

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

ROTHSCHILD PATENT IMAGING LLC,	§	
	§	
Plaintiff,	§	Case No:
	§	
vs.	§	PATENT CASE
	§	
YUNEEC USA, INC.	§	
	§	
Defendant.	§	
	§	

**COMPLAINT**

Plaintiff Rothschild Patent Imaging LLC (“Plaintiff” or “RPI”) files this original Complaint against Yuneeec USA, Inc. (“Defendant” or “Yuneeec”) for infringement of United States Patent No. 8,437,797 (“the ‘797 Patent”) and United States Patent No. 8,204,437 (“the ‘437 Patent”).

**PARTIES AND JURISDICTION**

1. This is an action for patent infringement under Title 35 of the United States Code. Plaintiff is seeking injunctive relief as well as damages.
2. Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 (Federal Question) and 1338(a) (Patents) because this is a civil action for patent infringement arising under the United States patent statutes.
3. Plaintiff is a Texas limited liability company having an office with an address at 1400 Preston Rd., Suite 400, Plano, TX 75093.
4. On information and belief, Defendant is a Delaware corporation, with its principal place of business at 2275 Sampson Ave, Ste. 200, Corona, CA 92879.
5. On information and belief, this Court has personal jurisdiction over Defendant

because Defendant has committed, and continues to commit, acts of infringement in this District, has conducted business in this District, and/or has engaged in continuous and systematic activities in this District.

6. On information and belief, Defendant's instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in this District.

**VENUE**

7. Venue is proper in this District pursuant to 28 U.S.C. § 1400(b) because Defendant is deemed to reside in this district as it is a Delaware corporation.

**COUNT I**  
**(INFRINGEMENT OF UNITED STATES PATENT NO 8,437,797)**

8. Plaintiff incorporates paragraphs 1-7 herein by reference.

9. This cause of action arises under the patent laws of the United States and, in particular, under 35 U.S.C. §§ 271, et seq.

10. Plaintiff is the owner by assignment of the '797 Patent with sole rights to enforce the '797 Patent and sue infringers.

11. A copy of the '797 Patent, titled "Wireless Image Distribution System and Method," is attached hereto as Exhibit A.

12. The '797 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

13. Upon information and belief, Defendant has infringed and continues to infringe one or more claims (at least by having its employees, or someone under Defendant's control, test the accused product), including at least Claims 6 and 7 of the '797 Patent by making, using, importing, selling, and/or offering for wireless drone cameras covered by at least Claims 6 and 7 of the '797 Patent.

14. On information and belief, Defendant sells, offers to sell, and/or uses wireless drone cameras, including, without limitation, the Yuneec International Breeze and Breeze Cam app, and any similar devices (“Product”), which infringe at least Claims 6 and 7 of the ‘797 Patent.

15. Regarding Claim 6, the Product is an image-capturing mobile device (e.g., a drone with a camera attachment), which includes a wireless receiver (e.g., a Wi-Fi receiver) and a wireless transmitter (e.g., a Wi-Fi transmitter). On information and belief, the Product receives instructions from a user’s smartphone via Wi-Fi utilizing a wireless receiver present on the Product and sends captured images to a user’s smartphone via Wi-Fi utilizing a wireless transmitter present on the Product. Certain limitations of the foregoing element are illustrated in the screenshots below.

## Your flying camera

Introducing Breeze, the flying camera designed with you in mind. Both convenient and compact, Breeze is controlled by your iOS or Android device with the Breeze Cam app and weighs just under 1 pound. Now capture aerial photos and video of your daily adventures effortlessly—and do it in stunning 4K Ultra High Definition. Simply take Breeze out of the box and let it fly.



<http://us.yuneec.com/breeze-overview>

### CAMERA

Controllable Range (Pitch): 0°-90°  
Image Sensor: 1/3.06 CMOS  
Effective Pixels: 13 Megapixels  
Video Stabilization: Digital Stabilization  
Video Modes:  
• UHD-(4K) 2160p 30fps  
Video Downlink: 848x480p 30fps  
• FHD-1080P 30fps with Digital Stabilization  
Video Downlink: 720p 30fps  
• HD- 720p 60fps with Digital Stabilization  
Video Downlink: 720p 30fps  
Photo Resolution: 4160x3120  
Photo Format: JPEG  
Scene Modes: Nature, Saturation, RAW, Night  
FOV: 117°  
Exposure: -2.0-2.0

[http://us.yuneec.com/files/downloads/breeze/Breeze\\_user\\_manual\\_v2.pdf](http://us.yuneec.com/files/downloads/breeze/Breeze_user_manual_v2.pdf)

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Exposure: -2.0-2.0

White Balance: Auto, Sunny, Sunrise, Sunset, Cloudy, Fluorescent, Incandescent  
Internal Memory: 16G Flash  
Other: Smart Follow Me, Video Editing

### CONNECTIVITY/APP

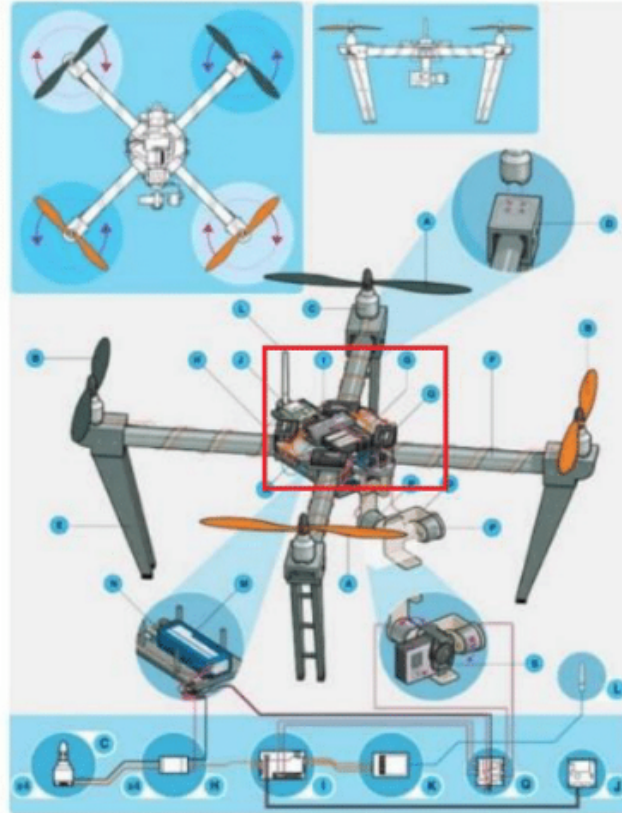
Radio Control: 5 GHz Wi-Fi  
Mobile APP: Breeze Cam (available at the Apple Store and Google play)  
Required Operating System:  
• iOS 8.0 or later  
• Android 4.2.2 or later  
Flight Range: 100m(depending on cellphone)  
Intelligent Flight Modes: Pilot, Selfie, Orbit, Journey, Follow Me

[http://us.yuneec.com/files/downloads/breeze/Breeze\\_user\\_manual\\_v2.pdf](http://us.yuneec.com/files/downloads/breeze/Breeze_user_manual_v2.pdf)

16. The Product includes a processor connected to the wireless receiver and

transmitter. For example, the Product must have a processor connected to a Wi-Fi module in order to capture and send images to a user's smartphone. Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.

### Drone Parts And Components – Quick Overview



<https://www.dronezon.com/learn-about-drones-quadcopters/drone-components-parts-overview-with-tips/>

#### F. Boom

Shorter booms increase maneuverability, while longer booms increase stability. Booms must be tough to hold up in a crash while interfering with prop downdraft as little as possible. In many drones the boom is part of the main body. Other drone have a definite boom as a separate part. The Parrot AR 2.0 has the central cross boom.

**Tip:** Examine and insure that the boom has not become bent as this would effect the flying capabilities.

#### G. Main Drone Body Part

This is the central hub from which booms radiate like spokes on a wheel. It houses battery, main boards, processors avionics, cameras, and sensors.

**Tip:** Most drones are not waterproof so it is vital that the internal components of the main body do not get wet. A hard landing may not break the body of the drone but the shock could damage the internal drone components in the main body.

<https://www.dronezon.com/learn-about-drones-quadcopters/drone-components-parts-overview-with-tips/>

17. The processor is configured to receive a plurality of photographic images. For example, the Product's camera assembly is able to capture digital images, record video, and capture still image frames from video. Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.

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<http://us.yuneec.com/breeze-overview>



### CAMERA

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• HD- 720p 60fps with Digital Stabilization  
Video Downlink: 720p 30fps  
Photo Resolution: 4160x3120  
Photo Format: JPEG  
Scene Modes: Nature, Saturation, RAW, Night  
FOV: 117°  
Exposure: -2.0-2.0

White Balance: Auto, Sunny, Sunrise, Sunset, Cloudy, Fluorescent, Incandescent  
Internal Memory: 16G Flash  
Other: Smart Follow Me, Video Editing





### CONNECTIVITY/APP

Radio Control: 5 GHz Wi-Fi  
Mobile APP: Breeze Cam (available at the Apple Store and Google play)  
Required Operating System:  
• iOS 8.0 or later  
• Android 4.2.2 or later  
Flight Range: 100m(depending on cellphone)  
Intelligent Flight Modes: Pilot, Selfie, Orbit, Journey, Follow Me

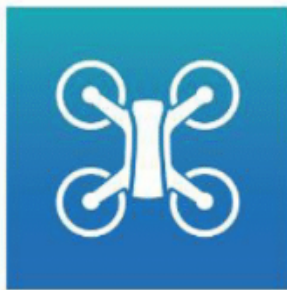
[http://us.yuneec.com/files/downloads/breeze/Breeze\\_user\\_manual\\_v2.pdf](http://us.yuneec.com/files/downloads/breeze/Breeze_user_manual_v2.pdf)

# Superior image quality

Featuring breathtaking 4K Ultra High Definition and ultra-clear 13 megapixel stills, Breeze is just as capable as drones twice its size. Enjoy a live 720 HD live stream of your flight on your smart device.

 4K VIDEO RESOLUTION	 13MP STILL IMAGES	 AUTOMATED FLIGHT MODES	 720 HD LIVE VIEW
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<http://us.yuneec.com/breeze-overview>



## Breeze Cam




Yuneec International Co.,Ltd Photography

★★★★☆ 375

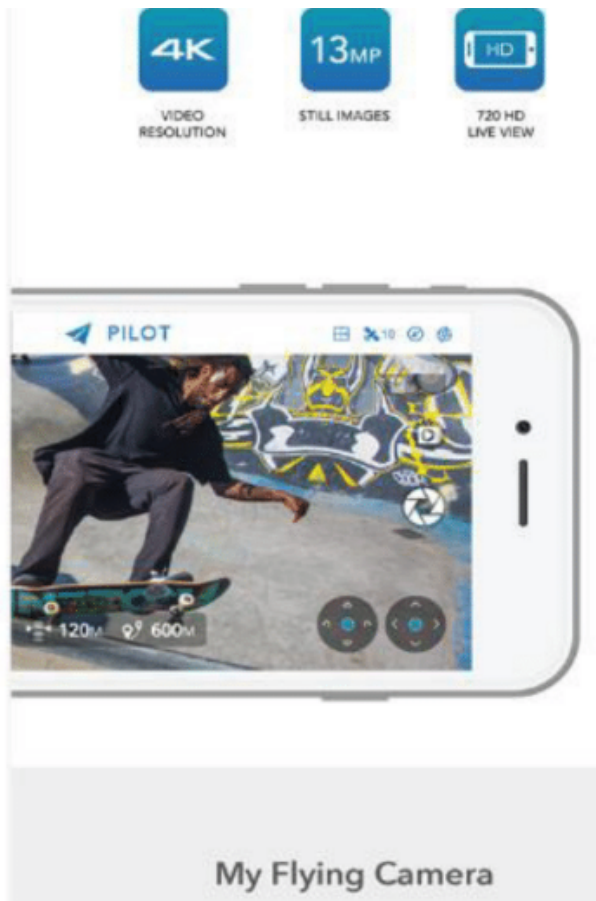
3+

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Install

 Five Automated Flight Modes	 Instant Sharing to Social Media	 Safe to Fly Indoors and Outdoors
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<https://play.google.com/store/apps/details?id=com.yuneec.android.flyingcamera&hl=en>



<https://play.google.com/store/apps/details?id=com.yuneeec.android.flyingcamera&hl=en>

18. The processor filters the images using a transfer criterion. For example, the Product filters the plurality of photographic images (e.g., image frames captured by the Product's camera assembly during a livestream feed) using a transfer criteria (e.g., a user can select to capture particular image frames as stills/snapshots using the Breeze Cam Application on a smartphone). Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.



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<http://us.yuneec.com/breeze-overview>



### CAMERA

Controllable Range (Pitch): 0°-90°

Image Sensor: 1/3.06 CMOS

Effective Pixels: 13 Megapixels

Video Stabilization: Digital Stabilization

Video Modes:

- UHD-(4K) 2160p 30fps  
Video Downlink: 848x480p 30fps
  - FHD-1080P 30fps with Digital Stabilization  
Video Downlink: 720p 30fps
  - HD- 720p 60fps with Digital Stabilization  
Video Downlink: 720p 30fps
- Photo Resolution: 4160x3120  
Photo Format: .JPEG

Scene Modes: Nature, Saturation, RAW, Night

FOV: 117°

Exposure: -2.0-2.0

White Balance: Auto, Sunny, Sunrise, Sunset, Cloudy, Fluorescent, Incandescent

Internal Memory: 16G Flash

Other: Smart Follow Me, Video Editing

### CONNECTIVITY/APP

Radio Control: 5 GHz Wi-Fi

Mobile APP: Breeze Cam (available at the Apple Store and Google play)

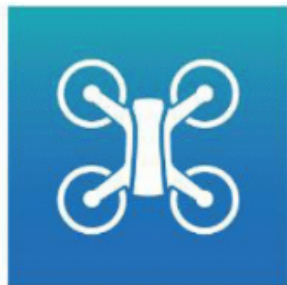
Required Operating System:

- iOS 8.0 or later
- Android 4.2.2 or later

Flight Range: 100m(dependent on cellphone)

Intelligent Flight Modes: Pilot, Selfie, Orbit, Journey, Follow Me

[http://us.yuneec.com/files/downloads/breeze/Breeze\\_user\\_manual\\_v2.pdf](http://us.yuneec.com/files/downloads/breeze/Breeze_user_manual_v2.pdf)



# Breeze Cam

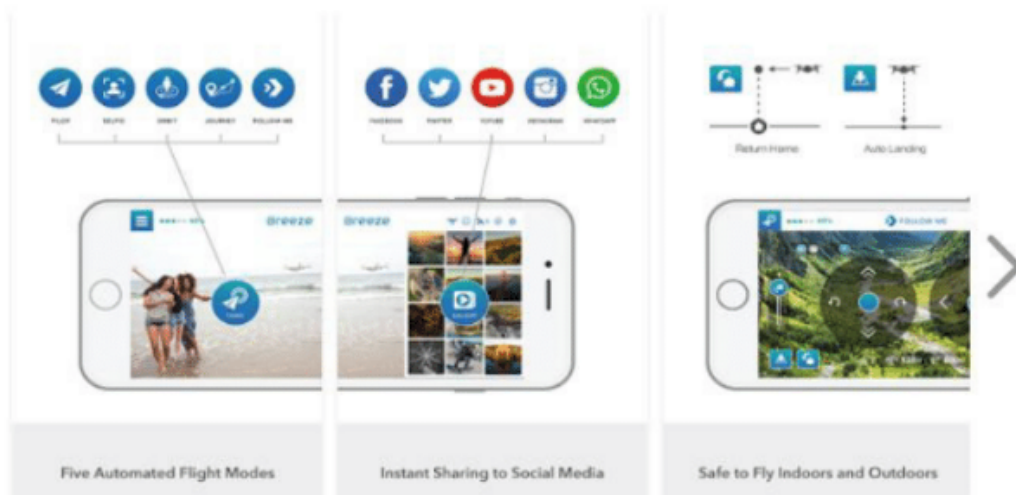
Yuneec International Co.,Ltd Photography

★★★★☆ 375

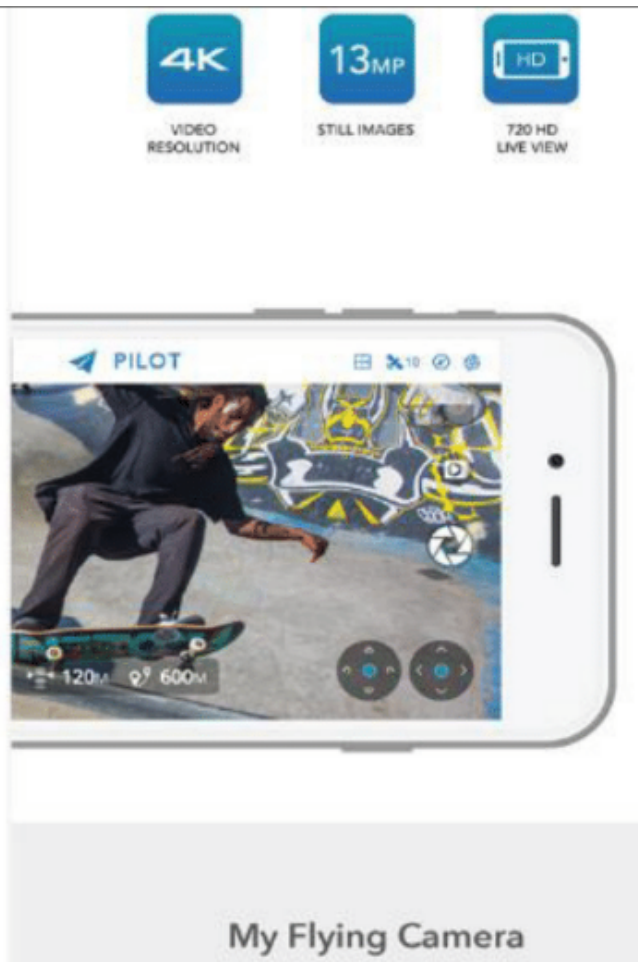
3+

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<https://play.google.com/store/apps/details?id=com.yuneec.android.flyingcamera&hl=en>



<https://play.google.com/store/apps/details?id=com.yuneeec.android.flyingcamera&hl=en>



<http://www.makeuseof.com/tag/yuneeec-breeze-4k-review/>


19. The processor, in conjunction with the wireless transmitter, sends the filtered images (e.g., the snapshot images selected by the user) to a second mobile device (e.g., a smartphone, tablet, etc. having the Breeze Cam app). For example, the Product transmits, via the wireless transmitter (e.g., the Product's Wi-Fi module) and to a second mobile device (e.g., a smartphone having the Breeze Cam app installed), the filtered plurality of photographic images (e.g., the snapshots/stills taken from all the image frames comprising a live stream). Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.

## 7. BINDING BREEZE WITH YOUR SMART DEVICE

Power on your Breeze on a flat and stable surface and wait for it to complete initialization. When the LED indicator blinks blue rapidly, Breeze has entered the "Wi-Fi" bind mode.



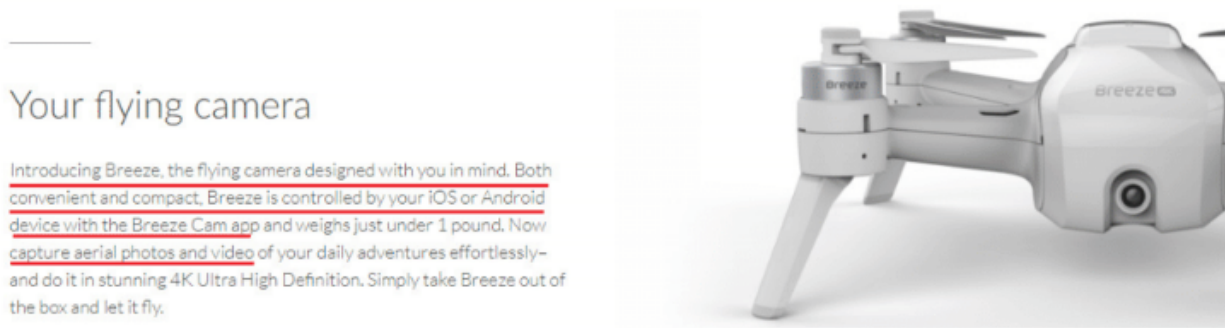
**METHOD 1:** If you are using an iPhone or an iPad, select Settings > Wi-Fi ;  
If you are using an Android smart phone, select Settings > Wireless and networks > Wi-Fi. Select the network: BreezeXXXXXX and enter the Password: 1234567890.

**METHOD 2:** Tap [  ] and you can connect the Wi-Fi network directly. Select the network: Breeze XXXXXX and enter the Password: 1234567890.

[http://us.yuneeec.com/files/downloads/breeze/Breeze\\_user\\_manual\\_v2.pdf](http://us.yuneeec.com/files/downloads/breeze/Breeze_user_manual_v2.pdf)

20. The processor, in conjunction with the wireless receiver, receives the transfer criteria (e.g., the user's selection of snapshot images) from the second mobile device (e.g., a smartphone with the Breeze Cam app installed). For example, the Product receives, via the wireless receiver (e.g., the Product's Wi-Fi module) and from the second mobile device (e.g., a smartphone with the Breeze Cam Application installed), the transfer criteria (e.g., a user will select stills/snapshots to be taken, from the image frames making up the entirety of a live stream, from a smartphone with the Breeze Cam app).

21. Regarding Claim 7, the transmitting is conditional upon the image-capturing mobile device and the second mobile device meeting a pre-defined pairing criteria. For example, image transmission is conditional upon the image-capturing mobile device (e.g., the Product's camera) and the second mobile device (e.g., a smartphone with the Breeze Cam app installed) meeting a pre-defined pairing criteria (e.g., both devices are connected over the same Wi-Fi network). Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.



<http://us.yuneec.com/breeze-overview>

**CAMERA**

Controllable Range (Pitch): 0°-90°  
Image Sensor: 1/3.06 CMOS  
Effective Pixels: 13 Megapixels  
Video Stabilization: Digital Stabilization  
Video Modes:  
• UHD-(4K) 2160p 30fps  
Video Downlink: 848x480p 30fps  
• FHD-1080P 30fps with Digital Stabilization  
Video Downlink: 720p 30fps  
• HD- 720p 60fps with Digital Stabilization  
Video Downlink: 720p 30fps  
Photo Resolution: 4160x3120  
Photo Format: JPEG  
Scene Modes: Nature, Saturation, RAW, Night  
FOV: 117°  
Exposure: -2.0-2.0

White Balance: Auto, Sunny, Sunrise, Sunset, Cloudy, Fluorescent, Incandescent  
Internal Memory: 16G Flash  
Other: Smart Follow Me, Video Editing





**CONNECTIVITY/APP**

Radio Control: 5 GHz Wi-Fi  
Mobile APP: Breeze Cam (available at the Apple Store and Google play)  
Required Operating System:  
• iOS 8.0 or later  
• Android 4.2.2 or later  
Flight Range: 100m(depending on cellphone)  
Intelligent Flight Modes: Pilot, Selfie, Orbit, Journey, Follow Me

[http://us.yuneec.com/files/downloads/breeze/Breeze\\_user\\_manual\\_v2.pdf](http://us.yuneec.com/files/downloads/breeze/Breeze_user_manual_v2.pdf)

## Superior image quality

Featuring breathtaking 4K Ultra High Definition and ultra-clear 13 megapixel stills, Breeze is just as capable as drones twice its size. Enjoy a live 720 HD live stream of your flight on your smart device.

			
VIDEO RESOLUTION	STILL IMAGES	AUTOMATED FLIGHT MODES	720 HD LIVE VIEW


<http://us.yuneec.com/breeze-overview>

## 7. BINDING BREEZE WITH YOUR SMART DEVICE

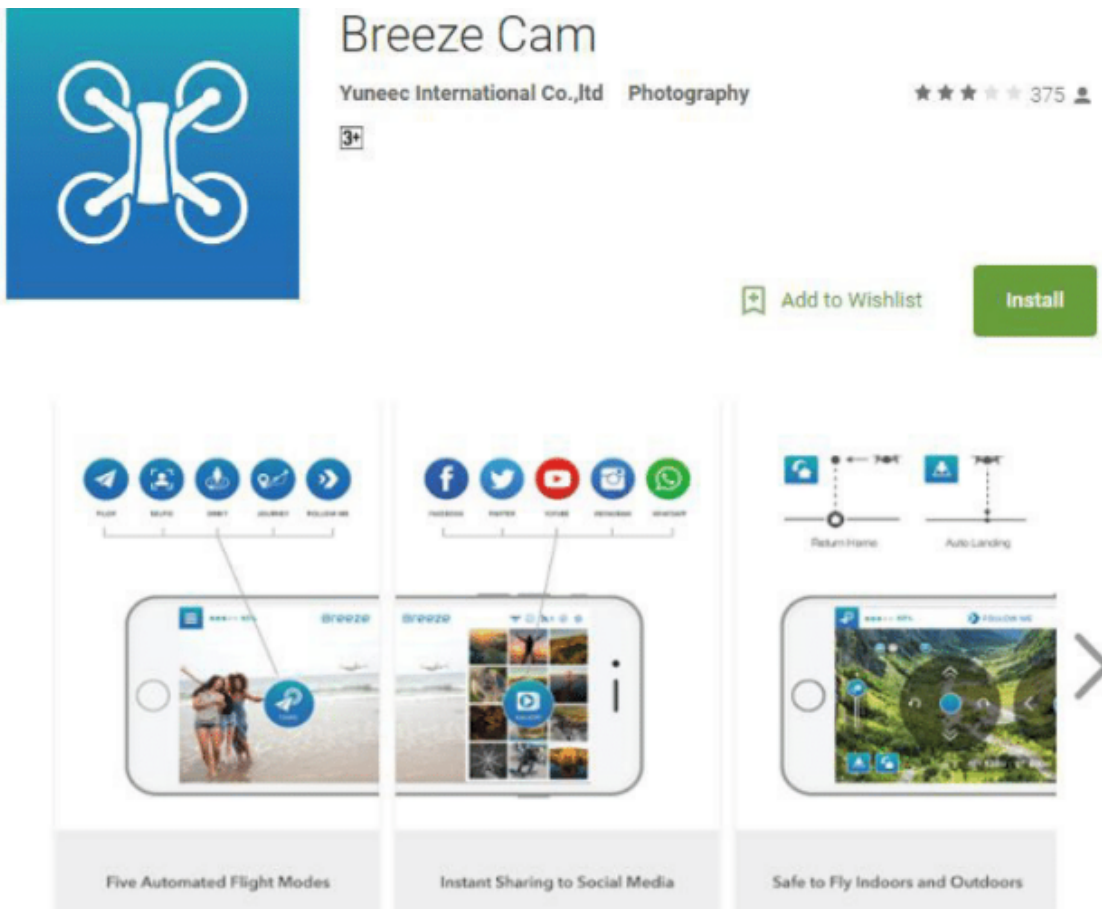
Power on your Breeze on a flat and stable surface and wait for it to complete initialization. When the LED indicator blinks blue rapidly, Breeze has entered the "Wi-Fi" bind mode.



**METHOD 1:** If you are using an iPhone or an iPad, select Settings > Wi-Fi ;  
If you are using an Android smart phone, select Settings > Wireless and networks > Wi-Fi. Select the network: BreezeXXXXXX and enter the Password: 1234567890.

**METHOD 2:** Tap [  ] and you can connect the Wi-Fi network directly. Select the network: Breeze XXXXXX and enter the Password: 1234567890.

[http://us.yuneeec.com/files/downloads/breeze/Breeze\\_user\\_manual\\_v2.pdf](http://us.yuneeec.com/files/downloads/breeze/Breeze_user_manual_v2.pdf)



<https://play.google.com/store/apps/details?id=com.yuneec.android.flyingcamera&hl=en>

22. Defendant’s actions complained of herein will continue unless Defendant is enjoined by this court.

23. Defendant’s actions complained of herein are causing irreparable harm and monetary damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained by this Court.

24. Plaintiff is in compliance with 35 U.S.C. § 287.

**COUNT II**  
**(INFRINGEMENT OF UNITED STATES PATENT NO 8,204,437)**

25. Plaintiff incorporates paragraphs 1-24 herein by reference.

26. This cause of action arises under the patent laws of the United States and, in



particular, under 35 U.S.C. §§ 271, et seq.

27. Plaintiff is the owner by assignment of the ‘437 Patent with sole rights to enforce the ‘437 patent and sue infringers.

28. A copy of the ‘437 Patent, titled “Wireless Image Distribution System and Method,” is attached hereto as Exhibit B.

29. The ‘437 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

30. On information and belief, Defendant has infringed and continues to infringe one or more claims (at least by having its employees, or someone under Defendant's control, test the accused product), including at least Claim 1 of the ‘437 Patent by making, using, importing, selling, and/or offering for wireless drone cameras covered by at least Claim 1 of the ‘437 Patent.

31. On information and belief, Defendant sells, offers to sell, and/or uses wireless drone cameras, including, without limitation, the Yuneec International Breeze and Breeze Cam app, and any similar devices (“Product”), which infringe at least Claim 1 of the ‘437 Patent.

32. The Product is a system that can distribute at least one digital photographic image (e.g., a drone camera with the ability to transmit images to another device). Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.



<http://us.yuneec.com/breeze-overview>

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**4K**  
VIDEO  
RESOLUTION

**13MP**  
STILL  
IMAGES

  
AUTOMATED  
FLIGHT MODES

  
720 HD  
LIVE VIEW

<http://us.yuneec.com/breeze-overview>

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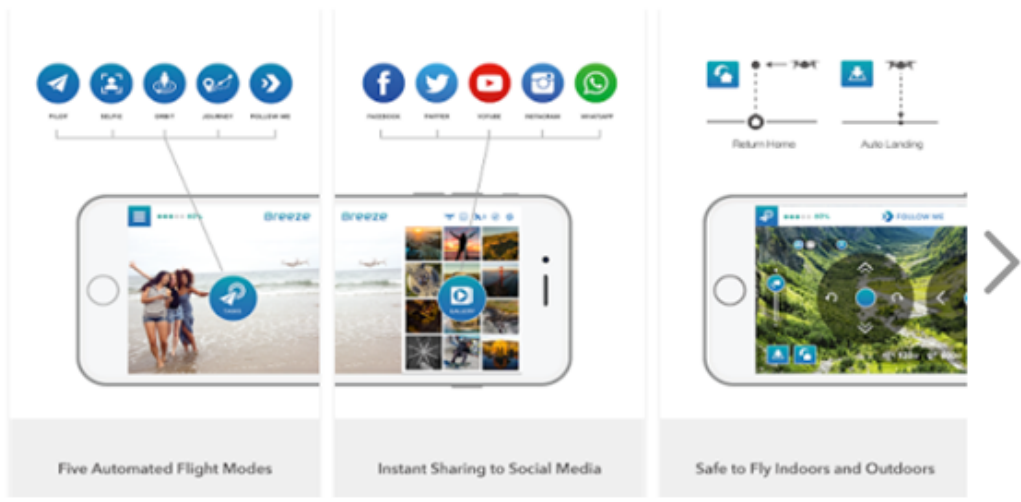
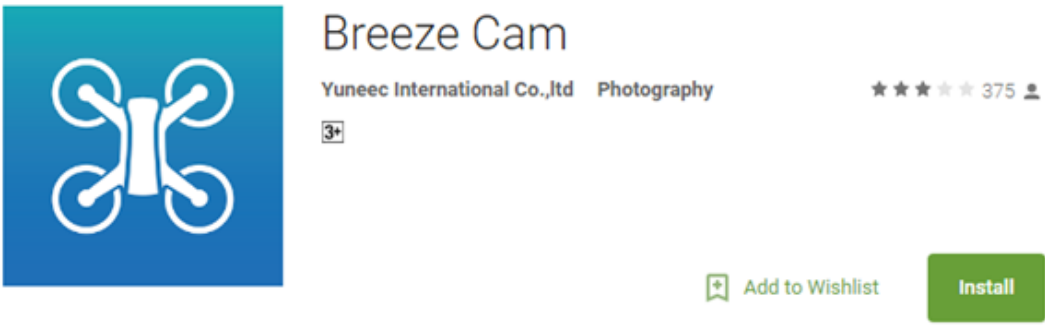
33. The Product includes at least one capturing device (e.g., a drone with a camera attachment) and at least one receiving device (e.g., a smartphone with the Breeze Cam app installed). Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.

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<http://us.yuneec.com/breeze-overview>



<https://play.google.com/store/apps/details?id=com.yuneec.android.flyingcamera&hl=en>


34. The capturing device and receiving device are cooperatively disposed in a communicative relation with one another via at least one wireless network. For example, the Product includes a capturing device (e.g., a drone with a camera attachment) and a receiving device (e.g., a smartphone with the Breeze Cam app) being cooperatively disposed in a communicative relation with one another via at least one wireless network (e.g., both the drone and a user's smartphone will be connected to the same Wi-Fi network allowing for image transfer and live streaming through the Wi-Fi network). Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.

## 7. BINDING BREEZE WITH YOUR SMART DEVICE

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**METHOD 1:** If you are using an iPhone or an iPad, select Settings > Wi-Fi ;  
If you are using an Android smart phone, select Settings > Wireless and networks > Wi-Fi. Select the network: BreezeXXXXXX and enter the Password: [1234567890](#).

**METHOD 2:** Tap [  ] and you can connect the Wi-Fi network directly. Select the network: Breeze XXXXXX and enter the Password: [1234567890](#).

[http://us.yuneeec.com/files/downloads/breeze/Breeze\\_user\\_manual\\_v2.pdf](http://us.yuneeec.com/files/downloads/breeze/Breeze_user_manual_v2.pdf)



# Breeze Cam

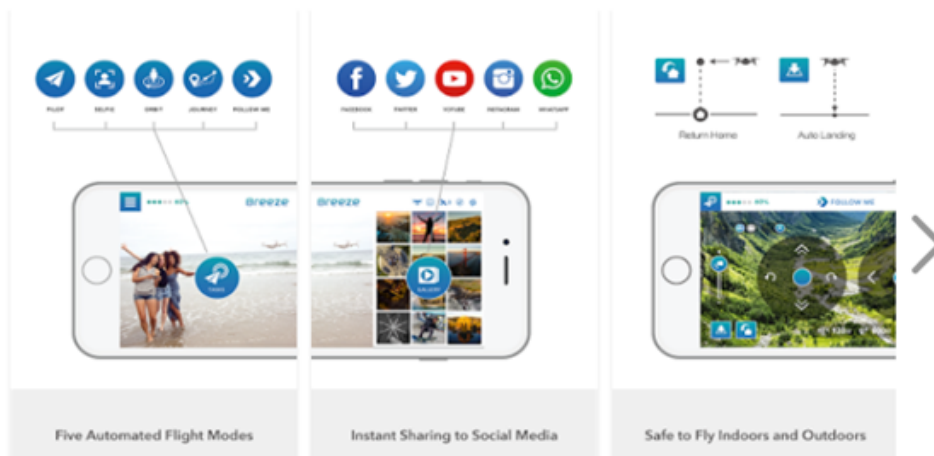
Yuneec International Co.,Ltd Photography

★★★★★ 375

3+

Add to Wishlist

Install



<https://play.google.com/store/apps/details?id=com.yuneec.android.flyingcamera&hl=en>



<https://play.google.com/store/apps/details?id=com.yuneeec.android.flyingcamera&hl=en>

35. The capturing device has a capture assembly that is structured to selectively capture the at least one digital photographic image. For example, the capturing device (e.g., a drone with a camera attachment) has a capture assembly (e.g., a camera assembly), and the capture assembly is structured to selectively capture the at least one digital photographic image (e.g., the Product's camera assembly is able to capture digital images, record video, and capture still image frames from video).

36. The capturing device also has a first network component (e.g., Wi-Fi module). The first network component is structured to communicate the at least one digital photographic image (e.g., images captured by the Product) to the receiving device (e.g., smartphone with Breeze Cam app) via the at least one wireless network (e.g., a Wi-Fi network). On information

and belief, because the Product is communicating with a smartphone or other device over a Wi-Fi network, it must include a wireless NIC. Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.

To connect to a network, a computer uses a network interface card (NIC). A NIC controls the wired and wireless connections of a computer to exchange information with other computers and the Internet.

## Network Interface Cards

In the early days of computing, individual computers operated as stand-alone systems. The earliest personal computers did not have an easy way to connect to other computers. In order to transfer files between computers, you had to use a portable storage medium such as a **floppy disk**; however, in modern-day computers, connecting to a network is essential. For example, you need to connect to use e-mail, access information on the Internet, and share documents within a corporate network.

A computer uses a **network interface card** (NIC) to become part of a network. The NIC contains the electronic circuitry required to communicate using a wired connection (e.g., **Ethernet**) or a wireless connection (e.g., **WiFi**). A network interface card is also known as a network interface controller, network adapter, or **Local Area Network (LAN)** adapter.

<http://study.com/academy/lesson/network-interface-card-nic-types-function-definition.html>

37. The receiving device (e.g., smartphone with Breeze Cam app installed) has a second network component (e.g., Wi-Fi module within the smartphone). The second network component is structured to receive the at least one digital photographic image (e.g., images captured by the drone camera) from the capturing device via the wireless network (e.g., a Wi-Fi network).

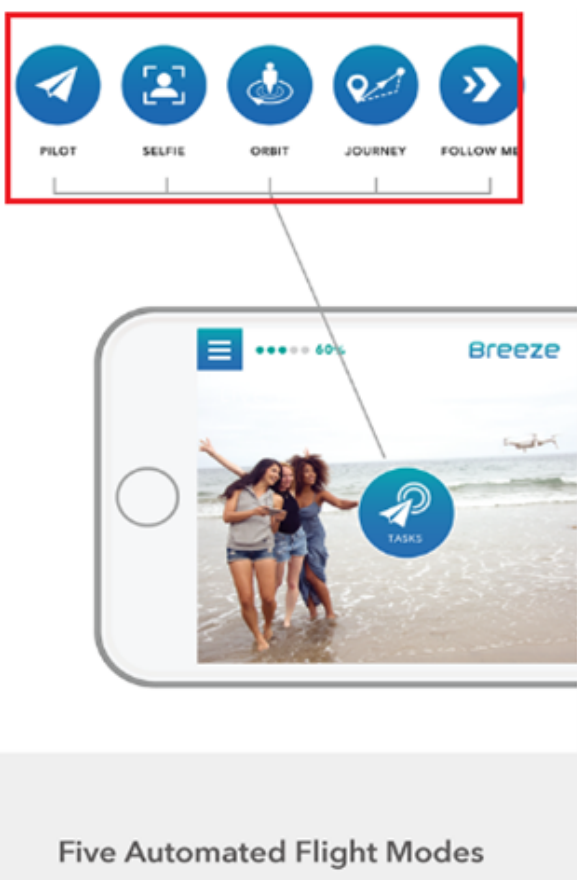
38. The capturing device and the receiving device are disposed in a selectively paired relationship with one another. For example, the capturing device (e.g., a drone with a camera attachment) and the receiving device (e.g., a smartphone with the Breeze Cam app installed) are disposed in a selectively paired relationship with one another (e.g., both devices are connected through the same Wi-Fi network).

39. The selectively paired relationship is at least partially based on the capturing



device and the receiving device being cooperatively associated with at least one common pre-defined pairing criterion. For example, both devices are connected over the same Wi-Fi network and are within the effective signal range of the Wi-Fi network.

40. The pre-defined pairing criterion is a geographic location of the capturing device. For example, the Product must be located at a geographic location within the signal range of the Wi-Fi network utilized by a user's smartphone in order to pair with said smartphone). Certain aspects of this element are illustrated in the screen shots below, and/or the screen shots provided in connection with other elements discussed herein.



<https://play.google.com/store/apps/details?id=com.yuneeec.android.flyingcamera&hl=en>



<http://us.yuneec.com/breeze-smart-feature>

Capture life's precious moments from an aerial view and share them instantly with Breeze, your flying camera. Use the Breeze Cam app and Breeze drone to make capturing photos of yourself simple and intuitive. We've created 5 automated flight modes that make capturing cool shots with Breeze easy for anyone, regardless of experience.

- Film UHD 4K videos
- Shoot 13 megapixel stills
- Choose one of 5 automated flight modes: Pilot, Selfie, Orbit, Journey, Follow Me
- Safely fly indoors using Indoor Positioning System (IPS)
- View a clear 720p live transmission of your flight on your smart device
- Edit photos and videos within the app
- Share to your favorite social media instantly

<https://play.google.com/store/apps/details?id=com.yuneec.android.flyingcamera&hl=en>

41. Defendant's actions complained of herein will continue unless Defendant is enjoined by this court.

42. Defendant's actions complained of herein are causing irreparable harm and monetary damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained by this Court.

43. Plaintiff is in compliance with 35 U.S.C. § 287.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff asks the Court to:

(a) Enter judgment for Plaintiff on this Complaint on all causes of action asserted herein;

(b) Enter an Order Enjoining Defendant, its agents, officers, servants, employees, attorneys, and all persons in active concert or participation with Defendant who receive notice of the order from further infringement of United States Patent No. 8,437,797, and 8,204,437 (or, in the alternative, awarding Plaintiff a running royalty from the time of judgment going forward);

(c) Award Plaintiff damages resulting from Defendant's infringement in accordance with 35 U.S.C. § 284;

(d) Award Plaintiff pre-judgment and post-judgment interest and costs; and

(e) Award Plaintiff such further relief to which the Court finds Plaintiff entitled under law or equity.

Dated: February 9, 2018

Respectfully submitted,

*/s/ Stamatios Stamoulis*

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