

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

TANGELO IP, LLC	)
	)
Plaintiff,	)
	) Civil Action No. _____
v.	)
	) <b>JURY TRIAL DEMANDED</b>
THERMO FISHER SCIENTIFIC INC.	)
	)
Defendant.	)
_____	)

**COMPLAINT**

For its Complaint, Plaintiff Tangelo IP, LLC ("Tangelo"), by and through the undersigned counsel, alleges as follows:

**THE PARTIES**

1. Tangelo is a Texas limited liability company with a place of business located at 555 Republic Drive, 2nd Floor #42, Plano, Texas 75074.

2. Defendant Thermo Fisher Scientific Inc. is a Delaware company with, upon information and belief, a place of business located at 168 Third Avenue, Waltham, Massachusetts 02451.

3. By registering to conduct business in Delaware, Defendant has a permanent and continuous presence in Delaware.

4. Thus, Defendant has a regular and established place of business in the District of Delaware.

**JURISDICTION AND VENUE**

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

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

7. Upon information and belief, Defendant conducts substantial business in this forum, directly or through intermediaries, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct and/or deriving substantial revenue from goods and services provided to individuals in this district.

8. Venue is proper in this district pursuant to 28 U.S.C. § 1400(b).

### **BACKGROUND**

9. Tangelo's closely related operating entity is Tangelo, LLC (formerly known as Active8media, LLC), a developer of advanced interactive and shoppable image products. Tangelo's technology already is used by many major publishers to drive sales and connect readers and customers. Tangelo, LLC was awarded a MAX Marketing Award for its interactive image technology. It was also showcased on CNBC's Power Lunch for the implementation of Vogue Magazine's interactive ad images and the resulting highest revenue issue in Vogue's 110-year history.

10. Among other things, Tangelo, LLC operates Tangelo Images, a user interface application for creating interactive brand and user-generated photos. In addition, Tangelo, LLC launched Tangelo Tags within the Facebook app center to allow brand and individual users to create interactive and shoppable photos within Facebook's timeline. Tangelo, LLC has been recognized as a TAG Top 40 - Georgia's Most Innovative Companies.

11. Todd Mannik is a co-founder of Tangelo, LLC. Since at least 1999, Mr. Mannik has dedicated his career to focusing on the interactivity of photo images and the discovery of what's "inside" a photo. Mr. Mannik is the co-inventor of several patents, including the patent-in-suit, which represent pioneering advances in the transformation of images into interactive and

shoppable images online.

### **THE PATENT-IN-SUIT**

12. On April 23, 2013, U.S. Patent No. 8,429,005 (the "'005 patent"), entitled "Method for Determining Effectiveness of Display of Objects in Advertising Images," was duly and lawfully issued by the U.S. Patent and Trademark Office. A true and correct copy of the '090 patent is attached hereto as Exhibit B.

13. Mr. Mannik is the first listed co-inventor on the patent-in-suit, which is U.S. Patent No. 8,429,005 (the "'005 patent"). The '005 patent is a continuation-in-part of U.S. Patent No. 6,535,889, which is a continuation-in-part of U.S. Patent No. 6,557,006. The earliest filing in the priority chain leading up to the '005 patent is U.S. Patent Application No. 09/406,171, filed on Sep. 23, 1999.

14. The technology recited in the claims of the '005 patent provides an inventive concept and does not claim an abstract idea. The inventive concept greatly enhances and facilitates technological methods and apparatuses which comprise providing of electronic and interactive catalogs comprising replications of product images appearing in a corresponding physical catalogs, wherein the electronic and interactive replications include selectable portions corresponding with the image replications, and wherein selection of the selectable portions provides additional product information and enables a user to initiate an online purchase of the product.

15. One inventive component of the '005 patent is improving electronic catalogs in ways that are necessarily rooted in computer technology to overcome problems specifically arising in the realm of computer networks, including the Internet. The claims recite an invention that was not merely a routine or conventional use of the Internet.

16. The technology claimed in the '005 patent does not preempt all types of electronic catalogs or anything else. For example, the prior art cited on the face of the '005 patent remains available for practice by the Defendant, and the '005 patent claims do not preempt practice of those prior art methods.

17. The '005 patent claims cannot be practiced by a human alone and there exists no human analogue to the methods claimed in the '005 patent. The claims are specifically directed to, *inter alia*, the electronic and interactive replication of product images appearing in a corresponding physical publication page, wherein the electronic and interactive replications include selectable portions corresponding with duplications of the appearance of the product, and wherein selection of the selectable portions provides additional product information and enables a user to initiate an online purchase of the product. These things exist only in the context of computers.

18. Tangelo is the assignee and owner of the right, title and interest in and to the '005 patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

**COUNT I – INFRINGEMENT OF U.S. PATENT NO. 8,429,005**

19. Tangelo 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), Defendant is liable for infringement of the '005 patent by practicing, making, using, importing, offering for sale, selling and/or hosting methods and computer readable media for methods, apparatuses, and computer readable media, including associated with websites and/or apps, for providing an

electronic and interactive replication of product images appearing in a corresponding physical publication page.

21. More specifically and upon information and belief, Defendant's online catalog system for providing interactive replications of product images appears in a corresponding physical publication page.


ANIMAL CARE/ASPIRATING PIPETS/BAGS **GENERAL LABORATORY**

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**General Laboratory Supplies**

**Animal Care**

**Fisherbrand™ Disposable Animal Feeding Needles**  
For critical applications requiring single-use feeding needles




01-208-87, 01-208-88, 01-208-89

- Nontoxic, nonpyrogenic
- Malleable stainless-steel tubing and silicone tip bend easily
- Plastic Luer hubs
- Sterile, packaged in Tyvek™ pouches
- Five per pouch, 20 pouches per box

Gauge/Length	Cat. No.	Each	Pack of 100
20/38mm (13 in.)	01-208-87	435.00	
18/35mm (13 in.)	01-208-88	438.00	
15/78mm (13 in.)	01-208-89	435.00	

**Aspirating Pipets**

**Fisherbrand™ Aspirating Pipet**  
For aseptically aspirating liquids using vacuum suction



14-955-135


- Capacity: 2mL
- One-piece polystyrene construction
- No graduations
- Ungraduated
- Outside diameter: 6.18mm
- Individually wrapped
- Tip shape: round

Description	Cat. No.	Each
Aspirating Pipet	14-955-135	83.00

**Bags**

**Autoclave**

**Fisherbrand™ Instant Sealing Sterilization Pouches**  
No tape or heat sealing needed




01-812-5 Series

Integral sealing strip eliminates the need to tape or heat seal pouches. Simply peel off protective strip, fold along perforation and press firmly to seal pouch.

- Triple heat-processed seams provide excellent tear and puncture resistance
- Suitable for steam or EtO gas sterilization
- Indicator arrows change color when sterilization cycle is complete
- Made of paper/plastic, medical-grade paper side guards against puncture
- 2mil-thick blue transparent polyester/polypropylene laminate film side allows contents to be identified quickly and shows any compromise in the film
- Corner tack seals prevent contamination in the seal area
- Thumb notch makes opening pouch easy

W x L	Cat. No.	Each	Pack of	Cases of
9 x 13.5cm (3.5 x 5 in.)	01-812-60	200/4.45	10 Pk./435.22	
9 x 25cm (3.5 x 9 in.)	01-812-61	200/7.27	20 Pk./1214.99	
12.3 x 25cm (5.25 x 10 in.)	01-812-64	200/9.45	10 Pk./753.75	
19 x 33cm (7 x 13 in.)	01-812-65	200/19.83	5 Pk./433.28	
25 x 38cm (10 x 15 in.)	01-812-67	100/172.06	5 Pk./722.84	
30 x 49cm (12 x 19 in.)	01-812-68	100/179.09	5 Pk./793.42	

**Fisherbrand™ Animal Ear-Tag Punch**  
For punching holes into thin part of animal's ear



13-812-201, shows with tag, sold separately

- For use with animal ear tags
- 2mm hole diameter

**Animal Ear Tag**

- Ear tags with washers
- Set numbered 1 to 100
- Aluminum

Description	Cat. No.	Each	Each	Pack of
Animal Ear-Tag Punch	13-812-201	22.00	12/224.00	
Animal Ear Tag	13-812-200	---	---	100/44.00

Phone: 1.800.766.7000 Fax: 1.800.925.1166 www.fishersci.com 3

Print Catalog.


ANIMAL CARE ASPIRATING PIPETS/BAGS GENERAL LABORATORY

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**General Laboratory Supplies**

**Animal Care**

**Fisherbrand™ Disposable Animal Feeding Needles**  
For critical applications requiring single-use feeding needles




01-208-87, 01-208-88, 01-208-89

- Nontoxic, nonpyrogenic.
- Malleable stainless-steel tubing and silicone tip bend easily
- Plastic Luer hubs
- Sterile, packaged in Tyvek® pouches
- Five per pouch, 20 pouches per box

Gauge/Length	Cat. No.	Each	Pack of 20
20/30mm (1.5 in.)	01-208-87	435.00	8,700.00
18/30mm (1 in.)	01-208-88	435.00	8,700.00
15/30mm (1 in.)	01-208-89	435.00	8,700.00

**Aspirating Pipets**

**Fisherbrand™ Aspirating Pipet**  
For aseptically aspirating liquids using vacuum suction



14-955-135


- Capacity: 2mL
- One-piece polystyrene construction
- No graduations
- Unplugged
- Outside diameter: 6.18mm
- Individually wrapped
- Tip shape: round

Description	Cat. No.	Each
Aspirating Pipet	14-955-135	65.00

**Bags**

**Autoclave**

**Fisherbrand™ Instant Sealing Sterilization Pouches**  
No tape or heat sealing needed




01-912-5 Series

- Integral sealing strip eliminates the need to tape or heat seal pouches. Simply peel off protective strip, fold along perforation and press firmly to seal pouch.
- Triple heat-processed seams provide excellent tear and puncture resistance
- Suitable for steam or EtO gas sterilization
- Indicator arrows change color when sterilization cycle is complete
- Made of paper/plastic, medical-grade paper side guards against puncture
- 2mil-thick blue transparent polyester/polypropylene laminate film side allows contents to be identified quickly and shows any compromise in the film
- Corner tack seals prevent contamination in the seal area
- Thumb notch makes opening pouch easy

W x L	Cat. No.	Pack of	Case of
9 x 13.3cm (3.5 x 5 in.)	01-912-50	200/54.40	10 Pk./425.22
9 x 23cm (3.5 x 9 in.)	01-912-51	200/72.71	20 Pk./1224.69
13.3 x 25cm (5.25 x 10 in.)	01-912-54	200/94.40	10 Pk./753.75
19 x 32cm (7 x 12 in.)	01-912-55	200/193.83	5 Pk./453.28
25 x 38cm (10 x 15 in.)	01-912-57	100/172.06	5 Pk./727.84
30 x 46cm (12 x 18 in.)	01-912-58	100/178.08	5 Pk./757.43

**Fisherbrand™ Animal Ear-Tag Punch**  
For punching holes into thin part of animal's ear



13-912-201, shows with tag, sold separately

- For use with animal ear tags
- 2mm hole diameter

**Animal Ear Tag**

- Ear tags with washers
- Set numbered 1 to 100
- Aluminum

Description	Cat. No.	Each	Pack of
Animal Ear-Tag Punch	13-912-201	22.00	12,224.00
Animal Ear Tag	13-912-200	---	100/44.00

Phone: 1.800.766.7000 Fax: 1.800.766.7000 / 340

<http://labessentials.fishersci.com/html5forpc.html?page=4&bbv=1&pcode=> ("Online Catalog"). Defendant uses a computer system that associates a page number of a physical publication page with an electronic and interactive replication of at least a portion of the physical publication page, and the electronic catalog comprises exact duplications of the at least two different products from the physical publication.


ANIMAL CARE/ASPIRATING PIPETS/BAGS
GENERAL LABORATORY

General Laboratory Supplies

Animal Care

### Fisherbrand™ Disposable Animal Feeding Needles

For critical applications requiring single-use feeding needles



01-208-87, 01-208-88, 01-208-89


- Nontoxic, nonpyrogenic
- Malleable stainless-steel tubing and silicone tip bend easily
- Plastic Luer hubs
- Sterile, packaged in Tyvek™ pouches
- Five per pouch, 20 pouches per box

Gauge/Length	Cat. No.	Pack of 100
20/38mm (1.5 in.)	01-208-87	435.00
18/50mm (2 in.)	01-208-88	438.00
15/78mm (3 in.)	01-208-89	435.00

Aspirating Pipets

### Fisherbrand™ Aspirating Pipet

For aseptically aspirating liquids using vacuum suction



14-955-135

- Capacity: 2mL
- One-piece polystyrene construction
- No graduations
- Unplugged
- Outside diameter: 6.18mm

- Individually wrapped
- Tip shape: round


Description	Cat. No.	Each
Aspirating Pipet	14-955-135	83.00

Bags

Autoclave

### Fisherbrand™ Instant Sealing Sterilization Pouches

No tape or heat sealing needed



01-812-5 Series

Integral sealing strip eliminates the need to tape or heat seal pouches. Simply peel off protective strip, fold along perforation and press firmly to seal pouch.

- Triple heat-processed seams provide excellent tear and puncture resistance
- Suitable for steam or EtO gas sterilization
- Indicator arrows change color when sterilization cycle is complete
- Made of paper/plastic; medical-grade paper side guards against puncture


- 2mil-thick blue transparent polyester/polypropylene laminate film side allows contents to be identified quickly and shows any compromise in the film
- Corner tack seals prevent contamination in the seal area
- Thumb notch makes opening pouch easy

W x L	Cat. No.	Pack of	Case of
9 × 13.2cm (3.5 × 5 in.)	01-812-50	200/54.45	10 Pk./435.22
9 × 25cm (3.5 × 9 in.)	01-812-51	200/72.71	20 Pk./1214.59
13.3 × 25cm (5.25 × 10 in.)	01-812-54	200/90.45	10 Pk./753.75
19 × 32cm (7 × 13 in.)	01-812-55	200/159.83	5 Pk./433.28
25 × 38cm (10 × 15 in.)	01-812-57	100/172.06	5 Pk./722.84
30 × 46cm (12 × 18 in.)	01-812-58	100/179.08	5 Pk./757.43

Animal Care

### Fisherbrand™ Animal Ear-Tag Punch

For punching holes into thin part of animal's ear



13-812-201, shows with tag, sold separately

- For use with animal ear tags
- 2mm hole diameter

**Animal Ear Tag**

- Ear tags with washers
- Set numbered 1 to 100
- Aluminum

Description	Cat. No.	Each	Pack of
Animal Ear-Tag Punch	13-812-201	22.00	12/224.00
Animal Ear Tag	13-812-200	---	100/44.00

Phone: 1.800.766.7000 Fax: 1.800.925.1166 www.fishersci.com 3

Print Catalog.

ANIMAL CARE/ASPIRATING PIPETS/BAGS
GENERAL LABORATORY

General Laboratory Supplies

Animal Care

### Fisherbrand™ Disposable Animal Feeding Needles

For critical applications requiring single-use feeding needles



01-208-87, 01-208-88, 01-208-89

- Nontoxic, nonpyrogenic
- Malleable stainless-steel tubing and silicone tip bend easily
- Plastic Luer hubs
- Sterile, packaged in Tyvek™ pouches
- Five per pouch, 20 pouches per box

Gauge/Length	Cat. No.	Pack of 100
20/38mm (1.5 in.)	01-208-87	435.00
18/50mm (2 in.)	01-208-88	438.00
15/78mm (3 in.)	01-208-89	435.00

Aspirating Pipets

### Fisherbrand™ Aspirating Pipet

For aseptically aspirating liquids using vacuum suction



14-955-135

- Capacity: 2mL
- One-piece polystyrene construction
- No graduations
- Unplugged
- Outside diameter: 6.18mm

- Individually wrapped
- Tip shape: round

Description	Cat. No.	Each
Aspirating Pipet	14-955-135	83.00

Bags

Autoclave

### Fisherbrand™ Instant Sealing Sterilization Pouches

No tape or heat sealing needed



01-812-5 Series

Integral sealing strip eliminates the need to tape or heat seal pouches. Simply peel off protective strip, fold along perforation and press firmly to seal pouch.

- Triple heat-processed seams provide excellent tear and puncture resistance
- Suitable for steam or EtO gas sterilization
- Indicator arrows change color when sterilization cycle is complete
- Made of paper/plastic; medical-grade paper side guards against puncture

- 2mil-thick blue transparent polyester/polypropylene laminate film side allows contents to be identified quickly and shows any compromise in the film
- Corner tack seals prevent contamination in the seal area
- Thumb notch makes opening pouch easy

W x L	Cat. No.	Pack of	Case of
9 × 13.2cm (3.5 × 5 in.)	01-812-50	200/54.45	10 Pk./435.22
9 × 25cm (3.5 × 9 in.)	01-812-51	200/72.71	20 Pk./1214.60
13.3 × 25cm (5.25 × 10 in.)	01-812-54	200/90.45	10 Pk./753.75
19 × 32cm (7 × 13 in.)	01-812-55	200/159.83	5 Pk./433.29
25 × 38cm (10 × 15 in.)	01-812-57	100/172.06	5 Pk./722.84
30 × 46cm (12 × 18 in.)	01-812-58	100/179.08	5 Pk./757.43

Animal Care

### Fisherbrand™ Animal Ear-Tag Punch

For punching holes into thin part of animal's ear



13-812-201, shows with tag, sold separately

- For use with animal ear tags
- 2mm hole diameter

**Animal Ear Tag**

- Ear tags with washers
- Set numbered 1 to 100
- Aluminum

Description	Cat. No.	Each	Pack of
Animal Ear-Tag Punch	13-812-201	22.00	12/224.00
Animal Ear Tag	13-812-200	---	100/44.00

Phone: 1.800.766.7000 Fax: 1.800.925.1166 www.fishersci.com 3

Online Catalog. The electronic catalog includes a first selectable portion corresponding with duplication of the appearance of a first product of the at least two different products and selection of the first selectable portion provides additional information about the first product and enables a user to initiate an online purchase of the first product.

Selecting the catalog number for an item opens a new page including additional information about the product and an options for purchasing the product.

Online Catalog.



**Fisherbrand™ Disposable Animal Feeding Needles**

Catalog No. 01-208-87

\$410.00 / Pack of 100

⚠ Due to product restrictions, please Sign In to purchase or view availability for this product.

For critical applications requiring single-use feeding needles  
 ◀ View more versions of this product

**Description**   **Specifications**

**Description**

- Non-toxic, nonpyrogenic
- Malleable stainless-steel tubing and silicone tip bend easily
- Plastic Luer hubs
- Sterile, packaged in Tyvek™ pouches
- Five per pouch, 20 pouches per box

**Specifications**

Disposable	Yes	Gauge	20g
Length (English)	1.5 in.	Length (Metric)	3.8cm
Sterile	Yes	For Use With (Application)	For critical applications requiring sterile, flexible, single use feeding needles
Product Type	Malleable Animal feeding needle		

<https://www.fishersci.com/shop/products/complete-manual-staining-assembly-100/0120887>.

The electronic catalog includes a second selectable portion corresponding with duplication of the appearance of a second product of the at least two different products and selection of the second selectable portion provides additional information about the second product and enables a user to initiate an online purchase of the second product.

**General Laboratory Supplies**

**Animal Care**

**Fisherbrand™ Disposable Animal Feeding Needles**  
For critical applications requiring single-use feeding needles

- Nontoxic, nonpyrogenic
- Malleable stainless-steel tubing and silicone tip bend easily
- Plastic Luer hubs
- Sterile, packaged in Tyvek™ pouches
- Five per pouch, 20 pouches per box

Gauge/Length	Cat. No.	Each	Pack of 20
20/10mm (3/4 x 1)	81-209-47	1.50	30.00
18/10mm (3/4 x 1)	81-209-48	1.50	30.00
16/10mm (3/4 x 1)	81-209-49	1.50	30.00

**Aspirating Pipets**

**Fisherbrand™ Aspirating Pipet**  
For aseptically aspirating liquids using vacuum suction

- Capacity: 2mL
- One-piece polystyrene construction
- No graduations
- Unplugged
- Outside diameter: 6.18mm
- Individually wrapped
- Tip shape: round

Description	Cat. No.	Each
Aspirating Pipet	84-995-126	03.00

**Fisherbrand™ Instant Sealing Sterilization Pouches**  
No tape or heat sealing needed

Integral sealing strip eliminates the need to tape or heat seal pouches. Simply peel off protective strip, fold along perforation and press firmly to seal pouch.

- Triple heat processed seams provide excellent tear and puncture resistance
- Suitable for steam or EtO gas sterilization
- Indicator arrows change color when sterilization cycle is complete
- Made of paper/plastic; medical grade paper side guards against puncture
- 2mil-thick blue transparent polyester/polypropylene laminate film side allows contents to be identified quickly and shows any compromise in the film
- Corner back seals prevent contamination in the seal area
- Thumb notch makes opening pouch easy

**Fisherbrand™ Animal Ear-Tag Punch**  
For punching holes into thin part of animal's ear

Integral sealing strip eliminates the need to tape or heat seal pouches. Simply peel off protective strip, fold along perforation and press firmly to seal pouch.

- For use with animal ear tags
- 2mm hole diameter
- Ear tags with washers
- Set numbered 1 to 100
- Aluminum

Description	Cat. No.	Each	Pack of 12	Case of 144
Animal Ear-Tag Punch	81-812-201	22.00	264.00	3168.00
Animal Ear-Tag	81-812-200	10.00	120.00	1440.00

Selecting the catalog number for an item opens a new page including additional information about the product and an options for purchasing the product.

Online Catalog.

**Fisherbrand™ Animal Ear-Punch and Tags**

Fisherbrand™ Ear punches are used for punching holes into an animal's ear for labeling purposes.

**Description**

Fisherbrand™ Animal Ear-Punch and Tags. These instruments are available in multiple designs, including thumb-style, plier-style, or scissors-style punches. Both the plier-style and scissors-style punches feature a longer handle for improved grip and handling.

**Ear-Punch**

- For use with animal ear tags
- Thumb-type for punching holes into thin part of animal's ear
- Plier-type: Provides a longer handle for gripping and punching into animal ear
- Made from corrosion-resistant ASTM (B99-94) series 400 stainless steel
- Available Ear-punch: Thumb, plier or scissor type
- Compatible with Gamma/EtO/Autoclavable sterilization methods
- Electronically passivated for corrosion resistance

**Ear-Tags**

- Insert tag through hole; place washer behind hole
- Bend ends of tag back in rivet fashion, leaving space for ear growth
- Made from ASTM standard aluminum

**Specifications**

For Use With (Application)	Animal Identification
Product Type	Ear Tag Punch

**Purchasing Interface:**

Catalog No. 13-812-201

\$21.00 / Each  
 \$214.00 / Pack of 12 EA

Qty:

<https://www.fishersci.com/shop/products/fisherbrand-animal-ear-tag-punch/13812201>. A web server application is executed by the host computer and it provides the electronic and interactive

representation to a computing device of a user in response to receiving input representing the page number.



Online Catalog.

22. Tangelo is entitled to recover from Defendant the damages sustained by Tangelo as a result of Defendant's infringement of the '005 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.

23. Defendant's use of Tangelo's patented technology has caused, is causing and will continue to cause Tangelo irreparable harm unless enjoined by this Court.

**JURY DEMAND**

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

**PRAYER FOR RELIEF**

WHEREFORE, Tangelo requests that this Court enter judgment against Defendant as

follows:

- A. An adjudication that Defendant has infringed the '005 patent;
- B. A permanent injunction enjoining Defendant and its officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert or participation with it, from making, using, offering to sell, or selling in the United States or importing into the United States any devices, methods or systems that infringe any claim of the '005 patent, or contributing to or inducing the same by others;
- C. An award of damages to be paid by Defendant adequate to compensate Tangelo for Defendant's past infringement of the '005 patent and any continuing or future infringement through the date such judgment is entered, including interest, costs, expenses and an accounting of all infringing acts including, but not limited to, those acts not presented at trial;
- D. A declaration that this case is exceptional under 35 U.S.C. § 285, and an award of Tangelo's reasonable attorneys' fees; and
- E. An award to Tangelo of such further relief at law or in equity as the Court deems just and proper.

Dated: May 7, 2018

STAMOULIS & WEINBLATT LLC

/s/ Richard C. Weinblatt

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