UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TECHNO VIEW IP, INC.,	)	
	)	
Plaintiff,	)	
	)	Civil Case No. _____
v.	)	
	)	
SONY INTERACTIVE ENTERTAINMENT LLC and SONY CORPORATION OF AMERICA,	)	**JURY TRIAL DEMANDED**
	)	
Defendants.	)	

_____

COMPLAINT

Plaintiff Techno View IP, Inc. brings this action against Defendants Sony Interactive Entertainment LLC and Sony Corporation of America (collectively "Sony"), and alleges the following:

THE PARTIES

1. Plaintiff Techno View IP, Inc. ("TVIP", also known as "TechnoView IP Inc.") is a corporation organized and doing business under the laws of California.

2. Plaintiff TVIP is the exclusive licensee of U.S. Patents Nos. 7,666,096 and 8,206,218 (collectively, the "Asserted Patents") and has all substantial rights and interest to pursue this lawsuit based on infringement of the Asserted Patents.

3. Defendant Sony Interactive Entertainment LLC is a limited liability company organized and doing business under the laws of the State of California.

4. Upon information and belief, Defendant Sony Interactive Entertainment LLC is the corporate successor of Sony Computer Entertainment Inc. (a Delaware corporation).

5. Defendant Sony Interactive Entertainment LLC may be served with process by

service upon its registered agent: CSC-Lawyers Incorporating Service, 2207 Bridgepointe Pkwy, San Mateo, CA 94404.

6. Upon information and belief, Defendant Sony Interactive Entertainment LLC has its principal place of business located at 2207 Bridgepointe Pkwy, San Mateo, CA 94404.

7. Defendant Sony Corporation of America is a New York corporation with its principal place of business at 550 Madison Ave., New York, NY 10022.

8. Defendant Sony Corporation of America is registered to do business as a foreign corporation in the State of Delaware.

9. Defendant Sony Corporation of America may be served with process by service upon its registered agent: The Corporation Trust Company, 1209 North Orange St., Wilmington, DE 19801.

10. Upon information and belief, Defendant Sony Corporation of America is a wholly owned subsidiary of Sony Corporation and serves as the United States headquarters for Sony Corporation, which is a Japanese foreign corporation.

JURISDICTION AND VENUE

11. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. § 271, *et seq*.

12. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

13. This Court has personal jurisdiction over Defendant Sony Corporation of America at least because it is a Delaware corporation.

14. This Court has personal jurisdiction over Defendant Sony Interactive Entertainment LLC at least because Defendant Sony Interactive Entertainment LLC conducts

regular and substantial business related to its sales of computer hardware and systems within this Federal District, upon Plaintiff's information and belief.

15. Venue in this district is proper pursuant to 28 U.S.C. §§ 1391(c) and (d), and 1400(b).

BACKGROUND

16. This suit alleges infringement by Defendants of Plaintiff TVIP's exclusive license and all substantial rights to U.S. Patent No. 7,666,096 ("the '096 Patent") and U.S. Patent No. 8,206,218 ("the '218 Patent"), jointly "the Asserted Patents."

17. The '096 Patent is entitled "METHOD FOR GENERATING THE LEFT AND RIGHT PERSPECTIVES IN A 3D VIDEOGAME." The '096 Patent describes systems and methods to dynamically process left and right video images in a stereoscopic videogame environment.

18. The '218 is entitled "3D VIDEOGAME SYSTEM." The '218 Patent describes methods and systems for displaying three-dimensional images in a videogame system.

19. Plaintiff TVIP is also the exclusive licensee and substantial rights holder of U.S. Patent No. 9,503,742 ("the '742 Patent"), entitled "SYSTEM AND METHOD FOR DECODING 3D STEREOSCOPIC DIGITAL VIDEO." The '742 Patent describes a system for displaying stereoscopic digital videos to a user.

20. Patent '096 is a continuation of an application originally filed in Mexico as Patent Cooperation Treaty ("PCT") PCT/MX2003/00112 on Dec. 19, 2003.

21. The '218 Patent is a continuation of the '096 Patent.

22. The '742 Patent is a continuation of US Patent Application No. 11/510,262, filed on Aug. 25, 2006, which is a continuation of Application No. PCT/MX2004/000012, filed on

Feb. 27, 2004.

23. Manuel Rafael Gutierrez Novelo is the inventor of the technology and CEO of TDVision Systems, Inc. (Irvine, CA), hereinafter "TDVision." ImmersiON-VRelia USA (Redwood City, CA) operates as a subsidiary of TDVision, hereinafter "ImmersiON-VRelia." Products incorporating the patented technologies are manufactured by ImmersiON-VRelia through subsidiaries and contract manufacturers in USA, Europe, Mexico, and China. These products include different types of head-mounted displays for consumers. One product even received a "2016 Best of CES Award" as the best designed virtual reality ("VR") headset.

24. Mr. Novelo, the inventor of the technology and the sole inventor listed on the '096, '218, and '742 Patents, is CEO of TDVision and ImmersiON-VRelia, as well as CEO of the various subsidiaries in Europe, Mexico and China responsible for manufacturing the products. Mr. Novelo also invented and patented a related technology known as the "2D plus Delta Codec." In 2008, *prior to the issuance* of his patents, Mr. Novelo voluntarily declared the pending patent applications as essential to the *proposed 3D encoding section of the H.264 Standard* promulgated by the International Telecommunications Union ("ITU"), the International Standards Organization (ISO), and the International Electrotechnical Commission ("IEC"). His declaration, made public at http://www.itu.int/net4/ipr/details_ps.aspx?sector=ITU-T&id=J180-01, stated that TDVision "… is prepared to grant a license to an unrestricted number of applicants on a worldwide, non-discriminatory basis and on reasonable terms and conditions …." Mr. Novelo did not insist on reciprocal cross-licenses as a condition for a license.

25. This technology was subsequently adopted by the ITU and renamed the MultiView Codec ("MVC") as part of its H.264 and ISO/IEC 14496-10 specifications. The 2010 dated release of the corresponding specification lists TDVision's voluntary declaration on page

410.

26. The MVC (or "2D+Delta Codec") functions by taking advantage of redundancies between multiple video frames or image views. In December 2009, the Blu-ray Disc Association (BDA) announced the incorporation of MVC into the standard specification for 3D Blu-ray movies and 3D Blu-ray players and recorders worldwide. This is significant because the industry wanted assurance that a new 3D disc would play a 2D version of the movie, if inserted into an older 2D Blu-ray player or if used in a 3D player connected to a 2D display. The BDA conducted independent tests and determined that TDVision had the only solution that maintained full Blu-Ray resolution while allowing 3D discs to function in a 2D player.

27. The prestigious 2013 Lumiere™ Award from the Advanced Imaging Society / International 3D Society was awarded to TDVision and Mr. Novelo for the development of the 2D + Delta Codec (or "MVC"). It should be noted that Defendants were founding members of the Advanced Imaging Society, according to the society website (http://www.advancedimagingsociety.com). One of the stated missions for the organization it to "Recognize impact and innovation in creative and technological achievement by a body of their peers." In 2015, the same MVC technology was made an extension to the new High Efficiency Video Coding ("HEVC") specification, also known as H.265.

28. TVIP has agreed to honor TDVision's declaration by licensing any claims that read on the H.264 and ISO/IEC 14496-10 specifications on fair, reasonable, and non-discriminatory ("FRAND") terms. However, and as the Court in "In re Innovatio" has previously established, a defendant has the burden to prove which claims of a patent, if any, are essential to the relevant standard [see *In re Innovatio IP Ventures, LLC Patent Litigation* (MDL), 2013 WL 3874042 (N. D. Ill. July 26, 2013)], and claims not proven essential are not subject to

FRAND terms.

29. As often happens in patent prosecution at the US Patent Office prior to issuance, claims are modified or amended to meet requirements from the patent examiners. With respect to TDVision's patents, TVIP performed an analysis of all the US patent claims (as well as the foreign patent claims). TVIP has determined that Claim 1 of the '742 Patent reads on the H.264 and ISO/IEC 14496-10 specifications. TVIP has also determined that various TDVision patents filed in foreign jurisdictions contain claims that read on the H.264 and ISO/IEC 14496-10 specifications, including issued patents in China, Korea, Japan, Singapore, and Hong Kong.

30. In this Complaint, the '742 Patent is not being asserted. However, TVIP reserves the right to amend this Complaint to assert the infringement of the '742 Patent. TVIP believes that the '742 Patent is infringed, and therefore, TVIP is currently making a separate FRAND offer to Defendants to license that claim (there is only one claim in US Patent '742) and all of the foreign counterparts that also read on the H.264 and ISO/IEC 14496-10 specifications. If such FRAND offer is accepted, the '742 Patent and its foreign counterparts will not be asserted against the Defendants in the US or the relevant foreign jurisdictions. The FRAND offer is not contingent upon the settlement or outcome of this Complaint. Rather, it is an unlinked, separate matter that also covers foreign jurisdictions. A reciprocal cross-license is not requested or required. The FRAND offer to Defendants is non-discriminatory. Identical offers are made to both large and small manufacturers. TVIP believes that this structure meets with the intent of TDVision when the original patent declaration was made to ITU/ISO/IEC.

31. In terms of a broad overview, the '096 Patent describes and claims systems and methods for creating and controlling a 3-dimensional image in a videogame system that may be used with a head-mounted display ("HMD"), such as the Defendants' PlayStation 4 and

PlayStation VR headset products. The patented technologies perform many functions including, but not limited to, the conversion of 2-dimensional images to 3-dimensional images; native creation of 3-dimensional images; faster execution of gaming software through data compression of redundant images; faster data transmission of virtual image data from a PC or other device external to the HMD; more effective use of HMD-related imaging buffers that temporally hold frames of video data; display of the 3-dimensional images on a single 3D display device or multiple 2D display devices (typically, one for each eye); dynamic control of image convergence between left and right eye-view; and, the related processing. The patented technologies provide for systems and methods to facilitate the efficient application of the various camera angles necessary for the effective display of images in a manner that creates a realistic 3-dimensional perspective to the user while minimizing the potential for nausea, disorientation, and dizziness, which are common side-effects associated with the use of virtual reality headsets, including those manufactured and sold by the Defendants.

32. In terms of a broad overview, the ‘218 Patent describes and claims methods and systems for displaying 3-dimensional images in a videogame system that may be used in a head-mounted display (“HMD”), such as the Defendants’ PlayStation 4 and PlayStation VR products. The patented technologies perform many functions that are related to the ‘096 Patent above, including, but not limited to, calculating position coordinates of first and second eye views within a videogame; calculating first and second eye views of virtual objects within a videogame; calculating coordinates of a camera view position in a videogame; and displaying first and second eye views to a user to provide a 3-dimensional image. The patented technologies have many applications including, but not limited to, reducing the nausea and dizziness experienced by some users of VR headsets.

CAUSES OF ACTION

COUNT I

INFRINGEMENT OF U.S. PATENT 7,666,096 BY SONY PLAYSTATION 4

33. On February 23, 2010, U.S. Patent No. 7,666,096 was issued to Manuel Rafael Gutierrez Novelo as the sole inventor thereof. A true and correct copy of the '096 Patent, which is entitled "Method for Generating the Left and Right Perspective in a 3D Videogame" is attached hereto as Exhibit "A."

34. Defendants have previously infringed, and do continue to infringe, the '096 patent in violation of 35 U.S.C. § 271, including Claims 1 through 19.

35. Purely as an example to place Defendants on notice of at least one exemplary product that infringes at least one claim of the '096 Patent, and without limiting further allegations of additional claims infringed by additional products of Defendants, Plaintiff TVIP identifies Claim 16 of the '096 Patent as an exemplary claim that was and is infringed by Defendants. Claim 16 is directed towards a videogame system that comprises a processor capable of running specific instructions. The Sony PlayStation 4, both as an independent product, and in combination with the PlayStation VR headset (together the "Sony PS System"), function as a videogame system as described in Claim 16 of the '096 Patent. Defendants make, use, offer to sell, and sell their Sony PS System through its U.S. website and third-party retail outlets. Defendants' exemplary product, the Sony PlayStation4 ("PS4"), infringes Claim 16 in at least the following exemplary manner:

a) The Sony PS4 product comprises at least "a videogame system comprising a processor configured to run instructions that when executed perform a method comprising the steps of" Claim 16 of the '096 Patent, in that the PS4 product incorporates and uses at least an

AMD "Jaguar" core processor that is configured to run such instructions utilizing an AMD Radeon Graphics processing unit ("GPU"). As an example, for purposes of illustration, Defendants' PS4 executes instructions that have been compiled according to Defendants' specifications from the Microsoft programming language "DirectX" (including at least "DirectX 11.1") and its subset "Direct3D."

b) The Sony PS4 "open[s] first and second buffers in a memory of the videogame system," as is required by Claim 16, such as through use of relevant commands in Microsoft's DirectX application programming interfaces (APIs), including at least the creation and use of a SwapChain that renders stereo content for left and right render-target views. [*For purposes of illustration only, creation of a 3-dimensional perception may be envisioned as a series of 2-dimensional images or frames that are displayed to the viewer. In order to create a 3-dimensional effect, different frames may be shown to the left eye and the right eye. The frame images will usually have an offset to allow for stereo-vision (i.e., each eye sees the same image from a slightly different angle to create a 3-dimensional effect). For purposes of illustration only, typically the first frame of a video is displayed to the first eye only after it has been rendered (or created) in a first memory location; while the first frame data is being transferred to the display for the first eye to view, a second video frame is rendered to a second memory location. After the first frame has been displayed, the second frame data from the second memory location is transmitted for display for the second eye to view. While the second frame data is being transferred for display to the second eye, the next frame is being queued up in the first memory location. The long string of frames, as is typically found in any virtual reality videogame or 3D movie, swaps back and forth between the first and second memory buffers for display to the left and right eyes. This is commonly referred to as a "SwapChain."*

Programmers often also use more sophisticated variations of this process to create enhancements and improved system performance.]

c) The Sony PS4 "stor[es] a videogame image in the first buffer," as required by Claim 16, such as at least through the creation of a left, or first, eye view buffer using Microsoft's DirectX APIs.

d) The Sony PS4 "determin[es] when the videogame image is a two-dimensional image or a three-dimensional image," such as through the use of the Direct3D stereoscopic 3D commands that retrieve Boolean logic values indicating whether the videogame system is two-dimensional or stereo-enabled, including at least through the "GetStereoEnabledStatus()" function call (i.e., determine whether the image is two dimensional or three-dimensional). [*The use of the term "stereo" means 3-dimensional in a video or optical context; it should not to be confused with the audio context of the term that refers to two-speaker sound systems.*]

e) "[W]hen the videogame image is a two-dimensional image, [Sony's PS4 displays] … the videogame image stored in the first buffer to a user," such as through the application call "IsWindowedStatusEnabled," where Boolean logic is flagged to indicate whether the image is two-dimensional or three-dimensional, and if flagged as two-dimensional, such as by a "false" value, then the image in the left eye (mono) view is displayed.

f) "[W]hen the videogame image is a three-dimensional image, [Sony's PS4 calculates] a second camera position view image" (i.e., the offset between left and right eyes must be accommodated if the image is to look realistic in 3D). The Sony PS4 uses the Direct3D code to create stereo 3D supported SwapChains on which to render stereo content for the left and right eye views, and then calculates stereo projection matrices for rendering the stereo content

using Direct3D. DirectX APIs are used to "create and set stereo projection matrices," wherein the camera parameters are set, and the stereo projection matrix is calculated and matrices are transposed to establish the right eye (stereo) view.

g) Also, when the videogame image is a three-dimensional image, the Sony PS4 product "stor[es] the second camera position view image in the second buffer," such as in the examples provided with the DirectX software libraries. The right view is stored in the back buffer of a SwapChain, where such back buffer of the SwapChain is obtained as a DXGI resource or similar hardware resource.

h) When the videogame image is intended as a three-dimensional image, the Sony PS4 "simultaneously display[s] the images in the first and second buffers to create a 3-dimensional perspective of the image to the user," such as where the DirectX software program uses a SwapChain to display both the first (left) and second (right) images to the display at the same time.

i) The Sony PS4, running the DirectX APIs, presents the rendered first and second buffered stereo images of a videogame to create a 3-dimensional synchronized user image, such as is displayed to Defendant's PlayStation VR.

COUNT II

INFRINGEMENT OF U.S. PATENT 8,206,218 BY SONY PLAYSTATION 4

36. On June 26, 2012, U.S. Patent No. 8,206,218 was issued to Manuel Rafael Gutierrez Novelo as the sole inventor thereof. A true and correct copy of the '218 Patent, which is entitled "3D Videogame System" is attached hereto as Exhibit "B."

37. Defendants have previously infringed, and do continue to infringe the '218 patent in violation of 35 U.S.C. § 271, including Claims 1 through 19.

38. Purely as an example to place Defendants on notice of at least one exemplary product that infringes at least one claim of the ‘218 Patent, and without limiting further allegations of additional claims infringed by additional products of Defendants, Plaintiff TVIP identifies Claim 1 of the ‘218 Patent as an exemplary claim that was and is infringed by Defendants. Claim 1 is directed towards a method of displaying three-dimensional images in a videogame system. The Sony PS System functions as a videogame system as described in Claim 16 of the ‘218 Patent. Defendants’ exemplary product, the PS4, infringes Claim 16 of the ‘218 Patent in at least the following exemplary manner:

a) The Sony PS4 product comprises at least “a videogame system for displaying three-dimensional images” in that the PS4 product incorporates and uses at least an AMD “Jaguar” core processor that is configured to run such instructions utilizing an AMD Radeon Graphics processing unit (“GPU”). The Sony PS4 executes instructions from the Microsoft programming language “DirectX” and its subset “Direct3D.” The AMD Radeon GPUs also support OpenGL APIs for the rendering and displaying of stereo videogame image frames. Defendant Sony creates and sells its own branded three-dimensional videogames specifically for use on its Sony PS4 product.

b) Defendants’ PS4 “provid[es] left and right backbuffers,” as is required by Claim 1, such as through use of relevant commands in the supported Microsoft DirectX or OpenGL software libraries, which creates a first buffer identified as a “left eye buffer,” and a second buffer identified as a “right eye buffer.” These Microsoft [OpenGL, or Sony specific API] commands are enabled at least by the PS4 using its “Active Quad Buffer” feature of the incorporated AMD Radeon graphics processor.

c) The Sony PS4 “calculat[es] first position coordinates of a first eye view,”

as required by Claim 1, for example, through the adjustment of the amount and direction of horizontal offset of the left [vs. right] images in order to create a comfortable perception of depth for a user. The offset position is created using the PS4 software and stereo projection matrices utilizing Microsoft's DirectX APIs and other libraries including, including, but not limited to, the D3D or DirectX3D libraries that are subsets of the larger DirectX platform.

d) Defendant's PS4 stores the virtually created first eye view of a videogame object into backbuffer by means of a SwapChain and using, for example, the Direct 3D "DXGI resource" to render the first, or left eye, view of the object intended as stereo content.

e) The Sony PS4 then "determin[es] a second eye view image of the object captured virtually from the processor calculated second position coordinates of the second eye view," as required by Claim 1, such as through Horizontal Image Translation, as when occurs with the offset of virtual object image sensors, by calculating the relative horizontal offset between the left and right images and generating a right eye view image therefrom.

f) The Sony PS4 then "stor[es] the second eye view object image in the right backbuffer," as required by Claim 1, such as through its use of the SwapChain and the "RenderEye" function in the DirectX API.

g) The Sony PS4 display[s] the first eye view image and the second eye view image to the user wearing the Sony PS VR headset and provides a 3-dimensional perspective of the object from the videogame system, as required by Claim 1. The animated sequences may be comprised of image frames, generated via the backbuffer SwapChains, as used in the Sony PS4. Defendant's PS4 employs, as an example, the DirectX Present( ) instruction to display stereo images to its PlayStation VR headset or alternate head mounted display products. [*For purposes of illustration and clarity only, the Sony PS4 displays left-eye and right-eye images on the PS VR*

with a series of 2-dimensional image frames that are displayed to the viewer. The display for each eye in the PS VR is a flat, 2-dimensional LCD panel. In order to create a 3-dimensional effect, different image frames are shown to the left eye and the right eye. The image frames will usually have an offset to allow for stereo-vision (i.e., each eye sees the same image but from a slightly different angle to create a 3-dimensional effect). Typically the first frame of a video is displayed to the first eye after it has been rendered (or created) in a first memory location; while the first frame data is being transferred from the PS4 to the display in the PS VR for the first eye to view, a second video frame is rendered to a second memory location. After the first frame has been displayed, the second frame data from the second memory location is transmitted for display for the second eye to view. While the second frame data is being transferred for display to the second eye, the next frame is being queued up in the first memory location. The long string of frames, as is typically found in any virtual reality videogame or 3D movie, swaps back and forth between the first and second memory buffers for display to the left and right eyes. This is commonly referred to as a "SwapChain". There are many complex variations that may use additional memory buffers combined with timing delays or horizontal or vertical offsets between frame swaps. These enhancements are intended to improve user perception and game performance but employ the same fundamental process.]

39. Plaintiff TVIP respectfully asserts that the discussions of exemplary product infringement in the paragraphs above are intended to provide Defendants with adequate and reasonable notice of the nature and factual basis of the patent infringement allegations made against it in the Complaint regarding an exemplary claim, pursuant to counsel to Plaintiff TVIP's best understanding of the current Courts' interpretations of the patent infringement notice requirements. Pursuant to continuing discovery and patent term construction law, Plaintiff TVIP

reserves all rights to further discuss, define, and construe its construction of any patent terms discussed above in the exemplary descriptions of Defendants' infringements of the Asserted Patents. Further, the above discussion is intended to give Defendants reasonable notice of the facts of the infringement in a non-technical and generally understood manner, and is not intended as a limitation on Plaintiff's construction of any terms of the Asserted Patents for Plaintiff's formal infringement contentions as those terms may later be considered by this Court in a *Markman* hearing or in any claim construction consideration.

40. By the service of this lawsuit, Defendants are placed on actual notice of their infringement of the Asserted Patents, and to whatever extent Defendants continue their infringing activities, Defendants also infringe the Asserted Patents in violation of 35 U.S.C. § 271(a) by infringement, either direct or indirect, after actual notice of infringement of the Asserted Patents during the time period beginning from the date of service of this Complaint, the date of actual notice.

41. Further, in accordance with *SCA Hygiene Products v. First Quality Baby Products,* (S.Ct. No. 15-972, March 21, 2017), Plaintiff TVIP alleges infringement by Defendants in the period of time preceding the filing of this lawsuit in which Defendants infringed the Asserted Patents in violation of 35 U.S.C. § 271(a) by infringement, either direct or indirect.

42. To the extent Defendants continue to infringe any one or more of the Asserted Patents after service of this Complaint, Defendants further infringe the Asserted Patents in violation of 35 U.S.C § 271(b) by inducing infringement of the '096 Patent or '218 Patent, whereby Defendants condition beneficial use of their products on participation in a videogame system that may or may not incorporate components from third-parties, and that Defendants

control the manner and timing in which such third-party components may be used to perform or manufacture the infringing methods and products, and that Defendants benefit financially by exerting such control over the third parties.

43. To the extent Defendants continue to infringe any one or more of the Asserted Patents after service of this Complaint, Defendants further infringe the Asserted Patents in violation of 35 U.S.C § 271(c) by contributorily infringing the '096 Patent or '218 Patent, whereby Defendants offer to sell a material component of an infringing system and whereby such material component has no substantially non-infringing use.

44. Section headings are included in this Complaint for general organization and orientation purposes only, and do not constitute separate or limiting allegations herein.

45. Plaintiff TVIP is entitled to recover from Defendants damages as a result of Defendants' acts of infringement of the Asserted Patents at least from the date of service of this Complaint, with damages in amounts subject to proof at trial, and, with the consent of the Court, up to six years prior to the date of service of this Complaint.

REQUESTED RELIEF

WHEREFORE, Plaintiff Techno View IP, Inc. prays for judgment against Defendants Sony Interactive Entertainment, Inc., and Sony Corporation of America, jointly and severally, for the following relief:

A. A judgment declaring that Defendants infringed any one or more claims of U.S. Patents Nos. 7,666,096 and/or 8,206,218;

B. an accounting for damages under 35 U.S.C. § 284 from Defendants for infringement of any one or more claims of U.S. Patents Nos. 7,666,096 and/or 8,206,218;

C. a judgment awarding Plaintiff compensatory damages as a result of Defendants'

infringement of any one or more claims of U.S. Patents Nos. 7,666,096 and/or 8,206,218, together with interest and costs, and in no event less than a reasonable royalty;

D. a judgment declaring that Defendants' infringement of any one or more claims of U.S. Patents Nos. 7,666,096 and/or 8,206,218 has been willful and deliberate;

E. a judgment awarding Plaintiff treble damages and pre-judgment interest under 35 U.S.C. § 284 as a result of Defendants' willful and deliberate infringement of any one or more claims of U.S. Patents Nos. 7,666,096 and/or 8,206,218;

F. a judgment declaring that this case is exceptional and awarding Plaintiff its expenses, costs, and attorneys' fees in accordance with 35 U.S.C. §§ 284 and 285 and Federal Rule of Civil Procedure 54(d);

G an accounting for damages under 35 U.S.C. § 271(a) and/or 35 U.S.C. § 271(b) or 35 U.S.C. § 271(c) from Defendants for intentional active inducement of infringement of any one or more claims of U.S. Patents Nos. 7,666,096 and 8,206,218, or contributory infringement from the date of actual notice of the patent infringement through the patent's expiration or, with the Court's consent from the period including six years prior to the date of actual notice, if either patent expires during the pendency of this Lawsuit, and an award of damages ascertained against Defendants in favor of Plaintiff, together with interest and costs thereon; and,

H. such other and further relief to Plaintiff and against Defendants as the Court may deem just and proper.

JURY DEMAND

Plaintiff Techno View IP, Inc. demands a trial by jury of all issues properly triable by jury in this action.

Respectfully submitted,

O'KELLY ERNST & JOYCE, LLC

Dated: May 15, 2017

/s/ Sean T. O'Kelly

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