

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

ZENO HOLDINGS, LLC)
)
 Plaintiff,)
) Civil Action No. 2:16-cv-583
 v.)
) **JURY TRIAL DEMANDED**
 ZOHO CORPORATION)
)
 Defendant.)
 _____)

COMPLAINT

For its Complaint, Plaintiff Zeno Holdings, LLC ("Zeno Holdings"), by and through the undersigned counsel, alleges as follows:

THE PARTIES

1. Zeno Holdings is a Texas limited liability company with a place of business located at 1400 Preston Road, Suite 400, Plano, Texas 75093.
2. Defendant Zoho Corporation is a California company with, upon information and belief, a place of business located at 805 Las Cimas Pkwy, Suite 380, Austin, Texas 78746
3. Upon information and belief, Defendant has registered with the Texas Secretary of State to conduct business in Texas.

JURISDICTION AND VENUE

4. This action arises under the Patent Act, 35 U.S.C. § 1 *et seq.*
5. Subject matter jurisdiction is proper in this Court under 28 U.S.C. §§ 1331 and 1338.
6. Upon information and belief, Defendant conducts substantial business in this forum, directly or through intermediaries, including: (i) at least a portion of the infringements

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 this district.

7. Venue is proper in this district pursuant to §§ 1391(b), (c) and 1400(b).

THE PATENTS-IN-SUIT

8. On August 25, 2015, U.S. Patent No. 9,118,773 (the "'773 patent"), entitled "Automated Prompting Techniques Implemented Via Mobile Devices and Systems," was duly and lawfully issued by the U.S. Patent and Trademark Office. A true and correct copy of the '063 patent is attached hereto as Exhibit A.

9. On June 10, 2014, U.S. Patent No. 8,750,836 (the "'836 patent"), entitled "Automated Prompting Techniques Implemented Via Mobile Devices and Systems," was duly and lawfully issued by the U.S. Patent and Trademark Office. A true and correct copy of the '836 patent is attached hereto as Exhibit B.

10. On April 9, 2013, U.S. Patent No. 8,417,233 (the "'233 patent"), entitled "Automated Notation Techniques Implemented Via Mobile Devices and/or Computer Networks," was duly and lawfully issued by the U.S. Patent and Trademark Office. A true and correct copy of the '233 patent is attached hereto as Exhibit C.

11. Zeno Holdings is the assignee and owner of the right, title and interest in and to the '773, '836 and '233 patents, including the right to assert all causes of action arising under said patents and the right to any remedies for infringement of them.

COUNT I – INFRINGEMENT OF U.S. PATENT NO. 9,118,773

12. Zeno Holdings repeats and realleges the allegations of paragraphs 1 through 11 as if fully set forth herein.

13. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendant is liable for infringement of at least claim 1 of the '773 patent by making, using, importing, offering for sale, and/or selling systems and methods for operating a mobile communication device associated with a user, including, but not limited to, Zoho CRM Mobile Edition.

14. More specifically and upon information and belief, Defendant's Zoho CRM Mobile Edition includes a method for operating a mobile communication device associated with a user.



Zoho CRM Mobile Edition



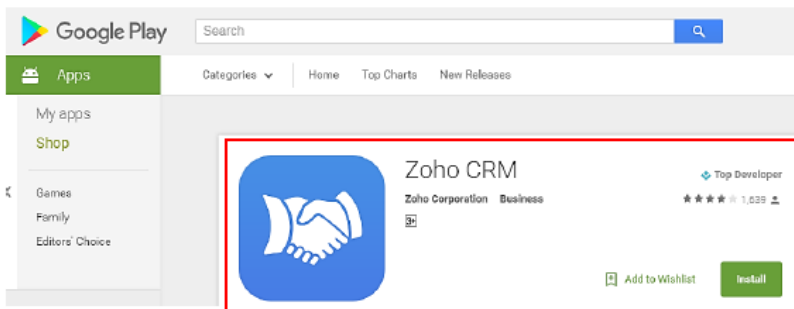
Zoho CRM Mobile Edition gives you the option to access and work with your Online Zoho CRM data from your mobile devices. The Zoho CRM native app is available for the iPhone, iPad and Android phones.

Additionally, you will be able to use the web app in other mobile devices. You can access data from CRM modules such as Leads, Accounts, Contacts, Potentials, Cases, Tasks, Events, etc. wherever you go. Also, you can work in the offline mode to add, modify, or delete records which will be saved locally and synchronized with your Online Account, when you connect to the network.

Zoho CRM Mobile Edition can be installed on the Android phones with OS 4.0 or a higher. Android systems require a 200 MHz processor to support a variety of platforms and configurations. The Android processor of the mobile device is the processor that executes the instructions provided by Zoho CRM Mobile Edition.

Installing App on Android Phones

You can download and install the Zoho CRM application from Play Store. Before you install, take a look at the prerequisites.



Android Requirements:

- You need an OS 4.0 or a higher Edition on your Android phone.

Google Android System Requirements

Based on Linux Kernel, Google Android is a special operating system designed for mobile devices that was developed by Google and Open Handset Alliance. Thanks to the Open handset Alliance, this great little mobile OS came with a handful of useful applications that made the Google Android even more popular.

But in order for you to be able to enjoy this great software on your mobile device, you have to make sure you have the following:

- 32 MB RAM
- 32 MB Flash Memory
- 200 MHz processor

Zoho CRM Mobile Edition identifies a set of threshold criteria for causing a display, at the mobile communication device, of a user interface message prompting the user to initiate a procedure at the mobile communication device.

Log Calls

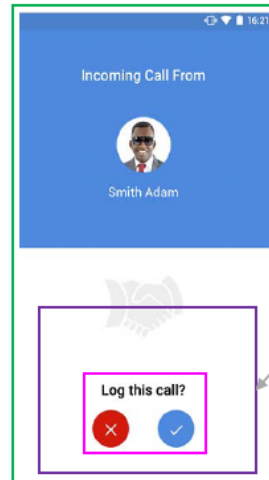
To log an incoming call

1. Answer the incoming call.

When the call is over, log a call option will be available if the incoming call's phone number is available in your Zoho CRM account.

2. Tap Yes to log the call.

Call Logging feature is presented only if incoming call's phone number is available in Zoho CRM account ("threshold criteria")



User Interface message to log the call is prompted on the mobile device's display

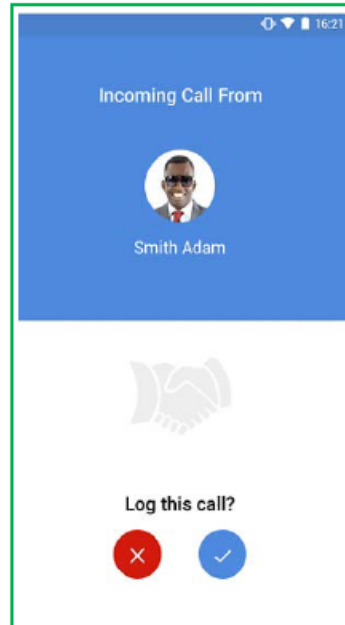
Zoho CRM Mobile Edition determines if an occurrence of an end of call (EOC) event has been detected at the mobile communication device.

Log Calls

To log an incoming call

1. Answer the incoming call.
When the call is over, log a call option will be available if the incoming call's phone number is available in your Zoho CRM account.
2. Tap Yes to log the call.

Determining occurrence of first event : End of incoming call



When the call is over, and if the threshold criteria is met (i.e., if the incoming contact's phone number is available in the database), a message is displayed on the interface of the mobile device prompting the user to initiate the call log ("first procedure").

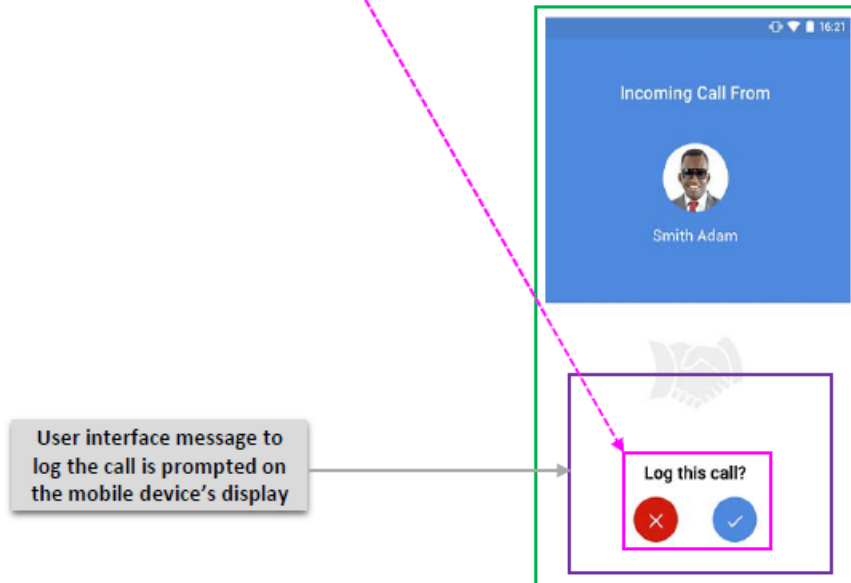
Log Calls

To log an incoming call

1. Answer the incoming call.

When the call is over, log a call option will be available if the incoming call's phone number is available in your Zoho CRM account.

2. Tap Yes to log the call.

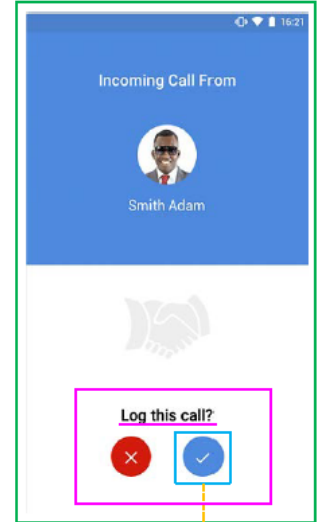


Then, the procedure is initiated at the mobile communication device in response to receiving an input from the user authorizing initiation of the procedure.

Log Calls

To log an incoming call

1. Answer the incoming call.
When the call is over, log a call option will be available if the incoming call's phone number is available in your Zoho CRM account.
2. Tap Yes to log the call.
3. In the *Call information page* enter the call information and tap Save.

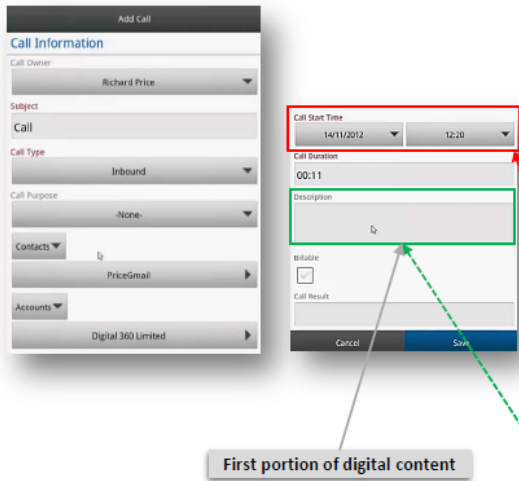


"Initiating": On tapping Yes (shown as 'blue tick' in the snapshot), the 'Call Information' page opens up where user can log the call.

Initiating the procedure includes generating, using the input from the user, a portion of digital content and accessing information which includes details relating to the phone call.

To log an incoming call

1. Answer the incoming call.
 When the call is over, log a call option will be available if the incoming call's phone number is available in your Zoho CRM account.
2. Tap Yes to log the call.
3. In the *Call information* page enter the call information and tap Save.



Standard Fields in Log Calls

In the *Log a Call* page, you need to specify the call-related information. The following table provides description of the various fields in the page.

Field Name	Description	Data Type
Subject	Enter the subject of the call.	Text Box
Call Type	<ul style="list-style-type: none"> Choose Inbound for the incoming calls in your organization. Choose Outbound for the outgoing calls in your organization. 	Select option
Related To	Choose the type of record to which the call is related and then choose the record.	Drop-down list
Call From/To	Specify to whom the call is made or from whom the call is received.	Select option
Call Purpose	Choose the purpose of the call from the drop-down list.	Pick list
Call Result	Specify the call result	Text Box
Time Details	<ul style="list-style-type: none"> Click Current Call if the call is in progress. Click Completed Call if the call is completed. 	Select option
Call Start Time	Automatically displays the current date and time.	Date and Time
Call Duration	<ul style="list-style-type: none"> Displays the call duration for the Current Calls. For Completed Calls, specify the call duration. 	Numeric
Description	Specify the description of the call.	Text Box
Billable	Select the check box if the call is billable.	Check Box

Zoho CRM Mobile Edition's "Log a Call" functionality allows a user to create an electronic file comprising details of the call such as call duration, date, time, etc. and notes (described by the user). The details are saved so that they are accessible to the user for future reference.

The Log a Call functionality helps you to register the inbound calls (received from leads and customers) and outbound calls (dialed to leads and customers) with call details such as call duration, date and time of calls, notes, etc. Users who frequently make calls or receive calls in an organization can make use of this functionality in Zoho CRM.

For example customer support executives can log calls and identify the time spent on each call and keep track of the average time spent in calls on a monthly basis. On the other hand, the Sales and Marketing Executives can keep track of all the calls they make to their prospects. The call details can be further used to generate reports on billing details, average time spent on calls, number of calls per day, etc.

Keeping track of calls for future reference

Benefits

- Helps identify typical questions asked by users
- Keep track of all the customer calls for future reference.

Activities

An important aspect in CRM is to keep track of all the tasks, meetings, calls, events, or activity records. You can neatly organize the numerous records along with the activities associated to them such as follow-up, pre sales and post sales activities, phone conversations etc. They can be very useful in initiating and tracking pending action items and in recording the results of meetings or events.

In Zoho CRM, the Activities module is where you can create and associate business tasks, events and calls. Each activity has vital information on the date, time, priority level and notification parameters that can even be accessible from within the record it is associated to.

15. Zeno Holdings is entitled to recover from Defendant the damages sustained by Zeno Holdings as a result of Defendant's infringement of the '773 patent in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT II – INFRINGEMENT OF U.S. PATENT NO. 8,750,836

16. Zeno Holdings repeats and realleges the allegations of paragraphs 1 through 15 as if fully set forth herein.

17. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendant is liable for infringement of at least claim 1 of the '836 patent by making, using, importing, offering for sale, and/or methods systems and methods for operating a mobile communication device associated with a user, including, but not limited to, Zoho CRM Mobile Edition.

18. More specifically and upon information and belief, Defendant's Zoho CRM Mobile Edition includes a method for operating a mobile communication device associated with a first user.



Zoho CRM Mobile Edition



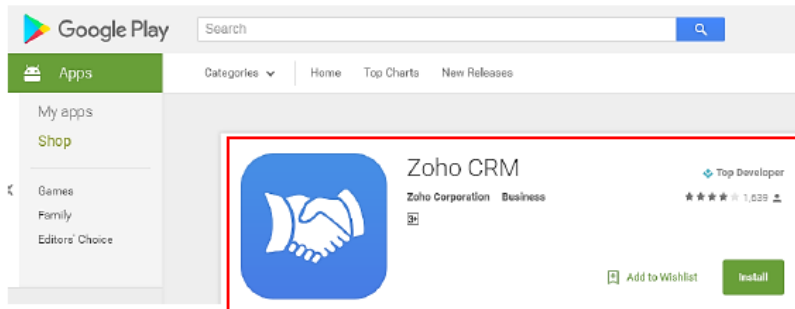
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Additionally, you will be able to use the web app in other mobile devices. You can access data from CRM modules such as Leads, Accounts, Contacts, Potentials, Cases, Tasks, Events, etc. wherever you go. Also, you can work in the offline mode to add, modify, or delete records which will be saved locally and synchronized with your Online Account, when you connect to the network.

Zoho CRM Mobile Edition can be installed on the Android phones with OS 4.0 or a higher. Android systems require a 200 MHz processor to support a variety of platforms and configurations. The Android processor of the mobile device is the processor that executes the instructions provided by Zoho CRM Mobile Edition.

Installing App on Android Phones

You can download and install the Zoho CRM application from Play Store. Before you install, take a look at the prerequisites.



Android Requirements:

- You need an OS 4.0 or a higher Edition on your Android phone.

Google Android System Requirements

Based on Linux Kernel, Google Android is a special operating system designed for mobile devices that was developed by Google and Open Handset Alliance. Thanks to the Open handset Alliance, this great little mobile OS came with a handful of useful applications that made the Google Android even more popular.

But in order for you to be able to enjoy this great software on your mobile device, you have to make sure you have the following:

- 32 MB RAM
- 32 MB Flash Memory
- 200 MHz processor

Zoho CRM Mobile Edition enables the first user of the mobile device to identify a first set of threshold criteria for enabling automatic display, at the mobile communication device, of a first user interface message prompting the first user to initiate a first procedure at the mobile communication device.

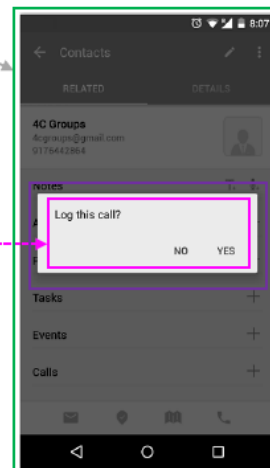
Log Calls

After making calls to your customer, you can instantly log your calls.

To log an outgoing call

1. Go to the module (Leads, Accounts, Contacts, etc.).
2. Tap a contact to whom you want to make a call.
3. Tap the phone number to call the contact.
When the call is completed, you will be asked if you want to log the call.
4. Tap Yes to log the call.

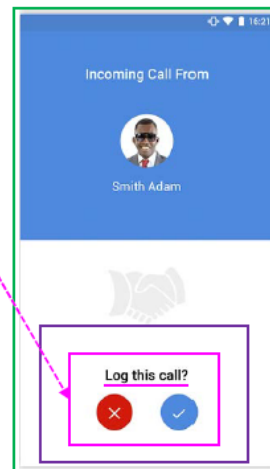
Mobile communication device



Call Logging feature is presented only if incoming call's phone number is available in Zoho CRM account ("threshold criteria")

To log an incoming call

1. Answer the incoming call.
When the call is over, log a call option will be available if the incoming call's phone number is available in your Zoho CRM account.
2. Tap Yes to log the call.



Zoho CRM Mobile Edition detects first event at the mobile communication device relating to an initiation of a first phone call at the mobile communication device and determines if an occurrence of a first end of call (EOC) event has been detected at the mobile communication device, the first EOC event relating to a termination of the first phone call.

Log Calls

After making calls to your customer, you can instantly log your calls.

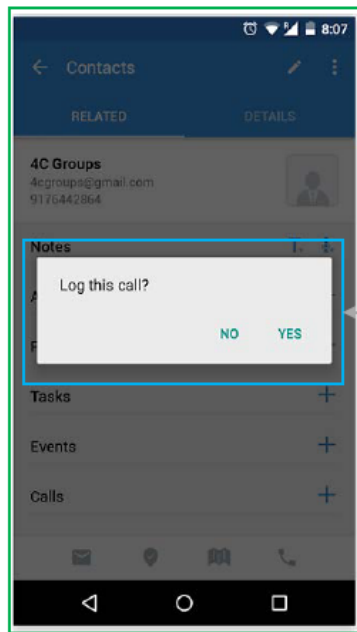
To log an outgoing call

1. Go to the module (Leads, Accounts, Contacts, etc.).
2. Tap a contact to whom you want to make a call.
3. Tap the phone number to call the contact.
When the call is completed, you will be asked if you want to log the call.
4. Tap Yes to log the call.

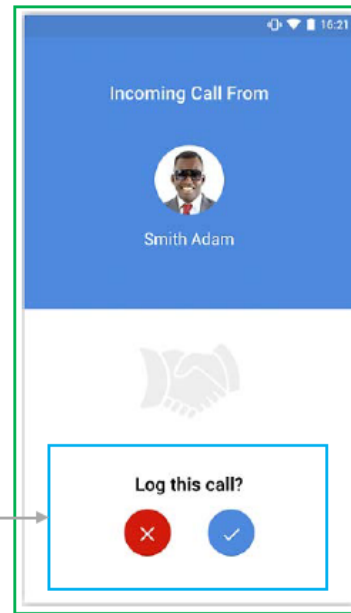
To log an incoming call

1. Answer the incoming call.
When the call is over, log a call option will be available if the incoming call's phone number is available in your Zoho CRM account.

Determining occurrence of first event :
End of outgoing or incoming call



Detecting a first event at mobile
communication device



When the call is over, and if the threshold criteria is met (i.e., if the Call Logging feature is enabled and the incoming call's phone number is available in the database), a message is displayed on the interface of the mobile device prompting the user to initiate the call log ("first procedure").

Log Calls

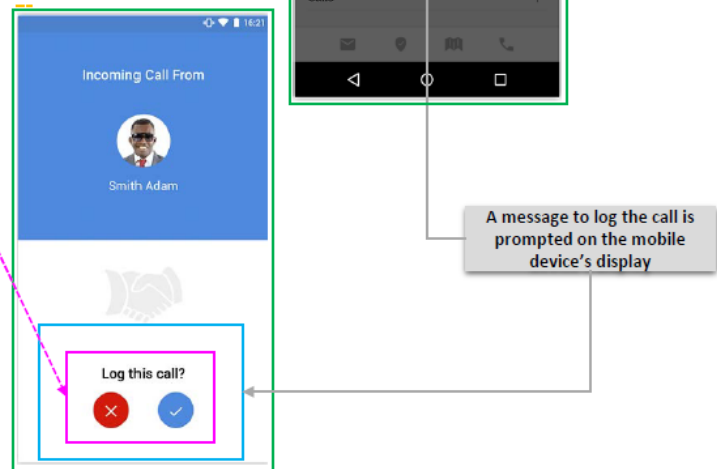
After making calls to your customer, you can instantly log your calls.

To log an outgoing call

1. Go to the module (Leads, Accounts, Contacts, etc.).
2. Tap a contact to whom you want to make a call.
3. Tap the phone number to call the contact.
4. When the call is completed, you will be asked if you want to log the call.

To log an incoming call

1. Answer the incoming call.
- When the call is over, log a call option will be available if the incoming call's phone number is available in your Zoho CRM account.



The first procedure at the mobile communication device is initiated in response to receiving input from the first user authorizing initiation of the first procedure.

Log Calls

After making calls to your customer, you can instantly log your calls.

To log an outgoing call

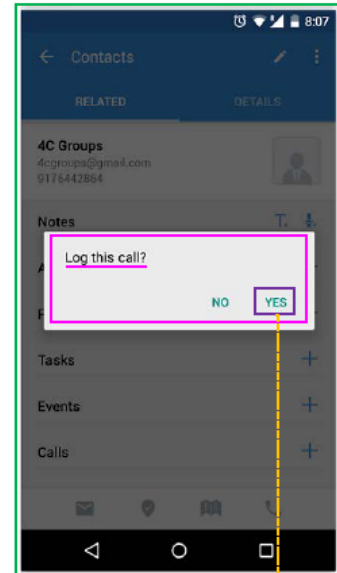
1. Go to the module (Leads, Accounts, Contacts, etc.).
2. Tap a contact to whom you want to make a call.
3. Tap the phone number to call the contact.
When the call is completed, you will be asked if you want to log the call.
4. Tap **Yes** to log the call.
5. In the *Call Information* page enter the call information and tap Save.

Source : https://www.zoho.com/crm/help/mobile/using-native-app-for-android.html#Log_Calls

"Initiating": On tapping 'Yes', the 'Call Information' page opens up where user can log the call.

The screenshot shows the 'Add Call' screen with the following details:

- Call Owner:** Richard Price
- Subject:** Call
- Call Type:** Inbound
- Call Purpose:** -None-
- Contacts:** PriceGmail
- Accounts:** Digital 360 Limited



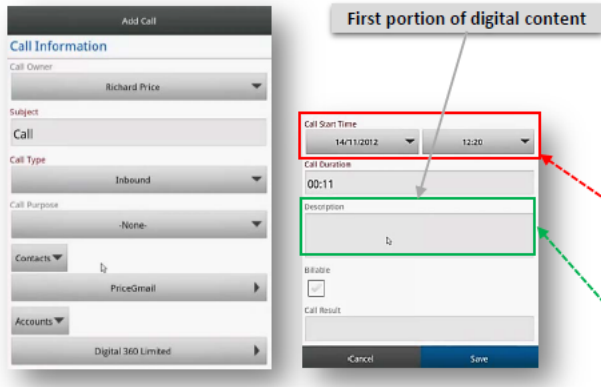
Initiating the first procedure includes generating, using input from the first user, a first portion of digital content, and accessing information which includes details relating to the first phone call.

Log Calls

After making calls to your customer, you can instantly log your calls.

To log an outgoing call

1. Go to the module (Leads, Accounts, Contacts, etc.).
2. Tap a contact to whom you want to make a call.
3. Tap the phone number to call the contact.
When the call is completed, you will be asked if you want to log the call.
4. Tap Yes to log the call.
5. In the Call Information page enter the call information and tap Save.



Standard Fields in Log Calls

In the Log a Call page, you need to specify the call-related information. The following table provides description of the various fields in the page.

Field Name	Description	Data Type
Subject	Enter the subject of the call.	Text Box
Call Type	<ul style="list-style-type: none"> Choose Inbound for the incoming calls in your organization. Choose Outbound for the outgoing calls in your organization. 	Select option
Related To	Choose the type of record to which the call is related and then choose the record.	Drop-down list
Call From/To	Specify to whom the call is made or from whom the call is received.	Select option
Call Purpose	Choose the purpose of the call from the drop-down list.	Pick list
Call Result	Specify the call result.	Text Box
Time Details	<ul style="list-style-type: none"> Click Current Call if the call is in progress. Click Completed Call if the call is completed. 	Select option
Call Start Time	Automatically displays the current date and time.	Date and Time
Call Duration	<ul style="list-style-type: none"> Displays the call duration for the Current Calls. For Completed Calls, specify the call duration. 	Numeric
Description	Specify the description of the call.	Text Box
Billable	Select the check box if the call is billable.	Check Box

Initiating the first procedure also includes creating a first electronic data file which associates the first portion of digital content with at least a portion of the details relating to the first phone call, and (iv) saving the first electronic data file at a first storage device such that the first electronic data file is accessible to the first user for future reference.

5. In the *Call Information* page enter the call information and tap **Save**.

The Log a Call functionality helps you to register the inbound calls (received from leads and customers) and outbound calls (dialed to leads and customers) with call details such as call duration, date and time of calls, notes, etc. Users who frequently make calls or receive calls in an organization can make use of this functionality in Zoho CRM.

For example customer support executives can log calls and identify the time spent on each call and keep track of the average time spent in calls on a monthly basis. On the other hand, the Sales and Marketing Executives can keep track of all the calls they make to their prospects. The call details can be further used to generate reports on billing details, average time spent on calls, number of calls per day, etc.

Benefits

- Helps identify typical questions asked by users
- Keep track of all the customer calls for future reference.

Keeping track of calls for future reference

Source : <https://www.zoho.com/crm/help/activities/log-calls.html>

Activities

An important aspect in CRM is to keep track of all the tasks, meetings, calls, events, or activity records. You can neatly organize the numerous records along with the activities associated to them such as follow-up, pre sales and post sales activities, phone conversations etc. They can be very useful in initiating and tracking pending action items and in recording the results of meetings or events.

In Zoho CRM, the Activities module is where you can create and associate business tasks, events and calls. Each activity has vital information on the date, time, priority level and notification parameters that can even be accessible from within the record it is associated to.

19. Zeno Holdings is entitled to recover from Defendant the damages sustained by Zeno Holdings as a result of Defendant's infringement of the '836 patent in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT III – INFRINGEMENT OF U.S. PATENT NO. 8,417,233

20. Zeno Holdings repeats and realleges the allegations of paragraphs 1 through 19 as if fully set forth herein.

21. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendant is liable for infringement of at least claims 1 and 2 of the '233 patent by making, using, importing, offering for sale, and/or methods systems and methods for operating a mobile

communication device associated with a user, including, but not limited to, Zoho CRM Mobile Edition.

22. More specifically and upon information and belief, Defendant's Zoho CRM Mobile Edition includes a method for operating a mobile communication device associated with a first user.



Zoho CRM Mobile Edition



Zoho CRM Mobile Edition gives you the option to access and work with your Online Zoho CRM data from your mobile devices. The Zoho CRM native app is available for the iPhone, iPad and Android phones.

Additionally, you will be able to use the web app in other mobile devices. You can access data from CRM modules such as Leads, Accounts, Contacts, Potentials, Cases, Tasks, Events, etc. wherever you go. Also, you can work in the offline mode to add, modify, or delete records which will be saved locally and synchronized with your Online Account, when you connect to the network.

Zoho CRM Mobile Edition can be installed on Android phones. *See* <https://www.zoho.com/crm/help/mobile/install-app-for-android.html> (last accessed June 2, 2016). Zoho CRM Mobile Edition detects, at the mobile communication device, an occurrence of a first communication event relating to a first communication activity at the mobile communication device.

Log Calls

To log an incoming call

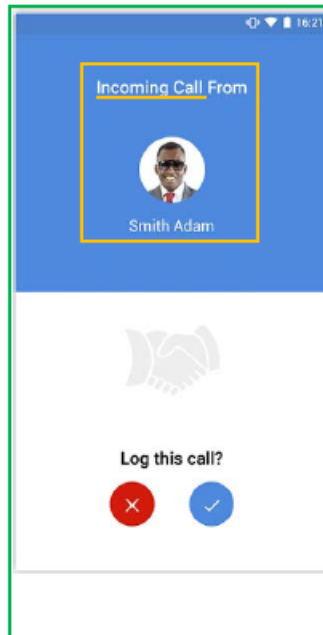
A first communication activity

1. Answer the incoming call.

When the call is over, log a call option will be available if the incoming call's phone number is available in your Zoho CRM account.

2. Tap Yes to log the call.

Detecting an end of incoming call



Zoho CRM Mobile Edition determines whether the Call Logging feature is enabled by the user. It also checks whether the incoming call's phone number is available in the Zoho CRM database ("threshold criteria").

Log Calls

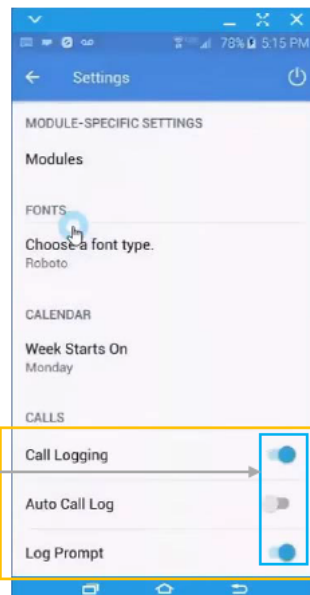
To log an incoming call

1. Answer the incoming call.

When the call is over, log a call option will be available if the incoming call's phone number is available in your Zoho CRM account.

2. Tap Yes to log the call.

"User-defined": User can enable or disable the Call Logging feature



If the threshold criteria is met (i.e., if the Call Logging feature is enabled and the incoming call's phone number is available in the database), a message is displayed on the interface of the mobile device prompting the user to initiate the call log ("recommended feature").

Log Calls

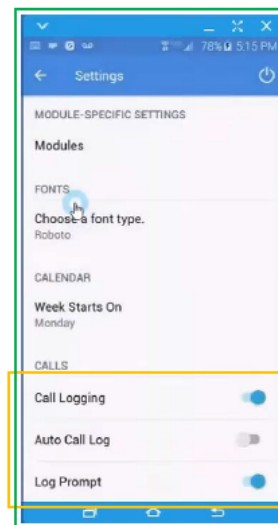
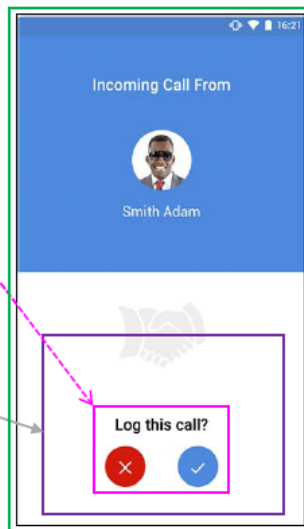
To log an incoming call

1. Answer the incoming call.

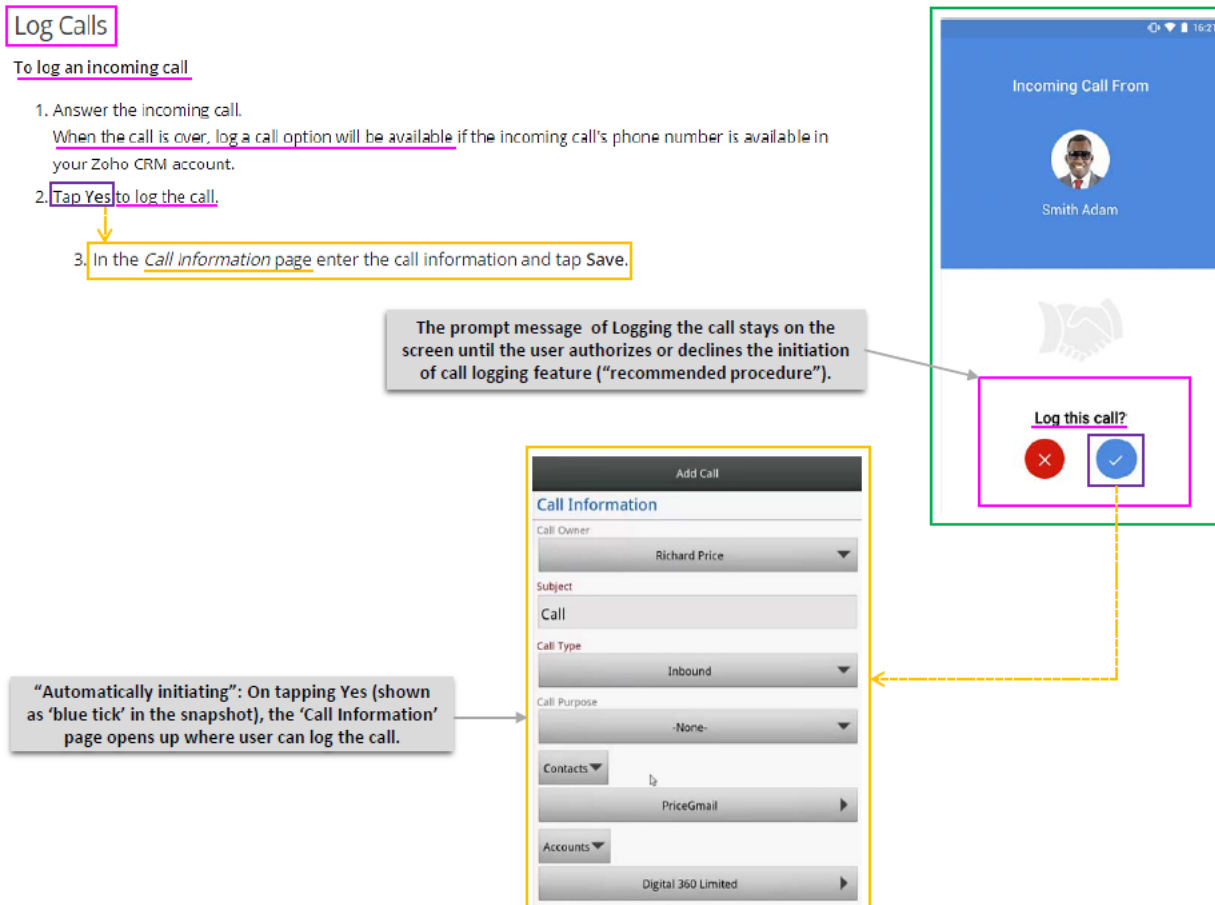
When the call is over, log a call option will be available if the incoming call's phone number is available in your Zoho CRM account.

2. Tap Yes to log the call.

A message to log the call is prompted on the mobile device's display



Zoho CRM Mobile Edition waits, at the mobile communication device, a first predetermined time interval to receive input from the user authorizing initiation of the first recommended procedure at the mobile communication device and automatically initiates the first recommended procedure at the mobile communication device in response to receiving input from the user authorizing initiation of the first recommended procedure.

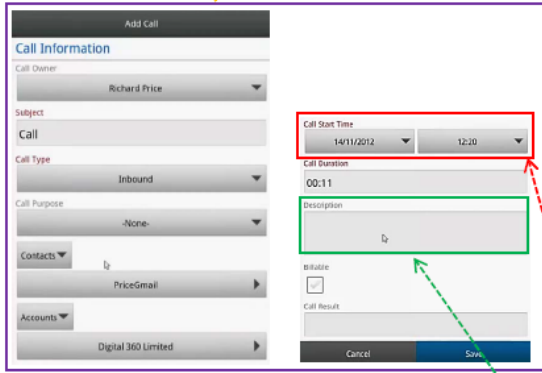


Zoho CRM Mobile Edition generates, in response to initiating the first recommended procedure, a first portion of digital content, accesses information which includes details relating to the detected first communication event, and creates a first electronic data file which associates the first portion of digital content with at least a portion of the details relating to the detected first communication event.

To log an incoming call

1. Answer the incoming call.
When the call is over, log a call option will be available if the incoming call's phone number is available in your Zoho CRM account.
2. Tap Yes to log the call.

3. In the *Call information* page enter the call information and tap Save.



Standard Fields in Log Calls

In the *Log a Call* page, you need to specify the call-related information. The following table provides description of the various fields in the page.

Field Name	Description	Data Type
Subject	Enter the subject of the call.	Text Box
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Related To	Choose the type of record to which the call is related and then choose the record.	Drop-down list
Call From/To	Specify to whom the call is made or from whom the call is received.	Select option
Call Purpose	Choose the purpose of the call from the drop-down list.	Pick list
Call Result	Specify the call result	Text Box
Time Details	<ul style="list-style-type: none"> Click Current Call if the call is in progress. Click Completed Call if the call is completed. 	Select option
Call Start Time	Automatically displays the current date and time.	Date and Time
Call Duration	<ul style="list-style-type: none"> Displays the call duration for the Current Calls. For Completed Calls, specify the call duration. 	Numeric
Description	Specify the description of the call.	Text Box
Billable	Select the check box if the call is billable.	Check Box

Zoho CRM Mobile Edition's Log a Call functionality allows a user to create an electronic file comprising the details of the call such as call duration, date, time, etc. and notes described by the user. The details are saved so that they are accessible to the user for future reference.

The Log a Call functionality helps you to register the inbound calls (received from leads and customers) and outbound calls (dialed to leads and customers) with call details such as call duration, date and time of calls, notes, etc. Users who frequently make calls or receive calls in an organization can make use of this functionality in Zoho CRM.

For example customer support executives can log calls and identify the time spent on each call and keep track of the average time spent in calls on a monthly basis. On the other hand, the Sales and Marketing Executives can keep track of all the calls they make to their prospects. The call details can be further used to generate reports on billing details, average time spent on calls, number of calls per day, etc.

Keeping track of calls for future reference

Benefits

- Helps identify typical questions asked by users
- Keep track of all the customer calls for future reference.

Activities

An important aspect in CRM is to keep track of all the tasks, meetings, calls, events, or activity records. You can neatly organize the numerous records along with the activities associated to them such as follow-up, pre sales and post sales activities, phone conversations etc. They can be very useful in initiating and tracking pending action items and in recording the results of meetings or events.

In Zoho CRM, the Activities module is where you can create and associate business tasks, events and calls. Each activity has vital information on the date, time, priority level and notification parameters that can even be accessible from within the record it is associated to.

23. Zeno Holdings is entitled to recover from Defendant the damages sustained by Zeno Holdings as a result of Defendant's infringement of the '233 patent in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

JURY DEMAND

Zeno Holdings hereby demands a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Zeno Holdings requests that this Court enter judgment against Defendant as follows:

A. An adjudication that Defendant has infringed the '773, '836 and '233 patents;

B. An award of damages to be paid by Defendant adequate to compensate Zeno Holdings for Defendant's past infringement of the '773, '836 and '233 patents and any continuing or future infringement through the date such judgment is entered, including interest, costs, expenses and an accounting of all infringing acts including, but not limited to, those acts not presented at trial;

C. A declaration that this case is exceptional under 35 U.S.C. § 285, and an award of Zeno Holdings' reasonable attorneys' fees; and

D. An award to Zeno Holdings of such further relief at law or in equity as the Court deems just and proper.

Dated: June 2, 2016

/s/ Richard C. Weinblatt

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