed invention. Such
18 other entities include, for example, Defendant's partners, customers and end users
19 of the '895 Patent Accused Products. Defendant's acts of inducement include its
20 advertising, offering for sale, and selling the '895 Patent Accused Products, and
21 providing user manuals, product documentation, and other instructions regarding
22 the use of the wireless networking features of the '895 Patent Accused Products.
23 On information and belief, Defendant has engaged in such actions with specific
24 intent to cause infringement or with willful blindness to the resulting infringement
25 because Defendant has had actual knowledge of the '895 Patent and that its acts
26 were inducing others to infringe the '895 Patent since at least the date it received
27 the notice letter from IWS notifying Defendant of its infringement of the '895
28 Patent.

1 19. Upon information and belief, Defendant has committed and continues
2 to commit acts of contributory infringement of the '895 Patent under 35 U.S.C.
3 § 271(c) by offering to sell, selling, and importing the '895 Patent Accused
4 Products. The '895 Patent Accused Products constitute a material part of the
5 invention, were especially made or especially adapted for use in an infringement of
6 the '895 Patent, and have no substantial non-infringing uses. The '895 Patent
7 Accused Products constitute a material part of the claimed invention at least
8 because they contain the components that interface a wireless network to an
9 Ethernet network and provide control information to the wireless devices as
10 claimed in the '895 Patent. Further, the '895 Patent Accused Products were made
11 or especially adapted for use in an infringement of the '895 Patent and have no
12 substantial non-infringing uses at least because they contain components whose
13 only purpose is to interface a wireless network to an Ethernet network and provide
14 control information to the wireless devices as claimed in the '895 Patent.
15 Defendant has known or remained willfully blind to these facts since at least the
16 date it received the notice letter from IWS detailing Defendant's infringement of
17 the '895 Patent.

18 20. IWS has been harmed by the Defendant's infringing activities.

19 21. IWS notified Defendant of its infringement of the '895 Patent
20 including an identification of the particular infringing products and features, but
21 Defendant thereafter continued to infringe the '895 Patent by continuing the
22 activities described in Paragraph 12-15. On information and belief, Defendant has
23 not obtained an opinion of counsel regarding the '895 Patent. The Defendant's
24 continued infringement has therefore been in reckless disregard of IWS's patent
25 rights. On information and belief, the Defendant's infringement has been and
26 continues to be willful.

COUNT II

(INFRINGEMENT OF U.S. PATENT NO. 6,327,264)

1
2
3 22. The allegations set forth in the foregoing paragraphs 1 through 21 are
4 hereby realleged and incorporated herein by reference.

5 23. IWS provided actual notice to Defendant of its infringement of the
6 '264 Patent in a letter dated October 18, 2013 from IWS to Defendant. In this
7 letter, IWS informed Defendant that it was infringing the '264 Patent by making,
8 using, offering for sale, selling, and/or importing wireless access points and/or
9 routers capable of connecting to an Ethernet network and an IEEE 802.11 wireless
10 network (the "'264 Patent Accused Products") to provide wireless Internet access.

11 24. IWS's letter further informed Defendant that its wireless network
12 satisfied all of the limitations of at least claim 5 of the '264 Patent in at least the
13 following manner:

14 a. The '264 Patent Accused Products allow wireless devices to
15 connect to a network.

16 b. The '264 Patent Accused Products include an Ethernet interface
17 for coupling to an Ethernet network. Ethernet is a CSMA/CD technology.

18 c. The '264 Patent Accused Products include a wireless interface
19 for coupling to the wireless network which provides a wireless bidirectional
20 communications path.

21 d. The '264 Patent Accused Products include a controller that
22 implements a control protocol as defined in IEEE 802.11. In accordance
23 with the wireless protocol, the controller provides information that controls
24 when wireless devices connected to the network are allowed to transmit,
25 thereby causing the communications over the wireless network to occur in a
26 half-duplex manner.

27 e. The '264 Patent Accused Products include a first buffer that
28 holds frames received from the Ethernet network via the Ethernet interface

1 and then supplies those frames via the wireless interface to the wireless
2 network.

3 f. The '264 Patent Accused Products include a second buffer that
4 holds frames received from the wireless network via the wireless interface
5 and then supplies those frames via the Ethernet interface to the Ethernet
6 network.

7 25. IWS's letter further informed Defendant that it was inducing
8 infringement of the '264 Patent under 35 U.S.C. § 271(b) by actively aiding and
9 abetting others to engage in the following actions that constitute direct
10 infringement: (1) performing the steps of the method claims in connection with use
11 of the '264 Patent Accused Products; (2) using the '264 Patent Accused Products;
12 and (3) combining the '264 Patent Accused Products with other components to
13 form the claimed invention. This letter further explained that such other entities
14 include, for example, Defendant's partners, customers and end users of the '264
15 Patent Accused Products. This letter further explained that Defendant's acts of
16 inducement include but are not limited to advertising, offering for sale, and selling
17 the '264 Patent Accused Products, and providing user manuals, product
18 documentation, and other instructions regarding the use of the wireless networking
19 features of the '264 Patent Accused Products.

20 26. Defendant has had actual knowledge of the '264 Patent and its
21 infringement of that patent since at least the date that Defendant received the
22 October 18, 2013 notice letter from IWS.

23 27. In violation of 35 U.S.C. § 271(a), Defendant has directly infringed
24 and continues to directly infringe, both literally and under the doctrine of
25 equivalents, the '264 Patent by making, using, offering to sell, and selling in the
26 United States, and importing into the United States, products that practice the
27 subject matter claimed in one or more claims of the '264 Patent, including but not
28 limited to claim 5, without the authority of IWS. The '264 Patent Accused

1 Products include, but are not limited to, Defendant's wireless base stations, wireless
2 access points and wireless routers including, but not limited to, Defendant's IEEE
3 802.11 compliant wireless access points and wireless routers such as its N450
4 Wireless Access Point.

5 28. Upon information and belief, Defendant has induced and continues to
6 induce others to infringe the '264 Patent under 35 U.S.C. § 271(b) by, and with
7 specific intent or willful blindness, actively aiding and abetting others to engage in
8 the following actions that constitute direct infringement: (1) performing the steps
9 of the method claims in connection with use of the '264 Patent Accused Products;
10 (2) using the '264 Patent Accused Products; and (3) combining the '264 Patent
11 Accused Products with other components to form the claimed invention. Such
12 other entities include, for example, Defendant's partners, customers and end users
13 of the '264 Patent Accused Products. Defendant's acts of inducement include
14 advertising, offering for sale, and selling the '264 Patent Accused Products, and
15 providing user manuals, product documentation, and other instructions regarding
16 the use of the wireless networking features of the '264 Patent Accused Products.
17 On information and belief, Defendant has engaged in such actions with specific
18 intent to cause infringement or with willful blindness to the resulting infringement
19 because Defendant has had actual knowledge of the '264 Patent and that its acts
20 were inducing others to infringe the '264 Patent since at least the date it received
21 the notice letter from IWS notifying Defendant of its infringement of the '264
22 Patent.

23 29. IWS has been harmed by the Defendant's infringing activities.

24 30. IWS notified Defendant of its infringement of the '264 Patent
25 including an identification of the particular infringing products and features, but
26 Defendant thereafter continued to infringe the '264 Patent by continuing the
27 activities described in Paragraph 23-25. On information and belief, Defendant has
28 not obtained an opinion of counsel regarding the '264 Patent. The Defendant's

1 continued infringement has therefore been in reckless disregard of IWS's patent
2 rights. On information and belief, the Defendant's infringement has been and
3 continues to be willful.

4 **COUNT III**

5 **(INFRINGEMENT OF U.S. PATENT NO. 6,587,473)**

6 31. The allegations set forth in the foregoing paragraphs 1 through 30 are
7 hereby realleged and incorporated herein by reference.

8 32. IWS provided actual notice to Defendant of its infringement of the
9 '473 Patent in a letter dated October 18, 2013 from IWS to Defendant. In this
10 letter, IWS informed Defendant that it was infringing the '473 Patent by making,
11 using, offering for sale, selling, and/or importing wireless access points and/or
12 routers capable of connecting to an Ethernet network and an IEEE 802.11 wireless
13 network (the "'473 Patent Accused Products") to provide wireless Internet access.

14 33. IWS's letter further informed Defendant that its wireless network
15 satisfied all of the limitations of at least claim 40 of the '473 Patent in at least the
16 following manner:

17 a. The '473 Patent Accused Products provide communication
18 between a CSMA/CD network (an Ethernet network) and a bidirectional
19 communications path (the wireless path).

20 b. The '473 Patent Accused Products include an Ethernet interface
21 that contains an Ethernet modem that receives information packets from an
22 Ethernet network.

23 c. The '473 Patent Accused Products transmit the information
24 packets over the wireless path in a direction towards a station.

25 d. The '473 Patent Accused Products include a controller that
26 implements the control protocol as defined in IEEE 802.11. In accordance
27 with that protocol, the controller provides information that controls when
28

1 stations connected to the network are allowed to transmit, thereby causing the
2 communications over the wireless network to occur in a half-duplex manner.

3 e. The '473 Patent Accused Products receive information
4 corresponding to information packets from the wireless path at the Ethernet
5 modem and transmit those information packets over the Ethernet network.

6 34. IWS's letter further informed Defendant that it was inducing
7 infringement of the '473 Patent under 35 U.S.C. § 271(b) by actively aiding and
8 abetting others to engage in the following actions that constitute direct
9 infringement: (1) performing the steps of the method claims in connection with use
10 of the '473 Patent Accused Products; (2) using the '473 Patent Accused Products;
11 and (3) combining the '473 Patent Accused Products with other components to
12 form the claimed invention. This letter further explained that such other entities
13 include, for example, Defendant's partners, customers and end users of the '473
14 Patent Accused Products. This letter further explained that Defendant's acts of
15 inducement include but are not limited to advertising, offering for sale, and selling
16 the '473 Patent Accused Products, and providing user manuals, product
17 documentation, and other instructions regarding the use of the wireless networking
18 features of the '473 Patent Accused Products.

19 35. IWS's letter also informed Defendant that it was contributing to
20 infringement of the '473 Patent under 35 U.S.C. § 271(c) by providing the '473
21 Patent Accused Products to others, including its partners, customers, and end users,
22 because the '473 Patent Accused Products constitute a material part of the
23 invention, were especially made or especially adapted for use in an infringement of
24 the '473 Patent, and have no substantial non-infringing uses. IWS further identified
25 within this letter that, for example, the '473 Patent Accused Products constitute a
26 material part of the claimed invention at least because they contain the components
27 that interface a wireless network to an Ethernet network and provide control
28 information to the wireless devices as claimed in the '473 Patent. Further, IWS

1 explained the '473 Patent Accused Products were made or especially adapted for
2 use in an infringement of the '473 Patent and have no substantial non-infringing
3 uses at least because they contain components whose only purpose is to interface a
4 wireless network to an Ethernet network and provide control information to the
5 wireless devices as claimed in the '473 Patent.

6 36. Defendant has had actual knowledge of the '473 Patent and its
7 infringement of that patent since at least the date that Defendant received the
8 October 18, 2013 notice letter from IWS.

9 37. In violation of 35 U.S.C. § 271(a), Defendant has directly infringed
10 and continues to directly infringe, both literally and under the doctrine of
11 equivalents, the '473 Patent by making, using, offering to sell, and selling in the
12 United States, and importing into the United States, products that practice the
13 subject matter claimed in one or more claims of the '473 Patent, including but not
14 limited to claim 40, without the authority of IWS. The '473 Patent Accused
15 Products include, but are not limited to, Defendant's wireless base stations, wireless
16 access points and wireless routers including, but not limited to, Defendant's IEEE
17 802.11 compliant wireless access points and wireless routers such as its N450
18 Wireless Access Point.

19 38. Upon information and belief, Defendant has induced and continues to
20 induce others to infringe the '473 Patent under 35 U.S.C. § 271(b) by, among other
21 things, and with specific intent or willful blindness, actively aiding and abetting
22 others to engage in the following actions that constitute direct infringement: (1)
23 performing the steps of the method claims in connection with use of the '473 Patent
24 Accused Products; (2) using the '473 Patent Accused Products; and (3) combining
25 the '473 Patent Accused Products with other components to form the claimed
26 invention. Such other entities include, for example, Defendant's partners,
27 customers and end users of the '473 Patent Accused Products. Defendant's acts of
28 inducement include advertising, offering for sale, and selling the '473 Patent

1 Accused Products, and providing user manuals, product documentation, and other
2 instructions regarding the use of the wireless networking features of the '473 Patent
3 Accused Products. On information and belief, Defendant has engaged in such
4 actions with specific intent to cause infringement or with willful blindness to the
5 resulting infringement because Defendant has had actual knowledge of the '473
6 Patent and that its acts were inducing others to infringe the '473 Patent since at least
7 the date it received the notice letter from IWS notifying Defendant of its
8 infringement of the '473 Patent.

9 39. Upon information and belief, Defendant has committed and continues
10 to commit acts of contributory infringement of the '473 Patent under 35 U.S.C.
11 § 271(c) by offering to sell and selling the '473 Patent Accused Products. The '473
12 Patent Accused Products constitute a material part of the invention, were especially
13 made or especially adapted for use in an infringement of the '473 Patent, and have
14 no substantial non-infringing uses. The '473 Patent Accused Products constitute a
15 material part of the claimed invention at least because they contain the components
16 that interface a wireless network to an Ethernet network and provide control
17 information to the wireless devices as claimed in the '473 Patent. Further, the '473
18 Patent Accused Products were made or especially adapted for use in an
19 infringement of the '473 Patent and have no substantial non-infringing uses at least
20 because they contain components whose only purpose is to interface a wireless
21 network to an Ethernet network and provide control information to the wireless
22 devices as claimed in the '473 Patent. Defendant has known or remained willfully
23 blind to these facts since at least the date it received the notice letter from IWS
24 detailing Defendant's infringement of the '473 Patent.

25 40. IWS has been harmed by the Defendant's infringing activities.

26 41. IWS notified Defendant of its infringement of the '473 Patent
27 including an identification of the particular infringing products and features, but
28 Defendant thereafter continued to infringe the '473 Patent by continuing the

1 activities described in Paragraph 32-35. On information and belief, Defendant has
2 not obtained an opinion of counsel regarding the '473 Patent. The Defendant's
3 continued infringement has therefore been in reckless disregard of IWS's patent
4 rights. On information and belief, the Defendant's infringement has been and
5 continues to be willful.

6 **JURY DEMAND**

7 IWS demands a jury trial on all issues and claims so triable.

8 **PRAYER FOR RELIEF**

9 **WHEREFORE**, IWS prays for judgment as follows:

- 10 a. An adjudication that Defendant has infringed one or more claims of
11 each of the patents-in-suit;
- 12 b. An award of damages to be paid by Defendant adequate to compensate
13 IWS for past infringement of the patents-in-suit, and any continuing or future
14 infringement through the date such judgment is entered, including interest, costs,
15 expenses and an accounting of all infringing acts including, but not limited to,
16 those acts not presented at trial;
- 17 c. An order that Defendant must pay an ongoing royalty in an amount to
18 be determined for any continued infringement after the date judgment is entered;
- 19 d. An award of treble damages under 35 U.S.C. § 284;
- 20 e. A declaration finding this to be an exceptional case, and awarding IWS
21 attorney fees under 35 U.S.C. § 285; and
- 22 f. For such further relief at law and in equity as the Court may deem just
23 and proper.

24 DATED: November 19, 2013

/s/ H. H. (Shashi) Kewalramani
H. H. (Shashi) Kewalramani

Attorneys for Plaintiff
Innovative Wireless Solutions, LLC