

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

MYMAIL, LTD.,

Plaintiff,

v.

**PANDA DISTRIBUTION INC.
D/B/A PANDA SECURITY USA,**

Defendant.

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Civil Action No. 2:16-cv-_____

Jury Trial Demanded

PLAINTIFF’S COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff MyMail, Ltd. files this Complaint against Panda Distribution, Inc. d/b/a Panda Security USA and alleges as follows.

PARTIES

1. Plaintiff MyMail, Ltd. (“MyMail”) is a Texas Limited Partnership with an office and place business at 5344 County Road 3901, Athens, TX 75752. MyMail was founded in 2003 as an intellectual property development and licensing company to provide secure, internet-related services and efficient web page interaction to internet service providers, mobile device manufacturers, network carriers, and internet related toolbar developers. MyMail’s toolbar patents disclose inventions that allow for the dynamic updating, changing, or modification of toolbar data from remote servers (the “MyMail Toolbar Technology”). Using the MyMail Toolbar Technology, toolbar providers can, for example, dynamically change elements, functions, and buttons on their toolbar(s) for specific targeted users based on use and individual searches. MyMail has successfully licensed the MyMail Toolbar Technology to toolbar providers.

2. Upon information and belief, Defendant Panda Distribution Inc. D/B/A/ Panda Security USA is a corporation organized and existing under the laws of the State of California, with its principal place of business located at 2600 Lake Lucien Drive, Suite 115, Maitland, Florida 32751. Panda Distribution Inc. may be served with process through its registered agent, Stephen L. Bradford, Musick Peeler & Garrett LLP, 624 S. Grand Avenue, Suite 2000, Los Angeles, California 90017.

JURISDICTION AND VENUE

3. This is an action for patent infringement arising under the patent laws of the United States of America, Title 35, United States Code. This Court has original jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

4. Panda is engaged in the business of publishing and distributing a browser plug-in called the Panda Toolbar that integrates with Microsoft Internet Explorer and Mozilla Firefox browsers that allows users to access computer anti-virus functionality, Internet weather content, and other functionalities from any web page location (the “Panda Toolbar”). The Panda Toolbar docks itself to a device’s browser when installed and sits atop the browser at all times. Panda publishes, promotes, and distributes the Panda Toolbar to users in the United States, including users within this District.

5. Upon information and belief, Panda is subject to this Court’s specific personal jurisdiction because it does business in the State of Texas and designated an agent for service of process in the State of Texas; and has committed acts of infringement in the State of Texas as alleged below. In particular, upon information and belief, Panda is subject to the specific personal jurisdiction of this Court because MyMail’s claims for patent infringement against Panda arise from its acts of infringement in the State of Texas. These acts of infringement

include providing the infringing Panda Toolbar to users of the Panda Toolbar in the State of Texas, and causing the browser on a user device to display the Panda toolbar and perform the other functions of one or more claims of the Asserted Patents (defined below). Therefore, this Court has personal jurisdiction over the Defendant under the Texas long-arm statute, TEX. CIV. PRAC. & REM. CODE §17.042.

6. Venue is proper in this District under 28 U.S.C. §§ 1391(c) and 1400(b). Upon information and belief, Panda has engaged in acts of infringement in the State of Texas described herein sufficient to subject it to personal jurisdiction in this District if the District were a separate State.

THE PATENTS-IN-SUIT

7. On September 25, 2012 the United States Patent and Trademark Office issued United States Patent No. 8,275,863 (the “’863 Patent”) entitled “Method of Modifying a Toolbar,” a true copy of which is attached as Exhibit 1.

8. On April 28, 2015, the United States Patent and Trademark Office issued United States Patent No. 9,021,070 (the “’070 Patent”) entitled “Dynamically Modifying a Toolbar,” a true copy of which is attached as Exhibit 2. The ’070 Patent is a continuation of the ’863 Patent. The ’863 and ’070 Patents are collectively referred to as the “Asserted Patents.”

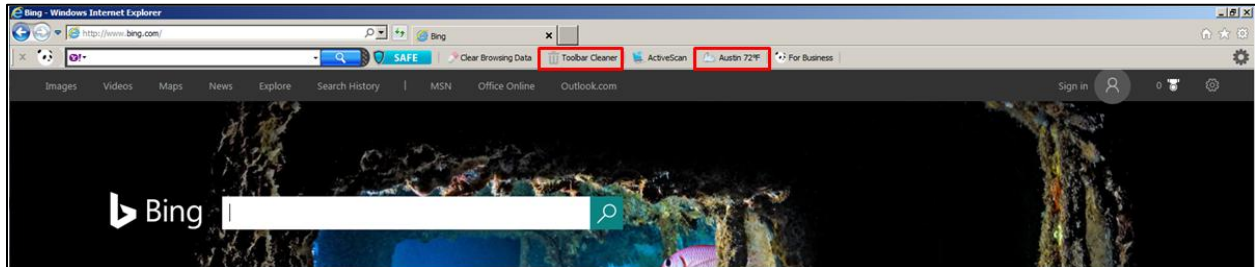
9. MyMail is the owner of the ’863 and ’070 Patents, and has the exclusive right to sue for and recover all past, present and future damages for infringement of the Asserted Patents.

ALLEGATIONS COMMON TO ALL CLAIMS

10. The Panda Toolbar software causes the toolbar to be displayed on a user Internet device (*i.e.*, a device that can communicate with other devices via the Internet) that includes

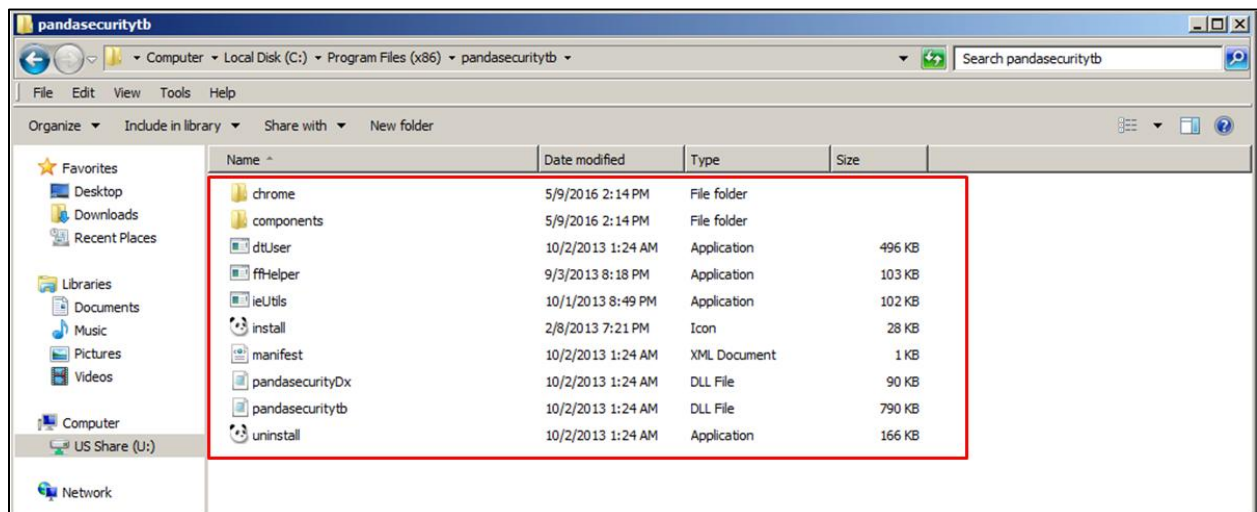
toolbar buttons. For example, the Panda Toolbar displayed on a user's Internet device includes the "Toolbar Cleaner" and "Weather" buttons indicated in FIGURE 1.

FIGURE 1



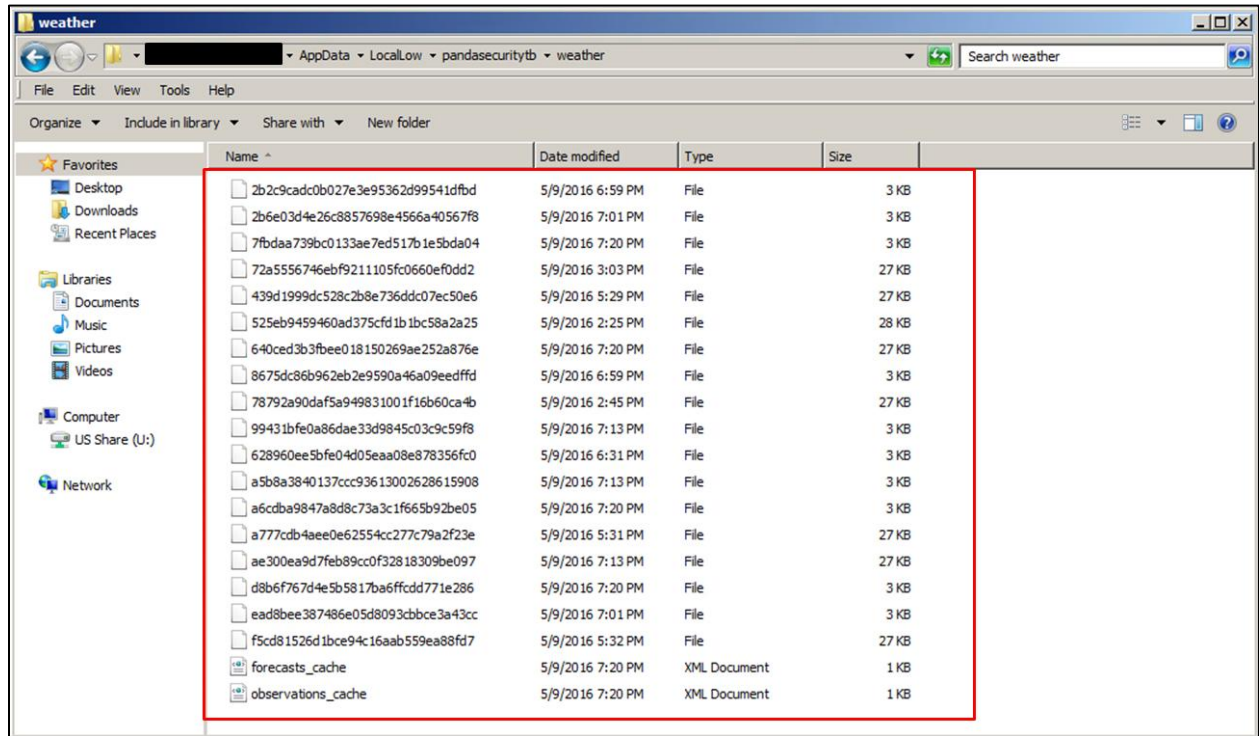
11. The toolbar buttons on the Panda Toolbar are defined by toolbar data stored in toolbar-defining databases. In particular, the toolbar buttons on the Panda Toolbar are defined by toolbar data as indicated in FIGURE 2 below stored in the "C:/Program Files (x86)/pandasecuritytb" folder on the user Internet device.

FIGURE 2



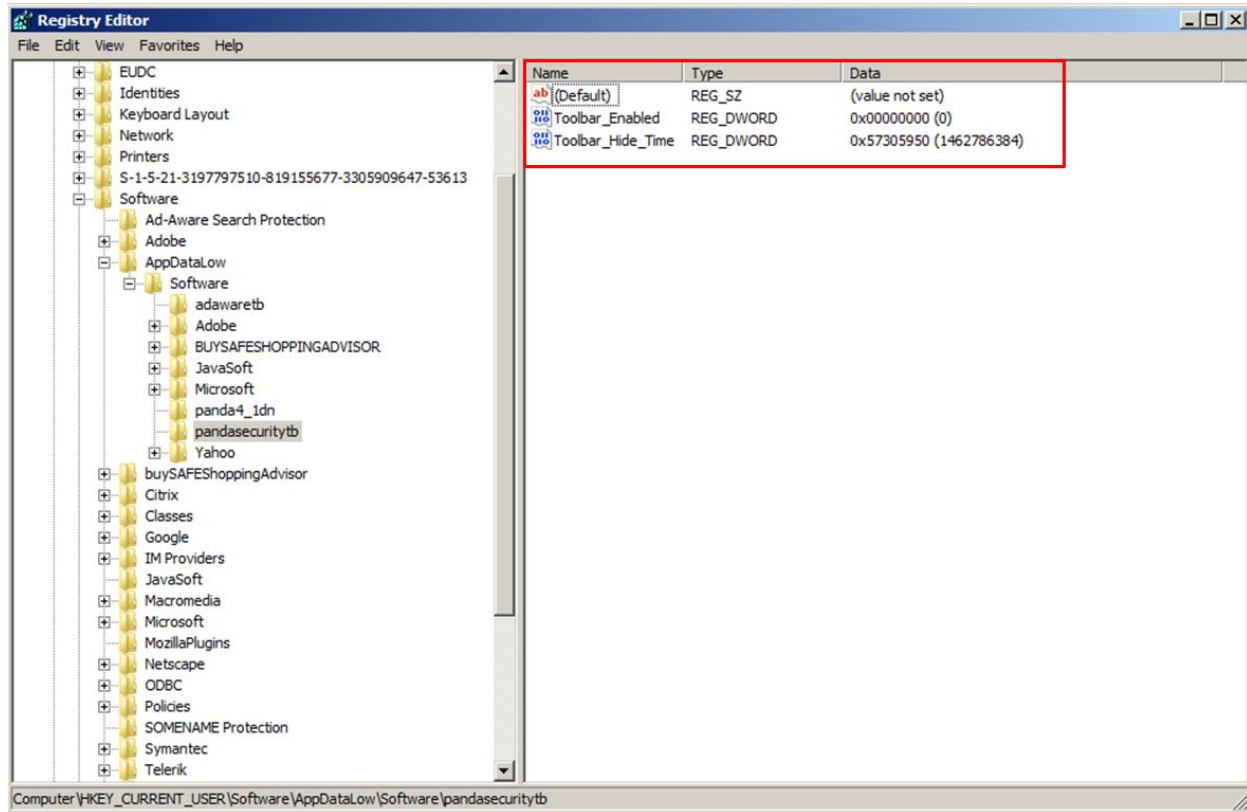
12. The toolbar buttons are also defined by toolbar data as indicated below in FIGURE 3 stored in the "AppData/LocalLow/pandasecuritytb/weather" folder on the user Internet device.

FIGURE 3



13. As shown below in FIGURE 4, the toolbar buttons are also defined by toolbar data stored in the Windows System Registry on the user Internet device.

FIGURE 4



14. The “C:/Program Files (x86)/pandasecuritytb” and “AppData/LocalLow/pandasecuritytb/weather” folders, and the Windows System Registry constitute toolbar defining databases of the user Internet device.

15. The toolbar data of the Panda Toolbar comprises a plurality of toolbar button attributes associated with the one or more toolbar buttons of the toolbar. For example, as shown below in FIGURE 5, the toolbar data in the “pandasecurity-toolbar.xml” file in the “AppData/Local/Temp” folder on the user Internet machine includes a plurality of toolbar button attributes associated with one or more toolbar buttons of the toolbar”:

FIGURE 5

```

<toolbarbutton id="pandasecuritytb-ActiveScan"
  class="pandasecuritytb-toolbarbutton"
  label="ActiveScan"
  title="ActiveScan"
  tooltiptext="Launch ActiveScan"
  image="chrome://pandasecuritytb/skin/ActiveScan.png"
  track="true"
  hidden="false"
  optional="true"
  persist="hidden index"
  oncommand="loadURI('
http://www.pandasecurity.com/activescan/index/?utm\_campaign=CAVLAUNCH&utm\_medium=TOOLBAR&utm\_source=BUTTON&utm\_content=ACTIVESCAN&utm\_track=102887')
/>

```

16. At least one of the toolbar button attributes (for example, in the “pandasecurity-toolbar.xml” toolbar data) identifies a function to be performed by a specific toolbar button upon actuation of the toolbar button. For example, as shown in FIGURE 6 below, the “oncommand” toolbar button attribute includes the following function to be performed when the “Active Scan” button is actuated:

FIGURE 6

```

<toolbarbutton id="pandasecuritytb-ActiveScan"
  class="pandasecuritytb-toolbarbutton"
  label="ActiveScan"
  title="ActiveScan"
  tooltiptext="Launch ActiveScan"
  image="chrome://pandasecuritytb/skin/ActiveScan.png"
  track="true"
  hidden="false"
  optional="true"
  persist="hidden index"
  oncommand="loadURI('
http://www.pandasecurity.com/activescan/index/?utm\_campaign=CAVLAUNCH&utm\_medium=TOOLBAR&utm\_source=BUTTON&utm\_content=ACTIVESCAN&utm\_track=102887')
/>

```

17. When the “Active Scan” button on the Panda Toolbar is actuated, as shown below in FIGURES 7-8, a webpage associated with the button is displayed:

FIGURE 7

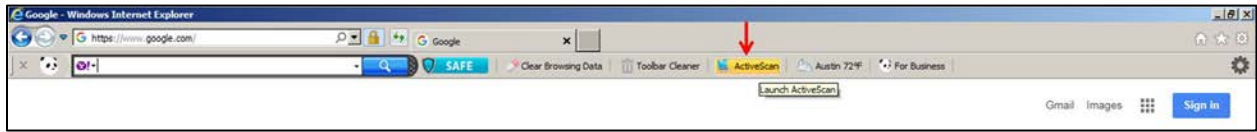


FIGURE 8



18. The Panda Toolbar performs a method for dynamically modifying a toolbar. For example, as shown below in FIGURE 9, the Panda Toolbar communicates with a server at IP Address 52.1.107.15, to dynamically modify the Panda Toolbar by, for example, modifying the weather information that is displayed on the toolbar:

FIGURE 9

#	ClientBeginR...	X-HostIP	X-ClientIP	Result	Protocol	Host	URL
49	16:14:25.152	52.1.107.15	127.0.0.1	200	HTTPS	thepulseapi2.earthnetwo...	/data/observations/v1/current?location=US48A0056&locationtype=city&units=english&stationid=ASTAN8...

19. The Panda Toolbar on the user Internet device automatically sends a revision level of the one or more toolbar-defining databases to a predetermined a network address. For example, as shown below in FIGURES 10-11, the Panda Toolbar causes the user Internet device at IP address 127.0.0.1 to send a “GET” request to a server associated with IP address 52.1.107.15. The GET request includes encoded data such as, for example, the encoded data

indicated by the red box in FIGURE 11 below. On information and belief, this encoded data, which changes between different GET requests, includes a revision level of the one or more toolbar-defining databases:

FIGURE 10

#	ClientBeginR...	X-HostIP	X-ClientIP	Result	Protocol	Host	URL
49	16:14:25.152	52.1.107.15	127.0.0.1	200	HTTPS	thepulseapi2.earthnetworks.com	/data/observations/v1/current?location=US48A0056&locationtype=city&units=english&stationid=ASTAN&...

FIGURE 11



20. The “GET” request is sent from the user Internet device at IP address 127.0.0.1, without user intervention or interaction. For example, the Panda Toolbar automatically sends a “GET” request at intervals of 30 seconds, without user intervention, to obtain an updated weather information, as reflected in FIGURE 12 below:

FIGURE 12

#	ClientBeginR...	X-HostIP	X-ClientIP	Result	Protocol	Host	URL
405	17:14:26.125	52.72.8.23	127.0.0.1	200	HTTPS	thepulseapi2.earthnetworks.com	/oauth2/token?grant_type=client_credentials&client_id=GeU7beTVonsFJYA8km0mHT7PtoAGEx6&client...
406	17:14:26.180	52.72.8.23	127.0.0.1	200	HTTPS	thepulseapi2.earthnetworks.com	/data/observations/v1/current?location=US48A0056&locationtype=city&units=english&stationid=ASTAN&...
407	17:44:24.519	52.1.107.15	127.0.0.1	200	HTTP	Tunnel to	thepulseapi2.earthnetworks.com:443
408	17:44:24.777	52.1.107.15	127.0.0.1	200	HTTPS	thepulseapi2.earthnetworks.com	/oauth2/token?grant_type=client_credentials&client_id=GeU7beTVonsFJYA8km0mHT7PtoAGEx6&client...
409	17:44:24.887	52.1.107.15	127.0.0.1	200	HTTPS	thepulseapi2.earthnetworks.com	/data/observations/v1/current?location=US48A0056&locationtype=city&units=english&stationid=ASTAN&...
410	17:44:25.031	52.84.0.72	127.0.0.1	200	HTTP	img.weather.weatherbug.com	/forecast/icons/localized/20x17/en/trans/cond024.png
411	18:14:24.582	52.1.107.15	127.0.0.1	200	HTTP	Tunnel to	thepulseapi2.earthnetworks.com:443
412	18:14:25.215	52.1.107.15	127.0.0.1	200	HTTPS	thepulseapi2.earthnetworks.com	/oauth2/token?grant_type=client_credentials&client_id=GeU7beTVonsFJYA8km0mHT7PtoAGEx6&client...
413	18:14:25.332	52.1.107.15	127.0.0.1	200	HTTPS	thepulseapi2.earthnetworks.com	/data/observations/v1/current?location=US48A0056&locationtype=city&units=english&stationid=ASTAN&...
414	18:44:24.614	52.6.61.129	127.0.0.1	200	HTTP	Tunnel to	thepulseapi2.earthnetworks.com:443
415	18:44:24.981	52.6.61.129	127.0.0.1	200	HTTPS	thepulseapi2.earthnetworks.com	/oauth2/token?grant_type=client_credentials&client_id=GeU7beTVonsFJYA8km0mHT7PtoAGEx6&client...
416	18:44:25.043	52.6.61.129	127.0.0.1	200	HTTPS	thepulseapi2.earthnetworks.com	/data/observations/v1/current?location=US48A0056&locationtype=city&units=english&stationid=ASTAN&...
417	19:14:24.630	52.1.107.15	127.0.0.1	200	HTTP	Tunnel to	thepulseapi2.earthnetworks.com:443
418	19:14:25.912	52.1.107.15	127.0.0.1	200	HTTPS	thepulseapi2.earthnetworks.com	/oauth2/token?grant_type=client_credentials&client_id=GeU7beTVonsFJYA8km0mHT7PtoAGEx6&client...
419	19:14:25.966	52.1.107.15	127.0.0.1	200	HTTPS	thepulseapi2.earthnetworks.com	/data/observations/v1/current?location=US48A0056&locationtype=city&units=english&stationid=ASTAN&...
460	22:44:24.862	52.6.61.129	127.0.0.1	200	HTTP	Tunnel to	thepulseapi2.earthnetworks.com:443
461	22:44:25.707	52.6.61.129	127.0.0.1	200	HTTPS	thepulseapi2.earthnetworks.com	/oauth2/token?grant_type=client_credentials&client_id=GeU7beTVonsFJYA8km0mHT7PtoAGEx6&client...
462	22:44:25.759	52.6.61.129	127.0.0.1	200	HTTPS	thepulseapi2.earthnetworks.com	/data/observations/v1/current?location=US48A0056&locationtype=city&units=english&stationid=ASTAN&...
463	22:44:25.894	52.84.0.36	127.0.0.1	200	HTTP	img.weather.weatherbug.com	/forecast/icons/localized/20x17/en/trans/cond026.png
486	23:14:24.896	52.72.8.23	127.0.0.1	200	HTTP	Tunnel to	thepulseapi2.earthnetworks.com:443
487	23:14:25.235	52.72.8.23	127.0.0.1	200	HTTPS	thepulseapi2.earthnetworks.com	/oauth2/token?grant_type=client_credentials&client_id=GeU7beTVonsFJYA8km0mHT7PtoAGEx6&client...
488	23:14:25.292	52.72.8.23	127.0.0.1	200	HTTPS	thepulseapi2.earthnetworks.com	/data/observations/v1/current?location=US48A0056&locationtype=city&units=english&stationid=ASTAN&...
530	23:44:24.959	52.1.107.15	127.0.0.1	200	HTTP	Tunnel to	thepulseapi2.earthnetworks.com:443
531	23:44:26.343	52.1.107.15	127.0.0.1	200	HTTPS	thepulseapi2.earthnetworks.com	/oauth2/token?grant_type=client_credentials&client_id=GeU7beTVonsFJYA8km0mHT7PtoAGEx6&client...
532	23:44:26.400	52.1.107.15	127.0.0.1	200	HTTPS	thepulseapi2.earthnetworks.com	/data/observations/v1/current?location=US48A0056&locationtype=city&units=english&stationid=ASTAN&...

21. A server at a predetermined network address such as, for example, the server at IP address 52.1.107.15, receives a GET request from the user Internet device as shown below in FIGURE 13:

FIGURE 13

#	ClientBeginR...	X-HostIP	X-ClientIP	Result	Protocol	Host	URL
49	16:14:25.152	52.1.107.15	127.0.0.1	200	HTTPS	thepulseapi2.earthnetworks.com	/data/observations/v1/current?location=US48A0056&locationtype=city&units=english&stationid=ASTAN&...

22. The GET request includes encoded data such as, for example, the encoded data indicated by the red box in FIGURE 14 below. On information and belief, this encoded data, which changes between different GET requests, includes a revision level of the one or more toolbar-defining databases.

FIGURE 14

Request Headers [Raw] [Header Definitions]

GET /data/observations/v1/current?location=US48A0056&locationtype=city&units=english&stationid=ASTAN&cultureinfo=en-en&verbose=true&access_token=fd7de94c0702439abfa45e4d7a69 HTTP/1.1

Client

- Accept: */*
- Accept-Encoding: gzip, deflate
- User-Agent: Mozilla/5.0 (compatible; MSIE 10.0; Windows NT 6.1; WOW64; Trident/6.0)

Cookies

- DNT: 1

Transport

- Connection: Keep-Alive
- Host: thepulseapi2.earthnetworks.com

23. On information and belief, a server at a predetermined network address such as, for example, the server at IP address 52.1.107.15, determines from the revision level that the user Internet device should receive the toolbar update data because, as shown below in FIGURES 15 and 16, the server at IP address 52.1.107.15 responds to the GET request by sending the user Internet device updated toolbar data in the form of one or more application/json messages containing the updated toolbar data such as, for example, updated weather information.

FIGURE 15

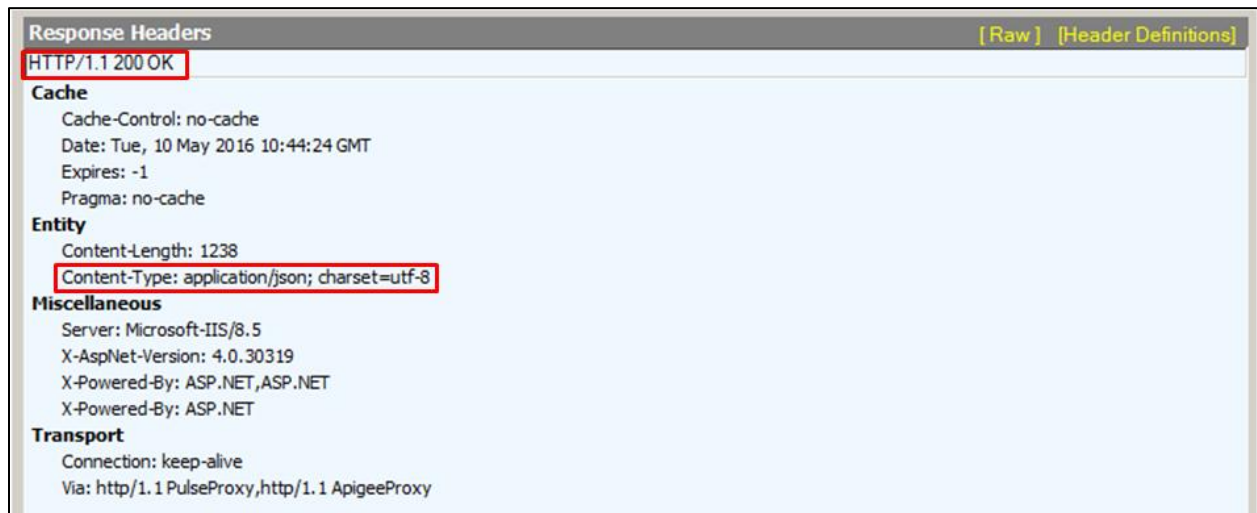


FIGURE 16

```

JSON
-- altimeter=(null)
-- altimeterRate=(null)
-- dewPoint=69.6
-- dewPointRate=(null)
-- feelsLike=72.2
-- heatIndex=72.2
-- humidity=91.2
-- humidityRate=0.7
-- iconCode=2
-- key=3_ASTAN
-- observationTimeAdjustedLocalStr=2016-05-10T05:44:24
-- observationTimeLocalStr=2016-05-10T05:43:46
-- observationTimeUtcStr=2016-05-10T10:43:46
-- pressureSeaLevel=29.85
-- pressureSeaLevelRate=0.01
-- providerId=3
-- rainDaily=0
-- rainMonthly=0.13
-- rainRate=0
-- rainYearly=10.49
-- snowDaily=(null)
-- snowMonthly=(null)
-- snowRate=(null)
-- snowYearly=(null)
-- stationId=ASTAN
-- temperature=72.2
-- temperatureRate=0
-- visibility=(null)
-- visibilityRate=(null)
-- windChill=72.2
-- windDirection=214
-- windDirectionAvg=183
-- windGustDaily=18.2
-- windGustDirectionDaily=170
-- windGustDirectionHourly=221
-- windGustHourly=13.4
-- windGustTimeLocalDailyStr=2016-05-10T00:36:00
-- windGustTimeLocalHourlyStr=2016-05-10T05:10:00
-- windGustTimeUtcDailyStr=2016-05-10T05:36:00
-- windGustTimeUtcHourlyStr=2016-05-10T10:10:00
-- windSpeed=6.6
-- windSpeedAvg=3.5

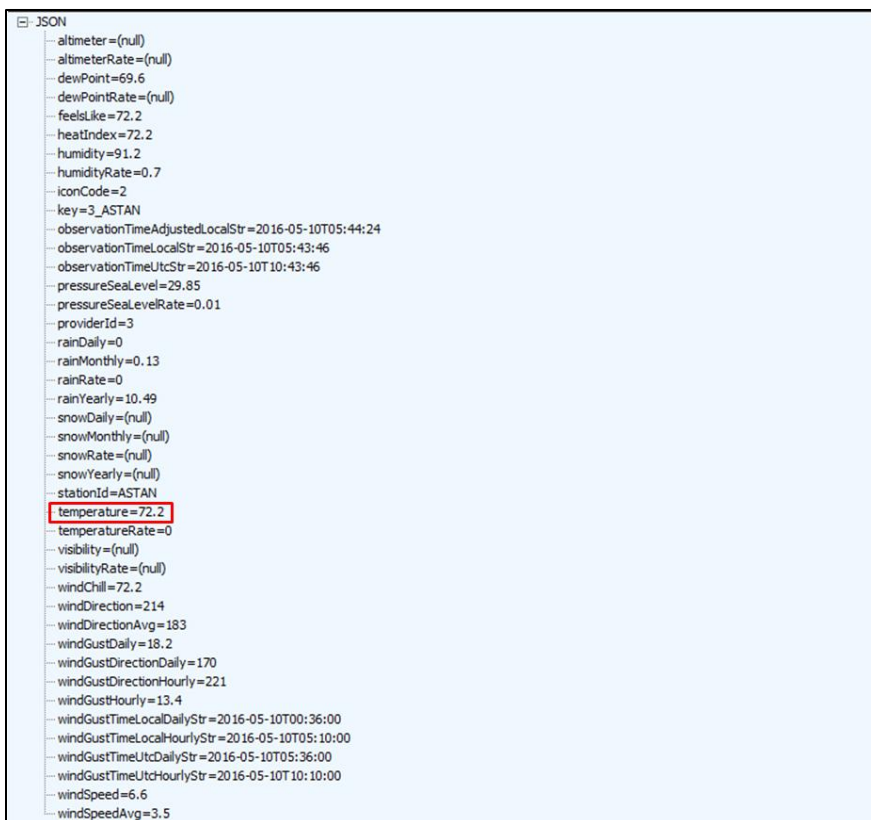
```

24. The Panda Toolbar causes the user Internet device to receive the updated toolbar data from the Internet. For example, as shown below in FIGURES 23 and 24, the user Internet device receives the updated toolbar data such as the latest weather information, in the form of in the form of one or more application/json messages containing the updated toolbar data from the server at IP address 52.1.107.15:

FIGURE 23



FIGURE 24



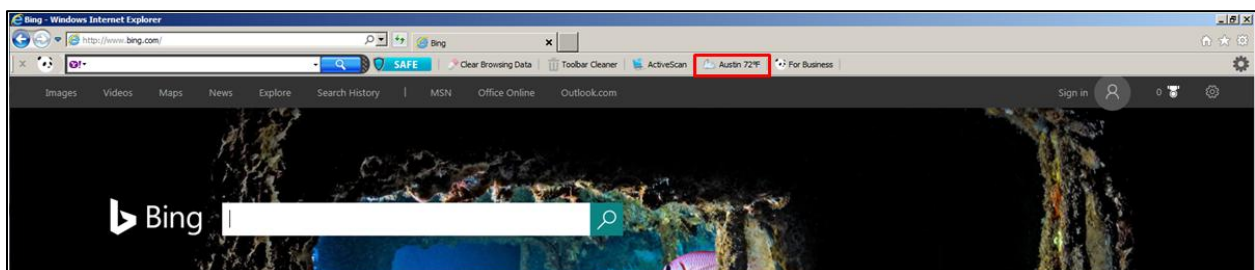
25. The Panda Toolbar initiates, at the user Internet device and without user interaction, an operation to update the toolbar data in accordance with the received updated toolbar data. For example, as shown below in FIGURES 26 and 27, the user Internet device receives the updated toolbar data, such as the latest weather information for a location, in the

form of one or more application/json messages containing the updated toolbar data from the server at IP address 52.1.107.15. The user Internet device updates the toolbar data by displaying the latest weather information on the “Weather” button in accordance with the received updated toolbar data without user interaction:

FIGURE 26

```
JSON
- altimeter=(null)
- altimeterRate=(null)
- dewPoint=69.6
- dewPointRate=(null)
- feelsLike=72.2
- heatIndex=72.2
- humidity=91.2
- humidityRate=0.7
- iconCode=2
- key=3_ASTAN
- observationTimeAdjustedLocalStr=2016-05-10T05:44:24
- observationTimeLocalStr=2016-05-10T05:43:46
- observationTimeUtcStr=2016-05-10T10:43:46
- pressureSeaLevel=29.85
- pressureSeaLevelRate=0.01
- providerId=3
- rainDaily=0
- rainMonthly=0.13
- rainRate=0
- rainYearly=10.49
- snowDaily=(null)
- snowMonthly=(null)
- snowRate=(null)
- snowYearly=(null)
- stationId=ASTAN
- temperature=72.2
- temperatureRate=0
- visibility=(null)
- visibilityRate=(null)
- windChill=72.2
- windDirection=214
- windDirectionAvg=183
- windGustDaily=18.2
- windGustDirectionDaily=170
- windGustDirectionHourly=221
- windGustHourly=13.4
- windGustTimeLocalDailyStr=2016-05-10T00:36:00
- windGustTimeLocalHourlyStr=2016-05-10T05:10:00
- windGustTimeUtcDailyStr=2016-05-10T05:36:00
- windGustTimeUtcHourlyStr=2016-05-10T10:10:00
- windSpeed=6.6
- windSpeedAvg=3.5
```

FIGURE 27



26. The Panda Toolbar further updates the toolbar data at the user Internet device based on the operation and in accordance with the updated toolbar data by, for example, updating at least one attribute of the toolbar data. For example, as shown below in FIGURES 28 and 29, the server at IP address 52.1.107.15 sends the user Internet device updated toolbar data in the form of one or more application/json messages containing the updated toolbar data:

FIGURE 28



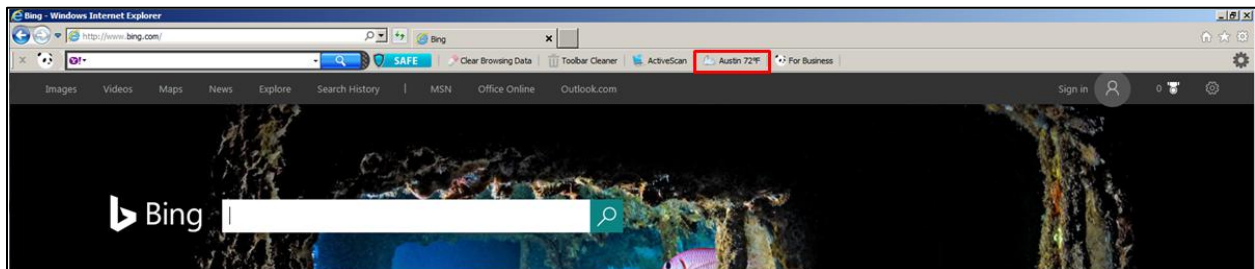
FIGURE 29

```

JSON
- altimeter=(null)
- altimeterRate=(null)
- dewPoint=69.6
- dewPointRate=(null)
- feelsLike=72.2
- heatIndex=72.2
- humidity=91.2
- humidityRate=0.7
- iconCode=2
- key=3_ASTAN
- observationTimeAdjustedLocalStr=2016-05-10T05:44:24
- observationTimeLocalStr=2016-05-10T05:43:46
- observationTimeUtcStr=2016-05-10T10:43:46
- pressureSeaLevel=29.85
- pressureSeaLevelRate=0.01
- providerId=3
- rainDaily=0
- rainMonthly=0.13
- rainRate=0
- rainYearly=10.49
- snowDaily=(null)
- snowMonthly=(null)
- snowRate=(null)
- snowYearly=(null)
- stationId=ASTAN
- temperature=72.2
- temperatureRate=0
- visibility=(null)
- visibilityRate=(null)
- windChill=72.2
- windDirection=214
- windDirectionAvg=183
- windGustDaily=18.2
- windGustDirectionDaily=170
- windGustDirectionHourly=221
- windGustHourly=13.4
- windGustTimeLocalDailyStr=2016-05-10T00:36:00
- windGustTimeLocalHourlyStr=2016-05-10T05:10:00
- windGustTimeUtcDailyStr=2016-05-10T05:36:00
- windGustTimeUtcHourlyStr=2016-05-10T10:10:00
- windSpeed=6.6
- windSpeedAvg=3.5
    
```

27. The Panda Toolbar modifies an attribute of at least one of the one or more toolbar buttons of the toolbar, such as by displaying the temperature of a location on the “Weather” button:

FIGURE 31



28. The Panda Toolbar integrates with a browser, such as Internet Explorer, on a device capable of communicating with other devices over a network such as a user Internet Device.

29. The Panda Toolbar performs each of the functions described one or more claims of the Asserted Patents, including the functions described above. In particular, the Panda Toolbar software embedded in the browser of the user Internet device and remotely located, such as on a server remote from the user Internet device, instruct these devices to perform these functions. The Panda Toolbar, therefore, directs and controls the functions of the user Internet device and the remote device(s) that perform the functions described above.

30. To the extent any third party performs any of the functions described above, the performance of such functions is attributable to the Panda Toolbar because it directs and controls the performance of those functions.

CLAIM 1 -- INFRINGEMENT OF U.S. PATENT NO. 8,275,863

31. Plaintiff incorporates paragraphs 1 through 30 as though fully set forth herein.

32. Upon information and belief, Panda has been and is now directly infringing one or more claims of the '863 Patent by using the Panda Toolbar (including use for testing purposes) in the United States in violation of 35 U.S.C. § 271(a). The Panda Toolbar performs the method of modifying a toolbar as described in one or more of the claims of the '863 Patent.

33. Plaintiff has been damaged by Panda's infringing activities.

CLAIM 2 -- INFRINGEMENT OF U.S. PATENT NO. 9,021,070

34. Plaintiff incorporates paragraphs 1 through 30 as though fully set forth herein.

35. Upon information and belief, Panda has been and is now directly infringing one or more claims of the '070 Patent by using the Panda Toolbar (including use for testing purposes) in

the United States in violation of 35 U.S.C. § 271(a). The Panda Toolbar performs the method of modifying a toolbar as described in one or more of the claims of the '070 Patent.

36. Plaintiff has been damaged by Panda's infringing activities.

DEMAND FOR JURY TRIAL

37. Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests the following relief:

1. A judgment in favor of Plaintiff that Panda has directly infringed one or more claims of the Asserted Patents;

2. A judgment and order requiring Panda to pay Plaintiff damages adequate to compensate for infringement under 35 U.S.C. § 284, which damages in no event shall be less than a reasonable royalty for the use made of the inventions of the Asserted Patents, including pre- and post-judgment interest and costs, including expenses and disbursements; and

3. Any and all such further necessary relief as the Court may deem just and proper under the circumstances.

Dated: November 18, 2016

Respectfully submitted,

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