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on signature page)*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

SECURENET SOLUTIONS GROUP,
LLC,

Plaintiff,

v.

PANASONIC CORPORATION OF
NORTH AMERICA,

Defendant.

Civil Action No.:
2:17-cv-04571 ES (JAD)

FIRST AMENDED COMPLAINT

JURY TRIAL DEMANDED

FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff SecureNet Solutions Group, LLC states its First Amended Complaint against Panasonic Corporation of North America, and alleges as follows:

THE PARTIES

1. Plaintiff SecureNet Solutions Group, LLC is a limited liability company organized and existing under the laws of the State of Florida, with its principal place of business at 2073 Summit Lake Drive, Suite 155, Tallahassee, Florida 32317.

2. Defendants Panasonic Corporation of North America is a corporation organized and existing under the laws of Delaware, with its principal place of business at Two Riverfront Plaza, 828 McCarter Highway, Newark, New Jersey 07102.

JURISDICTION AND VENUE

3. Plaintiff realleges and incorporates by reference the above paragraphs of this Complaint, inclusive, as though fully set forth herein.

4. This action is for patent infringement pursuant to the patent laws of the United States, 35 U.S.C. § 1, *et seq.* This Court has subject matter jurisdiction over the action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

5. Personal jurisdiction exists generally over Defendant because it has sufficient minimum contacts with the forum as a result of business conducted within the District of New Jersey. Personal jurisdiction also exists specifically over Defendant because it, directly or through subsidiaries or intermediaries, makes, uses, offers for sale, sells, imports, advertises, makes available and/or markets one or more products and/or services within New Jersey, that infringe the patents-in-suit, as described more particularly below.

6. Venue is proper in the District of New Jersey because, *inter alia*, the New Jersey is Defendant's principal place of business.

COUNT ONE INFRINGEMENT OF U.S. PATENT NO. 7,737,837

7. Plaintiff realleges and incorporates by reference the above paragraphs of this Complaint, inclusive, as though fully set forth herein.

8. Plaintiff is the owner of all right, title, and interest in United States Patent No. 7,737,837, entitled "Hierarchical Data Storage Manager, Anonymous Tip Processing Engine, and a Vehicle Information Processing Engine for Security and Safety Applications," duly and legally issued by the United States Patent and

Trademark Office on June 15, 2010 (the “’837 patent”). A true and correct copy of the ’837 patent is attached hereto as Exhibit A.

9. The ’837 patent generally describes and claims an alerting system for capturing sensory data from one or more sensors; processing the sensory data to detect primitive events; correlating two or more primitive events, the primitive events weighted by the attribute data of the sensors used to capture the sensory data; and to perform one or more actions based on the correlation performed in the correlating step.

10. Defendant has directly infringed and continues to infringe, literally and/or under the doctrine of equivalents, one or more claims of the ’837 patent under 35 U.S.C. § 271 by making, using, offering to sell, selling, and/or importing into the United States the patented invention within the United States.

Specifically, Defendant has infringed and continues to infringe the ’837 patent by making, using, offering to sell, selling, and/or importing into the United States the Panasonic WV-ASM200, WV-ASM200W, WV-ASC970, and WV-ASM970 i-PRO Management/IP Matrix Server Software, WV-ASE231 and/or WV-ASE231W extension software, the WV-ASF900 Face Recognition System, and compatible video cameras (the “Accused Instrumentalities”).

11. Defendant has had knowledge of the ’837 patent since at least as early as November 8, 2016, when the complaint in this action was filed.

12. Defendant actively, knowingly, and intentionally induces infringement of the ’837 patent by (i) making, using, offering for sale and/or selling the Accused Instrumentalities; (ii) contracting with its end user customers to use those products; (iii) offering its i-Pro Certified Reseller Program to train third parties to integrate the Accused Instrumentalities into security systems for end users; and (iv) creating and disseminating technical, promotional, marketing, training, and instructional materials in furtherance of these objectives. Defendant

undertakes all of these activities with knowledge of the patent and its claims; with knowledge that its end user customers and trainees will use these products and/or services, and with the knowledge and the specific intent to encourage and facilitate those infringing uses of these products.

13. Because the infringing Accused Instrumentalities were designed and developed by Defendant and/or at Defendant's direction and control, Defendant knows that each of the Accused Instrumentalities, which constitute a material part of the invention of the '837 patent, is especially adapted for use in infringing the patent and is not a staple article of commerce suitable for substantial noninfringing use with respect to the patent. Further, because each infringing Accused Instrumentality was designed and developed by Defendant and/or at Defendant's direction and control, Defendant knows how its end user customers and trainees use each Accused Instrumentality, and also knows that its end user customers and trainees use each Accused Instrumentality in a way that directly infringes the patent. Accordingly, Defendant has contributorily infringed and continues to contributorily infringe one or more claims of the patent, literally and/or under the doctrine of equivalents, by making, offering to sell, and/or selling the Accused Instrumentalities.

14. In committing these acts of infringement, Defendant acted despite an objectively high likelihood that its actions constituted infringement of at least one valid patent, and Defendant actually knew or should have known that its actions constituted an unjustifiably high risk of infringement of at least one valid and enforceable patent.

15. Attached as Exhibit B is a claim chart showing how Defendant infringes the claims of the '837 patent.

16. As a result of Defendant's infringing activities with respect to the '837 patent, Plaintiff has suffered damages in an amount not yet ascertained.

Plaintiff is entitled to recover damages adequate to compensate it for Defendant's infringing activities in an amount to be determined at trial, but in no event less than reasonable royalties, together with interest and costs. Defendant's infringement of Plaintiff's exclusive rights under the '837 patent will continue to damage Plaintiff, causing irreparable harm for which there is no adequate remedy at law, unless enjoined by this Court.

COUNT TWO
INFRINGEMENT OF U.S. PATENT NO. 8,013,738

17. Plaintiff realleges and incorporates by reference the above paragraphs of this Complaint, inclusive, as though fully set forth herein.

18. Plaintiff is the owner of all right, title, and interest in United States Patent No. 8,013,738, entitled "Hierarchical Storage Manager (HSM) for Intelligent Storage of Large Volumes of Data," duly and legally issued by the United States Patent and Trademark Office on September 6, 2011 (the "'738 patent"). A true and correct copy of the '738 patent is attached hereto as Exhibit C.

19. The '738 patent generally describes and claims an alerting system and method for capturing sensory data from one or more sensors, processing the sensory data to detect primitive events in the sensory data, correlating two or more primitive events to determine one or more correlated events, and performing one or more actions based on the correlation performed in the correlating step.

20. Defendant has directly infringed and continues to infringe, literally and/or under the doctrine of equivalents, one or more claims of the '738 patent under 35 U.S.C. § 271 by making, using, offering to sell, selling, and/or importing into the United States the patented invention within the United States. Specifically, Defendant has infringed and continues to infringe the '738 patent by

making, using, offering to sell, selling, and/or importing into the United States the Accused Instrumentalities.

21. Defendant has had knowledge of the '738 patent since at least as early as November 8, 2016, when the complaint in this action was filed.

22. Defendant actively, knowingly, and intentionally induces infringement of the '738 patent by (i) making, using, offering for sale and/or selling the Accused Instrumentalities; (ii) contracting with its end user customers to use those products; (iii) offering its i-Pro Certified Reseller Program to train third parties to integrate the Accused Instrumentalities into security systems for end users; and (iv) creating and disseminating technical, promotional, marketing, training, and instructional materials in furtherance of these objectives. Defendant undertakes all of these activities with knowledge of the patent and its claims; with knowledge that its end user customers and trainees will use these products and/or services, and with the knowledge and the specific intent to encourage and facilitate those infringing uses of these products.

23. Because the infringing Accused Instrumentalities were designed and developed by Defendant and/or at Defendant's direction and control, Defendant knows that each of the Accused Instrumentalities, which constitute a material part of the invention of the '738 patent, is especially adapted for use in infringing the patent and is not a staple article of commerce suitable for substantial noninfringing use with respect to the patent. Further, because each infringing Accused Instrumentality was designed and developed by Defendant and/or at Defendant's direction and control, Defendant knows how its end user customers and trainees use each Accused Instrumentality, and also knows that its end user customers and trainees use each Accused Instrumentality in a way that directly infringes the patent. Accordingly, Defendant has contributorily infringed and continues to contributorily infringe one or more claims of the patent, literally

and/or under the doctrine of equivalents, by making, offering to sell, and/or selling the Accused Instrumentalities.

24. In committing these acts of infringement, Defendant acted despite an objectively high likelihood that its actions constituted infringement of at least one valid patent, and Defendant actually knew or should have known that its actions constituted an unjustifiably high risk of infringement of at least one valid and enforceable patent.

25. Attached as Exhibit D is a claim chart showing how Defendant infringes the claims of the '738 patent.

26. As a result of Defendant's infringing activities with respect to the '738 patent, Plaintiff has suffered damages in an amount not yet ascertained. Plaintiff is entitled to recover damages adequate to compensate it for Defendant's infringing activities in an amount to be determined at trial, but in no event less than reasonable royalties, together with interest and costs. Defendant's infringement of Plaintiff's exclusive rights under the '738 patent will continue to damage Plaintiff, causing irreparable harm for which there is no adequate remedy at law, unless enjoined by this Court.

**COUNT THREE
INFRINGEMENT OF U.S. PATENT NO. 8,130,098**

27. Plaintiff realleges and incorporates by reference the above paragraphs of this Complaint, inclusive, as though fully set forth herein.

28. Plaintiff is the owner of all right, title, and interest in United States Patent No. 8,130,098, entitled "Systems and Methods for Safety and Business Productivity," duly and legally issued by the United States Patent and Trademark Office on March 6, 2012 (the "'098 patent"). A true and correct copy of the '098 patent is attached hereto as Exhibit E.

29. The '098 patent generally describes and claims a safety system and method with one or more sensors for capturing sensory data; a data storage device for storing the sensory data; and one or more memories or a data processing unit to: process the sensory data, weighted by attribute data representing information about the sensors; detect primitive events in the sensory data; correlate two or more primitive events to determine one or more correlated events; and perform one or more actions to ensure that safety procedures are followed based on the correlation.

30. Defendant has directly infringed and continues to infringe, literally and/or under the doctrine of equivalents, one or more claims of the '098 patent under 35 U.S.C. § 271 by making, using, offering to sell, selling, and/or importing into the United States the patented invention within the United States. Specifically, Defendant has infringed and continues to infringe the '098 patent by making, using, offering to sell, selling, and/or importing into the United States the Accused Instrumentalities.

31. Defendant has had knowledge of the '098 patent since at least as early as November 8, 2016, when the complaint in this action was filed.

32. Defendant actively, knowingly, and intentionally induces infringement of the '098 patent by (i) making, using, offering for sale and/or selling the Accused Instrumentalities; (ii) contracting with its end user customers to use those products; (iii) offering its i-Pro Certified Reseller Program to train third parties to integrate the Accused Instrumentalities into security systems for end users; and (iv) creating and disseminating technical, promotional, marketing, training, and instructional materials in furtherance of these objectives. Defendant undertakes all of these activities with knowledge of the patent and its claims; with knowledge that its end user customers and trainees will use these products and/or

services, and with the knowledge and the specific intent to encourage and facilitate those infringing uses of these products.

33. Because the infringing Accused Instrumentalities were designed and developed by Defendant and/or at Defendant's direction and control, Defendant knows that each of the Accused Instrumentalities, which constitute a material part of the invention of the '098 patent, is especially adapted for use in infringing the patent and is not a staple article of commerce suitable for substantial noninfringing use with respect to the patent. Further, because each infringing Accused Instrumentality was designed and developed by Defendant and/or at Defendant's direction and control, Defendant knows how its end user customers and trainees use each Accused Instrumentality, and also knows that its end user customers and trainees use each Accused Instrumentality in a way that directly infringes the patent. Accordingly, Defendant has contributorily infringed and continues to contributorily infringe one or more claims of the patent, literally and/or under the doctrine of equivalents, by making, offering to sell, and/or selling the Accused Instrumentalities.

34. In committing these acts of infringement, Defendant acted despite an objectively high likelihood that its actions constituted infringement of at least one valid patent, and Defendant actually knew or should have known that its actions constituted an unjustifiably high risk of infringement of at least one valid and enforceable patent.

35. Attached as Exhibit F is a claim chart showing how Defendant infringes the claims of the '098 patent.

36. As a result of Defendant's infringing activities with respect to the '098 patent, Plaintiff has suffered damages in an amount not yet ascertained. Plaintiff is entitled to recover damages adequate to compensate it for Defendant's infringing activities in an amount to be determined at trial, but in no event less

than reasonable royalties, together with interest and costs. Defendant's infringement of Plaintiff's exclusive rights under the '098 patent will continue to damage Plaintiff, causing irreparable harm for which there is no adequate remedy at law, unless enjoined by this Court.

**COUNT FOUR
INFRINGEMENT OF U.S. PATENT NO. 8,354,926**

37. Plaintiff realleges and incorporates by reference the above paragraphs of this Complaint, inclusive, as though fully set forth herein.

38. Plaintiff is the owner of all right, title, and interest in United States Patent No. 8,354,926, entitled "Systems and Methods for Business Process Monitoring" duly and legally issued by the United States Patent and Trademark Office on January 15, 2013 (the "'926 patent"). A true and correct copy of the '926 patent is attached hereto as Exhibit G.

39. The '926 patent generally describes and claims a business process monitoring system and method with one or more sensors for capturing sensory data; a data storage device for storing the sensory data; and one or more memories or a data processing unit to: process the sensory data to detect primitive events; correlate two or more primitive events, weighted by attribute data representing information about the sensors, to determine one or more correlated events; and to perform one or more actions to ensure that business processes are followed based on the correlation.

40. Defendant has directly infringed and continues to infringe, literally and/or under the doctrine of equivalents, one or more claims of the '926 patent under 35 U.S.C. § 271 by making, using, offering to sell, selling, and/or importing into the United States the patented invention within the United States. Specifically, Defendant has infringed and continues to infringe the '926 patent by

making, using, offering to sell, selling, and/or importing into the United States the Accused Instrumentalities.

41. Defendant has had knowledge of the '926 patent since at least as early as November 8, 2016, when the complaint in this action was filed.

42. Defendant actively, knowingly, and intentionally induces infringement of the '926 patent by (i) making, using, offering for sale and/or selling the Accused Instrumentalities; (ii) contracting with its end user customers to use those products; (iii) offering its i-Pro Certified Reseller Program to train third parties to integrate the Accused Instrumentalities into security systems for end users; and (iv) creating and disseminating technical, promotional, marketing, training, and instructional materials in furtherance of these objectives. Defendant undertakes all of these activities with knowledge of the patent and its claims; with knowledge that its end user customers and trainees will use these products and/or services, and with the knowledge and the specific intent to encourage and facilitate those infringing uses of these products.

43. Because the infringing Accused Instrumentalities were designed and developed by Defendant and/or at Defendant's direction and control, Defendant knows that each of the Accused Instrumentalities, which constitute a material part of the invention of the '926 patent, is especially adapted for use in infringing the patent and is not a staple article of commerce suitable for substantial noninfringing use with respect to the patent. Further, because each infringing Accused Instrumentality was designed and developed by Defendant and/or at Defendant's direction and control, Defendant knows how its end user customers and trainees use each Accused Instrumentality, and also knows that its end user customers and trainees use each Accused Instrumentality in a way that directly infringes the patent. Accordingly, Defendant has contributorily infringed and continues to contributorily infringe one or more claims of the patent, literally

and/or under the doctrine of equivalents, by making, offering to sell, and/or selling the Accused Instrumentalities.

44. In committing these acts of infringement, Defendant acted despite an objectively high likelihood that its actions constituted infringement of at least one valid patent, and Defendant actually knew or should have known that its actions constituted an unjustifiably high risk of infringement of at least one valid and enforceable patent.

45. Attached as Exhibit H is a claim chart showing how Defendant infringes the claims of the '926 patent.

46. As a result of Defendant's infringing activities with respect to the '926 patent, Plaintiff has suffered damages in an amount not yet ascertained. Plaintiff is entitled to recover damages adequate to compensate it for Defendant's infringing activities in an amount to be determined at trial, but in no event less than reasonable royalties, together with interest and costs. Defendant's infringement of Plaintiff's exclusive rights under the '926 patent will continue to damage Plaintiff, causing irreparable harm for which there is no adequate remedy at law, unless enjoined by this Court.

COUNT FIVE
INFRINGEMENT OF U.S. PATENT NO. 9,344,616

47. Plaintiff realleges and incorporates by reference the above paragraphs of this Complaint, inclusive, as though fully set forth herein.

48. Plaintiff is the owner of all right, title, and interest in United States Patent No. 9,344,616, entitled "Correlation engine for security, safety, and business productivity" duly and legally issued by the United States Patent and Trademark Office on May 17, 2016 (the "'616 patent"). A true and correct copy of the '616 patent is attached hereto as Exhibit I.

49. The '616 patent generally describes and claims a monitoring system that receives sensory data from one or more sensors and analyzes the sensory data to detect one or more events in the sensory data. The events are correlated by the correlation engine by weighing the events based on attributes of the sensors that were used to detect the primitive events. The events are then monitored for an occurrence of one or more correlations of interest. Finally, one or more actions are triggered based on a detection of one or more anomalous events or events of interest. Events may come from sensory devices, legacy systems, third-party systems, anonymous tips, and other data sources.

50. Defendant has directly infringed and continues to infringe, literally and/or under the doctrine of equivalents, one or more claims of the '616 patent under 35 U.S.C. § 271 by making, using, offering to sell, selling, and/or importing into the United States the patented invention within the United States. Specifically, Defendant has infringed and continues to infringe the '616 patent by making, using, offering to sell, selling, and/or importing into the United States the Accused Instrumentalities.

51. Defendant has had knowledge of the '616 patent since at least as early as November 8, 2016, when the complaint in this action was filed.

52. Defendant actively, knowingly, and intentionally induces infringement of the '616 patent by (i) making, using, offering for sale and/or selling the Accused Instrumentalities; (ii) contracting with its end user customers to use those products; (iii) offering its i-Pro Certified Reseller Program to train third parties to integrate the Accused Instrumentalities into security systems for end users; and (iv) creating and disseminating technical, promotional, marketing, training, and instructional materials in furtherance of these objectives. Defendant undertakes all of these activities with knowledge of the patent and its claims; with knowledge that its end user customers and trainees will use these products and/or

services, and with the knowledge and the specific intent to encourage and facilitate those infringing uses of these products.

53. Because the infringing Accused Instrumentalities were designed and developed by Defendant and/or at Defendant's direction and control, Defendant knows that each of the Accused Instrumentalities, which constitute a material part of the invention of the '616 patent, is especially adapted for use in infringing the patent and is not a staple article of commerce suitable for substantial noninfringing use with respect to the patent. Further, because each infringing Accused Instrumentality was designed and developed by Defendant and/or at Defendant's direction and control, Defendant knows how its end user customers and trainees use each Accused Instrumentality, and also knows that its end user customers and trainees use each Accused Instrumentality in a way that directly infringes the patent. Accordingly, Defendant has contributorily infringed and continues to contributorily infringe one or more claims of the patent, literally and/or under the doctrine of equivalents, by making, offering to sell, and/or selling the Accused Instrumentalities.

54. In committing these acts of infringement, Defendant acted despite an objectively high likelihood that its actions constituted infringement of at least one valid patent, and Defendant actually knew or should have known that its actions constituted an unjustifiably high risk of infringement of at least one valid and enforceable patent.

55. Attached as Exhibit J is a claim chart showing how Defendant infringes the claims of the '616 patent.

56. As a result of Defendant's infringing activities with respect to the '616 patent, Plaintiff has suffered damages in an amount not yet ascertained. Plaintiff is entitled to recover damages adequate to compensate it for Defendant's infringing activities in an amount to be determined at trial, but in no event less

than reasonable royalties, together with interest and costs. Defendant's infringement of Plaintiff's exclusive rights under the '616 patent will continue to damage Plaintiff, causing irreparable harm for which there is no adequate remedy at law, unless enjoined by this Court.

COUNT SIX
INFRINGEMENT OF U.S. PATENT NO. 9,619,984

57. Plaintiff realleges and incorporates by reference the above paragraphs of this Complaint, inclusive, as though fully set forth herein.

58. Plaintiff is the owner of all right, title, and interest in United States Patent No. 9,619,984, entitled "Systems and methods for correlating data from IP sensor networks for security, safety, and business productivity applications" duly and legally issued by the United States Patent and Trademark Office on April 11, 2017 (the "'984 patent"). A true and correct copy of the '616 patent is attached hereto as Exhibit K.

59. The '984 patent generally describes and claims a monitoring system that receives sensory data from one or more sensors and analyzes the sensory data to detect one or more events in the sensory data. The events are correlated by the correlation engine by weighing the events based on attributes of the sensors that were used to detect the primitive events. The events are then monitored for an occurrence of one or more correlations of interest. Finally, one or more alerts are sent based on critical events and network failure events.

60. Defendant has directly infringed and continues to infringe, literally and/or under the doctrine of equivalents, one or more claims of the '984 patent under 35 U.S.C. § 271 by making, using, offering to sell, selling, and/or importing into the United States the patented invention within the United States. Specifically, Defendant has infringed and continues to infringe the '984 patent by

making, using, offering to sell, selling, and/or importing into the United States the Accused Instrumentalities.

61. Defendant has had knowledge of the '984 patent since at least as early as November 8, 2016, when the complaint in this action was filed.

62. Defendant actively, knowingly, and intentionally induces infringement of the '984 patent by (i) making, using, offering for sale and/or selling the Accused Instrumentalities; (ii) contracting with its end user customers to use those products; (iii) offering its i-Pro Certified Reseller Program to train third parties to integrate the Accused Instrumentalities into security systems for end users; and (iv) creating and disseminating technical, promotional, marketing, training, and instructional materials in furtherance of these objectives. Defendant undertakes all of these activities with knowledge of the patent and its claims; with knowledge that its end user customers and trainees will use these products and/or services, and with the knowledge and the specific intent to encourage and facilitate those infringing uses of these products.

63. Because the infringing Accused Instrumentalities were designed and developed by Defendant and/or at Defendant's direction and control, Defendant knows that each of the Accused Instrumentalities, which constitute a material part of the invention of the '984 patent, is especially adapted for use in infringing the patent and is not a staple article of commerce suitable for substantial noninfringing use with respect to the patent. Further, because each infringing Accused Instrumentality was designed and developed by Defendant and/or at Defendant's direction and control, Defendant knows how its end user customers and trainees use each Accused Instrumentality, and also knows that its end user customers and trainees use each Accused Instrumentality in a way that directly infringes the patent. Accordingly, Defendant has contributorily infringed and continues to contributorily infringe one or more claims of the patent, literally

and/or under the doctrine of equivalents, by making, offering to sell, and/or selling the Accused Instrumentalities.

64. In committing these acts of infringement, Defendant acted despite an objectively high likelihood that its actions constituted infringement of at least one valid patent, and Defendant actually knew or should have known that its actions constituted an unjustifiably high risk of infringement of at least one valid and enforceable patent.

65. Attached as Exhibit L is a claim chart showing how Defendant infringes the claims of the '984 patent.

66. As a result of Defendant's infringing activities with respect to the '984 patent, Plaintiff has suffered damages in an amount not yet ascertained. Plaintiff is entitled to recover damages adequate to compensate it for Defendant's infringing activities in an amount to be determined at trial, but in no event less than reasonable royalties, together with interest and costs. Defendant's infringement of Plaintiff's exclusive rights under the '984 patent will continue to damage Plaintiff, causing irreparable harm for which there is no adequate remedy at law, unless enjoined by this Court.

PRAYER FOR RELIEF

Plaintiff requests entry of judgment in its favor against Defendant for the following:

- a) A declaration that Defendant has, directly infringed one or more claims of the patents-in-suit;
- d) An award of damages adequate to compensate Plaintiff for Defendant's infringement of the patents-in-suit, but in no event less than a reasonable royalty, together with prejudgment and post-judgment interest and costs, in an amount according to proof;

e) An entry of a permanent injunction enjoining Defendant, and its respective officers, agents, employees, and those acting in privity with it, from further infringement of the patents-in-suit, or in the alternative, awarding a royalty for post-judgment infringement; and

f) An award to Plaintiff of such other costs and further relief as the Court may deem just and proper.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff respectfully requests a trial by jury.

Dated: August 14, 2017

Respectfully submitted,

/s/ Michael J. DeBenedictis
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