

in response to Plaintiff's Motion for Default and a related dispute regarding existence of a company (VPS Group, Inc.) for which service was properly effected, the Court ordered (D.I. 65; 13-cv-07260) the "Existing Defendants to review their corporate organization and file in this court's record a list of all entities affiliated in any way to the Existing Defendants to which the subject matter of the Complaint pertains" (responsive list of companies attached as Exhibit E).

On March 27, 2014, Plaintiff RSI Video Technologies, Inc. filed a First Amended Complaint against seven entities (collectively, "Defendants") including four previously-identified entities Vacant Property Security LLC, Vacant Property Security Limited, Defendant Quatro Electronics Limited, Defendant VPS Group (a joint venture), and also against three newly-identified entities which were believed to be joint-venture participants of Defendant VPS Group. Those newly-identified entities were: VPS Holdings Limited; MCS AMS Holdings LLC; and MCS AMS Sub-Holdings LLC.

By this Second Amended Complaint, Plaintiff RSI Video Technologies, Inc. now brings this suit against ten entities (collectively "Defendants"), including six previously-identified entities: (1) Vacant Property Security LLC; (2) Vacant Property Security Limited; (3) Defendant Quatro Electronics Limited; (4) VPS Holdings Limited; (5) MCS AMS Holdings LLC; and (6) MCS AMS Sub-Holdings LLC. The newly-identified entities that will be added by the Second Amended Complaint are: (1) PAI Partners; (2) TDR Capital LLP ; and (3) Mortgage Contracting Services, LLC. Moreover, RSI changes the name of "VPS Group" (a joint venture) to "John Doe" (a joint venture doing business using the name "VPS Group") comprised of at least VPS LLC, Mortgage Contracting Services, LLC, Quatro Electronics, Limited, PAI Partners, TDR Capital, LLP and VPS Holdings, Limited. Participating in the joint-venture are at least two other companies, Monitor Computer Systems Limited and AlarmPartners, who are not named as

defendants herein. Monitor Computer Systems Limited is believed to have entered into agreements with one or more of the Defendants (on behalf of VPS Group) to cause the activities alleged herein as infringing Plaintiff's patent rights. MCS AMS Holdings LLC; and MCS AMS Sub-Holdings LLC may also be co-venturers but have not responded to overdue discovery requests.

BACKGROUND AND NATURE OF THE ACTION

1. Plaintiff RSI Video Technologies, Inc. ("RSI") is the owner by assignment of U.S. Patent No. 7,463,145 ("the '145 Patent"), entitled "Security Monitoring Arrangement And Method Using A Common Field Of View," U.S. Patent No. 7,463,146 ("the '146 Patent"), entitled "Integrated Motion-Image Monitoring Method And Device," U.S. Patent No. 8,155,105 ("the '105 Patent"), entitled "Spread spectrum wireless communication and monitoring arrangement and method," and U.S. Patent No. D555,528 ("the '528 Patent"), entitled "Mountable Security Detector," were duly and legally issued by the United States Patent and Trademark Office (collectively, the "patents-in-suit"). True and correct copies of the '145 Patent, the '146 Patent, the '105 Patent, and the '528 Patent are attached respectively as Exhibits A, B, C, and F.

2. Plaintiff is also the owner by assignment of U.S. Patent No. 7,835,343 ("the '343 Patent"), entitled "Calculating Transmission Anticipation Time Using Dwell And Blank Time In Spread Spectrum Communications For Security Systems" and U.S. Patent No. 8,081,073 ("the '073 Patent"), entitled "Integrated Motion-Image Monitoring Device With Solar Capacity." Various aspects of one of more of the claims in the '343 Patent and the '073 Patent are believed to be relevant and possibly cover the products/services accused herein of being infringed (by

direct infringement and/or indirect infringement), as may be developed over the course of discovery pursuant to the applicable Federal Rules of Civil Procedure.

3. Plaintiff has developed manufactured, sold, and invented security/alarm systems and devices around the world and in the United States. At least some of the patents-in-suit cover the Plaintiff's security/alarm systems and devices including Plaintiff's Videofied (system and devices) which system and devices are collectively referred to as "Plaintiff's Patented Products").

4. Defendants have been marketing devices/services used to secure, maintain, and manage property sites including VPS product offerings exemplified by a line of products including and sold with: SmartAlarm Gold and Verifeye Visual and including operationally-related devices and services (these product and service offerings are collectively referred to as "the accused instrumentalities" including without limitation SmartAlarm Silver, Quatro SmartQube and Quatro SmartTower). Based on information and belief and as indicated via websites and publications accessible through www.vpsgroup.com, Defendants cooperate through publications (to advance commercialization of products and/or services including technology known as SmartAlarm Gold and Verifeye Visual) controlled by: Mark Silver, who has been listed as CEO of VPS Group; and/or controlled by one or more entities listed in attached Exhibit E who have been participating on behalf of VPS Group.

PARTIES

5. Plaintiff is a Minnesota corporation having its principal place of business in St. Paul, Minnesota.

6. On information and belief, Defendant Vacant Property Security LLC is a Foreign Limited-Liability Company having a qualifying state of Delaware, and having its principal place of business in Chicago, Illinois.

7. On information and belief, Defendant Vacant Property Security Limited is a United Kingdom company incorporated in the United Kingdom, and having its principal place of business in London, England.

8. On information and belief, Defendant Quatro Electronics Limited is a United Kingdom company incorporated in the United Kingdom, and having its principal place of business in London, England.

9. On information and belief, Defendant VPS Holdings Limited is a United Kingdom company incorporated in the United Kingdom, and having its principal place of business in Borehamwood, England. Defendant VPS Holdings Limited is listed on Exhibit E as one of the companies of VPS Group but not as a parent organization for all the companies listed on Exhibit E.

10. On information and belief, Defendant MCS AMS Holdings LLC is a Limited Liability Company having been incorporated in Delaware. Defendant MCS AMS Holdings LLC is listed on Exhibit E as one of the companies of VPS Group but not as a parent organization for all the companies listed on Exhibit E.

11. On information and belief, Defendant MCS AMS Sub-Holdings LLC is a Limited Liability Company having been incorporated in Delaware. Defendant MCS AMS Sub-Holdings LLC is listed on Exhibit E as one of the companies of VPS Group but not as a parent organization for all the companies listed on Exhibit E.

12. On information and belief, Monitor Computer Systems Limited is a company incorporated in the United Kingdom and has been doing business, for profit, with at least one of the companies of VPS Group and for providing monitoring services based on the installation and operation of a line of products including SmartAlarm Gold and Verifeye Visual.

13. On information and belief, Monitor Computer Systems Limited has entered into an agreement with at least one of the other companies of VPS Group for purposes that include providing software and/or property monitoring services based on the installation and operation of a line of products including SmartAlarm Gold and Verifeye Visual.

14. On information and belief, Mortgage Contracting Services, LLC is an affiliate, by assuming the contract between VPS (UK) Limited and Monitor Computer Systems in October 2013 and is a parent of the VPS US entities, including VPS LLC.

15. On information and belief, PAI Partners is a European private equity firm which is finalizing its acquisition of VPS Holdings Limited as announced in June 2014.

16. On information and belief, TDR Capital LLP is a private equity company based in London which now controls the Defendants' U.S. operations.

17. On information and belief, John Doe (a joint venture doing business using the name "VPS Group") includes at least VPS LLC, Mortgage Contracting Services, LLC, Quatro Electronics, Limited, PAI Partners, TDR Capital, LLP and VPS Holdings, Limited, MCS AMS Holdings LLC; and MCS AMS Sub-Holdings LLC. Also on information and belief, participating in the joint-venture are at least two other companies, Monitor Computer Systems Limited and AlarmPartners, who are not named as defendants herein. On information and belief, MCS AMS Holdings LLC; and MCS AMS Sub-Holdings LLC may also be co-venturers but have not responded to overdue discovery requests.

JURISDICTION AND VENUE

18. This action arises under the patent laws of the United States, Title 35 of the United States Code. Thus, this Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

19. On information and belief, each of Defendants has transacted business in this district and has committed acts of patent infringement in this district. Thus, venue is proper in this district under 28 U.S.C. §§ 1391(c) and 1400(b).

20. Each of Defendants has directly and/or indirectly infringed at least one of the '145 Patent, the '146 Patent, the '105 patent, and the '528 Patent, by behavior which results in and/or causes that making, using, selling, offering to sell, and/or importing Plaintiff's Patented Products without Plaintiff's authorization.

21. Defendants, in combinations of two or more entities, are cooperating as participants in a joint venture (*e.g.*, as a John Doe entity and/or using the name "VPS Group") to infringe the patents-in-suit, without Plaintiff's authorization, by importing into the United States the accused Instrumentalities, and by making (through at least assembly and installation), using, selling, or offering to sell services and/or components based on, and to support use of, the accused Instrumentalities.

22. On information and belief, Monitor Computer Systems Limited participates in the joint venture by providing or authorizing the provision of computer software and/or computer monitoring services used with the accused Instrumentalities for various acts of infringement of the patents-in-suit including, for example, acts of making, using, selling, or offering to sell the accused Instrumentalities and/or services therefor; and by sharing in financial payment with one or more of the other Defendants pursuant to written agreements.

23. On information and belief, Defendants have offered to sell, and have operated, maintained, leased, sold and/or installed the accused Instrumentalities in various locations in the United States, including locations in Illinois.

24. On information and belief, Monitor Computer Systems Limited has cooperated with one or more of the other Defendants by controlling and managing, or authorizing the control and management of, aspects of the accused Instrumentalities including alarm monitoring software and alarm monitoring operations for areas (or premises) at which the accused Instrumentalities are installed.

25. AlarmPartners is a third-party supplier to VPS.

26. Mortgage Contracting Services, LLC is an affiliate which adopted responsibility for the Sentinel software license after the carve-out of the US-based entities including owning and operating a server that runs an interface for the Sentinel software and is also a parent of VPS LLC

27. VPS (UK) Limited and Mortgage Contracting Services, LLC have executed agreements used in the system and installation for Monitoring Computer Systems Limited.

28. VPS Holdings Limited and Quatro Electronics Limited advertise and/or sell the accused Instrumentalities in the U.S.

29. Quatro Electronics Limited and VPS LLC cooperate in the joint venture by sharing resources, including employees and/or equipment for testing, selling, leasing and/or installing the accused Instrumentalities.

30. PAI Partners controls and profits from the activities, directly or indirectly, of Defendant VPS Holdings Limited, Defendant VPS (UK) Limited and other affiliated companies in the U.K.

31. TDR Capital LLP controls and profits from the activities, directly or indirectly, of Defendant VPS LLC and other affiliated companies in the U.S.

32. On information and belief, Defendants have used at least one facility in Illinois wherefrom one or more employees of at least one of the Defendants have operated the accused Instrumentalities on behalf of customers or prospective customers, and has controlled and managed aspects of the accused Instrumentalities including sales involving installation and service.

33. At least one of Defendants has studied Plaintiff's Videofied product, and based thereon, Defendants have distributed brochures, as exemplified by the attached Exhibit D, that disclose comparisons of one or more of the accused Instrumentalities to Plaintiff's Videofied product. Plaintiff's Videofied product is covered by at least one of the patents-in-suit.

34. Plaintiff has complied with the notice requirement of 35 U.S.C. § 287(a) by placing a notice of the Letters Patents including each of the patents-in-suit on Plaintiff's Patented Products it manufactures and sells and/or by providing written notice of the alleged infringement to Defendants.

35. Plaintiff has been irreparably harmed by Defendants' behavior which has resulted in infringement of the patents-in-suit.

36. Defendants' infringement of the patents-in-suit has threatened the value of this intellectual property because Defendants' behavior has resulted in Plaintiff's loss of sales and has undermined Plaintiff's lawful patent rights to exclude others from making, using, selling, offering to sell and/or importing the patented inventions.

37. Defendants' disregard for Plaintiff's patent rights threatens Plaintiff's relationships with customers and potential customers of Plaintiff's Patented Products as well as Plaintiff's relationships with its existing licensees and potential licensees of this intellectual property.

38. Defendants regularly compete with Plaintiff for customers and sales of Plaintiff's Patented Products, and, on information and belief, Defendants had knowledge that Plaintiff's Patented Products are patented.

39. By infringing the patents-in-suit without authorization by Plaintiff, Defendants have been attempting to, and unless and until enjoined therefrom will, derive a competitive advantage over Plaintiff and over Plaintiff's patented technology. Accordingly, Plaintiff has suffered irreparable harm for which there is no adequate remedy at law and, unless and until Defendants' continuing acts of infringement are enjoined, Plaintiff will suffer further irreparable harm for which there is no adequate remedy at law.

40. On information and belief, Defendants have conducted substantial business in this forum, directly or through intermediaries; such substantial business including but not limited to: (i) at least a portion of the infringing activities alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct, and/or deriving substantial revenue from goods and services provided to individuals in Illinois and in this Judicial District. Thus, Defendants are subject to this Court's specific and general personal jurisdiction pursuant to due process and/or the Illinois Long Arm Statute.

INFRINGEMENT OF U.S. PATENT NO. 7,463,145

41. Paragraphs 1 through 40 are incorporated by reference as if fully restated herein.

42. On or about December 9, 2008, the '145 Patent was duly and legally issued by the United States Patent and Trademark Office. Plaintiff has owned the '145 Patent throughout the period of Defendants' infringing acts.

43. On information and belief, through their conduct in Illinois and other locations in the United States, Defendants Vacant Property Security LLC, Vacant Property Security Limited,

Quatro Electronics Limited, VPS Holdings Limited, MCS AMS Holdings LLC, MCS AMS Sub-Holdings LLC, , Mortgage Contracting Services, LLC; PAI Partners; TDR Capital LLP; and John Doe (a joint venture doing business using the name “VPS Group”) (comprising at least VPS LLC, Mortgage Contracting Services, LLC, Quatro Electronics, Limited, PAI Partners, TDR Capital, LLP and VPS Holdings, Limited) . have infringed and are still infringing the ‘145 Patent, by manufacturing, using, selling, offering for sale, or importing the accused Instrumentalities that embody the patented invention as claimed in the ‘145 Patent and, unless enjoined, will continue to infringe the ‘145 Patent by this behavior.

44. On information and belief, through its conduct in Illinois and other locations in the United States, each of Defendants has indirectly infringed the ‘145 Patent, by acts of inducing infringement and/or contributory infringement, by knowingly encouraging others to use the accused Instrumentalities as set forth in one or more of the claims of the ‘145 Patent unlawfully and without Plaintiff’s authorization and, unless enjoined, will continue to indirectly infringe the ‘145 Patent by this behavior. For example, based on information and belief and as evidenced by attached Exhibit D and interrelate website communications and corporate control, Defendants have directly or indirectly caused the accused instrumentalities to be made, shipped and/or imported installation in Illinois and non-Illinois U.S. locations (including Texas) and has thereby encouraged customers and prospective customers to use the accused Instrumentalities as embodied by the invention claimed in each of the patents-in-suit.

45. Defendants have been infringing one or more claims of the ‘145 Patent through the aforesaid acts, and will continue to do so unless enjoined by this Court. Defendants’ wrongful conduct has caused Plaintiff to suffer irreparable harm.

INFRINGEMENT OF U.S. PATENT NO. 7,463,146

46. Paragraphs 41 through 45 are incorporated herein by reference as if fully restated herein.

47. On or about December 9, 2008, the '146 Patent was duly and legally issued by the United States Patent and Trademark Office. Plaintiff has owned the '146 Patent throughout the period of Defendants' infringing acts.

48. On information and belief, through their conduct in Illinois and other locations in the United States, Defendants Vacant Property Security LLC, Vacant Property Security Limited, Quatro Electronics Limited, VPS Holdings Limited, MCS AMS Holdings LLC, MCS AMS Sub-Holdings LLC, , Mortgage Contracting Services, LLC; PAI Partners; TDR Capital LLP; and John Doe (a joint venture doing business using the name "VPS Group") (comprising at least VPS LLC, Mortgage Contracting Services, LLC, Quatro Electronics, Limited, PAI Partners, TDR Capital, LLP and VPS Holdings, Limited) ..have infringed and are still infringing the '146 Patent, by manufacturing, using, selling, offering for sale, or importing the accused Instrumentalities that embody the patented invention as claimed in the '146 Patent and, unless enjoined, will continue to infringe the '146 Patent by this behavior.

49. On information and belief, through its conduct in Illinois and other locations in the United States, each of Defendants has indirectly infringed the '146 Patent, by acts of inducing infringement and/or contributory infringement, by knowingly encouraging others to use the accused Instrumentalities accordingly to one or more of the claims of the '146 Patent unlawfully and without Plaintiff's authorization and, unless enjoined, will continue to indirectly infringe the '146 Patent by this behavior. For example, based on information and belief and as evidenced by attached Exhibit D and interrelate website communications and related control via

companies listed on behalf of VPS Group, Defendants have directly or indirectly caused the accused instrumentalities to be made, shipped and/or imported installation in Illinois and non-Illinois U.S. locations (including Texas) and has thereby encouraged customers and prospective customers to use the accused Instrumentalities as embodied by the invention claimed in each of the patents-in-suit.

50. Defendants have been infringing one or more claims of the '146 Patent through the aforesaid acts, and will continue to do so unless enjoined by this Court. Defendants' wrongful conduct has caused Plaintiff to suffer irreparable harm.

INFRINGEMENT OF U.S. PATENT NO. 8,155,105

51. Paragraphs 46 through 50 are incorporated herein by reference as if fully restated herein.

52. On or about April 10, 2012, the '105 Patent was duly and legally issued by the United States Patent and Trademark Office. Plaintiff has owned the '105 Patent throughout the period of Defendants' infringing acts.

53. On information and belief, through their conduct in Illinois and other locations in the United States, Defendants Vacant Property Security LLC, Vacant Property Security Limited, Quatro Electronics Limited, VPS Holdings Limited, MCS AMS Holdings LLC, MCS AMS Sub-Holdings LLC, , Mortgage Contracting Services, LLC; PAI Partners; TDR Capital LLP; and John Doe (a joint venture doing business using the name "VPS Group") (comprising at least VPS LLC, Mortgage Contracting Services, LLC, Quatro Electronics, Limited, PAI Partners, TDR Capital, LLP and VPS Holdings, Limited) .have infringed and are still infringing the '105 Patent, by manufacturing, using, selling, offering for sale, or importing the accused instrumentalities that embody the patented invention as claimed in the '105 Patent and, unless enjoined, will continue

to infringe the '105 Patent by this behavior. The factual contentions therefor, including the communications protocol between the central device and one or more of the monitoring devices of the accused instrumentalities, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery (such as from Defendants' Initial Disclosures with "documents sufficient to show the operation and construction of all aspects or elements of each accused apparatus ...").

54. On information and belief, through its conduct in Illinois and other locations in the United States, each of Defendants has indirectly infringed the '105 Patent, by acts of inducing infringement and/or contributory infringement, by knowingly encouraging others to use the accused instrumentalities accordingly to one or more of the claims of the '105 Patent unlawfully and without Plaintiff's authorization and, unless enjoined, will continue to indirectly infringe the '105 Patent by this behavior. For example, based on information and belief and as evidenced by attached Exhibit D and interrelated website communications and related control via companies listed on behalf of VPS Group, Defendants have directly or indirectly caused the accused instrumentalities to be made, shipped and/or imported installation in Illinois and non-Illinois U.S. locations (including Texas) and has thereby encouraged customers and prospective customers to use the accused Instrumentalities as embodied by the invention claimed in each of the patents-in-suit.

55. Defendants have been infringing one or more claims of the '105 Patent through the aforesaid acts, and will continue to do so unless enjoined by this Court. Defendants' wrongful conduct has caused Plaintiff to suffer irreparable harm.

INFRINGEMENT OF U.S. PATENT NO. D555,528

56. Paragraphs 51 through 55 are incorporated herein by reference as if fully restated

herein.

57. On or about November 20, 2007, the '528 Patent was duly and legally issued by the United States Patent and Trademark Office. Plaintiff has owned the '528 Patent throughout the period of Defendants' infringing acts.

58. On information and belief, through their conduct in Illinois and other locations in the United States, Defendants Vacant Property Security LLC, Vacant Property Security Limited, Quatro Electronics Limited, VPS Holdings Limited, MCS AMS Holdings LLC, MCS AMS Sub-Holdings LLC, , Mortgage Contracting Services, LLC; PAI Partners; TDR Capital LLP; and John Doe (a joint venture doing business using the name "VPS Group") (comprising at least VPS LLC, Mortgage Contracting Services, LLC, Quatro Electronics, Limited, PAI Partners, TDR Capital ,LLP and VPS Holdings, Limited) .have infringed and are still infringing the '528 Patent, by manufacturing, using, selling, offering for sale, or importing the accused Instrumentalities that embody the patented invention as claimed in the '528 Patent and, unless enjoined, will continue to infringe the '528 Patent by this behavior.

59. On information and belief, through its conduct in Illinois and other locations in the United States, each of Defendants has indirectly infringed the '528 Patent, by acts of inducing infringement and/or contributory infringement, by knowingly encouraging others to use the accused Instrumentalities as set forth in the claim of the '528 Patent unlawfully and without Plaintiff's authorization and, unless enjoined, will continue to indirectly infringe the '528 Patent by this behavior. For example, based on information and belief and as evidenced by attached Exhibit D and interrelate website communications and related control via companies listed on behalf of VPS Group, Defendants have directly or indirectly caused the accused instrumentalities to be made, shipped and/or imported installation in Illinois and non-Illinois U.S. locations

(including Texas) and has thereby encouraged customers and prospective customers to use the accused Instrumentalities as embodied by the invention claimed in each of the patents-in-suit.

60. Defendants have been infringing the claim of the '528 Patent through the aforesaid acts, and will continue to do so unless enjoined by this Court. Defendants' wrongful conduct has caused Plaintiff to suffer irreparable harm.

WILLFUL INFRINGEMENT

61. Paragraphs 1 through 60, with all their related averments and references to Exhibits A, B, C, D, E, and F are incorporated herein by reference as if fully restated herein.

62. Defendants were provided written notice of Plaintiff's patents-in-suit and of Plaintiff's concern of Defendants' infringement thereof.

63. Defendants' acts, alleged above to have caused infringement of the patents-in-suit, were performed with Defendants' knowledge of the patents-in-suit and of the risk that these acts might lead to an adjudication of infringement.

64. Defendants' acts, alleged above to have caused infringement of the patents-in-suit, were reckless and willful, and entitle Plaintiff to enhanced damages and attorneys' fees.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against each of Defendants, granting Plaintiff the following relief:

A. That this Court adjudge and decree that the '145 Patent is valid and enforceable against each of Defendants, that the '146 Patent is valid and enforceable against each of Defendants, that the '105 Patent is valid and enforceable against each of Defendants, and that the '528 Patent is valid and enforceable against each of Defendants;

B. That this Court adjudge and decree that each of Defendants has infringed the '145 Patent, the '146 Patent, the '105 Patent, and the '528 Patent;

C. That this Court adjudge and decree that each of Defendants has infringed the '145 Patent, the '146 Patent, the '105 Patent, and the '528 Patent through infringement by inducement or contributory infringement.

D. That this Court permanently enjoin each of Defendants, and their parents, subsidiaries, affiliates, successors and assigns, and each of their officers, directors, employees, representatives, agents, and attorneys, and all persons acting in concert or active participation with, or on their behalf, or within their control, from making, using, selling, offering to sell, importing, or advertising products and/or services and/or employing systems, hardware, software and/or components and/or making use of systems or processes that infringe any of the claims of the patents-in-suit, or otherwise engaging in acts of infringement of the patents-in-suit, all as alleged herein;

E. That this Court order an accounting, including a post-verdict accounting, to determine the damages to be awarded to Plaintiff as a result of Defendants' infringement;

F. That this Court, pursuant to 35 U.S.C. § 284, enter an award to Plaintiff of such damages as it shall prove at trial against Defendants that is adequate to compensate Plaintiff for said infringement, said damages to be no less than a reasonable royalty together with interest and costs;

G. That this Court assess pre-judgment and post-judgment interest and costs against Defendants, together with an award of such interest and costs, in accordance with 35 U.S.C. § 284;

H. That this Court declare this case to be exceptional and direct Defendants to pay Plaintiff's attorneys' fees incurred in connection with this lawsuit pursuant to 35 U.S.C. § 285;

I. That this Court award enhanced damages and attorney's fees due to Defendants RSI's willful infringement; and

J. Grant to Plaintiff such other, further, and different relief as may be just and proper.

DEMAND FOR JURY TRIAL

Plaintiff, under Rule 38 and other applicable Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

Respectfully submitted,

Dated: July 24, 2014

/s/ Michael J. Femal

Michael J. Femal
Much Shelist, P.C.
191 North Wacker Dr, Suite 1800
Chicago, IL 60606-1615
Phone: 312-521-2000
Fax: 312-521-2100

Robert J. Crawford
Lead Attorney
Email: bcrawford@ip-firm.com
Crawford Maunu PLLC
1150 Northland Drive, Suite 100
St. Paul, MN 55120
Phone: (651) 259-2300
Fax: (651) 686-7111

Attorneys for RSI Video Technologies, Inc.

Of Counsel:

Kenneth R. Breitbeil

State Bar of Texas No.: 02947690

Email: kbreitbeil@mcfall-law.com

Norma N. Bennett

State Bar of Texas No.:24028492

Email: nbennett@mcfall-law.com

McFALL, BREITBEIL & EIDMAN, P.C.

1250 Four Houston Center

Houston, Texas 77010-3027

Telephone: (713) 590-9300

Facsimile: (713) 590-9399

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record are being served with a copy of this document via the Court's CM/ECF system per Local Rule 5.9, on the 24th day of July 2014.

/s/ Michael J. Femal

Michael J. Femal