

CHIKIZIE OTIAH

15-cv-2465

SCANNED

2nd Amended
COMPLAINT

(In the space above enter the full name(s) of the plaintiff(s).)

-against-

BMW ~~KIAER~~ (SERV RIDER)
ATTACHED

Jury Trial: ☐ Yes ☐ No
(check one)

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 7/29/15

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff

Name CHIKIZIE OTIAH
Street Address 170 South Portland Avenue
County, City Brooklyn
State & Zip Code NY 11217
Telephone Number 718 581 4539

- B. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name BMW Motor Corporation
Street Address ABTelling TN-K 80788

8.JAGUAR LAND ROVER NORTH AMERICA	LODE LANE COURIER SERVICE, BLOCK 19 B92 BNW, SCLIHULL UNITED KINGDOM
9.NISSAN MOTORS CO. LIMITED	NISSAN ADVANCE TECHNOLOGY CENTER T-T, MOMRINOASATOAOYAMA, ATSUGI-SHI, KANAGAWA 243-0123. JAPAN
10.GENERAL MOTORS LLC	30001 VAN DYKE AVENUE MC 480-210-3N WARREN, MI 48090. USA
11.DAMIER AG (MERCEDES BENZ)	70545 STUTTGART GERMANY
12.MAZDA MOTOR	3 – 1 SHICHI FUCHUCHOI, AKI- GUN HIROSHIMA, JAPAN
13.CITRON/PEUGEOT MOTOR COMPANY ARNESSE PARIS 6 CITY.	75 AVENUE DE LA GRANDE,
14.MITSUBISHI MOTOR CORPORATION TOKYO 108-8410 JAPAN.	33-8 SHIBA 5-CHOME, MINATO-KU,
15. KIA MOTOR CORPORATION IRVINE, CA 92606 USA	111 PETERS CONYON ROAD

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ENTITY	ADDRESS
1. BMW MOTOR CORPORATION	ABTEILUNG TN-K, 80788 MUNICH, BAVANA, GERMANY 89 1250 16000
2.HYUNDAI MOTOR AMERICA	2204 RAVINE RD, KALAMAZOO, MI 49004 USA 1 800 494 7688
3.SUBURU MOTOR CORPORATION	FIJI HEAVY INDUSTRIES GROUP SUBURU BUILDING 1-7-2 NISHISHINJUKU, SHINJUKU- KU, TOKYO, 160-8316 JAPAN
4.ROLLS ROYCE CORPATION	65 BUCKINGHAM GATE, LONDON S W 1 E 6AT ENGLAND, UK
5.FIAT CHRYSYLER (FCA GROUP ABARTH, ALFA ROMEO, CHRYSLER, DOGE, FIAT, RA, SRT, FERRARS,AND MASERATI	CORPRATE OFFICE NIZZA, 250 TORINE, 10126 ITALY 1000 CHRYSLER DR AUBURN HILLS, MI 48326 USA
6.FORD MOTOR COMPANY	1 AMERICAN RD, DEAR BORN. DETROIT, MI 48136 USA.
7.TOYOTA INTELLECTUAL PROPERTY DIV 1 TOYOTA-CHO, TOYOTA AICHI 4718572	

County, City MUNICH, BARBARA GERMANY
 State & Zip Code _____
 Telephone Number 89-1250 16000

Defendant No. 2

Name ATTACH (SRB RIDRA)
 Street Address _____
 County, City _____
 State & Zip Code _____
 Telephone Number _____

Defendant No. 3

Name ATTACH (SRB RIDRA)
 Street Address _____
 County, City _____
 State & Zip Code _____
 Telephone Number _____

Defendant No. 4

Name ATTACH (SRB RIDRA)
 Street Address _____
 County, City _____
 State & Zip Code _____
 Telephone Number _____

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

A. What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal Questions☐ Diversity of CitizenshipB. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? PATRI INFRINGEMENT

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship _____

Defendant(s) state(s) of citizenship _____

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHIKEZIE OTTAH.

15 CV 2465 LTS
07/29/15

Plaintiff

V

BMW ET AL...

As ordered by the court, United States District Judge, Hon. Laura Taylor Swain, the following defendant (s) have their corporate names changed in the 3rd amended complain, defendant General Motors LLC. Jaguar Land Rover North America, FCA U.S LLC. (Fiat-Chrysler), Ford Motor Company, and Hyundai Motor America

How ever the court did not order the severity of the defendants, it is reflected in the 3rd amended complain. 2nd the court complain document does not indicate any such changes in their question and answer block.

The owners of the US Patent 7,152,840 have signed their rights to me, to represent them, in this captioned case, their letter is attached herein.

Thanks
Sincerely Chikezie Ottah

No. 6, 4th Avenue
Trans Ekulu
Enugu State
Nigeria
20 July, 2015.

TO WHOM IT MAY CONCERN

RE: CHIKEZIE OTTAH

The above name is representing us at U.S.A.

Thanks for your assistance.

Yours faithfully,



.....
KENNETH OTTAH



.....
CHIKA OTTAH



.....
CHINEYE OTTAH

- Yours
Ottah

You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? NRW YORK

CITY

B. What date and approximate time did the events giving rise to your claim(s) occur? 2009

C. Facts: I INVENTED A MOBILE CAMERA,
THE DEFENDANT'S BMW IS AT OUR MANUFACTURING
AND SELLING THE PRODUCT, USING AND SELLING
IT, WHEREBY INFRINGING ON THE PATENT.
I HAVE IN MANY OCCASIONS, APPROACHED
THE NARRA DEFENDANT ASKING THEM
FOR BUSINESS, THEY REFUSE CILING THAT
THEY HAVE CONTRADICTIONS.

What
happened
to you?

Who did
what?

Was anyone
else
involved?

Who else
saw what
happened?

MORE WHILE THEY HAVE CONTINUED TO
MAKE, USE AND SELL THE MOBILE
CAMERA, A VIOLATION OF CODE 35 USC
271B AND INFRINGEMENT OF PATENT
U.S. 7,152,840

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. _____

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
500 PEARL STREET, RM 230, NY, NY 10007

CHIKEZIE OTTAH

PLAINTIFF

**Case # 15 CV. 2465=LTS
[Judge Laura Taylor Swain]**

07/29/15

V

BMW, et al.

DEFENDANTS.

This an infringement case, in support of amended complain 3rd

INTRODUCTION:

I started this infringement issue over 2years age, when it became apparent all the Auto makers has began to equip their new cars with mobile camera (s). I began to write, or contact them by phone asking for any business opportunity, including licensing, or permit. Although some of the Auto makers replied with all kinds of idea what I should do with my patent, but none of the Auto maker made any offer, others replied, they inform me that they have their own contributors. Wrote them repeatedly, some Auto Maker ask me to apply to their on line new idea section, I did every thing they ask me to do, so we can have working relationship but they offered me no working relationship.

WINDSHIELD WIPER INTERMITTENT

Nov. 7th 1967 RW KEARNS US3,351,836

THE INTERMITTENT WINDSHIELD WIPER WAS INVENTED BY AN INVENTOR BY THE NAME OF ROBERT KEARNS, NONE OF THE MAJOR AUTOMAKERS WANTED TO DO BUSINESS WITH KEARNS, BUT THEY USED HIS IDEA ANYWAY ALTHOUGH SIMPLE, THIS CONCEPT WAS THE BASIS FOR A 30,000,000 AWARD TO KEARNS FOR THE AUTOMAKERS INFRINGEMENT ON HIS PATENT

WASHINGTON POST: SATURDAY FEB. 26 2005, PAGE B01.

INTELLECTUAL PROPERTY IS THE NEW PAIN FIELD A SMALL BUSINESS HAVE TO GAIN ENTRY INTO BUSINESS.

Like Mr Kearn, (35 USC 271b, direct infringement) I also tried in vain, even due my idea of a mobile Camera was minor, but the technology made a mighty deference in mobile information, reading, writing, looking at a photo album, road clearance check, blind spot visibility, phone calls, video conference, security, E-mail, internet system, on assignment mobile office, movies and entertainment. The name mobile camera came from US Patent 7,152,840, electronics equipment and we anticipate camera becoming smaller, some cameras becoming disposable and small, cheaper, USB port to comminute with other artificial intelligent and or human, all this are facts of new mobile camera today.

“TWOBMBLY AND FEDERAL RULE OF CIVIL PROCEDURE 8, A PLEAD FOR PATENT INFRIGEMENT TO BE ADEGUATE, A COMPLAIN MUST INCLUDE.

- 1. AN ALLEGATION OF JURISDICTION**
- 2, A STATEMENT THAT THE PLAINTIFF OWNS THE PATENT**
- 3. A STATEMENT THAT THE DEFENDANT HAS BEEN INFRINGING THE PATENT BY “MAKING, SELLING, AND USING {THE DEVICE} EMBODYING**
- 4. A STATEMENT THAT THE PLAINTIFF HAS GIVEN THE DEFENDANT NOTICE OF ITS INFRIGEMENT**
- 5. A DEMAND FOR AN INJUNCTION AND DAMAGES**

Please Your Hon. Attached is some of the letters I received form some of the Auto Makers, some letters went un-answered. I respectfully submit exhibit 1.

US PATENT 7,152, 840

This patent was established in 2006, 3 years after the application, eventually the publication, USPTO publication number 10/366,779.

Legal

35 USC 1.57 (37 CFR 1.57)

AU 2003231638 and US 7,152,840 where integrated into one document. Incorporate by reference (the application contain a claim under 1,78), in other words, two patents which are the same in claims, one have

omitted some of the meaning or description in the specification, Your Hon. US Patent 7,152,840 specification was amended by reference to add more description from AU Patent 2003231638, whereby the documents are incorporated from host AU 2003231638. Your Hon. the adoption of the patents into one document completed the legal process or 37 CFR 1.57 (35 USC 1.57).

FACT

AU Patent 20032321638 and US Patent 7,152,840 integrated define with clarity the subject matter of the invention. Respectfully Your Hon See page 2, at 60, line 7 and 8, “A book or suitable for use as a writing/ drawing board (eg a white Board, Black board, an electronic board,”

Page 5, paragraph 3, further add more facts and clarity to the above definition, the 12 platform may change to 16 support each item or devices. Activities board, drawing board, electronic board, writing board, black board, cell phone, CAMERA, computer, electronics, DPA’S, A musical instruments, audio video equipment, and other elements providing support to the assemble

WHAT IS US PATENT 7,152,840

Your Hon. US Patent 7,152,840 opened a new plain field in mobile book and technology assembly. The definition mention above stated that position clearly in support of the claimed element book or 12 platform, preferably (as an assembled mechanism with lot of tools) the book platform 12 may be used to support such devices as audio/video equipment, mobile phones, CAMERA, computers, DPA, musical instruments, toys, puzzles, board games, and their elements. To this end the panel 16 may be provided with a set of mounting positions(structure) for receiving and or mounting the above items. see exhibit 2, Your Hon. I respectively submit exhibit # 2 from the host AU Patent 2003231638 and other elements, a picture tell a thousand word.

ACCUSED PRODUCT

Preferable, as given all this technologies mention above, Assemble mechanism and to be suitable as clearly defined, exhibit 1 will preferable be a mounted mobile camera in a vehicle (not a computer LapTop, although LapTop have camera), back structure, the mobile

camera is clipped in a punch hole. Your Hon. using tools and device from claimed elements of 12 platform and 60 inter-connectors, respectfully submitted, see page 6, paragraph 2, line 16 US Patent 7,152,840, the claim. Using the reconstruction to show Patent infringement either literally or doctrine of equivalents. . Your Hon. the defendants have never denied manufacturing, using, and selling a mobile camera and audio video equipment

PRIOR ART

Prior art, I do not believe the auto makers want to go back to the prior arts, like tying books in your torso, or lectern, easel, or base. This book holders rest or mount only on the floor or a table structure, this book holders are not adequate for mobile vehicle use. In particular are US Patent numbers 5,460,102, 5,775,5423, 5,059,149, 5,671,900 none of this book holder ever mention any mobile use, none of this book holders ever mention the use of technology or other writing device like white, drawing board and /or black board, the use of technologies in the above definition, with the supporting elements and devices are only unique to US Patent 7,152,840, it is a new plain field

INFRINGEMENT;

Making of any thing often start with new ingridence, formula and or change of name, there is no doubt like Mr Kearn mention earlier, we are interest in making a new and better product in mobile camera. Another reason for infringement of our product which bring a genuine matter by the Giant auto maker is cameras have enter a new innovative age, no more washing and developing in the back room, or carrying heavy and bulky camera equipment

Camera have enter new era of a full electronic with artificial intelligent, Today cameras can communicate, dialog, read and write, create, book, folder, pictures, album, and/or e-mail it to other electronics like audio video, computers, television, like seen the laptop computer.

Your Hon. It is another facts, Today innovated cameras are small, light and affordable, everybody in the family have camera for out door activities, this is truly stated by book holder, “ this invention addresses this above deficiencies by attaching itself firmly and independently on a

child, elderly, or a handicapped persons environments, help them remain focused while enjoy the newest technologies like DVD, I PAD, and cellular phones with Cameras, radio and Television etc, without leaving the comfort of their vehicle, strollers, carriages, car seat, Winnie walkers, or will chairs” I believe this is the use the defendants which to archive. Respectfully Your Hon. published application # 10,366,779, and incorporated by reference US Patent 7,152,840, see the background.

Your Hon. there is a genuine dispute for infringement, (although defendant have agreed to illegal manufacturing, use, and sale of the innovated and digital, artificial intelligent mobile camera and audio video equipment) the above statement described with clarity that the device mobile camera technology was intend to be inbuilt “firmly” in a mobile vehicle like in reconstruction of the accused product and exhibit 2.

Another fact is that (37 CFR 1.57) the invention, US Patent 7,152,840 was established many years ago before the defendants began producing, using and/or sselling a new mobile cameras, 35 USC 102B.

For the purpose of obviousness, the defendants did not disagree that exhibit 2 is not a camera, therefore to out line infringement is one of obviousness between US Patent against Defendant product

US PATENT 7,152,840

- 1, Mobile Camera**
- 2. information**
- 3. reading**
- 4. writing /e-mail**
- 5. Entertainment**
- 6.book or album**
- 7 Security**
- 8. Observe**
- 9. Pictures**

BMW al el

- Mobile Camera**
- information**
- Reading**
- writing/ e-mail**
- Entertainment**
- book or album**
- Security**
- Observe**
- Pictures**

In other form, the case for infringement is over whelm using the law 35 usc 1.57 (37 CFR 1.57) incorporation by reference that established the 840 patent and it’s claimed elements as guide. Your Hon. I have clear

stated the facts and the law, any jury will return infringement on my favor

PROVING INFRINGEMENT WITH CLAIMED ELEMENTS

1.Whereas the element book is a method of learning including an activity boards, a drawing boards, a writing boards, a black boards, a whiting boards, an electronic boards, audio video and equipments, cell phones, CAMERAS, computers, electronics, DPA, Musical instruments, toys, puzzle, board games, and other element of the proceeding devices.

2.whereas the claimed element 12 platform, referenced incorporation of book/CAMERA according to claim 1 is an electronic, a mobile CAMERA.

3. Whereas the claim element 12 platform, 16 referenced incorporation according to claim 1 and 2 assembly, the book support 12 platform include a set of mounting positions for receiving and or mounting and fit in a mobile camera.

4.whereas the assembled element 12 platform, 16 referenced incorporation of claimed element 62 inter-connector including screws, clips, bolts, rivet, could firmly mount the CAMERA to bear in a punch hole inside a vehicle back, front, side structures, inside structures according to claims 1 to 3.

5. wherein the 62 assembled 12 elements and items including AUDIO VIDEO equipments according to claims 1 to 4 are fit together for learning and communication. Reading, writing,

QUICK REFERENCE TABLE US PATENT 7.152,840

See reference # 1, page 2, last paragraph, line 7 and 8. See reference # 3, page 4, line 20. See reference # 7, page 4, and paragraph 4 to finish. See reference # 8, page 5, paragraph 3, line 1 to 5.

AUGEMENT;

US Patent 7,152,840 was established with two claims, one is independent and dependent claims, to be clear, Elements have been grouped together under one name, because there is too many of the elements, 2nd to avoid too many repetition and unnecessary cost. Also the devices was group under one name

At page 2, the last paragraph, lines 7 and 8, the invention was defined with clarity, the rest of the embodiment or embodiments continue describing and elaborating on the process to archive the goals a new mobile camera, eg is in reference # 8, paragraph 3, line 1 to 5 which continue to describe other type of books incorporated in the definition with clarity and elements to the assembly need that archive the goals of mounting a camera in a mobile vehicle, which include the elements mentioned in reference # 1, page 2, lines 7 and 8, and another group of elements mentioned in referenced # 7.

All this method which archive the goal of a mobile camera in a vehicle mentioned here have been adopted and expressed in US Patent 7,152,840 . Your Hon. I respectfully submit exhibit 3 in support of the above augment,

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

YOUR HON. I PRAY
THAT YOU ASK THE DEFENDANT TO
PAY A REIMBURSEMENT OF TEN BILLION
DOLLARS.

THE DEFENDANT SHOULD PAY THE REIMBURSEMENT
AND INTEREST SINCE THEY HAVE
CONTINUED TO ~~MANUFACTURE~~ MAKE, USE AND
SELL THE PRODUCT, AND THE ADDITION
OF MOBILE CAMERA BUSINESS HAS BEEN
GROSS.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 29 day of July, 2015

Signature of Plaintiff

Mailing Address

Telephone Number

Fax Number (if you have one)

Offet
170 South prattland
AVB. Bklyn. ny
11217
718 581 4539

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this _____ day of _____, 20____, I am delivering this complaint to prison authorities to be mailed to the *Pro Se* Office of the United States District Court for the Southern District of New York.

Signature of Plaintiff: _____

Inmate Number _____

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHIKEZIE OTTAH.

15 CV 2465 LTS
07/29/15

Plaintiff

V

BMW ET AL

EXHIBIT.....

1

(12 pages)

CHIKEZIE OTTAH

SIGN



DATE 7/29/15

DAIMIER AG
70545 STUTTGART
GERANY

c/o ONE MERCEDES BENZ DRIVE,
MONTYALE NEW JERSY
07645
REF. NUMBER 131007-000047

KON WORYZ CORP
170 SOUTH PORTLAND AVE
BROOKLYN, NEW YORK
SUITE 14F, 11217 USA
Tel. 718 581 4539
E mail : eddyottah@yahoo.com

Sirs

This address was given to me by your headquarter in USA, we have developed the accessories which is used in the vehicles today, vehicles are still the largest means of movement, after the foot. Mercedes Benz is still the World leader in Automobile.

Our accessories have customized vehicles and improve the utility of today vehicles for example, in entertainment, security and information technology, it is an industrial icon, those accessories have elevated markets for those cars equipped the accessories. Without saying much, we have attached a well document Patents in support and effort to reaching out to you for partnership, the Patent number are, US 7,152,840 and AU 2003231638.

Attached with this letter are

1. a copy of your apple I Pad computer holder which is in violation of our patent,
- 2 our brochure and business plan.
- 3 a true copies of US Patent number 7,152,840 and AU Patent number 2003231638

Looking forward in doing business with Mercedes Benz

Sincerely
Chikezie Ottah
Christana Uzochikwe

TOYOTA

TOYOTA MOTOR CORPORATION

1, TOYOTA-CHO, TOYOTA, AICHI, 471-8571 (Head Office)
or 471-8572 (Research & Development Group) JAPAN
TEL: +81-565-28-2121

July 29, 2014

Mr. Chikezie Ottah
170 South Portland Avenue,
Apt. 14F Brooklyn New York
U.S.A.

Dear Mr. Chikezie Ottah:

Thank you for your letter, which has been referred to this office for reply.

We have studied your proposal in the departments concerned and came to the conclusion that we are unable to accept your offer at present. We greatly appreciate your kind offer but we are sorry that we cannot meet your request and hope for your best understanding.

Consequently, we are taking the liberty of returning the letter that you kindly sent to us with this letter.

We appreciate your taking an interest in Toyota Motor Corporation. Thank you for taking the time to write to us.

Very truly yours,



YOSUKE IIDA
Group Manager
Strategic Planning Group
Strategic Planning & Administration Dept.
Intellectual Property Div.

Enclosure: letter



May 22, 2014

Ref: Idea Submission

Dear Mr. Ottah:

The New Devices Section recently received your correspondence to General Motors. On behalf of the office of Ms. Mary Barra our office has been asked to reply to your submission. Our office is responsible for reviewing all unsolicited submissions to General Motors. Due to the high volume of submissions we receive each day, we apologize for any delay in our response.

The New Devices Section has implemented an automated, online submission evaluation process via the website at the following link: <http://www.gmideas.com>. The site provides information regarding the terms and policies of submitting ideas to General Motors. Plus, the automated process allows for ease of submission, prompt confirmation of receipt, and efficient evaluation. It provides submitters with the opportunity to concisely describe their idea and provide supporting documentation.

With implementation of the online submission process, hard copy/email/fax submissions to the New Devices Section are no longer accepted. According to our practices, GM New Devices has not retained your unsolicited submission.

We look forward to receiving your idea through the New Devices Section's automated online submission process and further appreciate your interest in General Motors.

Sincerely,

New Devices Section
General Motors

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We also take this opportunity to point out that Jaguar Land Rover **does not** sell any aftermarket camera or phone holders for its vehicles (i.e. the type that attach to a windscreen with a suction cup or other clamping device) and if you intend to rely on such devices to demonstrate infringement then you should direct any complaint you may have directly to the seller of such devices, as they are not linked in any way with Jaguar Land Rover.

We strongly suggest that you consult a patent attorney before further contacting us further, as your letter clearly displays a lack of knowledge of patent law.

Please direct any further correspondence to me at the above address.

Yours faithfully

A handwritten signature in black ink, appearing to read 'A. Bhimani', with a horizontal line extending from the end of the signature.

Alan Bhimani
Patent Attorney
Jaguar Land Rover

Office: +44 (0) 2476 567 314

Email: abhimani@jaguarlandrover.com



NISSAN MOTOR CO., LTD.

Nissan Advanced Technology Center
1-1, Morinosatoayama, Atsugi-shi,
Kanagawa 243-0123, Japan
www.nissan.co.jp

2 June 2014

Mr. Chikezie Ottah
170 South Portland Avenue, Apt. 14F
Brooklyn New York, 11217, USA

Dear Mr. Chikezie Ottah :

Thank you for your letter. We sincerely appreciate hearing from our valued customers.

Our customers often make suggestions regarding the design or marketing of our products, and we are thankful that our customers are so interested in Nissan's future.

Unfortunately, for legal reasons, our company policy prevents us from considering or using such suggestions from people who are not Nissan employees. Regretfully, we are returning your letter and any enclosures, although we sincerely appreciate the spirit in which your suggestions are offered.

Again, thank you for your consideration and your continued interest in Nissan.

Sincerely,

A handwritten signature in cursive script that reads "Tsuyoshi Tomita".

Tsuyoshi Tomita, Manager
Intellectual Property Department

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TOYOTA

TOYOTA MOTOR CORPORATION

1, TOYOTA-CHO, TOYOTA, AICHI, 471-8571 (Head Office)
or 471-8572 (Research & Development Group) JAPAN
TEL: +81-565-28-2121

July 29, 2014

Mr. Chikezie Ottah
170 South Portland Avenue,
Apt.14F Brooklyn New York
U.S.A.

Dear Mr. Chikezie Ottah:

Thank you for your letter, which has been referred to this office for reply.

We have studied your proposal in the departments concerned and came to the conclusion that we are unable to accept your offer at present. We greatly appreciate your kind offer but we are sorry that we cannot meet your request and hope for your best understanding.

Consequently, we are taking the liberty of returning the letter that you kindly sent to us with this letter.

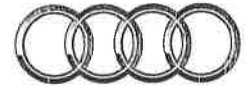
We appreciate your taking an interest in Toyota Motor Corporation. Thank you for taking the time to write to us.

Very truly yours,



YOSUKE IIDA
Group Manager
Strategic Planning Group
Strategic Planning & Administration Dept.
Intellectual Property Div.

Enclosure: letter



AUDI AG · 85045 Ingolstadt · Deutschland

Mr.
Chikezie Ottah
170 South Portland Avenue,
Apt. 14F,
Brooklyn New York,
11217,
USA

Ihre Zeichen
Ihre Nachricht
Unsere Org.-Einheit/Zeichen
I/EZ-14, BR/EB
35728
35183
Hausruf +49 841 89-
Telefax +49 841 89-
E-Mail
patents@audi.de

Datum
08. Juli 2014

Your Invention Proposal
"Mobile camera"
Our Ref: A01362

Dear Mr. Ottah,

We thank you for your invention offer, which was received by us on May 26, 2014 informing us about your above mentioned idea.

After examining your offer we unfortunately have to inform you, that we will not accept it. We are sorry that we cannot give you a positive response and hope that you will understand that we have to abide from detailed explanations which would inevitably offer an insight into research and development activities.

Nevertheless we thank you for your interest in our company.

Yours faithfully,

AUDI AG

i.V.

M. Herbst

i.V.

Dr. K. Brandt

AUDI AG

85045 Ingolstadt

Lieferverkehr:
Ettinger Straße
Tor 10

Telefon +49 841 89-0
www.audi.com

Ehrenvorsitzender des
Aufsichtsrats:
Carl H. Hahn

Vorsitzender des
Aufsichtsrats:
Martin Winterkorn

Vorstand:
Rupert Stadler,
Vorsitzender des Vorstands
Luca de Meo
Ulrich Hackenberg
Bernd Martens
Thomas Sigi
Axel Strotbek
Hubert Walth

AUDI Aktiengesellschaft
Sitz der Gesellschaft:
Ingolstadt
Eingetragen im
Handelsregister des
Amtsgerichts Ingolstadt
unter HR B 1

Bankverbindungen

EUR:
Commerzbank AG Ingolstadt
Konto: 191 100 700
BLZ: 721 400 52
SWIFT: COBADEFF721
IBAN:
DE67 7214 0052 0191 1007 00

USD:
Citibank AG Frankfurt/Main
Konto: 1600 488 003
SWIFT: CITIDFFXXX
IBAN:
DE77 5021 0900 1600 4880 03
USt.-ID-Nr.: DE 811 115 368

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**FORD GLOBAL
TECHNOLOGIES, LLC**

Ford Global Technologies, LLC
A Subsidiary of Ford Motor Company
Consumer Innovation Office

P.O. Box 6234
Dearborn, MI 48121-6234

June 24, 2014

Chikezie Ottah
170 South Poland Avenue Apt. 14F
Brooklyn, NY 11217

ND No: 92018

Dear Chikezie,

We received your recent communication. We truly appreciate that you took the time to write us.

Because your letter included an idea or suggestion, it was routed to the Consumer Innovation Office for handling. Our standard process for receiving ideas/suggestions is that we do not accept any mail, voicemail or email containing ideas - only those submitted to www.fordnewideas.com where a signed waiver is required.

Unfortunately, this means we must return your correspondence. If you wish to submit your idea to the Company, please visit www.fordnewideas.com and review our submission guidelines. Once you have completed the online process, we can then route your non-confidential information to an experienced technical reviewer for consideration.

In the meantime, please accept the enclosed coupons as a token of our appreciation for your initiative. Feel free to share them with friends and family. Thank you for your interest in Ford Motor Company. We look forward to your submission.

Best Regards,

Laurie

Consumer Innovation Office

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May 16, 2014

Mr. Chikezie Ottah
170 South Portland Ave., #14F
Brooklyn, New York 11217

Reference No.: 25025038

Dear Mr. Ottah:

Thank you for contacting the Customer Assistance Center for Chrysler, Dodge, Jeep and Fiat brands of products.

We receive many suggestions and ideas regarding a wide variety of topics. While we cannot evaluate every suggestion, we appreciate the time and effort you took to contact us about your idea.

We do our best to be sensitive to the needs and expectations of consumers and continuously look for ways to improve our product offerings. We mainly rely on our worldwide employees, affiliate suppliers and creative agencies to devise and develop innovations.

Sincerely,

A handwritten signature in cursive script that appears to read "Carol".

Carol
Senior Staff

CLA/sk

9

Phone 800.992.1997



FORD GLOBAL
TECHNOLOGIES, LLC

Ford Global Technologies, LLC
A Subsidiary of Ford Motor Company
Consumer Innovation Office

P.O. Box 6234
Dearborn, MI 48121-6234

April 14, 2015

Chikezie Ottah
170 South Portland Ave, Suite 14F
Brooklyn, NY 11217

Re: Idea No: 25020 - BOOK HOLDER

Dear Chikezie Ottah,

Thank you for submitting an idea to Ford Motor Company. Your suggestion was forwarded to a technical specialist for evaluation. Their evaluation is based on two major elements:

1) improvement upon current technology, and 2) cost. Our technical specialists have reviewed your idea and concluded that Ford Motor Company will not be able to further investigate development of your particular idea, nor acquiring any rights on your behalf.

Regretting that our response could not be more favorable, we, nevertheless, thank you for your interest in Ford.

Please accept the enclosed coupons as a token of our appreciation for your initiative. Feel free to share them with friends and family.

Best Regards,

Laurie
Consumer Innovation Office

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Chikezie Ottah
170 South Portland Avenue, Apt. 14F
Brooklyn
New York, 11217
USA

Jaguar Land Rover
Abbey Road, Whitley
Coventry CV3 4LF
T +44 (0)2476 303 080

Coventry, 6 October 2014

Our Ref: IV14-006

Dear Mr Ottah

US Patent No. 7,152,840

We are in receipt of your recent undated letter in which you appear to assert that certain vehicles sold by Jaguar Land Rover under the Jaguar brand infringe your above referenced patent.

We point out to you that the rights conferred by your patent are *limited* to the claimed subject matter, i.e. the single claim at column 8 of your patent immediately following the statement "We claim". The scope of your patent is therefore limited to a book holder having a number of physical features including a telescopic arm and a pair of resilient clip arms adjustably mounted on a clip head.

Jaguar Land Rover does not provide book holders in its vehicles and therefore does not infringe your patent. In contrast as shown in your images #05 and #06, vehicles sold under the Jaguar brand generally include a fixed screen located on the centre console in the interior of the vehicle and a reversing camera permanently mounted in a recessed position in the vehicle body, neither of which has either a telescopic arm or a pair of resilient clip arms adjustably mounted on a clip head.

In the unlikely event that your patent claim to a book holder were to be interpreted to include a camera holder, therefore, there would still be no infringement of your patent by any product manufactured or sold by Jaguar Land Rover.

With particular reference to your previous lawsuit against VeriFone Sys. Inc., you will be aware from the construction of your claims, and the resulting summary judgement against you, that your patent is subject to file wrapper estoppel preventing the adjustably mounted resilient clip from encompassing other alternative features under the doctrine of equivalents, a decision which was upheld upon appeal.

In light of the above we consider this matter closed and do not expect to hear further from you in this regard. If however, you still believe that your patent is infringed by Jaguar Land Rover vehicles please provide me with a detailed breakdown and demonstration of where you believe *each and every* feature of your patent claim, as construed by the court in your action against VeriFone Sys. Inc., is to be found.

PSA PEUGEOT CITROËN
Direction Recherche et Développement

Direction Recherche Innovation et Technologies Avancées

DRD/DRIA/ISSV/VPIB
Case courrier : LG081
Tel : 33 1 56 47 65 62
Fax : 33 1 56 47 78 12

Chikezie Ottah
170 South Portland Avenue, Apt. 14F
Brooklyn New York, 11217
USA

La Garenne, le 09.02.2015

N/Réf. : 2015MIS00009 US

Objet : MOBILE CAMERA; Patent US 7,152, 840

Dear Sir,

We acknowledge receipt of your letter.

First of all, we would like to thank you for having approached our Company with your project. It is a mark of confidence that is much appreciated.

However, after due consideration, we regret to inform you that we are unable to accept your proposition.

Nevertheless, we wish you every success with your project.

Yours faithfully.


Francis FERNANDEZ
Intellectual Property Department

12

No. 6, 4th Avenue
Trans Ekulu
Enugu State
Nigeria
20 July, 2015.

TO WHOM IT MAY CONCERN

RE: CHIKEZIE OTTAH

The above name is representing us at U.S.A.

Thanks for your assistance.

Yours faithfully,



.....
KENNETH OTTAH



.....
CHIKA OTTAH



.....
CHINEYE OTTAH

- yours



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHIKEZIE OTTAH.

15 CV 2465 LTS
07/29/15

Plaintiff

V

BMW ET AL

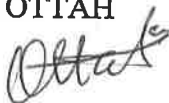
EXHIBIT.....

2

(4 PAGES)

CHIKEZIE OTTAH

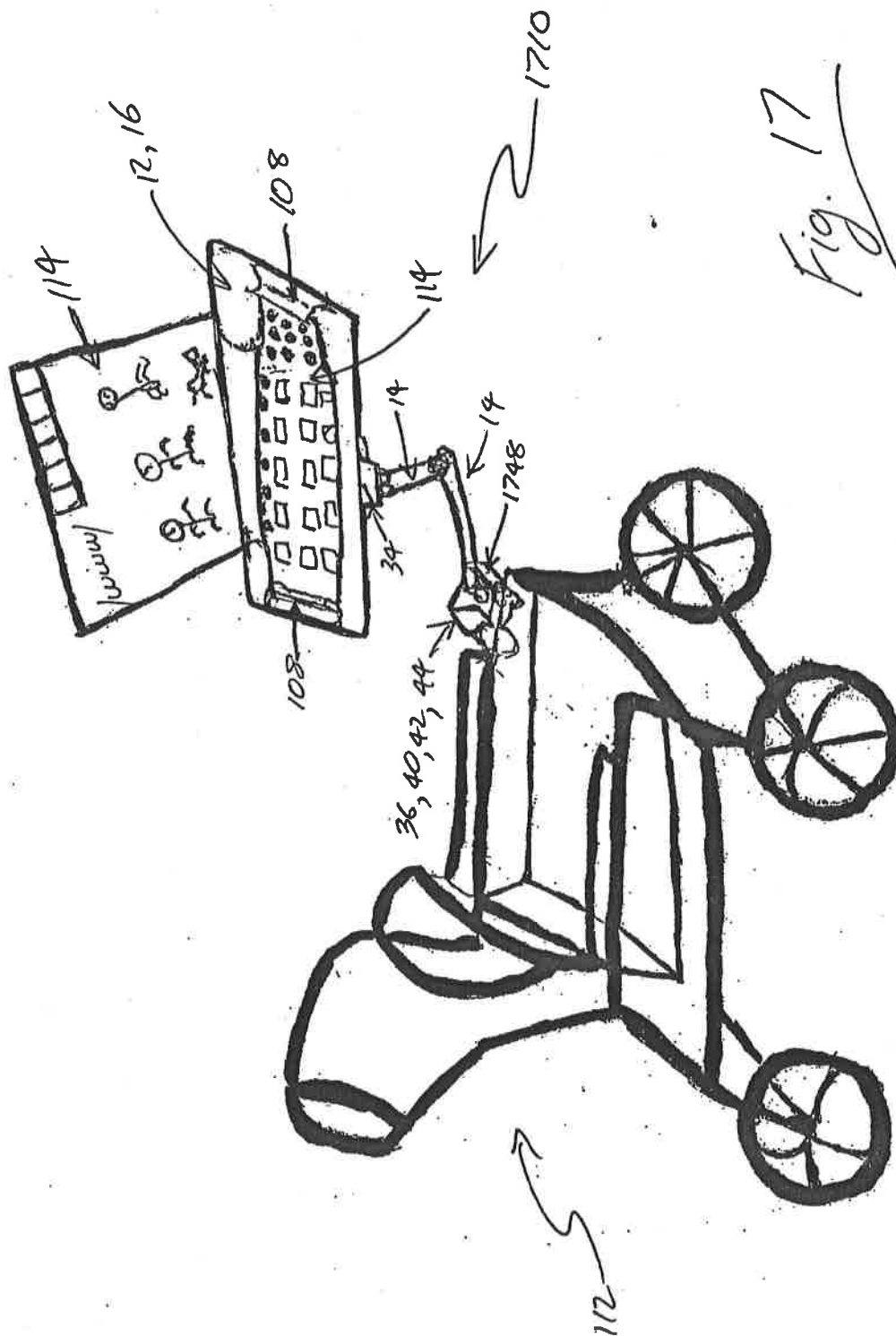
SIGN



DATE 7/29/15

2003231638 11 Nov 2009

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20032231638 11 Nov 2009

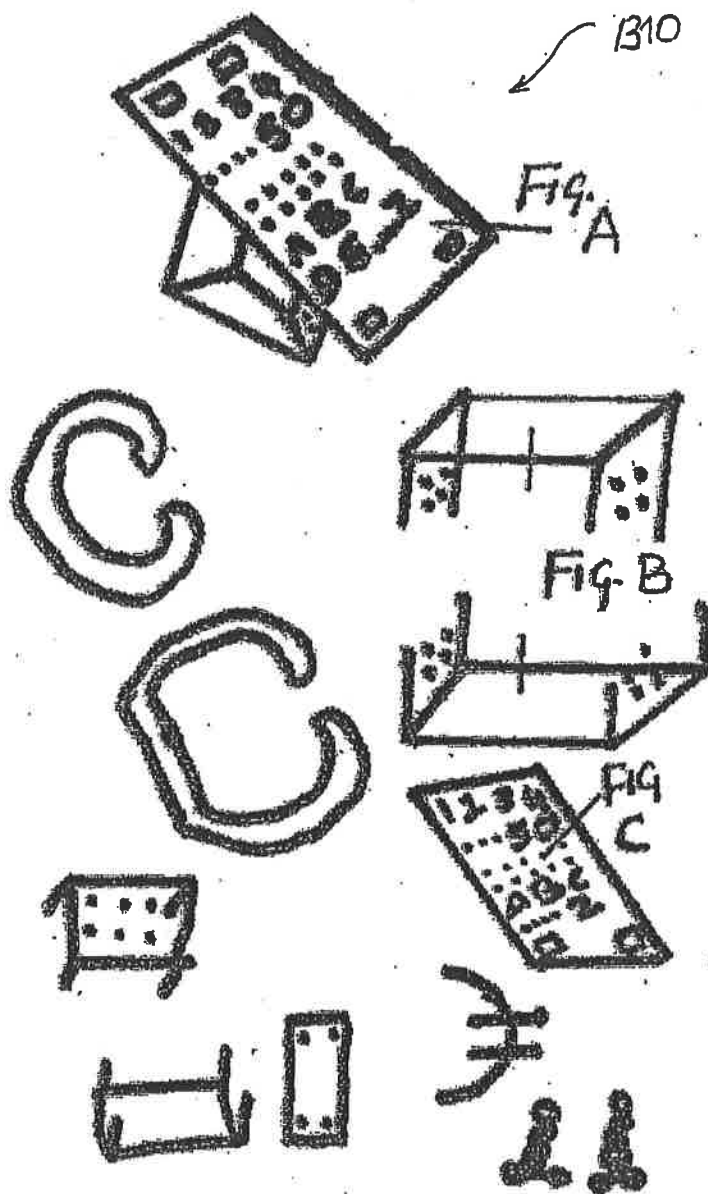


Fig. 13

2

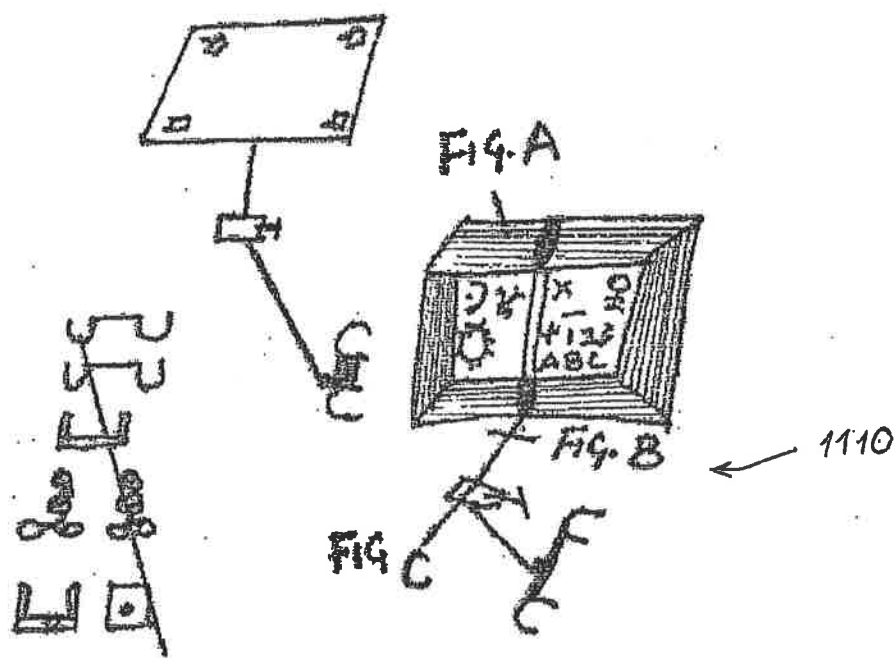


Fig. 11A-D

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INFRIGEMENT

WE ARE ASKING FOR LICESING AGREEMENT

We mention in the letter of a sudden increase of camera mounted in your vehicles, we would like a licensing agreement, this camera was claimed three time, first as electronic equipment, second as audio video, third as camera. See page 5, paragraph 2 and 3, also read page 6, paragraph 1 and the claim. US Patent 7,152,840 teach that the claim is/was compassed, example, or example used like the items mention above are part of the claim, all allowed publication, including the earlier claims are part of the document.

While ask for new business, we strongly believe there is issue to be resolve in the mounted cameras in your vehicle. The issue is licensing.

Thanks

Sincerely

Chikezie Ottah

04

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHIKEZIE OTTAH.

15 CV 2465 LTS
07/29/15

Plaintiff

V

BMW ET AL

EXHIBIT..... # 3 (1 PAGE).....

CHIKEZIE OTTAH

SIGN 

DATE 7/29/15

-25-2005 11:02P FROM:

TO: 17038729306

P: 21/38

REMARKS/ARGUMENTS

The specification has been rewritten to over come problems identified by the Examiner. The paragraphs describing in detail the Figures are as described above. Elements have been moved from the claims in the original disclosure to the specification and identified on the drawings. No new matter has been added. Several elements were identified with more than one name, the specification as amended has been changed to use a single name to identify each element of the invention. *18 Sample*

In the Specification paragraphs 0034-0039 have been added to further describe the previously disclosed elements identified in the original disclosure and now illustrated in Replacement sheet 4. Figures 6-8 on Replacement Sheet 4 are Figures from the original disclosure identified with elements from the original disclosure. No new matter has been added.

In the Claims.

The Examiner objected to claims 5-9 and 24-30 under 35 U.S.C. 112 first paragraph. Claims 5-9 and 24-30 have been cancelled. Appropriate correction has been made to the Specification

The Examiner objected to claims 3,4,6-8 17, 18 -9 and 24-30 under 35 U.S.C. 112 second paragraph. Claims 3,4,6-8 17, 18 -9 and 24-30 have been cancelled. Appropriate correction has been made to the Specification

The Examiner objected to claims 1-3, 5, 6, 8, 10, 18, 20, 25 and 27-31 under 35 U.S.C. 102 (b). Claims 1-3, 5, 6, 8, 10, 18, 20, 25 and 27-31 have been cancelled.

The Examiner objected to claims 4 and 7 under 35 U.S.C. 103. Claims 4 and 7 have been cancelled.

Page 12 of 14; Appl. No. 10/366,779; Amdt. dated Jan. 15, 2004;
Reply to Office action of January 24, 2005