

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

	§	
UNILOC USA, INC. and	§	
UNILOC LUXEMBOURG, S.A.,	§	Civil Action No. 1:18-CV-00166 (LY)
	§	
Plaintiffs,	§	
	§	
v.	§	
	§	
APPLE INC.,	§	
	§	
Defendant.	§	JURY TRIAL DEMANDED
	§	

FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT

Plaintiffs, Uniloc USA, Inc. (“Uniloc USA”) and Uniloc Luxembourg, S.A. (“Uniloc Luxembourg”) (together, “Uniloc”), for their First Amended Complaint against defendant, Apple Inc. (“Apple”), allege as follows:

THE PARTIES

1. Uniloc USA is a Texas corporation having a principal place of business at Legacy Town Center I, Suite 380, 7160 Dallas Parkway, Plano, Texas 75024. Uniloc USA also maintains a place of business at 102 N. College, Suite 603, Tyler, Texas 75702.

2. Uniloc Luxembourg is a Luxembourg public limited liability company having a principal place of business at 15, Rue Edward Steichen, 4th Floor, L-2540, Luxembourg (R.C.S. Luxembourg B159161).

3. Apple is a California corporation, having a principal place of business in Cupertino, California and regular and established places of business at 12535 Riata Vista Circle and 5501 West Parmer Lane, Austin, Texas. Apple offers its products and/or services, including

those accused herein of infringement, to customers and potential customers located in Texas and in the judicial Western District of Texas. Apple may be served with process through its registered agent for service in Texas: CT Corporation System, 1999 Bryant Street, Suite 900, Dallas, Texas 75201.

JURISDICTION AND VENUE

4. Uniloc brings this action for patent infringement under the patent laws of the United States, 35 U.S.C. § 271, *et seq.* This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331, 1332(a) and 1338(a).

5. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1400(b). Apple has committed acts of infringement in this judicial district and maintains regular and established places of business in this district, as set forth above.

COUNT I (INFRINGEMENT OF U.S. PATENT NO. 7,969,925)

6. Uniloc incorporates paragraphs 1-5 above by reference.

7. Uniloc Luxembourg is the owner, by assignment, of U.S. Patent No. 7,969,925 (“the ’925 Patent”), entitled PEER-TO-PEER MOBILE DATA TRANSFER METHOD AND DEVICE, which issued on June 28, 2011. A copy of the ’925 Patent is attached as Exhibit A.

8. Uniloc USA is the exclusive licensee of the ’925 Patent, with ownership of all substantial rights, including the right to grant sublicenses, to exclude others, and to enforce and recover past damages for infringement.

9. The ’925 Patent describes in detail and claims in various ways inventions in systems and devices for improved communication of data between mobile devices in a peer-to-peer fashion without using an intermediary communications server developed by the inventor around 2004.

10. The '925 Patent describes problems and shortcomings in the then-existing field of communications between wireless devices and describes and claims novel and inventive technological improvements and solutions to such problems and shortcomings. The technological improvements and solutions described and claimed in the '925 Patent were not conventional or generic at the time of their respective inventions but involved novel and non-obvious approaches to the problems and shortcomings prevalent in the art at the time.

11. The inventions claimed in the '925 Patent involve and cover more than just the performance of well-understood, routine and/or conventional activities known to the industry prior to the invention of such novel and non-obvious methods, systems and devices by the '925 Patent inventor.

12. The inventions claimed in the '925 Patent represent technological solutions to technological problems. The written description of the '925 Patent describes in technical detail each of the limitations of the claims, allowing a person of ordinary skill in the art to understand what the limitations cover and how the non-conventional and non-generic combination of claim elements differ markedly from and improved upon what may have been considered conventional or generic.

13. Apple imports, uses, offers for sale, and sells in the United States electronic devices that utilize Apple Push Notification service. Such devices include: (1) iPhone 4s, iPhone5, iPhone 5c, iPhone 5s, iPhone 6, iPhone 6 Plus, iPhone 6s, iPhone 6s Plus, iPhone SE, iPhone 7, iPhone 7 Plus, iPhone 8, iPhone 8 Plus, iPhone X smartphones; (2) iPad (3rd, 4th and 5th generation), iPad Mini, iPad Mini 2, iPad Mini 3, iPad Mini 4, iPad Pro, iPad Air, iPad Air 2 tablets; (3) MacBook, MacBook Air (13 inches), MacBook Pro (13 and 15 inches), iMac (21.5 and 27 inches), Mac Mini, Mac Pro laptops; (4) Apple watch Series 1, Apple watch series 2,

Apple watch series 3, Apple watch Hermes (series 1, 2, 3), Apple watch Edition (series 2 and 3), and (5) iPod (generation 5) and iPod touch (collectively “Accused Infringing Devices”).

14. The Accused Infringing Devices are mobile devices that are enabled to communicate data therebetween in a peer-to-peer fashion using unique identifiers and without the need for an intermediating communications server.

15. Apple has infringed, and continues to infringe, claims of the '925 Patent in the United States, including claims 1-20, by making, using, offering for sale, selling and/or importing the Accused Infringing Devices in violation of 35 U.S.C. § 271(a).

16. Apple has also infringed, and continues to infringe, claims 1-20 of the '925 Patent by actively inducing others to use, offer for sale, and sell the Accused Infringing Devices. Apple's customers who use those devices in accordance with Apple's instructions infringe claims 1-20 of the '925 Patent, in violation of 35 U.S.C. § 271(a). Apple intentionally instructs its customers to infringe through training videos, demonstrations, brochures, installation and user guides, such as those located at:

- www.apple.com
- <https://www.apple.com/ios/app-store/>
- <https://support.apple.com/en-us/>
- <https://developer.apple.com/app-store/product-page/>
- <https://www.apple.com/iphone-7/specs/>
- <https://developer.apple.com/hardwaredrivers/BluetoothDesignGuidelines.pdf>
- <https://developer.apple.com/library/content/documentation/NetworkingInternet/Conceptual/HandlingRemoteNotificationsPG/APNSOverview.html>
- <https://developer.apple.com/library/content/documentation/NetworkingInternet/Conceptual/RemoteNotificationsPG/APNSOverview.html>

- www.apple.com/iphone/compare/
- <https://support.apple.com/en-us/HT201287>
- <https://support.apple.com/en-us/HT202549>
- <https://support.apple.com/en-us/HT207006>
- <https://support.apple.com/en-us/HT202944>
- <https://support.apple.com/en-us/HT203609>
- <https://support.apple.com/en-us/HT202078>
- <https://support.apple.com/en-us/HT204380>
- www.apple.com/business/docs/iOS_Security_Guide.pdf
- www.youtube.com/user/apple

Apple also induces infringement by others by failing to remove or diminish the infringing features of the Accused Infringing Devices. Apple is thereby liable for infringement of the '925 Patent under 35 U.S.C. § 271(b).

17. Apple has also infringed, and continues to infringe, claims 1-20 of the '925 patent by offering to commercially distribute, commercially distributing, or importing the Accused Infringing Devices which devices are used in practicing the processes, or using the systems, of the '925 patent, and constitute a material part of the invention. Apple knows portions of the Accused Devices to be especially made or especially adapted for use in infringement of the '925 patent, not a staple article, and not a commodity of commerce suitable for substantial noninfringing use. Apple is thereby liable for infringement of the '925 Patent under 35 U.S.C. § 271(c).

18. Apple will have been on notice of the '925 Patent since, at the latest, the service of this complaint upon it. By the time of trial, Apple will have known and intended (since

receiving such notice) that its continued actions would actively induce and contribute to the infringement of claims 1-20 of the '925 Patent.

19. Apple may have infringed the '925 Patent through other software and devices utilizing the same or reasonably similar functionality, including other versions of the Accused Infringing Devices.

20. Uniloc has been damaged by Apple's infringement of the '925 Patent.

COUNT II
(INFRINGEMENT OF U.S. PATENT NO. 8,018,877)

21. Uniloc incorporates paragraphs 1-5 above by reference.

22. Uniloc Luxembourg is the owner, by assignment, of U.S. Patent No. 8,018,877 ("the '925 Patent"), entitled MOBILE CONFERENCING METHOD AND SYSTEM, which issued on September 13, 2011. A copy of the '877 Patent is attached as Exhibit B.

23. Uniloc USA is the exclusive licensee of the '877 Patent, with ownership of all substantial rights, including the right to grant sublicenses, to exclude others, and to enforce and recover past damages for infringement.

24. The '877 Patent describes in detail and claims in various ways inventions in systems and devices for improved communication of data between mobile devices using unique identifiers and page-mode messaging developed by the inventor around 2004.

25. The '877 Patent describes problems and shortcomings in the then-existing field of communications between wireless devices and describes and claims novel and inventive technological improvements and solutions to such problems and shortcomings. The technological improvements and solutions described and claimed in the '877 Patent were not conventional or generic at the time of their respective inventions but involved novel and non-obvious approaches to the problems and shortcomings prevalent in the art at the time.

26. The inventions claimed in the '877 Patent involve and cover more than just the performance of well-understood, routine and/or conventional activities known to the industry prior to the invention of such novel and non-obvious methods, systems and devices by the '877 Patent inventor.

27. The inventions claimed in the '877 Patent represent technological solutions to technological problems. The written description of the '877 Patent describes in technical detail each of the limitations of the claims, allowing a person of ordinary skill in the art to understand what the limitations cover and how the non-conventional and non-generic combination of claim elements differ markedly from and improved upon what may have been considered conventional or generic.

28. Apple imports, uses, offers for sale, and sells in the United States electronic devices that utilize Apple Push Notification service. Such devices include: (1) iPhone 4s, iPhone5, iPhone 5c, iPhone 5s, iPhone 6, iPhone 6 Plus, iPhone 6s, iPhone 6s Plus, iPhone SE, iPhone 7, iPhone 7 Plus, iPhone 8, iPhone 8 Plus, iPhone X smartphones; (2) iPad (3rd, 4th and 5th generation), iPad Mini, iPad Mini 2, iPad Mini 3, iPad Mini 4, iPad Pro, iPad Air, iPad Air 2 tablets; (3) MacBook, MacBook Air (13 inches), MacBook Pro (13 and 15 inches), iMac (21.5 and 27 inches), Mac Mini, Mac Pro laptops; (4) Apple watch Series 1, Apple watch series 2, Apple watch series 3, Apple watch Hermes (series 1, 2, 3), Apple watch Edition (series 2 and 3), and (5) iPod (generation 5) and iPod touch (collectively "Accused Infringing Devices").

29. The Accused Infringing Devices are mobile devices that are enabled to communicate data therebetween in a peer-to-peer fashion using unique identifiers and page-mode messaging.

30. Apple has infringed, and continues to infringe, claims of the '877 Patent in the United States, including claims 1-20, by making, using, offering for sale, selling and/or importing the Accused Infringing Devices in violation of 35 U.S.C. § 271(a).

31. Apple has also infringed, and continues to infringe, claims 1-20 of the '877 Patent by actively inducing others to use, offer for sale, and sell the Accused Infringing Devices. Apple's customers who use those devices in accordance with Apple's instructions infringe claims 1-20 of the '877 Patent, in violation of 35 U.S.C. § 271(a). Apple intentionally instructs its customers to infringe through training videos, demonstrations, brochures, installation and user guides, such as those located at:

- www.apple.com
- <https://www.apple.com/ios/app-store/>
- <https://support.apple.com/en-us/>
- <https://support.apple.com/explore/messages>
- <https://developer.apple.com/app-store/product-page/>
- <https://www.apple.com/iphone-7/specs/>
- <https://developer.apple.com/hardwaredrivers/BluetoothDesignGuidelines.pdf>
- <https://developer.apple.com/library/content/documentation/NetworkingInternet/Conceptual/HandlingRemoteNotificationsPG/APNSOverview.html>
- <https://developer.apple.com/library/content/documentation/NetworkingInternet/Conceptual/RemoteNotificationsPG/APNSOverview.html>
- www.apple.com/iphone/compare/
- <https://support.apple.com/en-us/HT201287>
- <https://support.apple.com/en-us/HT207006>
- <https://support.apple.com/en-us/HT202078>

- <https://support.apple.com/en-us/HT202549>
- <https://support.apple.com/en-us/HT203609>
- <http://apple.wikia.com/wiki/IMessage>
- www.apple.com/business/docs/iOS_Security_Guide.pdf
- www.youtube.com/user/apple

Apple also induces infringement by others by failing to remove or diminish the infringing features of the Accused Infringing Devices. Apple is thereby liable for infringement of the '877 Patent under 35 U.S.C. § 271(b).

32. Apple has also infringed, and continues to infringe, claims 1-20 of the '877 patent by offering to commercially distribute, commercially distributing, or importing the Accused Infringing Devices which devices are used in practicing the processes, or using the systems, of the '877 patent, and constitute a material part of the invention. Apple knows portions of the Accused Devices to be especially made or especially adapted for use in infringement of the '877 patent, not a staple article, and not a commodity of commerce suitable for substantial noninfringing use. Apple is thereby liable for infringement of the '877 Patent under 35 U.S.C. § 271(c).

33. Apple will have been on notice of the '877 Patent since, at the latest, the service of this complaint upon it. By the time of trial, Apple will have known and intended (since receiving such notice) that its continued actions would actively induce and contribute to the infringement of claims 1-20 of the '877 Patent.

34. Apple may have infringed the '877 Patent through other software and devices utilizing the same or reasonably similar functionality, including other versions of the Accused Infringing Devices.

35. Uniloc has been damaged by Apple's infringement of the '877 Patent.

COUNT III
(INFRINGEMENT OF U.S. PATENT NO. 8,406,116)

36. Uniloc incorporates paragraphs 1-5 above by reference.

37. Uniloc Luxembourg is the owner, by assignment, of U.S. Patent No. 8,406,116 ("the '116 Patent"), entitled MOBILE CONFERENCING METHOD AND SYSTEM which issued on March 26, 2013. A copy of the '116 Patent is attached as Exhibit C.

38. Uniloc USA is the exclusive licensee of the '116 Patent, with ownership of all substantial rights, including the right to grant sublicenses, to exclude others, and to enforce and recover past damages for infringement.

39. The '116 Patent describes in detail and claims in various ways inventions in systems and devices for improved server-based mobile conferencing developed by the inventor around 2004.

40. The '116 Patent describes problems and shortcomings in the then-existing field of exchanging data among mobile devices and describes and claims novel and inventive technological improvements and solutions to such problems and shortcomings. The technological improvements and solutions described and claimed in the '116 Patent were not conventional or generic at the time of their respective inventions but involved novel and non-obvious approaches to the problems and shortcomings prevalent in the art at the time.

41. The inventions claimed in the '116 Patent involve and cover more than just the performance of well-understood, routine and/or conventional activities known to the industry prior to the invention of such novel and non-obvious methods, systems and devices by the '116 Patent inventor.

42. The inventions claimed in the '116 Patent represent technological solutions to technological problems. The written description of the '116 Patent describes in technical detail each of the limitations of the claims, allowing a person of ordinary skill in the art to understand what the limitations cover and how the non-conventional and non-generic combination of claim elements differ markedly from and improved upon what may have been considered conventional or generic.

43. Apple imports, uses, offers for sale, and sells in the United States electronic devices, including but not limited to: (1) iPhone 4s, iPhone5, iPhone 5c, iPhone 5s, iPhone 6, iPhone 6 Plus, iPhone 6s, iPhone 6s Plus, iPhone SE, iPhone 7, iPhone 7 Plus, iPhone 8, iPhone 8 Plus, iPhone X cellphones; (2) iPad (3rd, 4th and 5th generation), iPad Mini, iPad Mini 2, iPad Mini 3, iPad Mini 4, iPad Pro, iPad Air, iPad Air 2 tablets; (3) MacBook, MacBook Air (13 inches), MacBook Pro (13 and 15 inches), iMac (21.5 and 27 inches), Mac Mini, Mac Pro laptops; (4) Apple watch Series 1, Apple watch series 2, Apple watch series 3, Apple watch Hermes (series 1, 2, 3), Apple watch Edition (series 2 and 3) watches; and (5) iPod (generation 5) and iPod touch, that utilize Apple's Continuity, FaceTime, iMessage, Messages and Apple Push Notification (APNs) services (collectively "Accused Infringing Devices").

44. The Accused Infringing Devices are mobile devices that utilize –server-based architecture for the exchange of data.

45. Apple has infringed, and continues to infringe, claims 1-20 of the '116 Patent in the United States by making, using, offering for sale, selling and/or importing the Accused Infringing Devices in violation of 35 U.S.C. § 271(a).

46. Apple has also infringed, and continues to infringe, claims 1-20 of the '116 Patent by actively inducing others to use, offer for sale, and sell the Accused Infringing Devices.

Apple's customers who use those devices in accordance with Apple's instructions infringe claims 1-20 of the '116 Patent, in violation of 35 U.S.C. § 271(a). Apple intentionally instructs its customers to infringe through training videos, demonstrations, brochures, installation and user guides, such as those located at:

- www.apple.com
- <https://support.apple.com/en-us/HT201287>
- <https://support.apple.com/en-us/HT202549>
- <https://support.apple.com/en-us/HT202078>
- <https://support.apple.com/en-us/HT203609>
- <https://support.apple.com/en-us/HT207006>
- www.apple.com/business/docs/iOS_Security_Guide.pdf
- <https://developer.apple.com/library/content/documentation/>
- <https://support.apple.com/explore/messages>
- <https://www.apple.com/iphone-7/specs/>
- [https:// www.apple.com/iphone-8/specs/](https://www.apple.com/iphone-8/specs/)
- www.youtube.com/user/apple

Apple also induces infringement by others by failing to remove or diminish the infringing features of the Accused Infringing Devices. Apple is thereby liable for infringement of the '116 Patent under 35 U.S.C. § 271(b).

47. Apple has also infringed, and continues to infringe, claims 1-20 of the '116 patent by offering to commercially distribute, commercially distributing, or importing the Accused Infringing Devices which devices are used in practicing the processes, or using the systems, of the '116 patent, and constitute a material part of the invention. Apple knows portions of the

Accused Devices to be especially made or especially adapted for use in infringement of the '116 patent, not a staple article, and not a commodity of commerce suitable for substantial non-infringing use. Apple is thereby liable for infringement of the '116 Patent under 35 U.S.C. § 271(c).

48. Apple will have been on notice of the '116 Patent since, at the latest, the service of this complaint upon it. By the time of trial, Apple will have known and intended (since receiving such notice) that its continued actions would actively induce and contribute to the infringement of claims 1-20 of the '116 Patent.

49. Apple may have infringed the '116 Patent through other software and devices utilizing the same or reasonably similar functionality, including other versions of the Accused Infringing Devices.

50. Uniloc has been damaged by Apple's infringement of the '116 Patent.

COUNT IV
(INFRINGEMENT OF U.S. PATENT NO. 8,369,298)

51. Uniloc incorporates paragraphs 1-5 above by reference.

52. Uniloc Luxembourg is the owner, by assignment, of U.S. Patent No. 8,369,298 ("the '298 Patent"), entitled METHOD FOR ESTABLISHING NETWORK CONNECTIONS BETWEEN STATIONARY TERMINALS AND REMOVE DEVICES THROUGH MOBILE DEVICES, which issued on February 5, 2013. A copy of the '298 Patent is attached as Exhibit D.

53. Uniloc USA is the exclusive licensee of the '298 Patent, with ownership of all substantial rights, including the right to grant sublicenses, to exclude others, and to enforce and recover past damages for infringement.

54. The '298 Patent describes in detail and claims in various ways inventions in systems and devices for establishing communication between mobile devices and a stationary terminal developed by the inventor around 2005.

55. The '298 Patent describes problems and shortcomings in the then-existing field of data communication between stationary and mobile devices and claims novel and inventive technological improvements and solutions to such problems and shortcomings. The technological improvements and solutions described and claimed in the '298 Patent were not conventional or generic at the time of their respective inventions but involved novel and non-obvious approaches to the problems and shortcomings prevalent in the art at the time.

56. The inventions claimed in the '298 Patent involve and cover more than just the performance of well-understood, routine and/or conventional activities known to the industry prior to the invention of such novel and non-obvious methods, systems and devices by the '298 Patent inventor.

57. The inventions claimed in the '298 Patent represent technological solutions to technological problems. The written description of the '298 Patent describes in technical detail each of the limitations of the claims, allowing a person of ordinary skill in the art to understand what the limitations cover and how the non-conventional and non-generic combination of claim elements differ markedly from and improved upon what may have been considered conventional or generic.

58. Apple imports, uses, offers for sale, and sells in the United States electronic devices, including but not limited to: (1) iPhone 4s, iPhone5, iPhone 5c, iPhone 5s, iPhone 6, iPhone 6 Plus, iPhone 6s, iPhone 6s Plus, iPhone SE, iPhone 7, iPhone 7 Plus, iPhone 8, iPhone 8 Plus, iPhone X cellphones; (2) iPad (3rd, 4th and 5th generation), iPad Mini, iPad Mini 2, iPad

Mini 3, iPad Mini 4, iPad Pro, iPad Air, iPad Air 2 tablets; (3) MacBook, MacBook Air (13 inches), MacBook Pro (13 and 15 inches), iMac (21.5 and 27 inches), Mac Mini, Mac Pro laptops; (4) Apple watch Series 1, Apple watch series 2, Apple watch series 3, Apple watch Hermes (series 1, 2, 3), Apple watch Edition (series 2 and 3); and (5) iPod (generation 5) and iPod touch, that utilize Apple's Continuity, FaceTime, and iMessage services (collectively "Accused Infringing Devices").

59. The Accused Infringing Devices implement server-based wireless communication between stationary and mobile devices.

60. Apple has infringed, and continues to infringe, claims of the '298 Patent in the United States, including claims 1, 3-6, 8-11 and 13-15, by making, using, offering for sale, selling and/or importing the Accused Infringing Devices in violation of 35 U.S.C. § 271(a).

61. Apple has also infringed, and continues to infringe, claims 1, 3-6, 8-11 and 13-15 of the '298 Patent by actively inducing others to use, offer for sale, and sell the Accused Infringing Devices. Apple's customers who use those devices in accordance with Apple's instructions infringe claims 1, 3-6, 8-11 and 13-15 of the '298 Patent, in violation of 35 U.S.C. § 271(a). Apple intentionally instructs its customers to infringe through training videos, demonstrations, brochures, installation and user guides, such as those located at:

- www.apple.com
- www.apple.com/shop/
- www.apple.com/iphone/compare/
- <https://www.apple.com/ios/app-store/>
- <https://support.apple.com/en-us/>
- <https://support.apple.com/en-in/>

- <https://support.apple.com/en-us/HT201303>
- <https://support.apple.com/en-in/HT202944>
- <https://support.apple.com/en-us/HT202078>
- <https://support.apple.com/en-us/HT208386>
- <https://support.apple.com/en-in/HT204689#calls>
- <https://support.apple.com/en-us/HT204681#sms>
- <https://support.apple.com/en-in/guide/facetime/>
- www.apple.com/business/docs/iOS_Security_Guide.pdf
- <https://developer.apple.com/app-store/>
- https://www.apple.com/iphone-*/specs/ (*=model number)
- www.youtube.com/user/apple

Apple also induces infringement by others by failing to remove or diminish the infringing features of the Accused Infringing Devices. Apple is thereby liable for infringement of the '298 Patent under 35 U.S.C. § 271(b).

62. Apple has also infringed, and continues to infringe, claims 1, 3-6, 8-11 and 13-15 of the '298 patent by offering to commercially distribute, commercially distributing, or importing the Accused Infringing Devices which devices are used in practicing the processes, or using the systems, of the '298 patent, and constitute a material part of the invention. Apple knows portions of the Accused Devices to be especially made or especially adapted for use in infringement of the '298 patent, not a staple article, and not a commodity of commerce suitable for substantial non-infringing use. Apple is thereby liable for infringement of the '298 Patent under 35 U.S.C. § 271(c).

63. Apple will have been on notice of the '298 Patent since, at the latest, the service of this complaint upon it. By the time of trial, Apple will have known and intended (since receiving such notice) that its continued actions would actively induce and contribute to the infringement of claims 1, 3-6, 8-11 and 13-15 of the '298 Patent.

64. Apple may have infringed the '298 Patent through other software and devices utilizing the same or reasonably similar functionality, including other versions of the Accused Infringing Devices.

65. Uniloc has been damaged by Apple's infringement of the '298 Patent.

PRAYER FOR RELIEF

Uniloc requests that the Court enter judgment against Apple:

(A) declaring that Apple has infringed the '925 Patent, the '877 Patent, the '116 Patent and the '298 Patent;

(B) awarding Uniloc its damages suffered as a result of Apple's infringement of the '925 Patent, the '877 Patent, the '116 Patent and the '298 Patent;

(C) awarding Uniloc its costs, attorneys' fees, expenses, and interest, and

(D) granting Uniloc such further relief as the Court finds appropriate.

DEMAND FOR JURY TRIAL

Uniloc demands trial by jury, under Fed. R. Civ. P. 38.

Date: April 12, 2018

Respectfully submitted,

/s/ Kevin Gannon

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Aaron Jacobs
Massachusetts State Bar No. 677545
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ATTORNEYS FOR THE PLAINTIFFS

CERTIFICATE OF SERVICE

I certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on April 12, 2018.

/s/ Kevin Gannon
