

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

QFO Labs, Inc.

Civil Action No. 0:16:cv-03443-JRT-HB

Plaintiff,

v.

Parrot S.A., Parrot Drones, S.A.S.,
and Parrot, Inc.

Defendants.

AMENDED COMPLAINT AND JURY DEMAND

Plaintiff QFO Labs Inc. ("Plaintiff"/"QFO") makes and files this Amended Complaint for Patent Infringement against Defendants Parrot S.A., Parrot Drones S.A.S., and Parrot Inc. (collectively "Defendants"/"Parrot"). In support of this Complaint, Plaintiff states and alleges as follows:

THE PARTIES

1. Plaintiff QFO is a Delaware Corporation, with its principal place of business located at 10149 Johnson Avenue South, Bloomington, Minnesota, 55437.

2. On information and belief, Defendant Parrot S.A. is a public limited company (*société anonyme*) organized and existing under the laws of the Republic of France, with its principal place of business located at 174, quai de Jemmapes

75010 Paris, France.

3. On information and belief, Defendant Parrot Drones S.A.S. is a simplified joint stock company (*société par actions simplifiée*) organized and existing under the laws of the Republic of France, with its principal place of business located at 174, quai de Jemmapes 75010 Paris, France, and is a wholly-owned subsidiary of Parrot S.A.

4. On information and belief, Defendant Parrot Inc. is a New York corporation with a principal place of business at 535 Mission Ste. 2602, San Francisco, CA 94105 and Defendant Parrot, Inc. is a wholly-owned subsidiary of Parrot Drones S.A.S.

NATURE OF THE ACTION

5. This is an action for patent infringement of three patents, United States Patent Nos. 7,931,239 (hereinafter the “‘239 Patent”), 9,073,532 (hereinafter the “‘532 Patent”), and 9,645,580 (hereinafter the “‘580 Patent”) pursuant to United States Patent Act, 35 U.S.C. § 1 *et seq.*, including at least 35 U.S.C. §§271(a), 271(b) and 281.

JURISDICTION AND VENUE

6. This Court has original and exclusive jurisdiction over the subject matter of this action under at least 28 U.S.C. § 1338(a) and 28 U.S.C. § 1331 because this action arises under the United States Patent Act, 35 U.S.C. § 1 *et seq.*

7. Venue is proper in this District under 28 U.S.C. §§ 1391(b), (c) and 1400(b). On information and belief, each of the Defendants have committed or induced acts of infringement, and/or a substantial part of the events, omissions or infringement giving rise to Plaintiff's claims have occurred in this District.

8. Each of the Defendants is subject to this Court's specific personal jurisdiction pursuant to the Due Process Clause of the United States Constitution and Minnesota's Long Arm Statute, Minn. Stat. § 543.19. On information and belief, each Defendants has transacted business in the State of Minnesota, actively infringed and/or induced infringement in Minnesota, and/or has established regular and systematic business contacts with the State of Minnesota and continue to conduct such business in the State through the sale of Defendants' drone products.

FACTUAL BACKGROUND

A. The '239 Patent.

9. On April 26, 2011, the United States Patent and Trademark Office duly and lawfully issued the '239 Patent, entitled "HOMEOSTATIC FLYING HOVERCRAFT," identifying Brad Pedersen and Peter Spirov as inventors. A true and correct copy of the '239 Patent is attached hereto as **Exhibit A**, which is incorporated by reference as if fully set forth herein.

10. All rights, title and interest in and to the '239 Patent were assigned

by the inventors by assignments recorded to Qaxu Technologies, Inc., which in turn was assigned to Plaintiff by an assignment recorded on January 19, 2013. Plaintiff is the sole owner of the '239 Patent, and has acquired all rights related to the '239 Patent, including the right to sue for Defendants' infringing acts.

11. The '239 Patent is directed to a homeostatic flying hovercraft that preferably utilizes two pairs of counter-rotating motors that drive corresponding blades to generate lift and utilizes a homeostatic control system to create a remote control flying craft, or drone, that is easily controlled. The homeostatic control system controls the flying craft with radio signals from a handheld controller that operates in what is referred to as the "tilt-to-fly mode."¹

B. The '532 Patent.

12. On July 7, 2015, the United States Patent and Trademark Office duly and lawfully issued the '532 Patent, entitled "HOMEOSTATIC FLYING HOVERCRAFT," identifying Brad Pedersen and Peter Spirov as inventors. A true and correct copy of the '532 Patent is attached hereto as **Exhibit B**, which is incorporated by reference as if fully set forth herein.

13. All rights, title and interest in and to the '532 Patent were assigned by the inventors by assignments recorded to Qaxu Technologies, Inc., which in

¹ This description of the '239 Patent is intended to provide a general explanation of the patent at issue. It is not intended to be limiting and nothing herein should be construed as a legal description of the '239 Patent's claims or limitations.

turn was assigned to Plaintiff by an assignment recorded on January 19, 2013. Plaintiff is the sole owner of the '532 Patent, and has been the sole owner of the '532 Patent throughout the period of Defendants' infringing acts.

14. The '532 Patent is a continuation of the '239 Patent and is directed to a homeostatic flying hovercraft that preferably utilizes at least two pairs of counter-rotating motors that drive corresponding blades to generate lift and utilizes a homeostatic control system to create a remote control flying craft, or drone, that is easily controlled. The homeostatic control system controls the flying craft with radio signals from a handheld controller that operates in what is referred to as the "tilt-to-fly mode."² The handheld controller can be implemented as an application which may, for example, be downloaded to an Apple® phone. In operation, the flying craft is controlled by the application and it mimics the orientation of the handheld phone.

C. The '580 Patent.

15. On September 21, 2016, QFO filed a prioritized patent examination under 37 CFR § 1.102(e) for U.S. Patent Application No. 15/272,414 entitled ""RADIO-CONTROLLED FLYING CRAFT."

16. On May 9, 2017, the United States Patent and Trademark Office duly

² This description of the '532 Patent is intended to provide a general explanation of the patent at issue. It is not intended to be limiting and nothing herein should be construed as a legal description of the '532 Patent's claims or limitations.

and lawfully issued the '580 Patent, entitled "RADIO-CONTROLLED FLYING CRAFT," identifying Brad Pedersen and Peter Spirov as inventors. A true and correct copy of the '580 Patent is attached hereto as **Exhibit C** which is incorporated by reference as if fully set forth herein.

17. All rights, title and interest in and to the '580 Patent belong to Plaintiff. Plaintiff is the sole owner of the '580 Patent, and has been the sole owner of the '580 Patent throughout the period of Defendants' infringing acts.

18. The '580 Patent is a continuation of the '239 Patent and the '532 Patent and is directed to a homeostatic flying hovercraft and a radio controlled flying saucer toy employing the principals of a homeostatic flying hovercraft that preferably utilizes at least two pairs of counter-rotating motors that drive corresponding blades to generate lift and utilizes a homeostatic control system to create a remote control flying craft, or drone, that is easily controlled. The homeostatic control system controls the flying craft with radio signals in response to software instructions configured to cause a control system in a handheld controller to operate in what is referred to as the "tilt-to-fly mode."³ The software instruction may, for example, be downloaded to an Apple® phone. In operation, the flying craft is controlled by the application and it mimics the

³ This description of the '580 Patent is intended to provide a general explanation of the patent at issue. It is not intended to be limiting and nothing herein should be construed as a legal description of the '580 Patent's claims or limitations.

orientation of the handheld phone.

D. Defendants' Infringing Conduct.

19. On information and belief, Defendants, and each of them, make and sell various technological products, including remote control flying craft, or drones, and software applications for download to a handheld device, such as a smart phone, that are configured to control such drones which may be categorized into two drone classes: (1) full-size drones; and (2) mini-drones (hereinafter the "Infringing Drone Products.")

20. The drones that comprise Defendants' full-sized drones include, without limitation, the Parrot AR.Drone 2.0 and the Parrot Bebop 2 Drone, and the related variations thereof, among others. (See <https://www.parrot.com/us/drones#see-also> (accessed Oct. 10, 2016.))

21. The drones that comprise Defendants' mini-sized drones include, without limitation, the Parrot Mambo Drone, the Parrot Jumping Drone, the Parrot Hydrofoil Drone, and the Parrot Airborne Drones, and the related variations thereof, among others. (See <https://www.parrot.com/us/Minidrones#see-also> (accessed Oct. 10, 2016.))

22. The downloadable applications that comprise the software instructions for the control system inside a handheld device, such as a smart phone, include, without limitation, the Parrot AR.FreeFlight, AR.FreeFlight 2.0,

and FreeFlight Pro, and the related variations thereof, among others. (*See Apple App Store – FreeFlight Pro* (accessed Mar. 24, 2017)).

23. On information and belief, Defendants' Infringing Drone Products incorporate important and valuable technical innovations embodied in the '239 Patent, including, without limitation, the tilt-to-fly mode for operating the drone. Attached hereto as **Exhibit D** is a claim chart analyzing how each element of Claims 1, 4, 6 and 8 of Plaintiff's '239 Patent is found in Parrot's AR.Drone, and which elements are also found within Defendants' other Infringing Drone Products similar to the AR.Drone and which likewise infringe Plaintiff's '239 Patent. **Exhibit D** is incorporated by reference as if fully set forth herein.

24. On information and belief, Defendants' Infringing Drone Products incorporate important and valuable technical innovations embodied in the '532 Patent including, without limitation, the tilt-to-fly mode for operating the drone. Attached hereto as **Exhibit E** is a claim chart analyzing how each element of Claims 1, 6, 21 and 24 of Plaintiff's '532 Patent is found in Parrot's AR.Drone, and which elements are found within Defendants' Infringing Drone Products similar to the AR.Drone and which likewise infringe Plaintiff's '532 Patent. **Exhibit E** is incorporated by reference as if fully set forth herein.

25. On information and belief, Defendants' Infringing Drone Products incorporate important and valuable technical innovations embodied in the '580

Patent including, without limitation, the tilt-to-fly mode for operating the drone. Attached hereto as **Exhibit F** is a claim chart analyzing how each element of Claims 1, 2, 5, 7, 8, 11, 13, 14 and 15 of Plaintiff's '580 Patent is found in Parrot's AR.Drone, and which elements are found within Defendants' Infringing Drone Products similar to the AR.Drone and which likewise infringe Plaintiff's '580 Patent. **Exhibit F** is incorporated by reference as if fully set forth herein.

26. By manufacturing, using, selling, or offering for sale or importing the Infringing Drone Products, which embody Plaintiff's rights in the '239 Patent, the '532 Patent, and the '580 Patent, or by inducing others to so act, Defendants have directly infringed, continue to infringe, and/or have induced others to infringe Plaintiff's intellectual property rights and, in particular, the '239 Patent, the '532 Patent, and the '580 Patent. (See <https://www.youtube.com/watch?v=QdFsd9R3vJ8> (Accessed Oct. 10, 2016), which link contains a video demonstrating the tilt-to-fly mode of the Infringing Drone Products and, specifically, how Defendants' AR.Drone 2.0, permits operation of those Products that directly infringe Claims 1, 4, 6 and 8 of the '239 Patent, Claims 1, 6, 21 and 24 of the '532 Patent and Claims 1, 2, 5, 7, 8, 11, 13, 14 and 15 of the '580 Patent; see also **Exhibit G**, "Parrot Bebop Drone User Guide," a true and correct copy of which is attached hereto and incorporated by reference as if fully set forth herein.)

27. Additionally, by manufacturing, using, selling, or offering for sale or importing the Infringing Drone Products, which embody Plaintiff's rights in the '239 Patent, the '532 Patent, and the '580 Patent, or by inducing others to so act, Defendants have profited from the sale of its Infringing Drone Products without Plaintiff's authorization and without compensating Plaintiff for the exploitation of Plaintiffs' intellectual property rights.

28. On information and belief, Defendants knew of the '239 Patent at least as early as November 2014.

29. On December 2, 2014, Defendants were specifically informed of the '239 Patent by Plaintiff and were provided actual notice of Defendants' infringement of the '239 Patent on that date by Plaintiff's transmission of the Claim Chart attached as **Exhibit H**.

30. In or about June 2015, Defendants were specifically informed of Plaintiff's continuation application, which continuation was allowed and which subsequently issued as the '532 Patent, and were provided actual notice of Defendants' infringement of the '532 Patent at least as early as April, 2016.

31. On August 8, 2016, Defendants filed a petition for *inter partes* review pursuant to 35 U.S.C. § 311 *et seq.* against both the '239 Patent and the '532 Patent asserting that all of the claims of each patent are unpatentable.

32. On August 8, 2016, Defendants also filed a complaint for declaratory

judgment action against Plaintiff in the United States District Court for the District of Delaware alleging that the '239 Patent and the '532 Patent are invalid, and are not infringed by any of Defendants' drone products.

33. On February 16, 2017, the Patent Trial and Appeal Board denied institution of an *inter partes* review trial with respect to claims 1-9 of the '239 Patent and claims 1-7 and 15-24 of the '532 Patent. An *inter partes* trial was instituted on one ground of obviousness for claim 10 of the '239 Patent and on one ground of obviousness for claims 8-14 of the '532 Patent. Neither claim 10 of the '239 Patent, nor claims 8-14 of the '532 Patent, are being asserted in this Complaint.

34. Notwithstanding their knowledge of the '239 Patent and the '532 Patent, Defendants, and each of them, have, on information and belief, continued their infringing conduct by manufacturing, using, selling, offering for sale or importing, or inducing others to use, manufacture, sell, or offer for sale or importation, the Infringing Drone Products.

35. On information and belief, Defendants knew of Plaintiff's claims relating to the '580 Patent at least as early as March 27, 2017 when Plaintiff provided Defendants' counsel with a copy of the claims to be issued along with a copy of the Reasons for Allowance.

36. Notwithstanding their knowledge of the claims to be issued as the

'580 Patent, Defendants, and each of them, have, on information and belief, continued their infringing conduct by manufacturing, using, selling, offering for sale or importing, or inducing others to use, manufacture, sell, or offer for sale or importation, the Infringing Drone Products.

COUNT I
INFRINGEMENT OF U.S. PATENT NO. 7,931,239

37. Plaintiff restates and realleges the foregoing paragraphs in this Complaint as though fully set forth in this Count.

38. On information and belief, Defendants, and each of them, have infringed and continues to infringe the '239 Patent by, on information and belief, making, selling, offering for sale and/or using within the United States, and/or importing into the United States, including within this District, its Infringing Drone Products, which embody the inventions claimed in claims 1, 4, 6 and 8 of the '239 Patent, at least as established in the claim chart attached as **Exhibit D**, and which comprise acts of infringement under 35 U.S.C. § 271(a).

39. On information and belief, Defendants, and each of them, have sold and/or offered for sale these items, and are continuing to do so, specifically intending to actively encourage third parties to make, use, and/or sell the infringing devices within the United States in a manner that Defendants know or reasonably should know to be infringing.

40. On information and belief, Defendants, and each of them, have

induced infringement of Claims 1, 4, 6 and 8 of the '239 Patent by inducing and encouraging third parties to sell, make and/or use infringing products, which actions comprise acts of infringement under 35 U.S.C. § 271(b). That conduct by Defendant includes, without limitation, inducing Defendant's drone customers to download an application from the Apple® Store for an Apple® phone or from the Google® Store for an Android® phone, which application can be used to control Defendants' Infringing Drone Products in a manner consistent with at least the limitations of Claims 1, 4, 6 and 8 of Plaintiff's '239 Patent. The software download is used to operate the Infringing Drone Products in a tilt-to-fly mode in which an orientation of the body of the flying craft mimics an orientation of the phone operating as a handheld controller as claimed in Claims 1, 4, 6 and 8 of the '239 Patent.

41. On information and belief, Defendants had knowledge of the '239 Patent, including knowledge of the claims, since at least December 2, 2014.

42. On information and belief, Defendants have acted and/or are continuing to act despite an objectively high likelihood that its actions constituted infringement of a valid patent, and knew or should have known of that objectively high risk at least as of December 2, 2014.

43. On information and belief, Defendants' infringement of the '239 Patent has been and continues to be willful and deliberate, in disregard of

Plaintiff's rights, entitling Plaintiff to enhanced damages under 35 U.S.C. § 284 and reasonable attorneys' fees and costs.

44. As a result of Defendant's infringement of the '239 Patent, Plaintiff has suffered damages and is entitled to a judgment in an amount adequate to compensate for Defendant's infringement, but in no event less than a reasonable royalty for the use made of Plaintiff's inventions by Defendant, together with interest and costs as fixed by the Court.

45. Defendants' acts of infringement and/or inducement of infringement have caused and will continue to cause irreparable harm to Plaintiff, thus entitling Plaintiff to injunctive relief enjoining Defendants and its agents, servants, employees, representatives, affiliates, and all others acting on in active concert therewith from infringing the '239 Patent.

COUNT II
INFRINGEMENT OF U.S. PATENT NO. 9,073,532

46. Plaintiff restates and realleges the foregoing paragraphs in this Complaint as though fully set forth in this Count.

47. On information and belief, Defendants, and each of them, have infringed and continue to infringe the '532 Patent by making, selling, offering for sale and/or using within the United States, and/or importing into the United States, including within this District, its Infringing Drone Products, which embody the inventions claimed in Claims 1, 6, 21, and 24 of the '532 Patent as

established in the claim chart attached as **Exhibit E** and which comprise acts of infringement under 35 U.S.C. § 271(a).

48. On information and belief, Defendants, and each of them, have sold and/or offered for sale these items, and are continuing to do so, specifically intending to actively encourage third parties to make, use, and/or sell the infringing devices within the United States in a manner that Defendants know to be infringing.

49. On information and belief, Defendants, and each of them, have induced infringement of Claims 1, 6, 21, and 24 of the '532 Patent by inducing and encouraging third parties to sell, make and/or use infringing products, which actions comprise acts of infringement under 35 U.S.C. § 271(b). That conduct by Defendant includes, without limitation, inducing Defendant's drone customers to download an application from the Apple® Store for an Apple® phone or from the Google® Store for an Android® phone, which application can be used to control Defendants' Infringing Drone Products, such as the Parrot AR.Drone 2.0, in a manner consistent with at least the limitations of Claims 1, 6, 21, and 24 of Plaintiff's '532 Patent. The software download is used to operate the Infringing Drone Products in a tilt-to-fly mode in which an orientation of the body of the flying craft mimics an orientation of the phone operating as a handheld controller as claimed in Claims 1, 6, 21, and 24 of the '532 Patent.

50. On information and belief, Defendants had knowledge of the '532 Patent, including knowledge of the claims, since at least as early as July 7, 2015, which was the issue date of the '532 Patent.

51. On information and belief, Defendants have acted and/or are continuing to act despite an objectively high likelihood that its actions constituted infringement of a valid patent, and knew or should have known of that objectively high risk since at least as early as July 7, 2015, which was the issue date of the '532 Patent.

52. On information and belief, Defendants' infringement of the '532 Patent has been and continues to be willful and deliberate, in disregard of Plaintiff's rights, entitling Plaintiff to enhanced damages under 35 U.S.C. § 284 and reasonable attorneys' fees and costs.

53. As a result of Defendant's infringement of the '532 Patent, Plaintiff has suffered damages and is entitled to a judgment in an amount adequate to compensate for Defendant's infringement, but in no event less than a reasonable royalty for the use made of Plaintiff's inventions by Defendant, together with interest and costs as fixed by the Court.

54. Defendants' acts of infringement and/or inducement of infringement have also caused and will continue to cause irreparable harm to Plaintiff, thus entitling Plaintiff to injunctive relief enjoining Defendants and its

agents, servants, employees, representatives, affiliates, and all others acting on in active concert therewith from infringing the '532 Patent.

**COUNT III
INFRINGEMENT OF U.S. PATENT NO. 9,645,580**

55. Plaintiff restates and realleges the foregoing paragraphs in this Complaint as though fully set forth in this Count.

56. On information and belief, Defendants, and each of them, have infringed and continue to infringe the '580 Patent by making, selling, offering for sale and/or using within the United States, and/or importing into the United States, including within this District, its Infringing Drone Products, which embody the inventions claimed in at least Claims 11, 2, 5, 7, 8, 11, 13, 14 and 15 of the '580 Patent as established in the claim chart attached as **Exhibit F** and which comprise acts of infringement under 35 U.S.C. § 271(a).

57. On information and belief, Defendants, and each of them, have sold and/or offered for sale these items, and are continuing to do so, specifically intending to actively encourage third parties to make, use, and/or sell the infringing devices within the United States in a manner that Defendants know to be infringing.

58. On information and belief, Defendants, and each of them, have induced infringement of at least Claims 1, 2, 5, 7, 8, 11, 13, 14 and 15 of the '580 Patent by inducing and encouraging third parties to sell, make and/or use

infringing products, which actions comprise acts of infringement under 35 U.S.C. § 271(b). That conduct by Defendant includes, without limitation, inducing Defendant's drone customers to download an application from the Apple® Store for an Apple® phone or from the Google® Store for an Android® phone, which application can be used to control Defendants' Infringing Drone Products, such as the Parrot AR.Drone 2.0, in a manner consistent with at least the limitations of Claims 1, 2, 5, 7, 8, 11, 13, 14 and 15 of Plaintiff's '580 Patent. The software download is used to operate the Infringing Drone Products in a tilt-to-fly mode in which an orientation of the body of the flying craft mimics an orientation of the phone operating as a handheld controller as claimed in the '580 Patent.

59. On information and belief, Defendants had knowledge of the '580 Patent, including knowledge of the claims, since at least as early as May 9, 2017, which was the issue date of the '580 Patent.

60. On information and belief, Defendants have acted and/or are continuing to act despite an objectively high likelihood that its actions constituted infringement of a valid patent, and knew or should have known of that objectively high risk since at least as early as May 9, 2017, which was the issue date of the '580 Patent.

61. On information and belief, Defendants' infringement of the '580 Patent has been and continues to be willful and deliberate, in disregard of

Plaintiff's rights, entitling Plaintiff to enhanced damages under 35 U.S.C. § 284 and reasonable attorneys' fees and costs.

62. As a result of Defendant's infringement of the '580 Patent, Plaintiff has suffered damages and is entitled to a judgment in an amount adequate to compensate for Defendant's infringement, but in no event less than a reasonable royalty for the use made of Plaintiff's inventions by Defendant, together with interest and costs as fixed by the Court.

63. Defendants' acts of infringement and/or inducement of infringement have also caused and will continue to cause irreparable harm to Plaintiff, thus entitling Plaintiff to injunctive relief enjoining Defendants and its agents, servants, employees, representatives, affiliates, and all others acting on in active concert therewith from infringing the '580 Patent.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter Judgment against Defendants as follows:

1. For a judgment in favor of Plaintiff and against Defendants determining that Defendants have infringed the '239 Patent, the '532 Patent and the '580 Patent, and that the claims asserted for those patents are valid;
2. For a judgment in favor of Plaintiff and against Defendants awarding Plaintiff damages in accordance with 35 U.S.C. § 284, including all

damages adequate to compensate Plaintiff for Defendants' infringement, in no event less than a reasonable royalty, such damages to be determined by a jury, and additionally, ordering an accounting sufficient to adequately compensate Plaintiff, and that such damages be awarded to Plaintiff, together with interest, including prejudgment and post-judgment interest, and costs;

3. For a judgment in favor of Plaintiff and against Defendant determining that Defendants have willfully and deliberately committed acts of patent infringement, and awarding Plaintiff enhanced damages in light of Defendants' willful infringement pursuant to 35 U.S.C. § 284;

4. For a judgment in favor of Plaintiff and against Defendant determining that this is an "exceptional case" pursuant to 35 U.S.C. § 285 and awarding Plaintiff the reasonable legal fees, costs and expenses that Plaintiff has incurred in prosecuting this action;

5. For a Judgment in favor of Plaintiff and against Defendant permanently enjoining Defendants and its officers, directors, agents servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert therewith from infringement, inducing the infringement of, or contributing to the infringement of the '239 Patent, the '532 Patent and the '580 Patent, or such other equitable relief the Court determines is warranted;

6. Any and all other relief, at law or equity, as the Court deems just

and proper.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury of all issue so triable by right under Rule 38 of the Federal Rules of Civil Procedure.

LOMMEN ABDO, P.A.

Dated: May 15, 2017

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