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 LINKSMART WIRELESS TECHNOLOGY, LLC

11
 12 **UNITED STATES DISTRICT COURT**
 13 **CENTRAL DISTRICT OF CALIFORNIA**

14
 15 LINKSMART WIRELESS
 TECHNOLOGY, LLC

16 *Plaintiff,*

17 *v.*

18
 19 AIR FRANCE-KLM SA

20 *Defendant.*

**COMPLAINT FOR PATENT
 INFRINGEMENT**

DEMAND FOR JURY TRIAL

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1 **Complaint**

2 1. Plaintiff Linksmart Wireless Technology, LLC (“Linksmart” or
3 “Plaintiff”), files this Complaint against Defendant Air France-KLM SA. (“Air
4 France-KLM” or “Defendant”), and alleges as follows:

5 **Nature of the Action**

6 2. This is a civil action for patent infringement arising under the patent
7 laws of the United States, Title 35, United States Code, including 35 U.S.C. §§ 271
8 *et seq.* and 281-285.

9 3. On June 27, 2017, the U.S. Patent and Trademark Office duly and
10 legally issued U.S. Reissued Patent No. RE46,459 (the “’459 patent” or “Asserted
11 Patent”), entitled “User specific automatic data redirection system,” to Koichiro
12 Ikudome and Moon Tai Yeung as the named inventors after full and fair
13 examination. A true and correct copy of the ’459 patent is attached hereto as Exhibit
14 A and incorporated herein by reference.

15 4. Air France-KLM has infringed and continues to infringe one or more
16 claims of the Asserted Patent.

17 **The Parties**

18 5. Linksmart was founded by Koichuru (“Ko”) Ikudome, who along with
19 co-inventor Moon Tai Yeung, created the innovation claimed by the ’459 patent.

20 6. In 1996, Mr. Ikudome, after over a decade of IT industry and business
21 experience in Japan and the United States, founded and became the CEO of Auric
22 Web Systems, Inc. (later renamed AuriQ Systems, Inc.). Mr. Ikudome and Mr.
23 Yeung, Auric’s Director of Technology, developed innovative and fundamental
24 technologies for users and Internet service providers (ISPs) to enable access to
25 information and commerce on the then-nascent Internet and World Wide Web.

26 7. Among Auric’s significant product innovations was the “WEBGate
27 card.” Auric created the WEBGate card as a prepaid long-distance Internet access
28 card with a pre-determined time limit. Like a prepaid phone card, the Auric’s

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1 innovative WEBGate card allowed Internet access from anywhere in the United
2 States without paying a long-distance phone bill or looking up local access numbers
3 when users were away from their home or office. As Auric further developed the
4 technology needed to make WEBGate work, Auric also developed other innovative
5 products to enable electronic commerce on the Internet, such as EC Gateway, which
6 combined an access control system at an ISP system with a CGI module to add
7 customizable graphical buttons to a merchant's homepage to allow customers to
8 make purchases more easily and add value to Internet services.

9 8. While Auric's Internet access products received substantial interest and
10 found some customers, the dot-com crash intervened and directly damaged the
11 potential customers for this product. Auric was thus forced to seek out new business
12 directions, ultimately resulting in AuriQ Systems' present-day business focused on
13 data analytics. Mr. Ikudome subsequently formed Linksmart as a way to continue to
14 derive value from the intellectual property of his and Auric's innovative
15 technological contributions, including the Asserted Patent. Many companies have
16 directly benefitted from the licensed use of Linksmart's patented technology in the
17 products and services they provide to their customers. Air France-KLM, however,
18 has taken advantage of Linksmart's patented technology, selling products and
19 services that practice the '459 patent, in wanton disregard of Linksmart's exclusive
20 property rights.

21 9. Plaintiff Linksmart is a limited liability company organized and
22 existing under the laws of State of California with its principal place of business at
23 199 S. Los Robles, Suite 440, Pasadena, California 91101.

24 10. Defendant Air France-KLM is a limited liability company organized
25 and existing under the laws of France.

26 **Jurisdiction**

27 11. Subject matter jurisdiction is conferred on this Court pursuant to 28
28 U.S.C. §§ 1381 and 1338(a).

1 12. Defendant Air France-KLM is subject to this Court’s personal
 2 jurisdiction because it has a regular and established place of business in this District,
 3 including at ground operations and other permanent business operations located at
 4 Los Angeles International Airport, 1 World Way, Los Angeles, California. Air
 5 France-KLM is also subject to this Court’s personal jurisdiction because Air France-
 6 KLM has committed and induced acts of patent infringement and has regularly and
 7 systematically conducted and solicited business in this District by and through at
 8 least its sales and offers for sale of its products and services, including wireless
 9 Internet products and services, and other contractual arrangements with customers
 10 and third parties using such Air France-KLM products and services located in and/or
 11 doing business in this District.

12 **Venue**

13 13. As set forth above, Air France-KLM has a regular and established place
 14 of business in the Central District of California. In particular, for example, Air
 15 France and KLM maintain ground operations and other permanent business
 16 operations at Los Angeles International Airport, which is located in this District at 1
 17 World Way, Los Angeles, California. Further, Air France-KLM has committed acts
 18 of infringement in this District, including, developing, testing, distributing,
 19 advertising, operating, selling, offering for sale, using and/or supporting products or
 20 services that fall within one or more claims of the Asserted Patent. Accordingly,
 21 venue to adjudicate whether the Asserted Patent is infringed is appropriate in the
 22 Central District of California pursuant to 28 U.S.C. §§ 1391 and 1400(b).

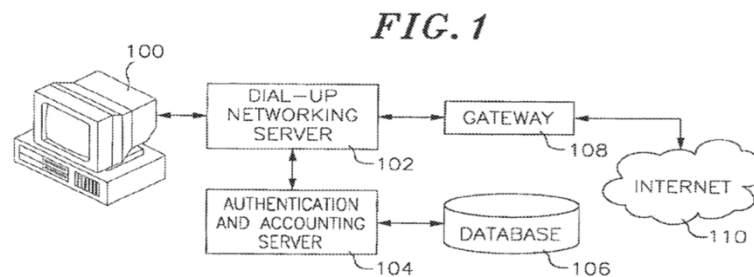
23 **Linksmart’s Patented Invention**

24 14. The ’459 patent is directed to a system for Internet access in a server
 25 that dynamically redirects users, i.e., a “redirection server,” based on rules that are
 26 dynamically and automatically modified by the redirection server itself based on a
 27 function of factors that may include, among others, time, user input, data transmitted
 28 to the user, or the Internet location accessed by the user.

1 15. The innovative technology underlying the '459 patent is described in
2 "User Specific Automatic Web Redirection System," a technical innovation report
3 co-authored by Mr. Ikudome and Mr. Yeung. This report was filed as U.S.
4 Provisional Pat. App. No. 60/084,014 (the "'014 app."), which is attached hereto as
5 Exhibit B and is incorporated herein by reference. The '459 patent claims priority to
6 this provisional application, and its disclosure is incorporated fully in the '459
7 patent's disclosure by reference.

8 16. The automatic redirection system described in the '459 patent provides
9 a novel architecture for Internet access. At the time of the invention, it was
10 conventionally understood that the World Wide Web was inherently a "passive
11 system," in which the "user must supply the exact destination, a Web site, before the
12 desired information can be retrieved." See '014 app. at 4. When a user was connected
13 to the Internet, and the user requested a particular location on the Internet, the user
14 was sent to that requested location. Ikudome and Yeung developed an innovative
15 automatic redirection system that could provide a more flexible way to mediate a
16 user's access to the Internet.

17 17. Figure 1 of the '459 patent shows an ISP environment for Internet

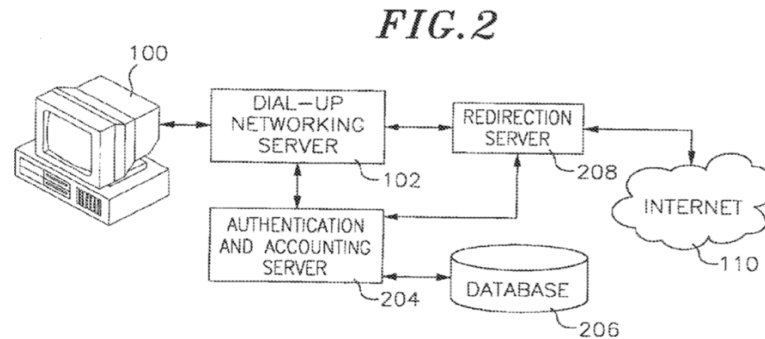


21 access in the absence of redirection:

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24 18. In such a conventional ISP environment, a user accesses the Internet by
25 connecting to the ISP, at which point networking software at the user end and the
26 ISP begin "negotiating." The ISP authenticates a user's login information, typically
27 from a database. Once authentication is successful, a network connection is
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1 established through the Internet gateway at the ISP. A commercial ISP may also send
2 an accounting request to bill the user for the access.

3 19. Figure 2 of the '459 patent shows the role of a redirection server, as
4 provided by the '459 patent, in the ISP environment:



11 20. In one embodiment described in the '459 patent, a redirection server
12 runs on the gateway to the Internet. Once the user is connected to the ISP in this
13 case, the user's requests to the Internet first go to the redirection server. There, the
14 redirection server can filter the requests based on a rule set to either the location
15 requested by the user, or some other location based on rule sets programmed in the
16 redirection server. By way of example, rule sets could be programmed such that a
17 user would need to access a location, e.g., a page with advertising, before being able
18 to freely surf the Web. *See, e.g., '459 pat. at 7:10-13.* As another example, a rule set
19 could require a user to access a questionnaire before accessing the Internet. *See '459*
20 *pat. at 8:9-14.*

21 21. Another embodiment described in the '459 patent further provides that
22 the redirection server is configured to be able to automatically modify the rule sets
23 dynamically. For example, if a questionnaire provided by an external server is filled
24 out, the rule set can be changed so that the user no longer needs to access the
25 questionnaire to gain access to the Internet. *See '459 pat. at 14-18.* As another
26 example of the redirection server automatically modifying the rule set if a user has
27 obtained access to the Internet through paid access for a limited time, the user's
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1 Internet access could be disabled once that time has been exceeded. *See* '459 pat. at
2 7:65-8:2.

3 22. The unconventional features of the embodiments described by the '459
4 patent provided improvements to and solved problems associated with redirection
5 methods and systems that existed at the time of the invention, as described in the
6 '459 patent's disclosure. *See id.* at 1:48-3:3.

7 23. In the prior art, redirection was conventionally performed by html code
8 on a web page that a user would need to manually access after the user has already
9 gained access to the Internet. The '459 patent, however, describes embodiments that
10 allow redirection to occur at the Internet gateway or before the user can access to
11 remote web servers. *See id.* at 2:6-11.

12 24. Another way in which redirection could be implemented in the prior art
13 was packet filtering at the Internet Protocol (IP) layer, for example, through a
14 firewall device or firewall at the Internet router. Information about an IP packet
15 being sent through a network could be used to allow filtering of the packet to
16 different network locations. However, while packet filtering, e.g., at a firewall, could
17 be controlled locally by a network administrator, it was a static technology, in which
18 the rule set could only be changed by manually reprogramming the packet filtering
19 device. '459 pat. at 2:29-36.

20 25. The '459 patent also describes prior methods in which packet filter
21 devices were used with proxy systems to control access to the Internet. In such a
22 method, a packet filter or firewall can prevent web access requests with the exception
23 of traffic coming from a proxy server. The way that proxy servers worked was that
24 a terminal had to be allowed access to a proxy server through which to send web
25 requests. The proxy server was programmed with a list of blocked or allowed
26 addresses, and requests to addresses were blocked or allowed according to that list.
27 As the '459 patent describes, such systems were limited in that they could only block
28 or allow specific terminals or sets of terminals' access to remote sites, and the rules

1 for access were static and needed to be reprogrammed, i.e., by some external server,
2 in order to change which locations specific terminals could access. *See* '459 pat. at
3 2:65-3:3.

4 26. The '459 patent issued from U.S. Patent App. No. 14/691,246. The file
5 history of the application from which the patent issued is available from the United
6 States Patent and Trademark Office, including electronically through the Office's
7 Public Patent Application Information Retrieval (PAIR) website, and is in
8 incorporated by reference herein.

9 27. The '459 patent, therefore, provides an advantageous technological
10 solution to the problem of mediating user access to the Internet through a redirection
11 server which can automatically modify rule sets for redirection dynamically while
12 connected to a user through a network connection. Among the benefits of the '459
13 patent's novel redirection system solution is that (1) redirection is automatic, i.e., a
14 user does not need to request a particular external address; it can be reconfigured for
15 specific users or categories of users; (2) the system can be easily installed and
16 configured by the ISP and it is resilient to potential failures; and (3) the system can
17 dynamically reconfigure the rule set controlling the user's access to the Internet,
18 such as by a function of time or user or external inputs while the user is connected.
19 *See, e.g.*, '014 app. at 8; *see also* the '459 patent.

20 Cause of Action

21 Infringement of the Linksmart Patent

22 28. The foregoing paragraphs are incorporated by reference as if fully set
23 forth herein.

24 29. Air France-KLM is unlawfully using Linksmart's patented technology.
25 Air France-KLM relies on technology covered by the Asserted Patent to enable its
26 core service, for example by providing Internet access to passengers traveling on
27 board aircraft.

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1 30. Air France-KLM has used, made, offered for sale, and/or sold Internet
2 access systems for use in aviation operations, and elsewhere, that infringed the
3 Asserted Patent, or induce or contribute to the infringement of the Asserted Patent.

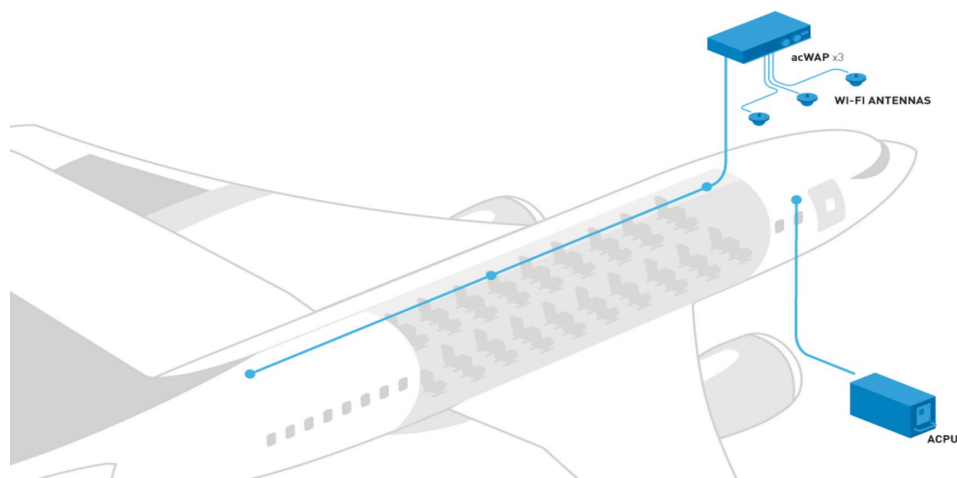
4 31. Air France-KLM has directly infringed and will continue to infringe,
5 directly and indirectly through induced infringement, one or more claims of the '459
6 patent, including at least claim 91, among other claims, by making, using, selling,
7 offering for sale, or importing in this District and elsewhere into the United States
8 systems and/or methods covered by one or more claims of the '459 patent including,
9 but not limited to at least the system that it has installed in its aircraft that use Gogo
10 technology for Air France-KLM's passengers to access ISP services for aviation
11 operations (the "Accused Gogo System") and the system that it has installed in its
12 aircraft that use Panasonic Avionics technology for Air France-KLM's passengers
13 to access ISP services for aviation operations (the "Accused Panasonic System")
14 (collectively the "Accused Systems"). Further discovery may reveal additional
15 infringing products, devices, systems and/or methods.

16 32. By way of example only, the Accused Gogo System infringes an
17 exemplary claim of the '459 patent, claim 91, as in the following description, which
18 Linksmart provides without the benefit of information about the Accused Gogo
19 System obtained through discovery. Claim 91 claims a system, such as the Accused
20 Gogo System, comprising:

- 21 a. *a redirection server programmed with a user's rule set*
22 *correlated to a temporarily assigned network address.* For
23 example, Air France and KLM aircraft have systems that employ
24 Gogo technology to enable Air France and KLM aircraft
25 passengers to access the Internet.¹ As an exemplary illustration

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27 ¹ See, e.g., "Air France-KLM Selects Gogo for In-flight Connectivity," September
28 19, 2016, <http://concourse.gogoair.com/air-france-klm-selects-gogo-flight-connectivity/> ("Today, we are announcing that we will partner with Air France-KLM to connect their existing long-haul fleet representing 124 aircraft, with an airline

1 of Air France-KLM’s Accused Gogo System, Gogo’s corporate
 2 website describes hardware components onboard aircraft that are
 3 connected to Gogo’s communication network. As shown below,
 4 Gogo shows that aircraft are equipped with “ACPU-2,”
 5 described as a “[n]ext-generation onboard server unit that
 6 uploads and downloads data to the aircraft both inflight and on
 7 the ground. *See* “In-Cabin Network Hardware for inflight
 8 connectivity and entertainment,”



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 17 <https://www.gogoair.com/commercial/in-cabin-network>.

18 When a user accesses Gogo’s network through the server, the
 19 user does so through a temporarily assigned network address. A
 20 rule set programmed in the redirection server initially forces and
 21 redirects the user’s web browser to the Gogo inflight wi-fi
 22 service portal, i.e., the “Gogo Portal.” *See, e.g.*, “Passenger
 23 Services,” [https://www.gogoair.com/commercial/passenger-](https://www.gogoair.com/commercial/passenger-services/)
 24 [services/](https://www.gogoair.com/commercial/passenger-services/). (“The Gogo Portal is the interface providing
 25 passengers access to the Internet and other inflight entertainment
 26 options on board.”).

27 _____
 28 option to install the technology on additional aircraft in the future. The fleet of
 aircraft receiving Gogo’s 2Ku technology will include numerous aircraft types,
 including the Boeing 777 and Airbus A330s.”)

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- b. *wherein the rule set contains at least one of a plurality of functions used to control data passing between the user and a public network.* The server that provides the passenger’s gateway to the Internet from on board the aircraft is configured to be able to redirect the passenger to the Gogo Portal regardless of which Internet address the passenger requests.
- c. *wherein the redirection server is configured to automatically modify at least a portion of the rule set while the rule set is correlated to the temporarily assigned network address.* For example, upon a passenger’s payment or other login authentication by the server on board the aircraft, the server modifies its rule set to allow that passenger access to the Internet. By way of another example, “Gogo’s digital ad server displays advertisements within the portal, and ads can even be tailored to certain routes, devices, and targeted audiences.” *See also* “Gogo Portal Brochure” at 12, *available for download at* <https://www.gogoair.com/learning-center/gogo-portal-brochure/?download=true>.
- d. *wherein the redirection server is configured to modify at least a portion of the rule set as a function of some combination of time, data transmitted to or from the user, or location the user accesses.* For example, upon payment or authentication of a passenger’s credentials, i.e., use of a pre-determined pass or login that provides access, a portion of the rule set is modified by providing the user with Internet access for a limited amount of time (e.g., 30 minutes), while the rule set is correlated to the temporarily assigned network address given to the user.

1 e. *wherein the redirection server is configured to modify at least a*
2 *portion of the rule set as a function of time while the rule set is*
3 *correlated to the temporarily assigned network address.* For
4 example, upon payment for a limited time of Internet use, a
5 portion of the rule set is modified by providing the user with
6 Internet access for a limited amount of time (e.g., 30 minutes),
7 while the rule set is correlated to the temporarily assigned
8 network address given to the user.

9 33. By way of example only, the Accused Panasonic System also infringes
10 an exemplary claim of the '459 patent, claim 91, as in the following description,
11 which Linksmart provides without the benefit of information about the Accused
12 Panasonic System obtained through discovery. Claim 91 claims a system, such as
13 the Accused Panasonic System, comprising:

14 a. *a redirection server programmed with a user's rule set*
15 *correlated to a temporarily assigned network address.* For
16 example, Air France aircraft have systems that employ Panasonic
17 Avionics technology to enable Air France and KLM aircraft
18 passengers to access the Internet.² As an exemplary illustration
19 of Air France-KLM's Accused Panasonic System, Panasonic
20 Avionics describes the Global Communications Service (GCS)
21 project it provides, which extends its inflight entertainment and
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23 ² See, e.g., "Panasonic Avionics Corporation Selected by Air France - KLM to
24 Provide World Class Entertainment on Air France's New B777-300ER," September
25 17, 2008, [https://www.businesswire.com/news/home/20080917006498/](https://www.businesswire.com/news/home/20080917006498/en/Panasonic-Avionics-Corporation-Selected-Air-France--)
26 en/Panasonic-Avionics-Corporation-Selected-Air-France-- ("Panasonic Avionics
27 Corporation (Panasonic), the world leader in state-of-the-art in-flight entertainment
28 (IFE) and communication systems, today announced an agreement with Air France
- KLM, the largest airline consortium, in terms of operating revenue, in the world.
Under this agreement, Panasonic's eX2 IFE system will be installed on ten (10) new
B777-300ER aircraft of Air France.")

1 communications (IFEC) offerings to provide internet
2 connectivity for aircraft passengers. *See, e.g.*, “Global
3 Communications Services,” [https://www.panasonic.aero/
4 inflight-connectivity/global-communications-services/](https://www.panasonic.aero/inflight-connectivity/global-communications-services/). By way
5 of further example, Panasonic’s eXConnect product provides
6 “global inflight broadband connectivity” through “the
7 company’s global Ku-band aeronautical network. . . . This
8 connectivity service enables passengers to access the Internet,
9 compose and send email, log onto their favorite social media
10 sites, or even watch Panasonic’s eXTV global television
11 service.” *See, e.g.*, “eXConnect,” [https://www.panasonic.aero/
12 inflight-connectivity/global-communications-services/broadba
13 nd-connectivity/](https://www.panasonic.aero/inflight-connectivity/global-communications-services/broadband-connectivity/). Panasonic’s eXConnect broadband connectivity
14 allows Internet access, for example, extending the IFEC services
15 that are provided by server hardware that Panasonic Avionics
16 provides as part of its system. When a user accesses Panasonic
17 Avionics’ network through the internet server, the user does so
18 through a temporarily assigned network address. A rule set
19 programmed in the redirection server initially forces and
20 redirects the user’s web browser to the Panasonic Avionics
21 inflight Wi-Fi service portal, through which a user may gain
22 Internet access.

- 23 b. *wherein the rule set contains at least one of a plurality of*
24 *functions used to control data passing between the user and a*
25 *public network*. The server that provides the passenger’s gateway
26 to the Internet from on board the aircraft is configured to be able
27 to redirect users to the Panasonic Avionics portal regardless of
28 the Internet address that the user requests.

- 1 c. *wherein the redirection server is configured to automatically*
2 *modify at least a portion of the rule set while the rule set is*
3 *correlated to the temporarily assigned network address. For*
4 example, upon a passenger's payment or other login
5 authentication by the server on board the aircraft, the server
6 modifies its rule set to allow that passenger access to the Internet.
- 7 d. *wherein the redirection server is configured to modify at least a*
8 *portion of the rule set as a function of some combination of time,*
9 *data transmitted to or from the user, or location the user*
10 *accesses. For example, upon payment or authentication of a*
11 passenger's credentials, i.e., use of a pre-determined pass or
12 login that provides access, a portion of the rule set is modified by
13 providing the user with Internet access for a limited amount of
14 time (e.g., 30 minutes), while the rule set is correlated to the
15 temporarily assigned network address given to the user.
- 16 e. *wherein the redirection server is configured to modify at least a*
17 *portion of the rule set as a function of time while the rule set is*
18 *correlated to the temporarily assigned network address. For*
19 example, upon payment for a limited time of Internet use, a
20 portion of the rule set is modified by providing the user with
21 Internet access for a limited amount of time (e.g., 30 minutes),
22 while the rule set is correlated to the temporarily assigned
23 network address given to the user.

24 34. Air France-KLM indirectly infringes the '459 patent, under 35 U.S.C.
25 § 271(b), by actively inducing direct infringement by others, for example, Air
26 France-KLM passengers who use the Accused Systems provided by Air France-
27 KLM for Internet Access following Air France-KLM's instructions on how to access
28 the Wi-Fi network. By at least the filing date and/or service date of this Complaint,

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1 Air France-KLM had knowledge of the '459 patent and that its actions resulted in
2 direct infringement of the '459 patent. Air France-KLM also knew or was willfully
3 blind that its actions would induce direct infringement by others and intended that
4 its actions would do so.

5 35. In accordance with 35 U.S.C. § 287, Air France-KLM has had
6 knowledge of the Asserted Patent at least as of the filing date of this Complaint
7 and/or the date this Complaint was served.

8 36. Despite Air France-KLM's knowledge of the Asserted Patent and its
9 infringing activities, Air France-KLM continues to make, use, market, offer for sale,
10 and/or sell in the United States systems that infringe the Asserted Patent. Air France-
11 KLM has continued to infringe in wanton disregard of Linksmart's patent rights.

12 37. Air France-KLM's continued infringement of the Asserted Patent has
13 damaged and will continue to damage Linksmart.

14 **Damages**

15 38. The foregoing paragraphs are incorporated by reference as if fully set
16 forth herein.

17 39. As a result of Air France-KLM's acts of infringement, Linksmart has
18 suffered actual and consequential damages; however, Linksmart does not yet know
19 the full extent of the infringement. The extent of Air France-KLM's infringement
20 and damages suffered by Linksmart cannot be ascertained except through discovery
21 and special accounting. To the fullest extent permitted by law, Linksmart seeks
22 recovery of damages at least for reasonable royalties, unjust enrichment, and benefits
23 received by Air France-KLM as a result of infringing the patents-in-suit. Linksmart
24 further seeks any other damages to which Linksmart is entitled under law or in
25 equity.

26 **Irreparable Harm to Linksmart**

27 40. The foregoing paragraphs are incorporated by reference as if fully set
28 forth herein.

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41. Linksmart has been irreparably harmed by Air France-KLM’s acts of infringement. Linksmart will continue to be irreparably harmed unless and until Air France-KLM’s acts of infringement are enjoined by this Court. Linksmart has no adequate remedy at law to redress Air France-KLM’s continuing acts of infringement. The hardships that would be imposed upon Air France-KLM are less than those faced by Linksmart should an injunction not issue. Furthermore, the public interest would be served by issuance of an injunction.

Attorneys’ Fees

42. Air France-KLM’s infringement of the Asserted Patent is exceptional, and Linksmart is entitled to recover reasonable and necessary attorneys’ fees under applicable law.

Prayer for Relief

WHEREFORE, Linksmart respectfully requests that this Court enter judgment in its favor and grant the following relief:

- a. A judgment that Air France-KLM directly and/or indirectly infringes the ’459 patent;
- b. An Order enjoining, permanently, Air France-KLM and its respective officers, directors, agents, partners, servants, employees, attorneys, licensees, successors, and assigns, and those in active concert or participation with any of them, from engaging in infringing activities with respect to the ’459 patent;
- c. A judgment that Air France-KLM’s infringement has been willful and that Air France-KLM’s continued infringement of the ’459 patent is willful;
- d. A ruling that this case is exception and awarding Linksmart its reasonable attorneys’ fees under 35 U.S.C. § 285;
- e. A judgment and order requiring Air France-KLM to pay Linksmart damages in an amount adequate to compensate Linksmart for Air

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France-KLM’s infringement, but in no event less than a reasonable royalty under 35 U.S.C. § 284, including supplemental damages for any continuing post-verdict infringement up until entry of judgment, with an accounting, as needed, as well as treble damages for willful infringement under 35 U.S.C. § 284;

- f. Award enhanced damages pursuant to 35 U.S.C. § 284;
- g. A judgment and order requiring Air France-KLM to pay Linksmart’s costs of this action (including all disbursements);
- h. An order for an accounting of damages;
- i. A judgment and order requiring Air France-KLM to pay pre-judgment and post-judgment interest to the full extent allowed under the law; and
- j. Award such other and further relief as the Court may deem just and proper under the circumstances.

Demand for Jury Trial

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, plaintiff Linksmart Wireless Technology, LLC demands trial by jury on all issues so triable.

Respectfully submitted,

Dated: April 20, 2018

RUSS AUGUST & KABAT

By: /s/ Kent N. Shum

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