

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

LOCAL INTELLIGENCE, LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS AMERICA, INC.,
and SAMSUNG ELECTRONICS CO., LTD.,

Defendants.

Civil Action no. 2:17-cv-716

JURY TRIAL DEMANDED

COMPLAINT

For its Complaint, Plaintiff Local Intelligence, LLC by and through its undersigned counsel, alleges as follows:

THE PARTIES

1. Local Intelligence, LLC (“Local Intelligence”) is a Texas limited liability company with a place of business located at 1400 Preston Road, Suite 400, Plano, Texas 75093.
2. On information and belief, Samsung Electronics America, Inc. (“Samsung America”) is a New York corporation with its principal place of business located at 85 Challenger Road, Ridgefield Park, NJ 07660. Samsung Electronics America, Inc. can be served through its registered agent CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201-3136.
3. Defendant Samsung Electronics Co., Ltd. (“Samsung Ltd.”; together with Samsung America, “Samsung”) is a Korean corporation with its principal place of business located at 129 Samsung-Ro, Maetan-3-dong, Yeongtong-gu, Seoul 443-772, Republic of Korea.

JURISDICTION AND VENUE

4. This action arises under the Patent Act, 35 U.S.C. § 1 *et seq.*

5. Subject matter jurisdiction is proper in this Court under 28 U.S.C. §§ 1331 and 1338.

6. This Court has general and specific personal jurisdiction over Samsung. Samsung has sufficient contacts with this judicial district, including but not limited to a regular and established place of business for Samsung America located within the district at 1301 E. Lookout Drive, Richardson, TX 75080 (“the Richardson facility”). Samsung also maintains multiple service centers within the District.

7. Venue is proper in this District under 28 U.S.C. § 1400(b). Samsung Ltd is a foreign corporation, and Samsung America has a regular and established place of business located at the Richardson Facility. The Richardson Facility is located in the Eastern District of Texas and employs individuals residing in the Eastern District of Texas. On information and belief, Samsung develops and markets electronics out of the Richardson Facility. A substantial part of the infringement alleged in this Complaint has occurred and is occurring in this district, including the marketing, selling, and offering for sale of infringing products.

THE PATENTS-IN-SUIT

8. There are three United States Patents at issue in this litigation. Each is entitled “Apparatus and Method for Automatically Refreshing a Display of a Telephone.” The first patent at issue, United States Patent No. 8,903,067 (the “’067 patent”) (a true and correct copy of which is attached hereto as Exhibit A) is the parent of the other two. The ’067 patent received careful and exacting scrutiny from the United States Patent and Trademark Office prior to its

issuance, as documented in its file history (a true and correct copy of which is attached hereto as Exhibit B).

9. The two additional patents at issue in this litigation are United States Patent Nos. 9,219,982 (the “’892 patent”) and No. 9,084,084 (the “’084 patent”). True and correct copies of these patents are attached as Exhibits C and D to this Complaint, respectively.

10. The ’067 patent was duly and lawfully issued by the U.S. Patent and Trademark Office on December 2, 2014.

11. Claim 1 of the ’067 patent discloses a telephone having
- a. a display panel; a datastore including at least one function,
 - b. wherein the at least one function comprises information relating to a current location of a telephone and at least one other condition associated with a user of the telephone,
 - c. wherein the at least one function is associated with at least one communication service;
 - d. circuitry operable to connect the telephone to a location server to obtain a current location of the telephone; and
 - e. a function selector programmable to refresh a screen on the display panel of the telephone to include at least one communication service associated with the function, based at least in part on a current location of the telephone.

12. The ’892 patent was duly and lawfully issued by the U.S. Patent and Trademark Office on July 14, 2015.

13. Claim 1 of the ’892 patent discloses a claim for a telephone comprising:

- a. a display panel, a processor, and a datastore comprising
 - b. at least one function comprising information relating to a current location of the telephone and a user of the telephone,
 - c. the telephone operable to connect to a communication network,
 - d. wherein the at least one function is associated with at least one communication service,
 - e. wherein the processor is operable to connect the telephone to a location server to obtain a current location of the telephone,
 - f. select a function from the datastore, and
 - g. refresh a screen on the display panel to include the at least one communication service associated with the selected function based at least in part on the current location of the telephone.
14. The '084 patent was duly and lawfully issued by the U.S. Patent and Trademark Office on July 14, 2015.
15. Claim 1 of the '084 patent discloses a conferencing system comprising:
- a. a display panel, a processor, a telephone coupled to a voice network, the display panel and the processor, and a datastore comprising at least one function comprising
 - b. information relating to a current location of the telephone and a user of the telephone,
 - c. wherein the at least one function is associated with at least one conferencing communication service,

- d. wherein the processor is operable to connect the telephone to a location server to obtain a current location of the telephone,
- e. select a function from the datastore, and
- f. refresh a screen on the display panel to include the at least one conferencing communication service associated with the selected function based on the current location of the telephone.

16. The inventor of the inventions claimed in the '067, '982 and '084 patents is Shin Cheung Simon Chiu.

17. Local Intelligence is the assignee and owner of all right, title and interest in and to the '067, '084 and '982 patents, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it, including but not limited to the right to sue for past, present, and future damages.

18. The accused devices include at least the Samsung Galaxy S6, S7 and S8 families of smart phones. Each family contains a series of similar smart phones that each infringe the patents in suit (collectively, "Accused Samsung Smartphones"). By way of illustration, the Galaxy S8 family includes the Galaxy S8, Galaxy S8+, Galaxy Note 8, Galaxy S8 Active. The respective models within each family vary in ways immaterial to the claims of this complaint: e.g., increased size, availability of a stylus or being hardened against accidental damage.

COUNT I – INFRINGEMENT OF U.S. PATENT NO. 8,903,067

19. Local Intelligence repeats and realleges the allegations of paragraphs 1 through 18 as if fully set forth herein.

20. Without license or authorization and in violation of 35 U.S.C. § 271(a), Samsung has infringed at least claim 1 of the '067 patent by making, having made, using, importing, offering for sale, and/or selling infringing smartphones, including the Accused Samsung Smartphones, each of which uses a location server to obtain a current location of the telephone and then uses that location information to refresh the display on the telephone with certain information, as further explained below.

21. The Accused Samsung Smartphones meet all the limitations of Claim 1 as they are

- a. telephones comprising
- b. a display panel;
- c. a datastore including at least one function, wherein the at least one function comprises information relating to a current location of a telephone and at least one other condition associated with a user of the telephone,
- d. wherein the at least one function is associated with at least one communication service;
- e. circuitry operable to connect the telephone to a location server to obtain a current location of the telephone; and

f. a function selector programmable to refresh a screen on the display panel of the telephone to include at least one communication service associated with the function, based at least in part on a current location of the telephone.

22. By way of illustration and only as example, the S7's features a datastore including at least one function, wherein the at least one function comprises information relating to a current location of a telephone and at least one other condition associated with a user of the telephone, as show in Figures A, B, C and D following this paragraph. The functions include operating system features, such as Google Maps, as well as Samsung's proprietary software (here, "My Places").

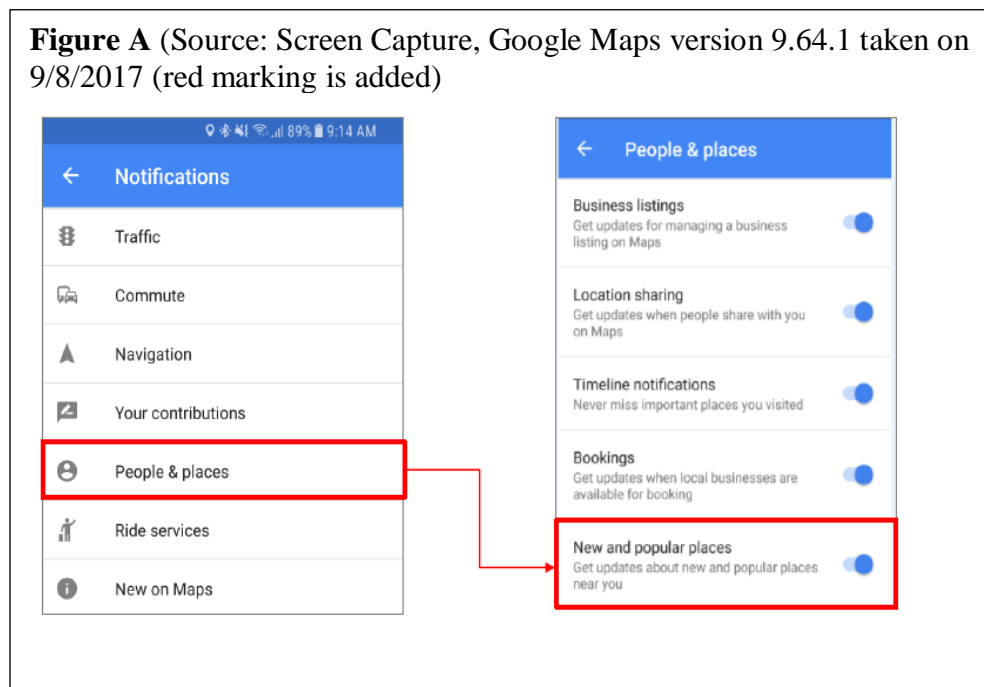


Figure B (Source: <https://www.samsung.com/us/support/answer/ANS00047881/>)

- **My Places:** Adjusts your settings and displays shortcuts pertinent to your location, such as Home, Work, and Out and about.

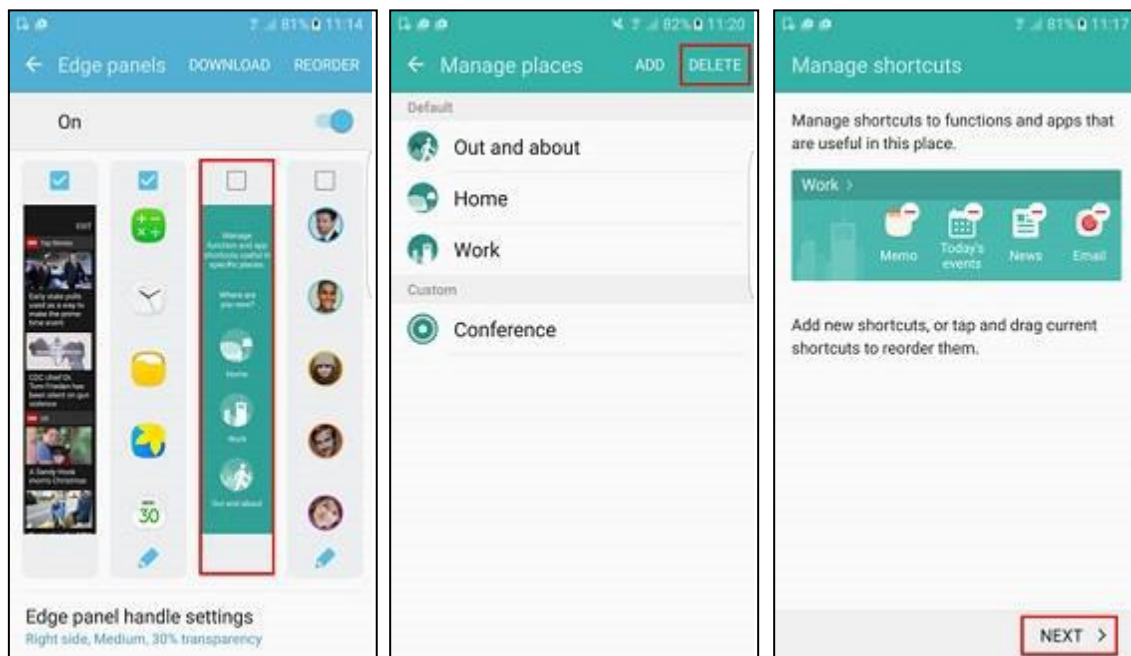
Figure C (Source: <https://web.archive.org/web/20170217211224/http://www.samsung.com:80/uk/support/skp/faq/1105547>)

The **My places** Edge panel allows you to set specific shortcuts and settings depending on your location. The below steps will show you how to enable the My Places function, set places, change your shortcuts, and add, edit and delete places.

Figure D (Source: <https://web.archive.org/web/20170217211224/http://www.samsung.com:80/uk/support/skp/faq/1105547>)

To enable the My Places edge panel:

5. Choose the **My Places** panel and enable it by ticking the box at the top.



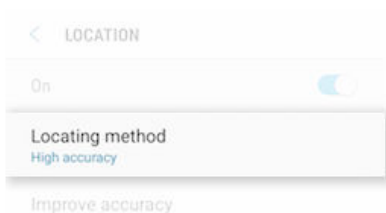
23. The S7 functions described in the paragraph immediately above are associated with at least one communication service and the S7 features circuitry operable to connect the

telephone to a location server to obtain a current location of the telephone, as illustrated in Figure E.

Figure E (Source: <https://www.samsung.com/us/support/answer/ANS00062037/>)

You can select the accuracy level of your device's locating method.

1. Navigate to **Apps > Settings**.
2. Touch **Search**, then search for and select **Location**.
3. Touch **Locating method**.



4. Choose the preferred location method option.



24. The S7 has a function selector programmable to refresh a screen on the display panel of the telephone to include at least one communication service associated with the

function, based at least in part on a current location of the telephone, as shown in Figures F, G and H below.

Figure F (Source: <https://www.samsung.com/us/support/answer/ANS00047881/>)

- **My Places:** Adjusts your settings and displays shortcuts pertinent to your location, such as Home, Work, and Out and about.

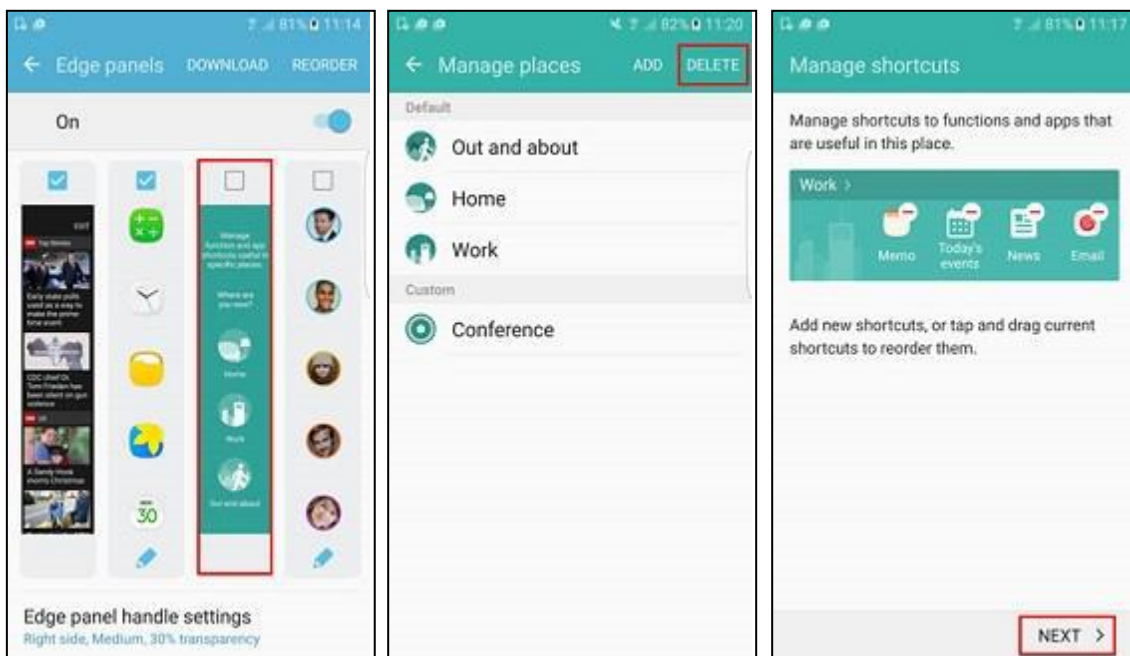
Figure G (Source: <https://web.archive.org/web/20170217211224/http://www.samsung.com:80/uk/support/skp/faq/1105547>)

The **My places** Edge panel allows you to set specific shortcuts and settings depending on your location. The below steps will show you how to enable the My Places function, set places, change your shortcuts, and add, edit and delete places.

Figure H (Source: <https://web.archive.org/web/20170217211224/http://www.samsung.com:80/uk/support/skp/faq/1105547>)

To enable the My Places edge panel:

5. Choose the **My Places** panel and enable it by ticking the box at the top.



25. Local Intelligence is entitled to recover from Defendants the damages sustained by Local Intelligence as a result of Defendants' infringement of the '067 patent 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.

26. Upon information and belief, Defendants began selling infringing phones in April 2015, if not earlier.

COUNT II – INFRINGEMENT OF U.S. PATENT NO. 9,219,982

27. Local repeats and realleges the allegations of paragraphs 1 through 26 as if fully set forth herein.

28. Without license or authorization and in violation of 35 U.S.C. § 271(a), Samsung has infringed at least claim 1 of the '982 patent by making, having made, using, importing, offering for sale, and/or selling infringing smartphones, including the Accused Samsung Smartphones, each of which uses a location server to obtain a current location of the telephone and then uses that location information to refresh the display on the telephone with certain information, as further explained below.

29. The Accused Samsung Smartphones meet all the limitations of Claim 1 as they are

- a. telephones comprising
- b. a display panel, a processor, and a datastore comprising
- c. at least one function comprising information relating to a current location of the telephone and a user of the telephone,
- d. the telephone operable to connect to a communication network,

- e. wherein the at least one function is associated with at least one communication service,
- f. wherein the processor is operable to connect the telephone to a location server to obtain a current location of the telephone,
- g. select a function from the datastore, and
- h. refresh a screen on the display panel to include the at least one communication service associated with the selected function based at least in part on the current location of the telephone.

30. By way of illustration and only as example, the S7 is a telephone comprising a display panel, a processor, and a datastore, as shown in Figure I.

Figure I (Source: Samsung Galaxy S7: [https://www.samsung.com/us/support/owners\[-\]/product/galaxy-s7-verizon](https://www.samsung.com/us/support/owners[-]/product/galaxy-s7-verizon))

Processor	
Processor Speed, Type 2.15GHz, 1.6GHz, Quad-CoreGHz	
Display	
Main Display Resolution 2560 x 1440 (Quad HD)	Main Display Size 5.1" (129.2mm)"
Color Depth 16MM	
Camera	
Camera resolution (Front) CMOS 5.0 MPMP, CMOS 5.0MP	Camera resolution (Rear) ? Dual Pixel 12.0 MPMP
Main Camera - Flash Yes	Main Camera - Auto Focus Yes
Memory	
Internal Memory ? 32GB	Available Memory ? MicroSD (Up to 256GB)

31. The S7 features at least one function comprising information relating to a current location of the telephone and a user of the telephone, as shown in Figures J, K, L M and N:

Figure J (Source: Screen Capture, Google Maps version 9.64.1 taken on 9/8/2017 (red marking is added))

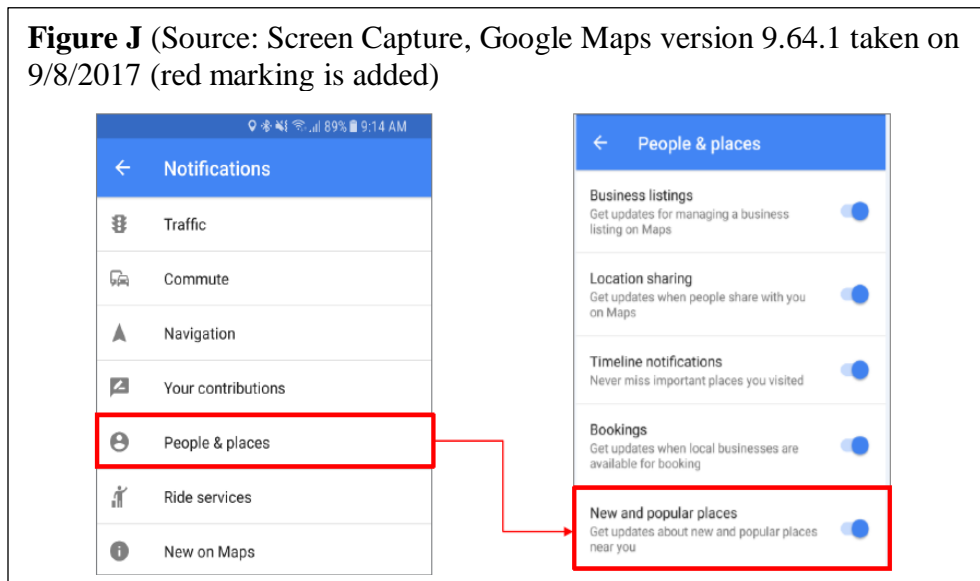


Figure K (Source www.androidpolice.com/2016/05/30/google-maps-v9-26-1-adds-search-along-route-walking-bicycling-changes-driving-mode-fabs-adds-new-settings-apk-teardown-download/; <https://unop.uk/on-google-maps-geotagging-and-privacy/>)

The Notifications screen continues to grow with about one new toggle every month ([here it was in February](#)). This time around, it adds an option to receive updates about new and popular places near you. This likely includes new businesses and attractions, or anything that seems to be building a higher visitor count recently.

This notification is enabled by default, so you can preemptively drop into *Settings* -> *Notifications* and turn it off if you aren't interested in details like this.

Update: It appears that Google have pushed out at least two new on-by-default features since I wrote this (not that long ago). These are "Photo view count opportunities" and "New and popular places". You may also like to read my post on [not respecting mobile data / WiFi settings and Apple](#).

Figure L (Source: <https://www.samsung.com/us/support/answer/ANS00047881/>)

- **My Places:** Adjusts your settings and displays shortcuts pertinent to your location, such as Home, Work, and Out and about.

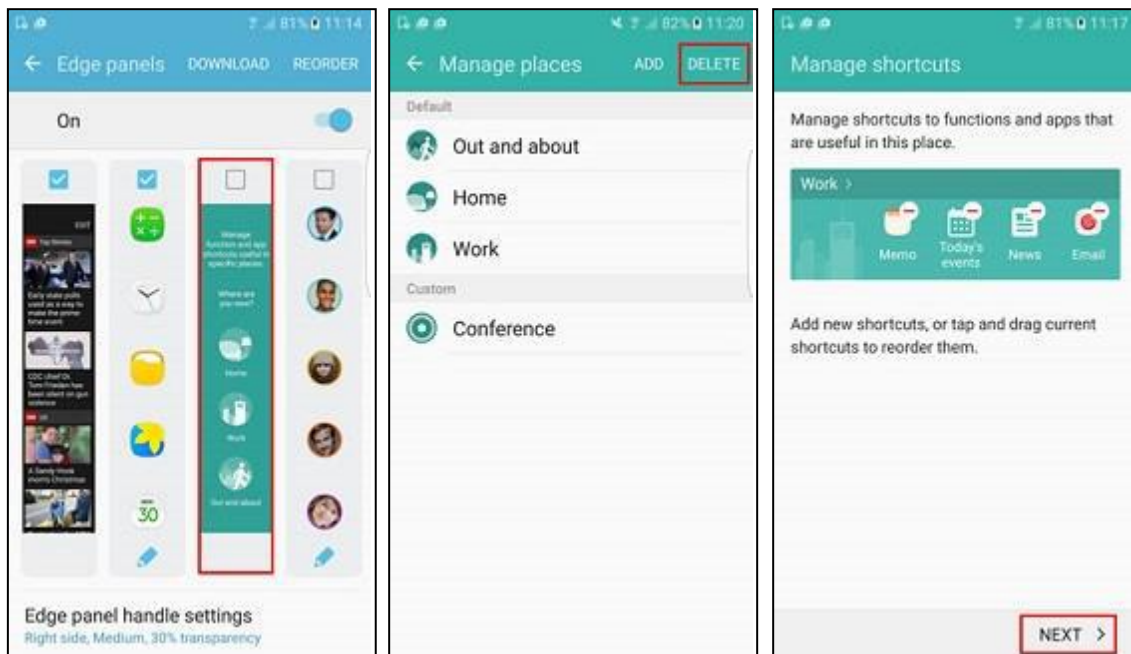
Figure M (Source: <https://web.archive.org/web/20170217211224/http://www.samsung.com:80/uk/support/skp/faq/1105547>)

The **My places** Edge panel allows you to set specific shortcuts and settings depending on your location. The below steps will show you how to enable the My Places function, set places, change your shortcuts, and add, edit and delete places.

Figure N (Source: <https://web.archive.org/web/20170217211224/http://www.samsung.com:80/uk/support/skp/faq/1105547>)

To enable the My Places edge panel:

5. Choose the **My Places** panel and enable it by ticking the box at the top.



32. The S7 is operable to connect to a communications network, as shown in

Figure O.

Figure O (Source: <https://www.samsung.com/us/support/owners/product/galaxy-s7-unlocked>)

<p>Frequencies and Data Type ?</p> <p>2G CDMA: CDMA800, USPCS1900</p> <p>2G GSM: GSM850,GSM900, DCS1800, PCS1900</p> <p>3G CDMA: BC0(800), BC1(1900, BC10(800)</p> <p>3G UMTS: B1(2100), B2(1900), B4(AWS), B5(850), B8(900)</p> <p>3G TD-SCDMA: B34(2010), B39(1880)</p> <p>4G FDD LTE: B1(2100), B2(1900), B3(1800), B4(AWS), B5(850), B7(2600), B8(900), B12(700), B13(700), B18(800), B19(800), B20(800)</p>	<p>SIM Size</p> <p>SIM 1 + MicroSD</p>
<p>Connectivity</p> <p>Wi-Fi ?</p> <p>802.11 a/b/g/n/ac 2.4G+5GHz, VHT80 MU-MIMO</p>	<p>USB ?</p> <p>USB 2.0</p>

33. The S7 features at least one function associated with at least one communication service, as shown in Figures P, Q, R and S.

Figure P (Source: <https://www.samsung.com/us/support/answer/ANS00047881/>)

- **My Places:** Adjusts your settings and displays shortcuts pertinent to your location, such as Home, Work, and Out and about.

Figure Q (Source: [https://web.archive.org/web/20170217211224/http://www.sam\[sung.com:80/uk/support/skp/faq/1105547](https://web.archive.org/web/20170217211224/http://www.sam[sung.com:80/uk/support/skp/faq/1105547))

The My places Edge panel allows you to set specific shortcuts and settings depending on your location.

The below steps will show you how to enable the My Places function, set places, change your shortcuts, and add, edit and delete places.

Figure R (Source: [https://web.archive.org/web/20170217211224/http://www.sam\[sung.com:80/uk/support/skp/faq/1105547](https://web.archive.org/web/20170217211224/http://www.sam[sung.com:80/uk/support/skp/faq/1105547))

To enable the My Places edge panel:

5. Choose the **My Places** panel and enable it by ticking the box at the top.

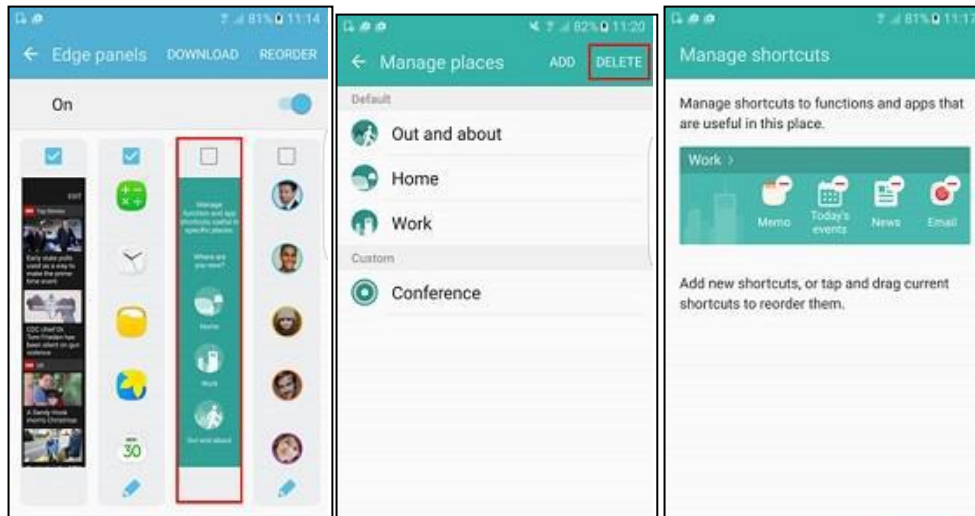
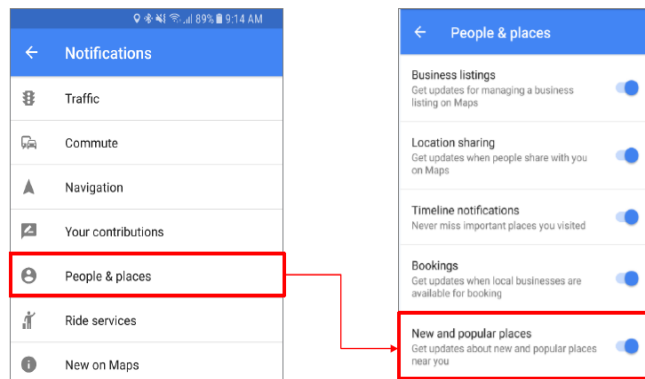


Figure S (Source: Screen Capture, Google Maps version 9.64.1 taken on 9/8/2017) (red marking is added)

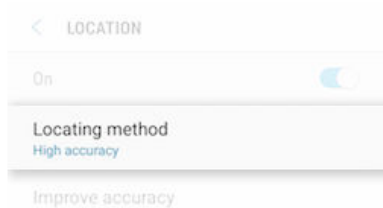


34. The S7 processor is operable to connect the telephone to a location server to obtain a current location of the telephone, as shown in Figure T:

Figure T (Source: <https://www.samsung.com/us/support/answer/ANS00062037/>)

You can select the accuracy level of your device's locating method.

1. Navigate to **Apps > Settings**.
2. Touch **Search**, then search for and select **Location**.
3. Touch **Locating method**.



4. Choose the preferred location method option.



35. The S7 is able to select a function from the datastore, and refresh a screen on the display panel to include the at least one communication service associated with the selected

function based at least in part on the current location of the telephone, as shown in Figure U, V and W.

Figure U (Source: <https://www.samsung.com/us/support/answer/ANS00047881/>)

- **My Places:** Adjusts your settings and displays shortcuts pertinent to your location, such as Home, Work, and Out and about.

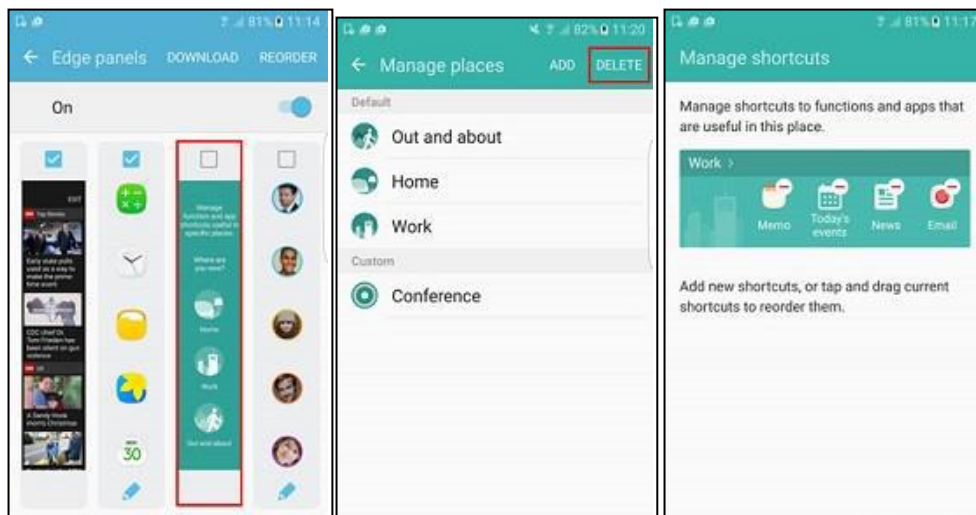
Figure V (Source: <https://web.archive.org/web/20170217211224/http://www.samsung.com:80/uk/support/skp/faq/1105547>)

The **My places** Edge panel allows you to set specific shortcuts and settings depending on your location. The below steps will show you how to enable the My Places function, set places, change your shortcuts, and add, edit and delete places.

Figure W (Source: <https://web.archive.org/web/20170217211224/http://www.samsung.com:80/uk/support/skp/faq/1105547>)

To enable the My Places edge panel:

5. Choose the **My Places** panel and enable it by ticking the box at the top.



36. Local Intelligence is entitled to recover from Defendants the damages sustained by Local Intelligence as a result of Defendants' infringement of the '982 patent 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.

37. Upon information and belief, Defendants began selling infringing phones in April 2015, if not earlier.

COUNT III – INFRINGEMENT OF U.S. PATENT NO. 9,084,084

38. Local repeats and realleges the allegations of paragraphs 1 through 37 as if fully set forth herein.

39. Without license or authorization and in violation of 35 U.S.C. § 271(a), Samsung has infringed at least claim 1 of the '084 patent by making, having made, using, importing, offering for sale, and/or selling infringing smartphones, including the Accused Samsung Smartphones, each of which has a conferencing system that uses a location server to obtain a current location of the telephone and then uses that location information to refresh the display on the telephone with certain information, as further explained below.

40. The Accused Samsung Smartphones meet all limitations of Claim 1 as they are
- a. a conferencing system comprising
 - b. a display panel, a processor, a telephone coupled to a voice network, the display panel and the processor, and a datastore comprising at least one function comprising
 - c. information relating to a current location of the telephone and a user of the telephone,
 - d. wherein the at least one function is associated with at least one conferencing communication service,

- e. wherein the processor is operable to connect the telephone to a location server to obtain a current location of the telephone,
- f. select a function from the datastore, and
- g. refresh a screen on the display panel to include the at least one conferencing communication service associated with the selected function based on the current location of the telephone.

41. By way of illustration and only as example, the S7 is a conferencing system comprising a display panel, a processor, a telephone coupled to a voice network, the display panel and the processor, and a datastore comprising at least one function, as shown in Figure X.

Figure X (Source: Samsung Galaxy S7: [https://www.samsung.com/us/support/owners\[-\]/product/galaxy-s7-verizon](https://www.samsung.com/us/support/owners[-]/product/galaxy-s7-verizon))

Processor	
Processor Speed, Type 2.15GHz, 1.6GHz, Quad-CoreGHz	
Display	
Main Display Resolution 2560 x 1440 (Quad HD)	Main Display Size 5.1" (129.2mm)"
Color Depth 16MM	
Camera	
Camera resolution (Front) CMOS 5.0 MPMP, CMOS 5.0MP	Camera resolution (Rear) ? Dual Pixel 12.0 MPMP
Main Camera - Flash Yes	Main Camera - Auto Focus Yes
Memory	
Internal Memory ? 32GB	Available Memory ? MicroSD (Up to 256GB)

42. The S7 provides information relating to a current location of the telephone and a user of the telephone, as shown in Figures Y, Z, AA, and BB:

Figure Y (Source: <http://www.samsung.com/us/support/answer/ANS0004788>)

The following Edge panels are available by default. Swipe the Edge screen to scroll through the panels.

- **Apps edge:** Displays frequently used applications.
- **Tasks edge:** Displays any application shortcuts you've added to your Home screen.
- **People edge:** Displays contacts you have marked as favorites and any others you select.
- **Yahoo! News:** Shows breaking news and top headlines.
- **My Places:** Adjusts your settings and displays shortcuts pertinent to your location, such as Home, Work, and Out and about.

Enhanced Edge Features on Your Galaxy S7 Edge

The Edge screen on your device gives you instant access to the features and information you rely on the most. Edge panels keep you in the moment by putting your favorite applications, contacts, news, and more at your fingertips without having to leave the application you are using. When your device's screen is covered, Edge feeds display notifications, news, scores, and more, so you can stay up to date without waking up your device. When your device is turned over, Edge lighting alerts you to notifications and incoming calls.

Figure Z (Source: <https://www.samsung.com/us/support/answer/ANS00047881/>)

- **My Places:** Adjusts your settings and displays shortcuts pertinent to your location, such as Home, Work, and Out and about.

Figure AA (Source: <https://web.archive.org/web/20170217211224/http://www.samsung.com:80/uk/support/skp/faq/1105547>)

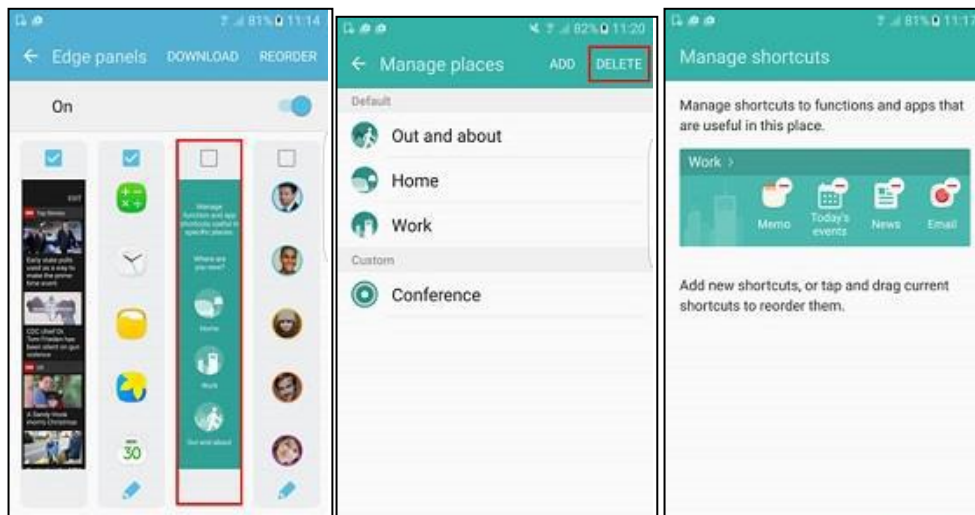
The **My places** Edge panel allows you to set specific shortcuts and settings depending on your location.

The below steps will show you how to enable the My Places function, set places, change your shortcuts, and add, edit and delete places.

Figure BB (Source: <https://web.archive.org/web/20170217211224/http://www.samsung.com:80/uk/support/skp/faq/1105547>)

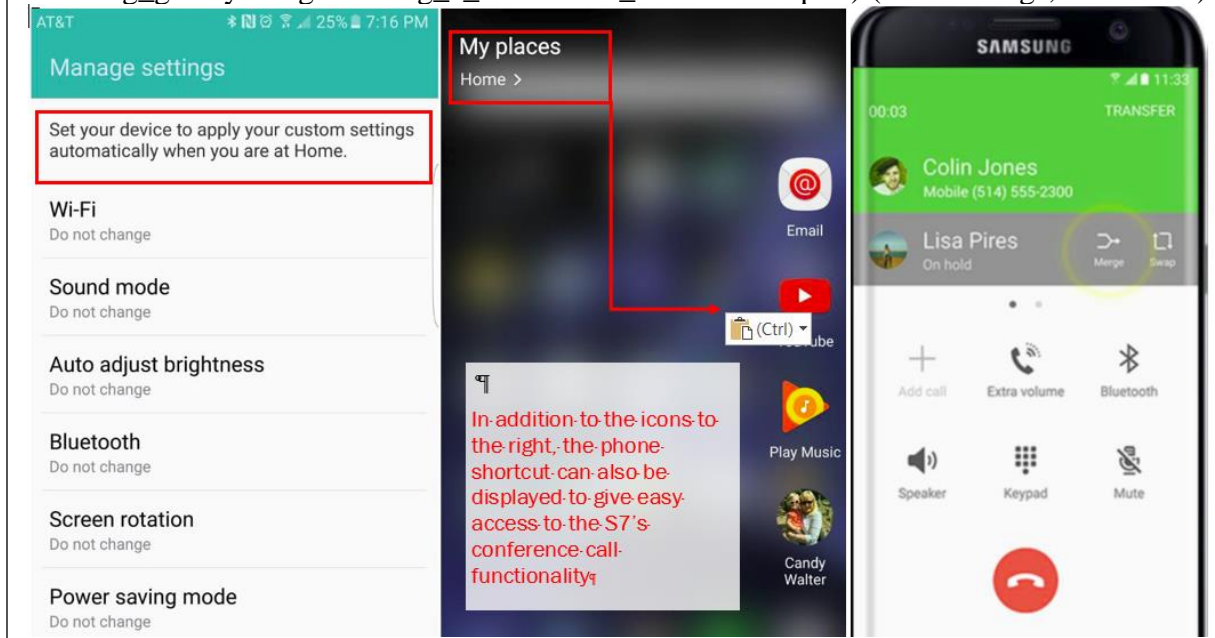
To enable the My Places edge panel:

5. Choose the **My Places** panel and enable it by ticking the box at the top.



43. The S7 also provides at least one function associated with at least one conferencing communication service, as shown in Figure CC.

Figure CC (Source: <https://www.greenbot.com/article/3075841/android/the-best-edge-panel-add-ons-for-the-galaxy-s7-edge.html#slide9>; [https://videotron.tmx.ca/en/topic/\[-\]samsung_galaxys7edge/making_a_conference_call.html#step=7](https://videotron.tmx.ca/en/topic/[-]samsung_galaxys7edge/making_a_conference_call.html#step=7)) (red markings, text added)

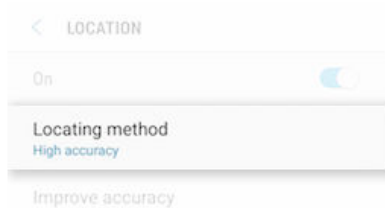


44. The S7 is operable to connect the telephone to a location server to obtain a current location of the telephone, as show in Figure DD below.

Figure DD (Source: <https://www.samsung.com/us/support/answer/ANS00062037/>)

You can select the accuracy level of your device's locating method.

1. Navigate to **Apps > Settings**.
2. Touch **Search**, then search for and select **Location**.
3. Touch **Locating method**.



4. Choose the preferred location method option.



45. The S7 can select a function from the datastore, per Figure EE, FF, GG, HH and

II:

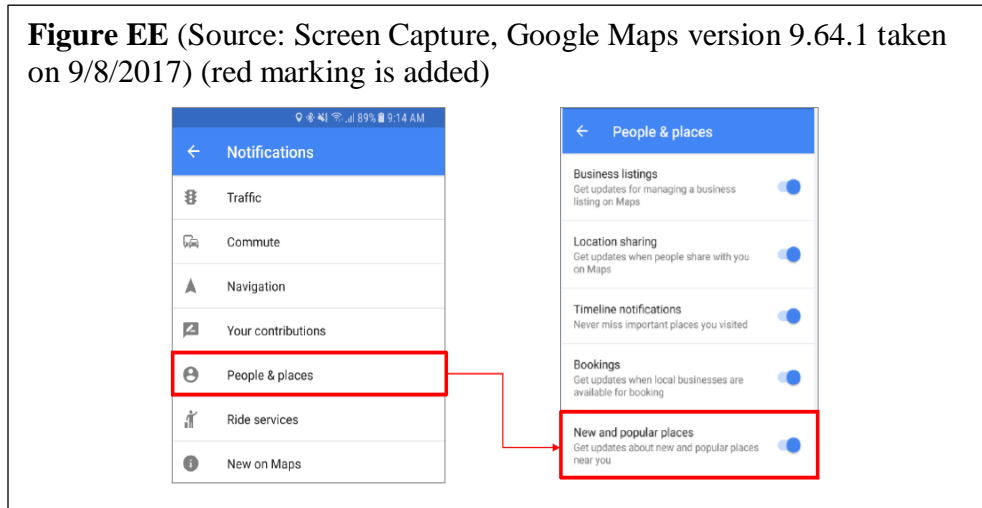


Figure FF (Source: www.androidpolice.com/2016/05/30/google-maps-v9-26-1-adds-search-along-route-walking-bicycling-changes-driving-mode-fabs-adds-new-settings-apk-teardown-download/; <https://unop.uk/on-google-maps-geotagging-and-privacy/>)

The Notifications screen continues to grow with about one new toggle every month ([here it was in February](#)). This time around, it adds an option to receive updates about new and popular places near you. This likely includes new businesses and attractions, or anything that seems to be building a higher visitor count recently.

This notification is enabled by default, so you can preemptively drop into *Settings* → *Notifications* and turn it off if you aren't interested in details like this.

Update: It appears that Google have pushed out at least two new on-by-default features since I wrote this (not that long ago). These are "Photo view count opportunities" and "New and popular places". You may also like to read my post on [not respecting mobile data / WiFi settings and Apple](#).

Figure GG (Source: <https://www.samsung.com/us/support/answer/ANS00047881/>)

- **My Places:** Adjusts your settings and displays shortcuts pertinent to your location, such as Home, Work, and Out and about.

Figure HH (Source: <https://web.archive.org/web/20170217211224/http://www.samsung.com:80/uk/support/skp/faq/1105547>)

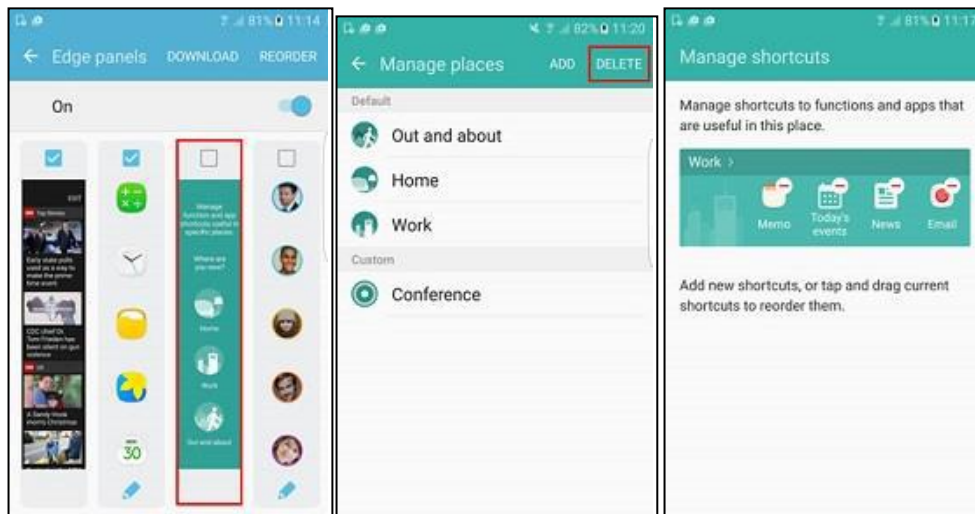
The **My places** Edge panel allows you to set specific shortcuts and settings depending on your location.

The below steps will show you how to enable the My Places function, set places, change your shortcuts, and add, edit and delete places.

Figure II (Source: <https://web.archive.org/web/20170217211224/http://www.samsung.com:80/uk/support/skp/faq/1105547>)

To enable the My Places edge panel:

5. Choose the **My Places** panel and enable it by ticking the box at the top.



46. The above illustrations also show that the S7 refreshes its screen on the display panel to include the at least one conferencing communication service associated with the selected function based on the current location of the telephone.

47. Upon information and belief, Defendants began selling infringing phones in April 2015, if not earlier.

JURY DEMAND

Local Intelligence hereby demands a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Local Intelligence requests that this Court enter judgment against Defendants as follows:

- A. An adjudication that Defendants have infringed the '067, '982, and '084 patents;
- B. An award of damages to be paid by Defendants adequate to compensate Local Intelligence for Defendants' past infringement of the '067, '982, and '084 patents through the earlier of the date of judgment or the expiration of the patents, including interest, costs, expenses and an accounting of all infringing acts including, but not limited to, those acts not presented at trial;
- C. An injunction precluding Defendants' further infringement of the '067, '982, and '084 patents;
- D. A declaration that this case is exceptional under 35 U.S.C. § 285, and an award of Local Intelligence's reasonable attorneys' fees; and

E. An award to Local Intelligence of such further relief at law or in equity as the Court decides is just and proper.

DATED: October 27, 2017

Respectfully submitted,

/s/ L. Charles van Cleef

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