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

MYMAIL, LTD.,	§	
	§	
Plaintiff,	§	
	§	Civil Action No. 2:17-cv-00253
V.	§	
	§	
ACER AMERICA CORPORATION and	§	JURY TRIAL DEMANDED
ACER INC.,	§	
	§	
Defendants.	§	

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff, MyMail, Ltd., by and through their undersigned counsel, submits this Complaint against the above-named Defendants, as follows:

NATURE OF THE ACTION

1. This is a patent infringement action to stop Defendants' infringement of United States Patent No. 8,732,318 (the "'318 patent" or "patent-in-suit").

THE PARTIES

2. Plaintiff, MyMail, Ltd. ("MyMail"), is a Texas Limited Partnership with an office and place business at 5344 County Road 3901, Athens, TX 75752.

3. Upon information and belief, Defendant, Acer America Corporation ("AAC"), is a corporation existing under the laws of the state of California, with a principal place of business at 333 West San Carlos Street, Suite 1500, San Jose, California 95110.

4. Upon information and belief, Defendant, Acer Inc. ("Acer Inc.") is a corporation existing under the laws of Taiwan, with a principal place of business at 8F, 88, Section 1, Xintai 5th Road, Xizhi, New Taipei City 221, Taiwan.

5. Defendants AAC and Acer Inc. are collectively referred to herein as "Acer" or

"Defendants."

JURISDICTION AND VENUE

6. 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 pursuant to 28 U.S.C. §§ 1331 and 1338(a).

7. The Court has personal jurisdiction over Defendants, including because Defendants have minimum contacts within the State of Texas; Defendants have purposefully availed themselves of the privileges of conducting business in the State of Texas; Defendants regularly conduct business within the State of Texas; and Plaintiff's cause of action arises directly from Defendants' business contacts and other activities in the State of Texas, including at least by virtue of Defendants' infringing methods and apparatuses, which are at least sold and/or used in the State of Texas. Further, this Court has general jurisdiction over Defendants, including due to their continuous and systematic contacts with the State of Texas. Further, on information and belief, Defendants are subject to the Court's jurisdiction, including because Defendants have committed patent infringement in the State of Texas.

8. Venue is proper in the Eastern District of Texas pursuant to 28 U.S.C. §§ 1391 and 1400(b), including because Defendants have purposefully availed themselves of the privileges of conducting business in this District; Defendants regularly conduct business within this District; and Plaintiff's cause of action arises directly from Defendants' business contacts and other activities in this District, including at least by virtue of Defendants' infringing methods and apparatuses, which are at least sold and/or used in this District. Further, Defendants have continuous and systematic contacts with this District.

9. More specifically, on information and belief, Defendants are subject to the Court's

jurisdiction, including because Defendants have committed patent infringement in this District. Pursuant to 35 U.S.C. § 271, Defendants infringe the patent-in-suit by, without authority, their practicing the accused methods described herein in this District. Further, Defendants solicit customers/users in this District. On information and belief, Defendants have customers/users who are residents of this District and who purchase, acquire, and/or use Defendants' infringing products in this District.

INTRODUCTION

A.   _MyMail, Ltd._

10. MyMail was co-founded in 2003. Its executive team includes Thomas Selgas, a visionary and named inventor on the patent-in-suit. MyMail is an intellectual property development and licensing company which provides secure, internet related technologies which have brought essential communications capabilities to cell phones, web browsers, and the backbone of the internet.

11. The technologies developed and owned by MyMail enable substantial cost savings to companies, including Internet Service Providers, Content Providers (_i.e._, 'publishers'), and Affinity Marketers (_i.e._, 'Advertisers'), by allowing them to transparently manage network connections, network credentials of their end-user clients, and the use of dynamic toolbar operations.

12. MyMail is the current assignee of the patent-in-suit and has standing to bring this lawsuit, including the right to recover damages for past, present, and future infringement of the patent.

B.   _Patent-in-Suit_

13. Mr. Selgas is the first listed co-inventor on the patent-in-suit, which is U.S. Patent No. 8,732,318 (the "'318 Patent"). Mr. Selgas and the other inventors filed a provisional patent

application with the United States Patent and Trademark Office ("USPTO") on June 19, 1997. The

'318 Patent was filed as application No. 10/417,821 on April 16, 2003. The '318 Patent is a

division of application No. 09/100,619, filed on June 19, 1998, now U.S. Patent No. 6,571,290.

14. The Abstract of the '318 Patent states the following:

> The present invention comprises a method of and apparatus for simplifying the
> process of access to a network for a roaming computer user, divides the
> responsibility of servicing a given user wanting to access the network between
> multiple parties and minimizes the possibility of improper dissemination of email
> header data as well as improper use of network resources (including server systems)
> by non-clients

15. As of the priority date of the '318 Patent, Internet users were becoming highly mobile and

the need to access the Internet from various locations was increasing, some of which locations did

not have a local phone number for communicating with the normally used ISP. Such a user either

had to pay the cost of a long distance call or access a different ISP after modifying the appropriate

data the operating system's networking, dial-up-networking, or communications properties used to

accomplish such access. Such modification always invites a chance for erroneous data entry in the

process and the accompanying time required to rectify the situation. '318/2:53-62.

16. In view of these issues and others, there existed a need to quickly and easily access the

Internet from various locations, being able to access ISPs providing different types of services,

using various adaptors (*i.e.*, modem or LAN card) and being able to choose whether preference

should be given to items such as cost and quality of service, without the user having to be

concerned about correctly modifying associated data and parameters such as phone numbers, IDs,

passwords etc. used by the Internet software. '318/3:27-34. It should be noted that the invention

applies to any network or interconnected set of networks including the Internet. '318/4:54-59.

17. As noted in the '318 patent, the recited technology solves all or some of at least the

following ten problems:

a. Eliminates the need for a computer user to configure and reconfigure computer networking software for network access through a multiplicity of ISPs and Network Access 65 Providers (NAP) (companies which own the telephone networks and modem banks such as AT&T, GTE, UUNet, PSI, etc.).

b. Allows a Network Re-seller such as an Internet Service Provider to offer network access via a multiplicity of Network Access Providers based on cost, location, availability, reliability, etc.

c. Allows a Network Re-seller to balance network loads through a multiplicity of Network Access Providers and across a multiplicity of network computer servers.

d. Eliminates the need for a computer user to know or configure network access telephone numbers or network access protocol identification numbers.

e. Eliminates the need for a computer user or mobile computer user to reconfigure remote network access software to connect to a network from a remote location.

f. Allows multiple users to use a single computer each with their own unique networking attributes and unique network identity.

g. Allows separate and distinct identifications (ID) and passwords for different services and network functions such as PAP IDs and PAP password, Email ID and password, etc.

h. Provides a user with true network anonymity by assigning independent non-user specific identifications and passwords for such things as PAP authentication, FTP and Email logins, News Server logins, and network server logins.

i. Provides Email anonymity by transmitting and receiving all email through a third party (broker) wherein, if appropriate, aliases may be used for all un-encrypted data and these aliases may be changed periodically by the system in a manner transparent to the user.

j. Eliminates third party email relay (SPAMMING) by transparently authenticating each user-system prior to giving access to a sendmail server.

'318/4:59-5:31.

18. The technology recited in the claims of the '318 Patent provides an inventive concept and does not claim an abstract idea. The inventive concept greatly enhances and facilitates technological methods which comprise obtaining a set of network access information comprising modifying a stored set of network access information using new information downloaded, via the network, to a network access device from an access provider connected to said network; and the network access device re-accessing the network via a given network service provider (NSP) using

the modified set of network access information.

19. The technology recited in the claims of the '318 patent improves the functioning of computers, it improves computer capabilities, and it improves over existing technological processes, including with respect to network access and security, wherein new access information is downloaded via the network and network access is re-established using the new access information.

20. One inventive component of the '318 patent is improving network access and security in ways that are necessarily rooted in computer, specifically network, technology to overcome problems specifically arising in the realm of computer networks. The claims recite an invention that was not merely a routine or conventional use of conventional devices and technologies. The claimed invention was not practiced by others prior to the '318 invention, nor was it a well-known, fundamental economic or conventional business practice, nor was it a practice to which general-purpose computer components were added after the fact.

21. Claim 5 of the '318 Patent covers the following:

> A method for obtaining a set of network access information comprising the steps of:
>> modifying a stored set of network access information using new information downloaded, via the network, to a network access device from an access provider connected to said network; and
>> the network access device re-accessing the network via a given network service provider (NSP) using the modified set of network access information.

22. Neither claim 5 nor any other claims of the '318 Patent is directed to an abstract idea. Neither claim 5 nor any other claims of the '318 Patent preempt any abstract idea or otherwise preempt anything that would render them unpatentable. For example, one is free to practice the prior art of record and the prior art referenced in the specification. The '318 claims do not improperly inhibit further discovery by tying up any building blocks of human ingenuity or

technological work.

23. Claim 5 of the '318 Patent covers, among other things, specific applications of specific methods for obtaining a new or modified set of network access information via the network and re-accessing the network using the modified set of network access information, including in order to achieve the aims of the invention as stated above, and to overcome the shortcomings in the prior art, including prior art network access and security methods, as noted above. This claim comprises, among other things, specific applications or improvements to technologies in the marketplace, including improvements to the existing network access and security methods. Properly understood, the claimed technology constitutes the application of certain ideas, and it necessitates the use of discrete computer hardware and software components configured and programmed in a particular way that enable performance of the specified functions.

24. Further, including when claim 5 is viewed as a whole at the time of the invention, there are sufficient unconventional, non-routine, novel, meaningful, and inventive claim limitations to claim 5 that are sufficient to ensure that the claim in practice amounts to significantly more than merely a patent on any abstract idea or patent ineligible concept. Those unconventional, non-routine, novel, meaningful, and inventive claim limitations comprise the following: modifying a stored set of network access information using new information downloaded, via the network, to a network access device from an access provider connected to said network, wherein the network access device re-accesses the network via a given network service provider (NSP) using the modified set of network access information.

25. Further, claim 5 can only be implemented by a special purpose computer, which is integral to the claimed invention, facilitating the process in a way that a person making calculations or computations could not, including that such calculations or computations could not be performed

solely in the human mind. A special computer is integral to claim 5, including because special programming is necessary to perform the claimed steps. Further, claim 5 is necessarily rooted in computer technology because computer technology is the only way to perform the claimed steps, including that, as noted above, claim 5 relates to specific use of network technology.

26. The '318 Patent claims cannot be practiced by a human alone and there exists no human analogue to the methods claimed in the '318 Patent. The claims are specifically directed to, *inter alia*, network access and security, wherein new access information is downloaded via the network and network access is re-established using the new access information. These things exist only in the context of computers, and specifically computer networks.

27. The invention of claim 5 uses computer technology to overcome the shortcomings of prior art methods, as noted above, including state of the art network access and security methods, which lacked, among other things, the ability to perform the foregoing steps. As such, claim 5 overcomes a technical problem and effects an improvement to a specific technology or technical field, namely computer networks and networking. One such inventive component of the '318 Patent is improving network access and security in ways that are necessarily rooted in computer technology to overcome problems specifically arising in the realm of computer networks, including the Internet. The claims recite an invention that was not merely a routine or conventional use of the Internet.

28. Claim 5 is not directed to a longstanding commercial practice nor does it merely apply generic or general purposes computers to prior art systems or methods. Including as noted above, prior art methods were incapable of the functionality of the method of claim 5. The technology claimed in the '318 Patent does not preempt all types of network access and security or anything else. For example, the prior art cited on the face of the '318 Patent remains available for practice

by Defendants, and the '318 Patent claims do not preempt practice of those prior art methods.

COUNT I – INFRINGEMENT OF U.S. PATENT NO. 8,732,318

29. Plaintiff refers to and incorporates herein the allegations in the above paragraphs.

30. The '318 Patent, entitled "Method of Connecting a User to a Network," was duly and legally issued by the USPTO on May 20, 2014 after full and fair examination.

31. The claims of the '318 Patent cover, *inter alia*, methods, including associated with computers and computer networks, for obtaining a set of network access information comprising modifying a stored set of network access information using new information downloaded, via the network, to a network access device from an access provider connected to said network; and the network access device re-accessing the network via a given network service provider (NSP) using the modified set of network access information.

32. Acer has infringed and is now infringing, including literally, jointly, and/or equivalently, the '318 patent, including at least claim 5, in this judicial district, the State of Texas, and elsewhere in the United States, in violation of 35 U.S.C. § 271 through actions comprising the practicing, making, using, offering for sale, and/or selling, without authority from Plaintiff, methods and devices implementing methods, including associated with computers and computer networks, for obtaining a set of network access information comprising modifying a stored set of network access information using new information downloaded, via the network, to a network access device from an access provider connected to said network; and the network access device re-accessing the network via a given network service provider (NSP) using the modified set of network access information. For example, the accused Acer devices support Wi-Fi Protected Setup ("WPS") and can connect to WPS-enabled wireless networks. When connected to a WPS-enabled network in which a guest device leaves the network, the accused Acer devices perform a method of obtaining

a set of network access information comprising modifying a stored set of network access information (*e.g.*, WLAN credentials) using new information downloaded, via the network, from an access provider connected to said network, followed by re-accessing the network via a network service provider using the modified set of network access information. Additionally, for example, the accused Acer devices support Wi-Fi Protected Access ("WPA/WPA2") functionality and can connect to WPA/WPA2-enabled wireless networks. Without limitation, when connected to a WPA/WPA2-enabled wireless network in which a device is deauthenticated or dissociated, the accused Acer devices perform a method of obtaining a set of network access information comprising a stored set of network access information (*e.g.*, a Group Temporal Key) using new information downloaded, via the network, from an access provider connected to said network, followed by re-accessing the network via a network service provider using the modified network access information.

33. Acer infringes the '318 Patent by and through at least its practicing of the patented method, included via its making, using, offering for sale, and/or selling desktops, laptops, tablets, phones, and/or other computers or mobile devices, including "all-in-one" computers, comprising WPS functionality and/or WPA/WPA2 functionality, including the products and/or series comprising Acer Chromebox, Acer One, AcerPower, AP, Aspire, Aspire One, Aspire One Cloudbook, Aspire Switch, beTouch Series, Chromebase 24, Chromebook, Chromebook 11, Chromebook 11 N7, Chromebook 13, Chromebook 14, Chromebook 14 for Work, Chromebook 15, Chromebook R 11, Chromebook R 13, CloudMobile, easyStore, Extensa, Ferrari, Ferrari One, ICONIA, ICONIA A, Iconia A1, Iconia A3, ICONIA B, Iconia One 10, Iconia One 7, Iconia One 8, Iconia Tab 10, Iconia Tab 7, Iconia Tab 8, Iconia Tab 8 W, Iconia Talk 7, Iconia Talk S, ICONIA W, ICONIA W3, ICONIA W4, Liquid, Liquid C1, Liquid E1, Liquid E2, Liquid E3, Liquid E600, Liquid E700,

Liquid Gallant, Liquid Jade, Liquid Jade Primo, Liquid Jade S, Liquid Jade Z, Liquid M220, Liquid M330, Liquid S1, Liquid S2, Liquid X1, Liquid X2, Liquid Z220, Liquid Z320, Liquid Z410, Liquid Z500, Liquid Z520, Liquid Z530, Liquid Z530S, Liquid Z6, Liquid Z630, Liquid Z630S, Liquid Zest, Predator, Predator 8, Revo, Spin, Swift, Switch, TravelMate, and Veriton, Z Series, including at least the following product and/or model numbers comprising A100, A110, A1-713, A1-713HD, A1-724, A1-734, A1-810, A1-811, A1-830, A1-840, A1-840FHD, A1-841, A1-850, A1-860, A200, A210, A211, A3-A10, A3-A11, A3-A20, A3-A20FHD, A3-A30, A3-A40, A500, A501, A510, A700, AcerPower 1000, AcerPower 2000, AcerPower F1, AcerPower F2, AcerPower F3, AcerPower F5, AcerPower F6, AcerPower FE, AcerPower FG, AcerPower FH, AcerPower FV, AcerPower M8, AcerPower S220, AcerPower S260, AcerPower S280, AcerPower S285, AcerPower S290, AcerPower Sc, AcerPower Sd, AcerPower SK20, AcerPower SK30, AcerPower SK50, AcerPower SP, AcerPower ST, AcerPower SV, AcerPower Sx, AO521, AO522, AO531h, AO532h, AO533, AO721, AO722, AO725, AO751h, AO752, AO753, AO756, AOA110, AOA150, AOD150, AOD250, AOD255, AOD255E, AOD257, AOD260, AOD270, AOD271, AOHAPPY, AOHAPPY2, AOP531h, AP130 F2, Aspire 1100X, Aspire 1110X, Aspire 1300, Aspire 1350, Aspire 1360, Aspire 1400, Aspire 1410 (11.6"), Aspire 1420P, Aspire 1430, Aspire 1430Z, Aspire 1500, Aspire 1520, Aspire 1551, Aspire 1600X, Aspire 1601M, Aspire 1601X, Aspire 1602M, Aspire 1640, Aspire 1640Z, Aspire 1650, Aspire 1660, Aspire 1670, Aspire 1680, Aspire 1690, Aspire 1700, Aspire 1710, Aspire 1800, Aspire 1810T, Aspire 1810TZ, Aspire 1820PT, Aspire 1830, Aspire 1830T, Aspire 1830TZ, Aspire 2000, Aspire 2010, Aspire 2020, Aspire 2420, Aspire 2430, Aspire 2920, Aspire 2920Z, Aspire 2930, Aspire 2930Z, Aspire 3000, Aspire 3050, Aspire 3100, Aspire 3500, Aspire 3600, Aspire 3610, Aspire 3620, Aspire 3630, Aspire 3640, Aspire 3650, Aspire 3660, Aspire 3680, Aspire 3690, Aspire 3750, Aspire

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7250, Aspire 7250G, Aspire 7315, Aspire 7320, Aspire 7330, Aspire 7339, Aspire 7520, Aspire 7520G, Aspire 7530, Aspire 7530G, Aspire 7535, Aspire 7535G, Aspire 7540, Aspire 7540G, Aspire 7551, Aspire 7551G, Aspire 7552G, Aspire 7560, Aspire 7560G, Aspire 7600U, Aspire 7715Z, Aspire 7720, Aspire 7720G, Aspire 7720Z, Aspire 7720ZG, Aspire 7730, Aspire 7730G, Aspire 7730Z, Aspire 7730ZG, Aspire 7735, Aspire 7735G, Aspire 7735Z, Aspire 7735ZG, Aspire 7736, Aspire 7736G, Aspire 7736Z, Aspire 7736ZG, Aspire 7738G, Aspire 7739, Aspire 7739G, Aspire 7739Z, Aspire 7739ZG, Aspire 7740, Aspire 7740G, Aspire 7741, Aspire 7741G, Aspire 7741Z, Aspire 7741ZG, Aspire 7745, Aspire 7745G, Aspire 7745Z, Aspire 7750, Aspire 7750G, Aspire 7750Z, Aspire 7750ZG, Aspire 8530, Aspire 8530G, Aspire 8730, Aspire 8730G, Aspire 8730ZG, Aspire 8735, Aspire 8735G, Aspire 8735ZG, Aspire 8920G, Aspire 8930G, Aspire 8935G, Aspire 8940G, Aspire 8942G, Aspire 8943G, Aspire 8950G, Aspire 8951G, Aspire 9100, Aspire 9110, Aspire 9120, Aspire 9300, Aspire 9400, Aspire 9410, Aspire 9410Z, Aspire 9420, Aspire 9500, Aspire 9510, Aspire 9520, Aspire 9800, Aspire 9810, Aspire 9920, Aspire 9920G, Aspire A3-600, Aspire C20-220, Aspire C20-720, Aspire C22-720, Aspire C22-760, Aspire C24-760, Aspire C500, Aspire E1-410, Aspire E1-410G, Aspire E1-421, Aspire E1-422, Aspire E1-422G, Aspire E1-430, Aspire E1-430G, Aspire E1-430P, Aspire E1-431, Aspire E1-431G, Aspire E1-432, Aspire E1-432G, Aspire E1-432P, Aspire E1-451G, Aspire E1-470, Aspire E1-470G, Aspire E1-470P, Aspire E1-470PG, Aspire E1-471, Aspire E1-471G, Aspire E1-472, Aspire E1-472G, Aspire E1-472P, Aspire E1-472PG, Aspire E1-510, Aspire E1-510P, Aspire E1-521, Aspire E1-522, Aspire E1-530, Aspire E1-530G, Aspire E1-531, Aspire E1-531G, Aspire E1-532, Aspire E1-532G, Aspire E1-532P, Aspire E1-532PG, Aspire E1-570, Aspire E1-570G, Aspire E1-571, Aspire E1-571G, Aspire E1-572, Aspire E1-572G, Aspire E1-572P, Aspire E1-572PG, Aspire E1-731, Aspire E1-731G, Aspire E1-732G, Aspire E1-771, Aspire E1-771G,

Aspire E1-772, Aspire E1-772G, Aspire E3-111, Aspire E3-112, Aspire E3-112M, Aspire E360,

Aspire E380, Aspire E500, Aspire E5-411, Aspire E5-411G, Aspire E5-421, Aspire E5-421G,

Aspire E5-422, Aspire E5-422G, Aspire E5-432, Aspire E5-432G, Aspire E5-452G, Aspire E5-

471, Aspire E5-471G, Aspire E5-471P, Aspire E5-471PG, Aspire E5-472G, Aspire E5-473,

Aspire E5-473G, Aspire E5-473T, Aspire E5-473TG, Aspire E5-474, Aspire E5-474G, Aspire E5-

475, Aspire E5-475G, Aspire E5-491G, Aspire E5-511, Aspire E5-511G, Aspire E5-511P, Aspire

E5-521, Aspire E5-521G, Aspire E5-522, Aspire E5-522G, Aspire E5-523, Aspire E5-523G,

Aspire E5-531, Aspire E5-531G, Aspire E5-531P, Aspire E5-532, Aspire E5-532G, Aspire E5-

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E5-553G, Aspire E5-571, Aspire E5-571G, Aspire E5-571P, Aspire E5-571PG, Aspire E5-572G,

Aspire E5-573, Aspire E5-573G, Aspire E5-573T, Aspire E5-573TG, Aspire E5-574, Aspire E5-

574G, Aspire E5-574T, Aspire E5-574TG, Aspire E5-575, Aspire E5-575G, Aspire E5-575T,

Aspire E5-575TG, Aspire E560, Aspire E571, Aspire E5-721, Aspire E5-722, Aspire E5-722G,

Aspire E5-731, Aspire E5-731G, Aspire E5-752, Aspire E5-752G, Aspire E5-771, Aspire E5-

771G, Aspire E5-772, Aspire E5-772G, Aspire E5-773, Aspire E5-773G, Aspire E5-774, Aspire

E5-774G, Aspire E600, Aspire E650, Aspire E700, Aspire EC-470G, Aspire EC-471G, Aspire

EK-571G, Aspire EL, Aspire ELD, Aspire ES1-111, Aspire ES1-111M, Aspire ES1-131, Aspire

ES1-132, Aspire ES1-311, Aspire ES1-331, Aspire ES1-332, Aspire ES1-411, Aspire ES1-420,

Aspire ES1-421, Aspire ES1-422, Aspire ES1-431, Aspire ES1-432, Aspire ES1-433, Aspire ES1-

433G, Aspire ES1-511, Aspire ES1-512, Aspire ES1-520, Aspire ES1-521, Aspire ES1-522,

Aspire ES1-523, Aspire ES1-524, Aspire ES1-531, Aspire ES1-532G, Aspire ES1-533, Aspire

ES1-571, Aspire ES1-572, Aspire ES1-711, Aspire ES1-711G, Aspire ES1-731, Aspire ES1-

731G, Aspire ES1-732, Aspire F5-521, Aspire F5-522, Aspire F5-571, Aspire F5-571G, Aspire

F5-571T, Aspire F5-572, Aspire F5-572G, Aspire F5-573, Aspire F5-573G, Aspire F5-573T, Aspire F5-771, Aspire F5-771G, Aspire G7700, Aspire G7710, Aspire G7750, Aspire GX-781, Aspire GX-785, Aspire IDea500, Aspire IDea510, Aspire K40-10, Aspire K50-10, Aspire K50-20, Aspire L100, Aspire L310, Aspire L320, Aspire L350, Aspire L3600, Aspire L5100, Aspire M1100, Aspire M1200, Aspire M1201, Aspire M1202, Aspire M1420, Aspire M1470, Aspire M1600, Aspire M1610, Aspire M1620, Aspire M1640, Aspire M1831, Aspire M1860, Aspire M1920, Aspire M1930, Aspire M1935, Aspire M3100, Aspire M3160, Aspire M3200, Aspire M3201, Aspire M3202, Aspire M3203, Aspire M3300, Aspire M3400, Aspire M3410, Aspire M3420, Aspire M3450, Aspire M3470, Aspire M3470G, Aspire M3-481, Aspire M3-481G, Aspire M3-580, Aspire M3-580G, Aspire M3-581G, Aspire M3-581PT, Aspire M3-581PTG, Aspire M3-581T, Aspire M3-581TG, Aspire M3600, Aspire M3640, Aspire M3660, Aspire M3710, Aspire M3800, Aspire M3802, Aspire M3860, Aspire M3900, Aspire M3910, Aspire M3920, Aspire M3970, Aspire M3970G, Aspire M3985, Aspire M5100, Aspire M5200, Aspire M5201, Aspire M5400, Aspire M5-481, Aspire M5-481G, Aspire M5-481PT, Aspire M5-481PTG, Aspire M5-481T, Aspire M5-481TG, Aspire M5-581G, Aspire M5-581T, Aspire M5-581TG, Aspire M5-582PT, Aspire M5-583P, Aspire M5600, Aspire M5620, Aspire M5621, Aspire M5630, Aspire M5640, Aspire M5641, Aspire M5700, Aspire M5800, Aspire M5802, Aspire M5810, Aspire M5811, Aspire M5910, Aspire M7720, Aspire MC605, Aspire ME600, Aspire MM1-571, Aspire one 1-131, Aspire one 1-131M, Aspire one 1-132, Aspire one 1-431, Aspire one 1-431M, Aspire P3-131, Aspire P3-171, Aspire R1600, Aspire R3-131T, Aspire R3-431T, Aspire R3-471T, Aspire R3-471TG, Aspire R3600, Aspire R3610, Aspire R3700, Aspire R5-371T, Aspire R5-431T, Aspire R5-471T, Aspire R5-571T, Aspire R5-571TG, Aspire R7-371T, Aspire R7-372T, Aspire R7-571, Aspire R7-571G, Aspire R7-572, Aspire R7-572G, Aspire

S1-600, Aspire S3-331, Aspire S3-371, Aspire S3-391, Aspire S3-392, Aspire S3-392G, Aspire S3-951, Aspire S5-371, Aspire S5-371T, Aspire S5-391, Aspire S7-191, Aspire S7-391, Aspire S7-392, Aspire S7-392 (InstantGo), Aspire S7-393, Aspire SA10, Aspire SA20, Aspire SA60, Aspire SA80, Aspire SA85, Aspire SA90, Aspire T100, Aspire T135, Aspire T136, Aspire T160, Aspire T180, Aspire T300, Aspire T3-100, Aspire T320, Aspire T3-600, Aspire T3-605, Aspire T3-710, Aspire T3-715, Aspire T3-715A, Aspire T3-780, Aspire T600, Aspire T630, Aspire T650, Aspire T660, Aspire T670, Aspire T671, Aspire T680, Aspire T690, Aspire TC-100, Aspire TC-102, Aspire TC-105, Aspire TC-115, Aspire TC-120, Aspire TC-214, Aspire TC-215, Aspire TC-217, Aspire TC-220, Aspire TC-230, Aspire TC-280, Aspire TC-600, Aspire TC-601, Aspire TC-602, Aspire TC-603, Aspire TC-605, Aspire TC-606, Aspire TC-651, Aspire TC-701, Aspire TC-703, Aspire TC-704, Aspire TC-705, Aspire TC-708, Aspire TC-710, Aspire TC-730, Aspire TC-752, Aspire TC-760, Aspire TC-780, Aspire TC-780A, Aspire U5-610, Aspire U5-620, Aspire U5-710, Aspire V3-111P, Aspire V3-112P, Aspire V3-331, Aspire V3-371, Aspire V3-372, Aspire V3-372T, Aspire V3-431, Aspire V3-471, Aspire V3-471G, Aspire V3-472, Aspire V3-472G, Aspire V3-472P, Aspire V3-472PG, Aspire V3-531, Aspire V3-531G, Aspire V3-532, Aspire V3-532G, Aspire V3-551, Aspire V3-551G, Aspire V3-571, Aspire V3-571G, Aspire V3-572, Aspire V3-572G, Aspire V3-572P, Aspire V3-572PG, Aspire V3-574, Aspire V3-574G, Aspire V3-574T, Aspire V3-574TG, Aspire V3-575, Aspire V3-575G, Aspire V3-575T, Aspire V3-575TG, Aspire V3-731, Aspire V3-731G, Aspire V3-771, Aspire V3-7710, Aspire V3-7710G, Aspire V3-771G, Aspire V3-772G, Aspire V5-121, Aspire V5-122P, Aspire V5-123, Aspire V5-131, Aspire V5-132, Aspire V5-132P, Aspire V5-171, Aspire V5-431, Aspire V5-431G, Aspire V5-431P, Aspire V5-431PG, Aspire V5-452G, Aspire V5-452PG, Aspire V5-471, Aspire V5-471G, Aspire V5-471P, Aspire V5-471PG, Aspire V5-472, Aspire V5-472G, Aspire V5-472P,

Aspire V5-472PG, Aspire V5-473, Aspire V5-473G, Aspire V5-473P, Aspire V5-473PG, Aspire V5-531, Aspire V5-531G, Aspire V5-531P, Aspire V5-531PG, Aspire V5-551, Aspire V5-551G, Aspire V5-552, Aspire V5-552G, Aspire V5-552P, Aspire V5-552PG, Aspire V5-561, Aspire V5-561G, Aspire V5-561P, Aspire V5-561PG, Aspire V5-571, Aspire V5-571G, Aspire V5-571P, Aspire V5-571PG, Aspire V5-572, Aspire V5-572G, Aspire V5-572P, Aspire V5-572PG, Aspire V5-573, Aspire V5-573G, Aspire V5-573P, Aspire V5-573PG, Aspire V5-591G, Aspire V7-481, Aspire V7-481G, Aspire V7-481P, Aspire V7-481PG, Aspire V7-482P, Aspire V7-482PG, Aspire V7-581, Aspire V7-581G, Aspire V7-581P, Aspire V7-581PG, Aspire V7-582P, Aspire V7-582PG, Aspire VN7-571, Aspire VN7-571G, Aspire VN7-572, Aspire VN7-572G, Aspire VN7-572TG, Aspire VN7-591G, Aspire VN7-592G, Aspire VN7-593G, Aspire VN7-791G, Aspire VN7-792G, Aspire VN7-793G, Aspire VX5-591G, Aspire X1200, Aspire X1300, Aspire X1301, Aspire X1400, Aspire X1420, Aspire X1420G, Aspire X1430, Aspire X1430G, Aspire X1440, Aspire X1470, Aspire X1700, Aspire X1800, Aspire X1900, Aspire X1920, Aspire X1930, Aspire X1935, Aspire X3-100, Aspire X3200, Aspire X3300, Aspire X3400, Aspire X3400G, Aspire X3450, Aspire X3470, Aspire X3475, Aspire X3-600, Aspire X3-710, Aspire X3-780, Aspire X3810, Aspire X3812, Aspire X3910, Aspire X3950, Aspire X3960, Aspire X3990, Aspire X3995, Aspire X5810, Aspire XC100, Aspire XC-105, Aspire XC-115, Aspire XC-214, Aspire XC-215, Aspire XC-217, Aspire XC-230, Aspire XC600, Aspire XC-602, Aspire XC-603, Aspire XC-603G, Aspire XC-605, Aspire XC-605G, Aspire XC-703, Aspire XC-703G, Aspire XC-704, Aspire XC-704G, Aspire XC-705, Aspire XC-710, Aspire XC-730, Aspire XC-780, Aspire Z1100, Aspire Z1110, Aspire Z1-211, Aspire Z1220, Aspire Z1-601, Aspire Z1-602, Aspire Z1-611, Aspire Z1-612, Aspire Z1620, Aspire Z1-621, Aspire Z1-621G, Aspire Z1-622, Aspire Z1-623, Aspire Z1650, Aspire Z1-751, Aspire Z1-752, Aspire Z1800, Aspire Z1801, Aspire Z1810,

Aspire Z1811, Aspire Z1850, Aspire Z20-730, Aspire Z20-780, Aspire Z22-780, Aspire Z3100, Aspire Z3101, Aspire Z3-105, Aspire Z3-115, Aspire Z3170, Aspire Z3171, Aspire Z3280, Aspire Z3-600, Aspire Z3-601, Aspire Z3-605, Aspire Z3-610, Aspire Z3-613, Aspire Z3-615, Aspire Z3620, Aspire Z3-700, Aspire Z3-705, Aspire Z3-710, Aspire Z3-711, Aspire Z3-715, Aspire Z3730, Aspire Z3731, Aspire Z3760, Aspire Z3761, Aspire Z3770, Aspire Z3771, Aspire Z3800, Aspire Z3801, Aspire Z5101, Aspire Z5600, Aspire Z5610, Aspire Z5700, Aspire Z5710, Aspire Z5730, Aspire Z5751, Aspire Z5760, Aspire Z5761, Aspire Z5770, Aspire Z5771, Aspire Z5801, Aspire ZC-102, Aspire ZC-105, Aspire ZC-106, Aspire ZC-107, Aspire ZC-602, Aspire ZC-605, Aspire ZC-606, Aspire ZC-610, Aspire ZC-700, Aspire ZC-700G, Aspire ZS600, Aspire ZS600G, B1-710, B1-711, B1-720, B1-721, B1-723, B1-730, B1-730HD, B1-733, B1-740, B1-750, B1-760HD, B1-770, B1-780, B1-810, B1-820, B1-830, B1-850, B1-A71, B3-A10, B3-A20, B3-A20B, B3-A30, B3-A32, C710, C720, C720P, C730, C730E, C731, C731T, C735, C738T, C740, C810, C910, CA24I, CA24V, CB3-111, CB3-131, CB3-431, CB3-531, CB3-532, CB5-132T, CB5-311, CB5-311P, CB5-312T, CB5-571, CP5-471, CXI, CXI2, CXV2, E100, E101, E110, E130, E350, E380, E39, E600, easyStore H340, easyStore H341, easyStore H342, Extensa 2000, Extensa 2300, Extensa 2350, Extensa 2408, Extensa 2500, Extensa 2508, Extensa 2509, Extensa 2510, Extensa 2510G, Extensa 2511, Extensa 2511G, Extensa 2519, Extensa 2520, Extensa 2520G, Extensa 2530, Extensa 2540, Extensa 2600, Extensa 2900, Extensa 2900D, Extensa 2900E, Extensa 2950, Extensa 3000, Extensa 3100, Extensa 4010, Extensa 4100, Extensa 4120, Extensa 4130, Extensa 4210, Extensa 4220, Extensa 4230, Extensa 4420, Extensa 4430, Extensa 4620, Extensa 4620Z, Extensa 4630, Extensa 4630G, Extensa 4630Z, Extensa 4630ZG, Extensa 500, Extensa 5010, Extensa 5120, Extensa 5200, Extensa 5210, Extensa 5220, Extensa 5230, Extensa 5230E, Extensa 5235, Extensa 5410, Extensa 5420, Extensa 5420G, Extensa 5430,

Extensa 5510, Extensa 5510Z, Extensa 5610, Extensa 5610G, Extensa 5620, Extensa 5620G, Extensa 5620Z, Extensa 5620ZG, Extensa 5630, Extensa 5630EZ, Extensa 5630G, Extensa 5630Z, Extensa 5630ZG, Extensa 5635, Extensa 5635G, Extensa 5635Z, Extensa 5635ZG, Extensa 6600, Extensa 6700, Extensa 6700Z, Extensa 710, Extensa 7120, Extensa 7220, Extensa 7230, Extensa 7230E, Extensa 7420, Extensa 7620, Extensa 7620G, Extensa 7620Z, Extensa 7630, Extensa 7630EZ, Extensa 7630G, Extensa 7630Z, Extensa 7630ZG, Extensa M2610, Extensa M2710, Extensa X2610G, Extensa X2710, Ferrari 1000, Ferrari 1100, Ferrari 3000, Ferrari 3200, Ferrari 3400, Ferrari 4000, Ferrari 5000, FO200, GT-810, I110, ICONIA, Liquid E, Liquid Glow, Liquid mini Ferrari, M1-601, M220, M2-601, M330, Predator G1-710, Predator G3100, Predator G3120, Predator G3600, Predator G3-605, Predator G3610, Predator G3620, Predator G3-710, Predator G5-793, Predator G5900, Predator G5910, Predator G5920, Predator G6-710, Predator G7760, Predator G9-591, Predator G9-591R, Predator G9-592, Predator G9-593, Predator G9-791, Predator G9-792, Predator G9-793, Predator GX21-71, Predator GX-791, Predator GX-792, RC111, RL100, RL70, RL80, RL85, RN66, S1002, S1002P, S1003, S30-10, S500, S510, S520, S53, S55, S56, S57, S58, S59, SA5-271, SA5-271P, SF114-31, SF314-51, SF514-51, SF713-51, SP111-31, SP113-31, SP315-51, SP513-51, SP714-51, SW1-011, SW3-013, SW3-013P, SW3-016, SW3-016P, SW5-011, SW5-012, SW5-012P, SW5-014, SW5-014P, SW5-015, SW5-017, SW5-017P, SW5-111, SW5-111P, SW5-171, SW5-171P, SW5-173, SW5-173P, SW5-271, SW7-272, SW7-272P, TravelMate 200, TravelMate 2000, TravelMate 210, TravelMate 2100, TravelMate 2200, TravelMate 225, TravelMate 230, TravelMate 2300, TravelMate 2310, TravelMate 2350, TravelMate 240, TravelMate 2400, TravelMate 2410, TravelMate 2420, TravelMate 2430, TravelMate 2440, TravelMate 2450, TravelMate 2460, TravelMate 2470, TravelMate 2480, TravelMate 2490, TravelMate 250, TravelMate 2500, TravelMate 250P,

TravelMate 260, TravelMate 2600, TravelMate 270, TravelMate 2700, TravelMate 280, TravelMate 290, TravelMate 290D, TravelMate 290E, TravelMate 3000, TravelMate 3010, TravelMate 3020, TravelMate 3030, TravelMate 3040, TravelMate 310, TravelMate 320, TravelMate 3200, TravelMate 3210, TravelMate 3210Z, TravelMate 3220, TravelMate 3230, TravelMate 3240, TravelMate 3250, TravelMate 3260, TravelMate 3270, TravelMate 3280, TravelMate 3290, TravelMate 330, TravelMate 3300, TravelMate 340, TravelMate 350, TravelMate 360, TravelMate 370, TravelMate 380, TravelMate 4000, TravelMate 4010, TravelMate 4020, TravelMate 4050, TravelMate 4060, TravelMate 4070, TravelMate 4080, TravelMate 4100, TravelMate 4150, TravelMate 420, TravelMate 4200, TravelMate 4210, TravelMate 4220, TravelMate 4230, TravelMate 4235, TravelMate 4260, TravelMate 4270, TravelMate 4280, TravelMate 430, TravelMate 4310, TravelMate 4320, TravelMate 4330, TravelMate 4335, TravelMate 4350, TravelMate 4400, TravelMate 4500, TravelMate 4520, TravelMate 4530, TravelMate 4600, TravelMate 4650, TravelMate 4670, TravelMate 4720, TravelMate 4730, TravelMate 4730G, TravelMate 4730ZG, TravelMate 4732G, TravelMate 4740, TravelMate 4740G, TravelMate 4740Z, TravelMate 4740ZG, TravelMate 4750, TravelMate 4750G, TravelMate 4750Z, TravelMate 4750ZG, TravelMate 505, TravelMate 510, TravelMate 5100, TravelMate 5110, TravelMate 520, TravelMate 5210, TravelMate 5220, TravelMate 5220G, TravelMate 5230, TravelMate 530, TravelMate 5310, TravelMate 5320, TravelMate 5330, TravelMate 5330G, TravelMate 5335, TravelMate 5344, TravelMate 5360, TravelMate 5360G, TravelMate 540, TravelMate 5510, TravelMate 5520, TravelMate 5520G, TravelMate 5530, TravelMate 5530G, TravelMate 5542, TravelMate 5542G, TravelMate 5600, TravelMate 5610, TravelMate 5620, TravelMate 5710, TravelMate 5710G, TravelMate 5720, TravelMate 5720G, TravelMate 5725, TravelMate 5725G, TravelMate 5730, TravelMate 5730G, TravelMate 5735,

TravelMate 5735G, TravelMate 5735Z, TravelMate 5740, TravelMate 5740G, TravelMate 5740Z, TravelMate 5740ZG, TravelMate 5742, TravelMate 5742G, TravelMate 5742Z, TravelMate 5742ZG, TravelMate 5744, TravelMate 5744Z, TravelMate 5760, TravelMate 5760G, TravelMate 5760Z, TravelMate 5760ZG, TravelMate 600, TravelMate 6000, TravelMate 610, TravelMate 620, TravelMate 6231, TravelMate 6252, TravelMate 6253, TravelMate 6291, TravelMate 6292, TravelMate 6293, TravelMate 630, TravelMate 6410, TravelMate 6452, TravelMate 6460, TravelMate 6492, TravelMate 6492G, TravelMate 6493, TravelMate 6495, TravelMate 6495G, TravelMate 6495T, TravelMate 6495TG, TravelMate 650, TravelMate 6500, TravelMate 6550, TravelMate 6552, TravelMate 6553, TravelMate 6592, TravelMate 6592G, TravelMate 6593, TravelMate 6593G, TravelMate 6594, TravelMate 6594e, TravelMate 6594eG, TravelMate 6594G, TravelMate 6595, TravelMate 6595G, TravelMate 6595T, TravelMate 6595TG, TravelMate 660, TravelMate 720, TravelMate 7220, TravelMate 7220G, TravelMate 7230, TravelMate 730, TravelMate 7320, TravelMate 7330, TravelMate 740, TravelMate 7510, TravelMate 7520, TravelMate 7520G, TravelMate 7530, TravelMate 7530G, TravelMate 7720, TravelMate 7720G, TravelMate 7730, TravelMate 7730G, TravelMate 7740, TravelMate 7740G, TravelMate 7740Z, TravelMate 7740ZG, TravelMate 7750, TravelMate 7750G, TravelMate 7750Z, TravelMate 7750ZG, TravelMate 800, TravelMate 8000, TravelMate 8100, TravelMate 8172, TravelMate 8172T, TravelMate 8172Z, TravelMate 8200, TravelMate 8210, TravelMate 8331, TravelMate 8331G, TravelMate 8371, TravelMate 8371G, TravelMate 8372, TravelMate 8372G, TravelMate 8372T, TravelMate 8372TG, TravelMate 8372TZ, TravelMate 8372Z, TravelMate 8372ZG, TravelMate 8431, TravelMate 8471, TravelMate 8472, TravelMate 8472G, TravelMate 8472T, TravelMate 8472TG, TravelMate 8472Z, TravelMate 8473, TravelMate 8473G, TravelMate 8473T, TravelMate 8473TG, TravelMate 8473Z, TravelMate 8481,

TravelMate 8481G, TravelMate 8481T, TravelMate 8481TG, TravelMate 8531, TravelMate 8571,

TravelMate 8572, TravelMate 8572G, TravelMate 8572T, TravelMate 8572TG, TravelMate 8573,

TravelMate 8573G, TravelMate 8573T, TravelMate 8573TG, TravelMate a550, TravelMate

B113-E, TravelMate B113-M, TravelMate B115-M, TravelMate B115-MP, TravelMate B116-M,

TravelMate B116-MP, TravelMate B117-M, TravelMate B117-MP, TravelMate C100,

TravelMate C110, TravelMate C200, TravelMate C210, TravelMate C300, TravelMate C310,

TravelMate P236-M, TravelMate P238-M, TravelMate P243-M, TravelMate P243-MG,

TravelMate P245-M, TravelMate P245-MG, TravelMate P245-MP, TravelMate P245-MPG,

TravelMate P246-M, TravelMate P246-MG, TravelMate P246M-M, TravelMate P246M-MG,

TravelMate P248-M, TravelMate P248-MG, TravelMate P249-G2-M, TravelMate P249-G2-MG,

TravelMate P249-M, TravelMate P249-MG, TravelMate P253-E, TravelMate P253-M,

TravelMate P253-MG, TravelMate P255-M, TravelMate P255-MG, TravelMate P255-MP,

TravelMate P255-MPG, TravelMate P256-M, TravelMate P256-MG, TravelMate P257-M,

TravelMate P257-MG, TravelMate P258-M, TravelMate P258-MG, TravelMate P259-G2-M,

TravelMate P259-G2-MG, TravelMate P259-M, TravelMate P259-MG, TravelMate P273-M,

TravelMate P273-MG, TravelMate P276-M, TravelMate P276-MG, TravelMate P277-M,

TravelMate P277-MG, TravelMate P278-M, TravelMate P278-MG, TravelMate P446-M,

TravelMate P446-MG, TravelMate P449-G2-M, TravelMate P449-G2-MG, TravelMate P449-M,

TravelMate P449-MG, TravelMate P453-M, TravelMate P453-MG, TravelMate P455-M,

TravelMate P455-MG, TravelMate P459-G2-M, TravelMate P459-G2-MG, TravelMate P459-M,

TravelMate P459-MG, TravelMate P633-M, TravelMate P633-V, TravelMate P643-M,

TravelMate P643-MG, TravelMate P643-V, TravelMate P645-M, TravelMate P645-MG,

TravelMate P645-S, TravelMate P645-SG, TravelMate P645-V, TravelMate P645-VG,

TravelMate P648-G2-M, TravelMate P648-M, TravelMate P648-MG, TravelMate P653-M, TravelMate P653-MG, TravelMate P653-V, TravelMate P658-G2-M, TravelMate P658-G2-MG, TravelMate P658-M, TravelMate P658-MG, TravelMate TX40-G1, TravelMate TX40-G2, TravelMate TX50-G1, TravelMate TX50-G2, TravelMate X313-E, TravelMate X313-M, TravelMate X349-G2-M, TravelMate X349-M, TravelMate X483, TravelMate X483G, V360, V370, Veriton 1000, Veriton 2800, Veriton 3200, Veriton 3500G, Veriton 3600G, Veriton 3600GT, Veriton 3700G, Veriton 3700GX, Veriton 3900Pro, Veriton 5100, Veriton 5500, Veriton 5500G, Veriton 5600G, Veriton 5600GT, Veriton 5700G, Veriton 5700GX, Veriton 5800, Veriton 5900Pro, Veriton 6800, Veriton 6900Pro, Veriton 7100, Veriton 7500, Veriton 7500G, Veriton 7600G, Veriton 7600GT, Veriton 7700G, Veriton 7700GX, Veriton 7800, Veriton 7900Pro, Veriton B430_44, Veriton B430_52, Veriton B430_63, Veriton B430_N52, Veriton B630_39, Veriton B630_49, Veriton B630_58, Veriton B830_38, Veriton B830_48, Veriton B830_57, Veriton B830_65, Veriton C630, Veriton C650_59, Veriton C650_66, Veriton D430_17, Veriton D430_45, Veriton D430_53, Veriton D430_60, Veriton D430_N53, Veriton D461, Veriton D630_36, Veriton D630_47, Veriton D630_61, Veriton D630_N47, Veriton D730_27, Veriton D730_54, Veriton D730_N54, Veriton D830, Veriton E430, Veriton E430_17, Veriton E430_45, Veriton E430_60, Veriton E430_68, Veriton E430_73, Veriton E430_N53, Veriton E430G, Veriton L410, Veriton L410G, Veriton L460, Veriton L460G, Veriton L4610, Veriton L4610G, Veriton L4618G, Veriton L4620G, Veriton L4630G, Veriton L480G, Veriton L6610G, Veriton L6620G, Veriton L6630G, Veriton L670G, Veriton M2110, Veriton M2110G, Veriton M2120G, Veriton M258, Veriton M261, Veriton M2610, Veriton M2610G, Veriton M2611, Veriton M2611G, Veriton M2630, Veriton M2630G, Veriton M2631, Veriton M2631G, Veriton M2632, Veriton M2632G, Veriton M264, Veriton M2640, Veriton M2640G, Veriton M265, Veriton

M275, Veriton M280, Veriton M288, Veriton M290, Veriton M410, Veriton M420, Veriton M421G, Veriton M430, Veriton M460, Veriton M460G, Veriton M4610, Veriton M4610G, Veriton M4618G, Veriton M4620, Veriton M4620G, Veriton M4630, Veriton M4630G, Veriton M4640G, Veriton M480G, Veriton M490G, Veriton M498G, Veriton M661, Veriton M6610G, Veriton M6618G, Veriton M6620G, Veriton M6630G, Veriton M6640G, Veriton M670, Veriton M670G, Veriton M678G, Veriton M680G, Veriton M688G, Veriton N2010G, Veriton N2110G, Veriton N2120G, Veriton N2510G, Veriton N260G, Veriton N2620G, Veriton N280G, Veriton N281G, Veriton N282G, Veriton N4620G, Veriton N4630G, Veriton N4640G, Veriton N6630G, Veriton N6640G, Veriton P130 F3, Veriton P130 F4, Veriton P30 F4, Veriton P330 F2, Veriton P330 F3, Veriton P530 F2, Veriton P530 F3, Veriton S2610G, Veriton S2611G, Veriton S460, Veriton S461, Veriton S4610, Veriton S4610G, Veriton S4620G, Veriton S4630G, Veriton S480G, Veriton S661, Veriton S6610G, Veriton S6620G, Veriton S6630G, Veriton S670, Veriton T430_17, Veriton T430_45, Veriton T430_53, Veriton T430_60, Veriton T430_N53, Veriton T630_36, Veriton T630_47, Veriton T630_61, Veriton T630_N47, Veriton T661, Veriton T661 (Q45-DDR3), Veriton T830_35, Veriton T830_46, Veriton T830_62, Veriton T830_N46, Veriton X2110, Veriton X2120G, Veriton X2610, Veriton X2610G, Veriton X2611, Veriton X2611G, Veriton X2630, Veriton X2630G, Veriton X2631, Veriton X2631G, Veriton X2632, Veriton X2632G, Veriton X2640, Veriton X2640G, Veriton X270, Veriton X275, Veriton X4110G, Veriton X4610, Veriton X4610G, Veriton X4618G, Veriton X4620, Veriton X4620G, Veriton X4630G, Veriton X4640G, Veriton X480, Veriton X480G, Veriton X488G, Veriton X490, Veriton X498G, Veriton X6610G, Veriton X6620G, Veriton X6630G, Veriton X6640G, Veriton X680G, W1-810, W1-811, W3-810, W3-810P, W4-820, W4-820P, W4-821, W4-821P, W500, W500P, W510, W510P, W511, W511P, W700, W700P, W701, W701P, Z110, Z120, Z130,

Z1402, Z150, Z160, Z200, Z205, Z220, Z320, Z410, Z500, Z520, Z530, Z530S, Z6, Z6 plus, Z630, Z630S, Z6E, Zest, Zest 4G, and Zest Plus.

34. Additionally, or in the alternative, upon information and belief, Acer has induced infringement of the '318 Patent in this judicial district, the State of Texas, and elsewhere in the United States, by intentionally inducing direct infringement of the '318 Patent, including by aiding or abetting the infringement of its end users and/or customers, by and through at least Acer's practicing, making, using, offering for sale, selling, without authority from Plaintiff, methods and devices implementing methods, including associated with computers and computer networks, comprising at least the above-described products. Upon information and belief, such aiding and abetting comprises providing hardware, software and/or instructions. Upon information and belief, such induced infringement has occurred since Acer became aware of the '318 Patent, which is at a minimum is in connection with the filing of this lawsuit.

35. Additionally, or in the alternative, upon information and belief, Acer contributed to infringement of the '318 patent in this judicial district, the State of Texas, and elsewhere in the United States, by actions comprising making, selling, and/or offering for sale at least the above-described products, which at a minimum are used in practicing the methods of the '318 patent. These products contribute to the direct infringement of the '318 patent by customers and/or other end users in this judicial district, the State of Texas, and elsewhere in the United States. Upon information and belief, these products are especially made or especially adapted for uses and practices which constitute infringement of the '318 patent. These products are not staple articles or commodities of commerce suitable for substantial non-infringing uses, including at least because they are especially made or especially adapted for uses and practices which constitute infringement of the '318 patent.

36. On information and belief, Acer's contributory infringement comprises its knowledge that the above-mentioned products are especially made or especially adapted for uses and/or practices which constitute infringement of the '318 patent and they are not staple articles or commodities of commerce suitable for substantial non-infringing uses. Such knowledge is evidenced by the fact that infringement of the '318 patent from the use of the products is clear, evident, and unmistakable to anyone aware of both the '318 patent and of the details of the uses and practices employed in connection with the products. It is similarly clear, evident, and unmistakable to anyone aware of both the '318 patent and of the details of the uses and practices employed in connection with the products that they are especially made or especially adapted for uses and/or practices which constitute infringement of the '318 patent and they do not comprise staple articles or commodities of commerce suitable for substantial non-infringing uses. Acer would necessarily be aware of the details of the methods used and practiced in connection with the products at the time it became aware of the '318 patent, and at that point it would have necessarily become clear and unmistakable to Acer that at least its customers and end users were infringing the '318 patent, that the products are, at a minimum, contributing to such infringement, and that the products are especially made or especially adapted for uses and practices which constitute infringement of the '318 patent, and they are not staple articles or commodities of commerce suitable for substantial non-infringing uses. Since Acer became aware of the '318 patent, it has necessarily possessed such knowledge.

37. On information and belief, Defendants have had at least constructive notice of the '318 Patent pursuant to the Patent Act. Further, it is likely that Defendants became aware of the '318 patent well before the filing of this suit and perhaps at least months ago upon being informed of Cases 2:16-cv-01293 and 2:16-cv-01294, which MyMail filed in this District on November 23, 2016 against Huawei and ZTE, respectively, for activities infringing the '318 patent comprising

methods for obtaining a set of network access information with at least substantial similarities to Defendants' infringing activities. Further, Defendants will at a minimum have actual notice of the '318 patent at least upon being notified of and/or formally served with a copy of this Complaint. At a minimum, this Complaint (and also MyMail's Complaints against Huawei and ZTE, to the extent Defendants have previously been aware of such) notifies Defendants that they have been infringing, and their activities have been accused of infringing, the '318 patent. MyMail's Complaint also recites facts which state a valid and plausible claim of infringement. Defendants' infringement of the '318 patent is clear, unmistakeable, and inexcusable. To the extent Defendants continue their infringing activities comprising obtaining a set of network access information in an infringing manner post-notice, such infringement is necessarily willful and deliberate. Plaintiff believes and contends that Defendants' continuance of their clear and inexcusable infringement of the '318 patent post notice and at a minimum post-suit suit is willful, wanton, malicious, bad-faith, deliberate, consciously wrongful, flagrant, and/or characteristic of a pirate.

38. On account of the foregoing, Plaintiff contends such activities by Defendants qualify this as an egregious case of misconduct beyond typical infringement, entitling Plaintiff to enhanced damages. Thus, Plaintiff requests an award enhanced damages, including treble damages, pursuant to 35 U.S.C. § 284. Plaintiff reserves the right to take discovery regarding Defendants' first actual notice of the '318 Patent, including as related to whether Defendants' infringement is or was willful, and to the extent such notice preceded this suit being filed.

39. Each of Defendants' aforesaid activities have been without authority and/or license from Plaintiff.

DAMAGES

40. By way of their infringing activities, Defendants have caused and continue to cause

Plaintiff to suffer damages, and Plaintiff is entitled to recover from Defendants the damages sustained by Plaintiff as a result of Defendants' 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 under 35 U.S.C. § 284.

41. Defendants' infringement of Plaintiff's rights under the patent-in-suit will continue to damage Plaintiff, causing irreparable harm for which there is no adequate remedy at law, unless enjoined by this Court.

42. Plaintiff also requests that the Court make a finding that this is an exceptional case entitling Plaintiff to recover their attorneys' fees and costs pursuant to 35 U.S.C. § 285.

JURY DEMAND

43. Plaintiff hereby requests a trial by jury pursuant to Rule 38 of the Federal Rules of Civil Procedure on all issues so triable.

PRAYER FOR RELIEF

44. Plaintiff respectfully requests that the Court find in their favor and against Defendants, and that the Court grant Plaintiff the following relief:

A. An adjudication that one or more claims of the patent-in-suit has been directly and/or indirectly infringed, either literally and/or under the doctrine of equivalents, by Defendants;

B. An award to Plaintiff of damages adequate to compensate Plaintiff for Defendants' past infringement, together with pre-judgment and post-judgment interest, 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 grant of preliminary and permanent injunction pursuant to 35 U.S.C. § 283, enjoining

Defendants and all persons, including its officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert or participation therewith, from making, using, offering to sell, or selling in the United States or importing into the United States any methods, systems, or computer readable media that infringe any claim of the patent-in-suit, or contributing to or inducing the same by others from further acts of infringement with respect to the claims of the patent-in-suit;

D. That this Court declare that Defendants' infringement has been, and continues to be, willful, including that Defendants acted to infringe the patent-in-suit despite an objectively high likelihood that its actions constituted infringement of a valid patent and, accordingly, award enhanced damages, including treble damages, pursuant to 35 U.S.C. § 284;

E. That this Court declare this to be an exceptional case and award Plaintiff reasonable attorneys' fees and costs in accordance with 35 U.S.C. § 285; and

F. A judgment and order requiring Defendants to pay Plaintiff their damages, costs, expenses, fees, and prejudgment and post-judgment interest for Defendants' infringement of the patent-in-suit as provided under 35 U.S.C. §§ 284 and/or 285; and

G. Any and all further relief for which Plaintiff may show itself justly entitled that this Court deems just and proper.

April 3, 2017

Respectfully submitted,

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