

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

COLLABO INNOVATIONS, INC.,	§	
	§	
Plaintiff,	§	
	§	
v.	§	C.A. No. 16-cv-197-SLR
	§	
OMNIVISION TECHNOLOGIES, INC.,	§	JURY TRIAL DEMANDED
	§	
Defendant.	§	

PLAINTIFF’S FIRST AMENDED COMPLAINT

Plaintiff, Collabo Innovations, Inc. (“Plaintiff”), by and through their undersigned counsel, file this First Amended Complaint against Defendant OmniVision Technologies, Inc. as follows:

I. THE PARTIES

1. Collabo Innovations, Inc., is a Delaware corporation with its principal place of business at 600 Anton Blvd., Suite 1350, Costa Mesa, California, 92626.

2. Upon information and belief, OmniVision Technologies, Inc. ("OmniVision" or "Defendant") is a corporation organized under the laws of Delaware with its principal place of business at 4275 Burton Drive, Santa Clara, California 95054. OmniVision can be served with process by serving its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. OmniVision has conducted and regularly conducts business within this District, has purposefully availed itself of the privileges of conducting business in this District, and has sought protection and benefit from the laws of the State of Delaware.

II. JURISDICTION AND VENUE

3. This action arises under the Patent Laws of the United States, 35 U.S.C. § 1, *et seq.*, including 35 U.S.C. §§ 271, 281, 283, 284, and 285. This Court has subject matter jurisdiction over this case for patent infringement under 28 U.S.C. §§ 1331 and 1338(a).

4. As further detailed herein, this Court has personal jurisdiction over OmniVision. OmniVision is a citizen of Delaware because it is incorporated in this State. It has conducted and regularly conduct business within this District. OmniVision, directly or through intermediaries (including distributors, retailers, and others), ships, distributes, offers for sale, and/or sells its products in the United States and the State of Delaware. OmniVision has purposefully and voluntarily placed one or more of its infringing products into the stream of commerce with the expectation that they will be purchased by consumers in the state of Delaware. Upon information and belief, OmniVision has committed acts of patent infringement within the State of Delaware

5. Venue is proper in this Court under 28 U.S.C. §§ 1391(b), (c), and (d), as well as 28 U.S.C. § 1400(b), in that, upon information and belief, Defendant has committed acts within this judicial District giving rise to this action and does (and has done) business in this District, including but not limited to making sales in this District, providing service and support to its customers in this District, and/or operating an interactive website that is available to persons in this District, which website advertises, markets, and/or offers for sale infringing products.

III. BACKGROUND

A. THE PATENTS-IN-SUIT

6. U.S. Patent No. 7,411,180 titled “Solid state image sensor with transparent film on micro-lenses and offsetting positions of micro-lenses and color filters from a central portion of a corresponding light receiving area,” (“the ’180 patent”) was duly and legally issued by the

U.S. Patent and Trademark Office on August 12, 2008 after full and fair examination. Plaintiff is the sole owner of the '180 patent by assignment. A true and correct copy of the '180 patent is attached as **Exhibit "A"** and made a part hereof.

7. U.S. Patent No. 8,592,880, titled "Solid-State Imaging Device," ("the '880 patent") was duly and legally issued by the U.S. Patent and Trademark Office on November 26, 2013, after full and fair examination. Plaintiff is the sole owner of the '880 patent. A true and correct copy of the '880 patent is attached as **Exhibit "B"** and made a part hereof.

8. U.S. Patent No. 7,944,493, titled "Solid-State Imaging Device with Specific Contact Arrangement," ("the '493 patent") was duly and legally issued by the U.S. Patent and Trademark Office on May 17, 2011, after full and fair examination. Plaintiff is the sole owner of the '493 patent. A true and correct copy of the '493 patent is attached as **Exhibit "C"** and made a part hereof.

9. U.S. Patent No. 7,728,895, titled "Solid-state image sensing device having shared floating diffusion portions," ("the '895 patent") was duly and legally issued by the U.S. Patent and Trademark Office on June 1, 2010, after full and fair examination. Plaintiff is the sole owner of the '895 patent. A true and correct copy of the '895 patent is attached as **Exhibit "D"** and made a part hereof.

10. U.S. Patent No. 8,004,026, titled "Solid-State Imaging Device," ("the '026 patent") was duly and legally issued by the U.S. Patent and Trademark Office on August 23, 2011, after full and fair examination. Plaintiff is the sole owner of the '026 patent. A true and correct copy of the '026 patent is attached as **Exhibit "E"** and made a part hereof.

B. DEFENDANT'S INFRINGING CONDUCT

11. Upon information and belief, Defendant makes, made, uses, used, offers, offered to sell, and/or sells, sold within, and/or imported, or imports into the United States semiconductor devices that utilize technologies covered by the Patents-In-Suit. Upon information and belief, the infringing semiconductor devices include, but are not limited to CMOS image sensors, and related technologies and products.

12. Upon information and belief, Defendant's semiconductor devices are also incorporated into products, including but not limited to mobile handsets, tablets, automotive cameras and gamepads by manufacturers such as Nintendo, as well as other consumer electronics that are made, used, offered for sale, and/or sold within, and/or imported into the United States, including this District. This is done with Defendant's knowledge and specific intent to induce infringement of the Patents-In-Suit

III. COUNTS OF INFRINGEMENT

COUNT I

Patent Infringement of U.S. Patent No. 7,411,180

13. Plaintiff repeats and re-alleges each and every allegation of paragraphs 1-12 as though fully set forth herein.

14. The '180 patent is valid and enforceable.

15. Defendant is not, and was not at any time, either expressly or impliedly, licensed under the '180 patent.

16. Upon information and belief, to the extent any marking or notice was required by 35 U.S.C. § 287, Plaintiff has complied with the requirements of that statute, including, but not limited to, by providing actual or constructive notice to Defendant of their alleged infringement.

Defendant has had actual notice of its infringement of the '180 patent since at least the filing of Plaintiff's Original Complaint.

17. Upon information and belief, Defendant has been and continues to directly, literally under 35 U.S.C. § 271(a), and/or equivalently under the doctrine of equivalents, infringing the '180 patent by making, using, offering to sell, and/or selling to customers and/or distributors (directly or through intermediaries and/or subsidiaries) in this District and elsewhere within the United States and/or importing into the United States, without authority, semiconductor devices or products containing semiconductor devices that include all of the limitations of one or more claims of the '180 patent, including, but not limited to, the OmniVision OV7740 Image Sensor, and related products and technologies, including, but not limited to, camera modules in products such as the Nintendo Wii U Gamepad Console.

18. Upon information and belief, Defendant has been and continues to actively and knowingly induce, with specific intent, infringement of the '180 Patent under 35 U.S.C. § 271(b) and contributes to the infringement of the '180 Patent under 35 U.S.C. § 271(c), by making, using, offering for sale, selling, and/or importing image sensors, including, but not limited to, the OmniVision OV7740 Image Sensor, and related products and technologies, including, but not limited to, camera modules in products such as the Nintendo Wii U Gamepad Console. Defendant encourages and facilitates infringing sales and uses of image sensors through the creation and dissemination of promotional and marketing materials, instructional materials, product manuals, and/or technical materials to manufacturers and/or distributors. Defendant knows that its image sensors are incorporated in end-user products which are made, sold, used, offered for sell, and/or imported into the United States. Defendant contributes to infringement by others, including manufacturers, distributors, and end users, knowing that its image sensors

constitute a material part of the inventions of the '180 Patent, knowing those image sensors to be especially made or adapted to infringe the '180 Patent, and knowing that those image sensors are not staple articles or commodities of commerce suitable for substantial non-infringing use. Defendant knew, or should have known, that its encouragement would result in infringement of at least one claim of the '180 Patent.

19. Upon information and belief, the products containing these semiconductor devices have no substantial non-infringing uses, and Defendant had knowledge of the non-staple nature of the products containing these semiconductor devices and the '180 patent at least by the filing of the Original Complaint identifying the '180 patent and products accused of infringement.

COUNT II

Patent Infringement of U.S. Patent No. 8,592,880

20. Plaintiff repeats and re-alleges each and every allegation of paragraphs 1-19 as though fully set forth herein.

21. The '880 patent is valid and enforceable.

22. Defendant is not, and was not at any time, either expressly or impliedly, licensed under the '880 patent.

23. Upon information and belief, to the extent any marking or notice was required by 35 U.S.C. § 287, Plaintiff has complied with the requirements of that statute, including, but not limited to, by providing actual or constructive notice to Defendant of their alleged infringement. Defendant has had actual notice of its infringement of the '880 patent since at least the filing of Plaintiff's Original Complaint.

24. Upon information and belief, Defendant has been and continues to directly, literally under 35 U.S.C. § 271(a), and/or equivalently under the doctrine of equivalents, infringing, the '880 patent by making, using, offering to sell, and/or selling to customers and/or

distributors (directly or through intermediaries and/or subsidiaries) in this District and elsewhere within the United States and/or importing into the United States, without authority, semiconductor devices or products containing semiconductor devices that include all of the limitations of one or more claims of the '880 patent, including, but not limited to, the OmniVision OV7740 Image Sensor, and related products and technologies, including, but not limited to, camera modules in products such as the Nintendo Wii U Gamepad Console.

25. Upon information and belief, Defendant has been and continues to actively and knowingly induce, with specific intent, infringement of the '880 Patent under 35 U.S.C. § 271(b) and contributes to the infringement of the '880 Patent under 35 U.S.C. § 271(c), by making, using, offering for sale, selling, and/or importing image sensors, including, but not limited to, the OmniVision OV7740 Image Sensor, and related products and technologies, including, but not limited to, camera modules in products such as the Nintendo Wii U Gamepad Console. Defendant encourages and facilitates infringing sales and uses of image sensors through the creation and dissemination of promotional and marketing materials, instructional materials, product manuals, and/or technical materials to manufacturers and/or distributors. Defendant knows that its image sensors are incorporated in end-user products which are made, sold, used, offered for sell, and/or imported into the United States. Defendant contributes to infringement by others, including manufacturers, distributors, and end users, knowing that its image sensors constitute a material part of the inventions of the '880 Patent, knowing those image sensors to be especially made or adapted to infringe the '880 Patent, and knowing that those image sensors are not staple articles or commodities of commerce suitable for substantial non-infringing use. Defendant knew, or should have known, that its encouragement would result in infringement of at least one claim of the '880 Patent.

26. Upon information and belief, the products containing these semiconductor devices have no substantial non-infringing uses, and Defendant had knowledge of the non-staple nature of the products containing these semiconductor devices and the '880 patent throughout the entire period of its infringing conduct or at least by service of Plaintiff's Original Complaint identifying the '880 patent and products accused of infringement.

COUNT III

Patent Infringement of U.S. Patent No. 7,944,493

27. Plaintiff repeats and re-alleges each and every allegation of paragraphs 1-26 as though fully set forth herein.

28. The '493 patent is valid and enforceable.

29. Defendant is not, and was not at any time, either expressly or impliedly, licensed under the '493 patent.

30. Upon information and belief, to the extent any marking or notice was required by 35 U.S.C. § 287, Plaintiff has complied with the requirements of that statute, including, but not limited to, by providing actual or constructive notice to Defendant of their alleged infringement. Defendant has had actual notice of its infringement of the '493 patent since at least the filing of Plaintiff's Original Complaint.

31. Upon information and belief, Defendant has been and continues to directly, literally under 35 U.S.C. § 271(a), and/or equivalently under the doctrine of equivalents, infringing, the '493 patent by making, using, offering to sell, and/or selling to customers and/or distributors (directly or through intermediaries and/or subsidiaries) in this District and elsewhere within the United States and/or importing into the United States, without authority, semiconductor devices or products containing semiconductor devices that include all of the limitations of one or more claims of the '493 patent, including, but not limited to, OmniVision's

CMOS image sensors such as OmniVision's PureCel-S image sensors, e.g., the OmniVision OV13860 CMOS image sensor. The products containing these semiconductor devices, including the OnePlus 2 mobile phone, offered for sale in this District by OnePlus perform substantially the same function as the inventions embodied in one or more claims of the '493 patent in substantially the same way to achieve the same result.

32. Upon information and belief, Defendant has been and continues to actively and knowingly induce, with specific intent, infringement of the '493 Patent under 35 U.S.C. § 271(b) and contributes to the infringement of the '493 Patent under 35 U.S.C. § 271(c), by making, using, offering for sale, selling, and/or importing image sensors, including, but not limited to, the OmniVision's CMOS image sensors such as OmniVision's PureCel-S image sensors, e.g., the OmniVision OV13860 CMOS image sensor. The products containing these semiconductor devices, including the OnePlus 2 mobile phone, offered for sale in this District by OnePlus perform substantially the same function as the inventions embodied in one or more claims of the '493 patent in substantially the same way to achieve the same result. Defendant encourages and facilitates infringing sales and uses of image sensors through the creation and dissemination of promotional and marketing materials, instructional materials, product manuals, and/or technical materials to manufacturers and/or distributors. Defendant knows that its image sensors are incorporated in end-user products which are made, sold, used, offered for sell, and/or imported into the United States. Defendant contributes to infringement by others, including manufacturers, distributors, and end users, knowing that its image sensors constitute a material part of the inventions of the '493 Patent, knowing those image sensors to be especially made or adapted to infringe the '493 Patent, and knowing that those image sensors are not staple articles or commodities of commerce suitable for substantial non-infringing use. Defendant knew, or should

have known, that its encouragement would result in infringement of at least one claim of the '493 Patent.

33. Upon information and belief, the products containing these semiconductor devices have no substantial non-infringing uses, and Defendant had knowledge of the non-staple nature of the products containing these semiconductor devices and the '493 patent throughout the entire period of its infringing conduct or at least by filing of the Original Complaint identifying the '493 patent and products accused of infringement.

COUNT IV

Patent Infringement of U.S. Patent No. 7,728,895

34. Plaintiff repeats and re-alleges each and every allegation of paragraphs 1-33 as though fully set forth herein.

35. The '895 patent is valid and enforceable.

36. Defendant is not, and was not at any time, either expressly or impliedly, licensed under the '895 patent.

37. Upon information and belief, to the extent any marking or notice was required by 35 U.S.C. § 287, Plaintiff has complied with the requirements of that statute, including, but not limited to, by providing actual or constructive notice to Defendant of its alleged infringement. Defendant has had actual notice of its infringement of the '895 patent since at least the filing of Plaintiff's Original Complaint.

38. Upon information and belief, Defendant has been and continues to directly, literally under 35 U.S.C. § 271(a), and/or equivalently under the doctrine of equivalents, infringing, the '895 patent by making, using, offering to sell, and/or selling to customers and/or distributors (directly or through intermediaries and/or subsidiaries) in this District and elsewhere within the United States and/or importing into the United States, without authority,

semiconductor devices or products containing semiconductor devices that include all of the limitations of one or more claims of the '895 patent, including, but not limited to, CMOS image sensors and related products and technologies, including, but not limited to OmniVision's OV10640 CMOS image sensor.

39. Upon information and belief, Defendant has been and continues to actively and knowingly induce, with specific intent, infringement of the '895 Patent under 35 U.S.C. § 271(b) and contributes to the infringement of the '895 Patent under 35 U.S.C. § 271(c), by making, using, offering for sale, selling, and/or importing image sensors, including, but not limited to CMOS image sensors and related products and technologies, including, but not limited to OmniVision's OV10640 CMOS image sensor. Defendant encourages and facilitates infringing sales and uses of image sensors through the creation and dissemination of promotional and marketing materials, instructional materials, product manuals, and/or technical materials to manufacturers and/or distributors. Defendant knows that its image sensors are incorporated in end-user products which are made, sold, used, offered for sell, and/or imported into the United States. Defendant contributes to infringement by others, including manufacturers, distributors, and end users, knowing that its image sensors constitute a material part of the inventions of the '895 Patent, knowing those image sensors to be especially made or adapted to infringe the '895 Patent, and knowing that those image sensors are not staple articles or commodities of commerce suitable for substantial non-infringing use. Defendant knew, or should have known, that its encouragement would result in infringement of at least one claim of the '895 Patent.

40. Upon information and belief, Defendant has been and continues to directly, literally under 35 U.S.C. § 271(a), and/or equivalently under the doctrine of equivalents, infringing, the '895 patent by making, using, offering to sell, and/or selling to customers and/or

distributors (directly or through intermediaries and/or subsidiaries) in this District and elsewhere within the United States and/or importing into the United States, without authority, semiconductor devices or products containing semiconductor devices that include all of the limitations of one or more claims of the '895 patent, including, but not limited to, CMOS image sensors and related products and technologies, including, but not limited to, products containing semiconductor devices that include all of the limitations of one or more claims of the '895 patent, including, but not limited to the Leopard Imaging LI-CAM-OV10640-MIPI, LI-USB30-OV10640C, LI-CAM-OV10640P-1.8 and USB30-MIPI-TESTER-OV10640 camera modules and similar products. The semiconductor devices found in such products perform substantially the same function as the inventions embodied in one or more claims of the '895 patent in substantially the same way to achieve the same result.

41. Upon information and belief, Defendant has been and continues to actively and knowingly induce, with specific intent, infringement of the '895 Patent under 35 U.S.C. § 271(b) and contributes to the infringement of the '895 Patent under 35 U.S.C. § 271(c), by making, using, offering for sale, selling, and/or importing image sensors, including, but not limited to, products containing semiconductor devices that include all of the limitations of one or more claims of the '895 patent, including, but not limited to the Leopard Imaging LI-CAM-OV10640-MIPI, LI-USB30-OV10640C, LI-CAM-OV10640P-1.8 and USB30-MIPI-TESTER-OV10640 camera modules and similar products. The semiconductor devices found in such products perform substantially the same function as the inventions embodied in one or more claims of the '895 patent in substantially the same way to achieve the same result. Defendant encourages and facilitates infringing sales and uses of image sensors through the creation and dissemination of promotional and marketing materials, instructional materials, product manuals, and/or technical

materials to manufacturers and/or distributors. Defendant knows that its image sensors are incorporated in end-user products which are made, sold, used, offered for sell, and/or imported into the United States. Defendant contributes to infringement by others, including manufacturers, distributors, and end users, knowing that its image sensors constitute a material part of the inventions of the '895 Patent, knowing those image sensors to be especially made or adapted to infringe the '895 Patent, and knowing that those image sensors are not staple articles or commodities of commerce suitable for substantial non-infringing use. Defendant knew, or should have known, that its encouragement would result in infringement of at least one claim of the '895 Patent.

42. Upon information and belief, the products containing these semiconductor devices have no substantial non-infringing uses, and Defendant had knowledge of the non-staple nature of the products containing these semiconductor devices and the '895 patent throughout the entire period of its infringing conduct or at least by the filing of the Original Complaint identifying the '895 patent and products accused of infringement.

COUNT V

Patent Infringement of U.S. Patent No. 8,004,026

43. Plaintiff repeats and re-alleges each and every allegation of paragraphs 1-42 as though fully set forth herein.

44. The '026 patent is valid and enforceable.

45. Defendant is not, and was not at any time, either expressly or impliedly, licensed under the '026 patent.

46. Upon information and belief, to the extent any marking or notice was required by 35 U.S.C. § 287, Plaintiff has complied with the requirements of that statute, including, but not limited to, by providing actual or constructive notice to Defendant of its alleged infringement.

Defendant has had actual notice of its infringement of the '026 patent since at least the filing of Plaintiff's Original Complaint.

47. Upon information and belief, Defendant has been and continues to directly, literally under 35 U.S.C. § 271(a), and/or equivalently under the doctrine of equivalents, infringing, the '026 patent by making, using, offering to sell, and/or selling to customers and/or distributors (directly or through intermediaries and/or subsidiaries) in this District and elsewhere within the United States and/or importing into the United States, without authority, semiconductor devices or products containing semiconductor devices that include all of the limitations of one or more claims of the '026 patent, including, but not limited to CMOS image sensors and related products and technologies, including, but not limited to, OmniVision's OV10640 CMOS image sensor.

48. Upon information and belief, Defendant has been and continues to actively and knowingly induce, with specific intent, infringement of the '026 Patent under 35 U.S.C. § 271(b) and contributes to the infringement of the '026 Patent under 35 U.S.C. § 271(c), by making, using, offering for sale, selling, and/or importing image sensors, including, but not limited to CMOS image sensors and related products and technologies, including, but not limited to OmniVision's OV10640 CMOS image sensor. Defendant encourages and facilitates infringing sales and uses of image sensors through the creation and dissemination of promotional and marketing materials, instructional materials, product manuals, and/or technical materials to manufacturers and/or distributors. Defendant knows that its image sensors are incorporated end-user products which are made, sold, used, offered for sell, and/or imported into the United States. Defendant contributes to infringement by others, including manufacturers, distributors, and end users, knowing that its image sensors constitute a material part of the inventions of the '026

Patent, knowing those image sensors to be especially made or adapted to infringe the '026 Patent, and knowing that those image sensors are not staple articles or commodities of commerce suitable for substantial non-infringing use. Defendant knew, or should have known, that its encouragement would result in infringement of at least one claim of the '026 Patent.

49. Upon information and belief, Defendant has been and continues to directly, literally under 35 U.S.C. § 271(a), and/or equivalently under the doctrine of equivalents, infringing, the '026 patent by making, using, offering to sell, and/or selling to customers and/or distributors (directly or through intermediaries and/or subsidiaries) in this District and elsewhere within the United States and/or importing into the United States, without authority, semiconductor devices or products containing semiconductor devices that include all of the limitations of one or more claims of the '026 patent, including, but not limited to, CMOS image sensors and related products and technologies, including, but not limited to, products containing semiconductor devices that include all of the limitations of one or more claims of the '026 patent, including, but not limited to the Leopard Imaging LI-CAM-OV10640-MIPI, LI-USB30-OV10640C, LI-CAM-OV10640P-1.8 and USB30-MIPI-TESTER-OV10640 camera modules and similar products. The semiconductor devices found in such products perform substantially the same function as the inventions embodied in one or more claims of the '026 patent in substantially the same way to achieve the same result.

50. Upon information and belief, Defendant has been and continues to actively and knowingly induce, with specific intent, infringement of the '026 Patent under 35 U.S.C. § 271(b) and contributes to the infringement of the '026 Patent under 35 U.S.C. § 271(c), by making, using, offering for sale, selling, and/or importing image sensors, including, but not limited to, products containing semiconductor devices that include all of the limitations of one or more

claims of the '895 patent, including, but not limited to the Leopard Imaging LI-CAM-OV10640-MIPI, LI-USB30-OV10640C, LI-CAM-OV10640P-1.8 and USB30-MIPI-TESTER-OV10640 camera modules and similar products. The semiconductor devices found in such products perform substantially the same function as the inventions embodied in one or more claims of the '026 patent in substantially the same way to achieve the same result. Defendant encourages and facilitates infringing sales and uses of image sensors through the creation and dissemination of promotional and marketing materials, instructional materials, product manuals, and/or technical materials to manufacturers and/or distributors. Defendant knows that its image sensors are incorporated in end-user products which are made, sold, used, offered for sell, and/or imported into the United States. Defendant contributes to infringement by others, including manufacturers, distributors, and end users, knowing that its image sensors constitute a material part of the inventions of the '026 Patent, knowing those image sensors to be especially made or adapted to infringe the '026 Patent, and knowing that those image sensors are not staple articles or commodities of commerce suitable for substantial non-infringing use. Defendant knew, or should have known, that its encouragement would result in infringement of at least one claim of the '026 Patent.

51. Upon information and belief, the products containing these semiconductor devices have no substantial non-infringing uses, and Defendant had knowledge of the non-staple nature of the products containing these semiconductor devices and the '026 patent throughout the entire period of its infringing conduct or at least by the filing of the Original Complaint identifying the '026 patent and products accused of infringement.

IV. CONCLUSION

52. Plaintiff is entitled to recover from Defendant the damages sustained by Plaintiff as a result of Defendant's wrongful acts 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.

53. Plaintiff has incurred and will incur attorneys' fees, costs, and expenses in the prosecution of this action. The circumstances of this dispute create an exceptional case within the meaning of 35 U.S.C. § 285, and Plaintiff is entitled to recover their reasonable and necessary attorneys' fees, costs, and expenses.

V. JURY DEMAND

54. Plaintiff hereby requests a trial by jury pursuant to Rule 38 of the Federal Rules of Civil Procedure.

VI. PRAYER FOR RELIEF

55. Plaintiff respectfully request that the Court find in its favor and against Defendant, and that the Court grant Plaintiff the following relief:

- A. A judgment that Defendant has infringed the patents-in-suit as alleged herein, directly and/or indirectly by way of inducing or contributing to infringement of such patents;
- B. A judgment for an accounting of all damages sustained by Plaintiff as a result of the acts of infringement by Defendant;
- C. A judgment and order requiring Defendant to pay Plaintiff pre-judgment and post-judgment interest on the damages awarded;

- D. A judgment and order finding this to be an exceptional case and requiring Defendant to pay the costs of this action (including all disbursements) and attorneys' fees as provided by 35 U.S.C. § 285; and
- E. Such other and further relief as the Court deems just and equitable.

Dated: June 3, 2016

Respectfully submitted,

FARNAN LLP

/s/ Brian E. Farnan

Brian E. Farnan (Bar No. 4089)
Michael J. Farnan (Bar No. 5165)
919 North Market Street, 12th Floor
Wilmington, Delaware 19801
302-777-0300 Telephone
302-777-0301 Facsimile
bfarnan@farnanlaw.com
mfarnan@farnanlaw.com

Of Counsel:

Jeffrey R. Bragalone
Patrick J. Conroy
Monte M. Bond
Nicholas C Kliewer
BRAGALONE CONROY P.C.
Chase Tower,
2200 Ross Ave., Suite 4500W
Dallas, Texas 75201
214-785-6670 Telephone
214-785-6680 Facsimile
jbragalone@bcpc-law.com
pconroy@bcpc-law.com
mbond@bcpc-law.com
nkliewer@bcpc-law.com

Attorneys for Plaintiff
COLLABO INNOVATIONS, INC.