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-00159-LY
Plaintiffs,	§ § §	
v.	§ §	PATENT CASE
APPLE INC.,	§ § §	
Defendant.	§ § §	

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.

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

2961384.v1

those accused herein of infringement, to customers and potential customers located in Texas and in the judicial Western District of Texas.

JURISDICTION

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).

COUNT I
(INFRINGEMENT OF U.S. PATENT NO. 7,587,207)

5.   Uniloc incorporates paragraphs 1-4 above by reference.

6.   Uniloc Luxembourg is the owner, by assignment, of U.S. Patent No. 7,587,207 ("the '207 Patent"), entitled DATA DELIVERY THROUGH BEACONS, which issued on September 8, 2009. A copy of the '207 Patent is attached as Exhibit A.

7.   Uniloc USA is the exclusive licensee of the '207 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.

8.   The '207 Patent describes in detail and claims in various ways inventions in systems and devices for improved communication of data between beacon devices and portable devices in accordance with a communication protocol such as Bluetooth developed by the inventor around 2000.

9.   The '207 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 '207 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.

10.   The inventions claimed in the '207 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 systems and devices by the '207 Patent inventors.

11.   The inventions claimed in the '207 Patent represent technological solutions to technological problems. The written description of the '207 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 differed markedly from and improved upon what may have been considered conventional or generic.

12.   Apple imports, uses, offers for sale, and sells in the United States electronic devices that operate in compliance with Bluetooth Low Energy version 4.0 and above. 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 Nike+(series 2 and 3), Apple watch Edition (series 2 and 3) watches; (5) iPod (generation 5), iPod touch, iPod nano; (6) Apple TV and Apple TV 4K, and (7) Airpods (collectively, the "Accused Infringing Devices").

13.   The Accused Infringing Devices are used to create a communications system wherein a device operates as a beacon that sends a series of inquiry messages that include data fields arranged in accordance with the Bluetooth 4.0 and above protocol and another device receives such a message and is capable of reading data, including location data, contained in the inquiry message.

14.   Apple has infringed, and continues to infringe, claims of the '207 Patent in the United States, including claims 1-3, and 5-11, by making, using, offering for sale, selling and/or importing the Accused Infringing Devices in violation of 35 U.S.C. §271(a).

15.   Using claim 1 merely as an illustrative example, Apple's Accused Infringing Devices implement a communications system comprising at least one beacon device capable of wireless message transmission and at least one portable device capable of receiving such a message transmission. For example, the Accused Products communicate via iBeacon protocol which is an advertising protocol developed by Apple using Bluetooth 4.0 specifications. Beacons (Bluetooth transmitters installed in departmental stores, parks, parking, airports, etc.) implementing iBeacon protocol can communicate with portable devices such as smartphones implementing Bluetooth low energy (BLE) and applications installed on them.

> Accessories that implement the Proximity Beacon (iBeacon) feature may interact with iOS apps that make use of the Core Location framework in iOS 7.0 or above on Apple devices that support Bluetooth Low Energy.
>
> These accessories may provide vendor-specific information to an iOS app concerning the users's current location. It is up to the accessory and/or app developer to specify the nature of the vendor-specific information and how the iOS app will use that information.

Proximity Beacon Specification R1 (Page 6)

iBeacons are standalone devices that constantly send out a UUID (Universally Unique Identifier) using Bluetooth 4.0 Low Energy. The iBeacon devices can come in different form factors. You can turn any device that has a Bluetooth 4.0 LE radio onboard into an iBeacon device, therefor you can find them on:
- iPhones
- Android phones
- Small PCBs
- USBs
- MAC laptops
- Apple TVs
- …

https://www.cisco.com/c/dam/en/us/solutions/collateral/enterprise-networks/connected-mobile-experiences/ibeacon_faq.pdf (Page 1)
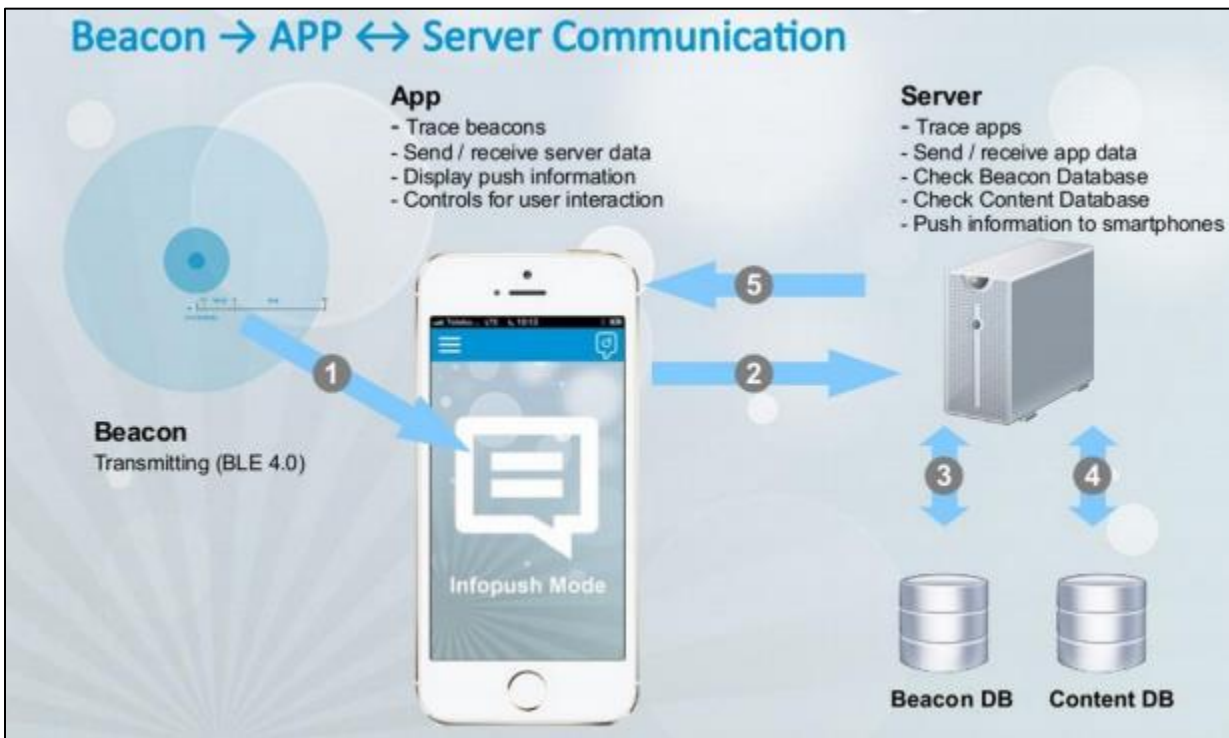
https://www.cisco.com/c/dam/en/us/solutions/collateral/enterprise-networks/connected-mobile-experiences/ibeacon_faq.pdf (Page 12). The beacon devices broadcast inquiry/advertising messages at regular intervals which can be received by smartphones.

5

> Devices that transmit advertising packets on the advertising PHY channels are referred to as **advertisers**. Devices that receive advertising packets on the advertising channels without the intention to connect to the advertising device are referred to as **scanners**. Transmissions on the advertising PHY channels occur in advertising events. At the start of each advertising event, the advertiser sends an advertising packet corresponding to the advertising event type. Depending on the type of advertising packet, the scanner may make a request to the advertiser on the same advertising PHY channel which may be followed by a response from the advertiser on the same advertising PHY channel. The advertising PHY channel changes on the next advertising packet sent by the advertiser in the same advertising event. The advertiser may end the advertising event at any time during the event. The first advertising PHY channel is used at the start of the next advertising event.

Bluetooth Core Specification 5.0 (Page 170, Volume 1).

### Centrals Discover and Connect to Peripherals That Are Advertising

> Peripherals broadcast some of the data they have in the form of advertising packets. An *advertising packet* is a relatively small bundle of data that may contain useful information about what a peripheral has to offer, such as the peripheral's name and primary functionality. For instance, a digital thermostat may advertise that it provides the current temperature of a room. In Bluetooth low energy, advertising is the primary way that peripherals make their presence known.

A central, on the other hand, can scan and listen for any peripheral device that is advertising information that it's interested in, as shown in Figure 1-2. A central can ask to connect to any peripheral that it has discovered advertising.

Figure 1-2 Advertising and discovery

Central → Ad Ad Ad → Peripheral

https://developer.apple.com/library/content/documentation/NetworkingInternetWeb/Conceptual/CoreBluetooth_concepts/CoreBluetoothOverview/CoreBluetoothOverview.html#//apple_ref/doc/uid/TP40013257-CH2-SW1. The advertiser (beacon) broadcasts advertising packets which contain Preamble, Access Address, Payload and CRC, to the initiators/scanners (smartphones).

Preamble	Access Address	PDU Header	PDU Payload	MIC	CRC

Figure 3.5: The packet structure for the LE Uncoded PHYs
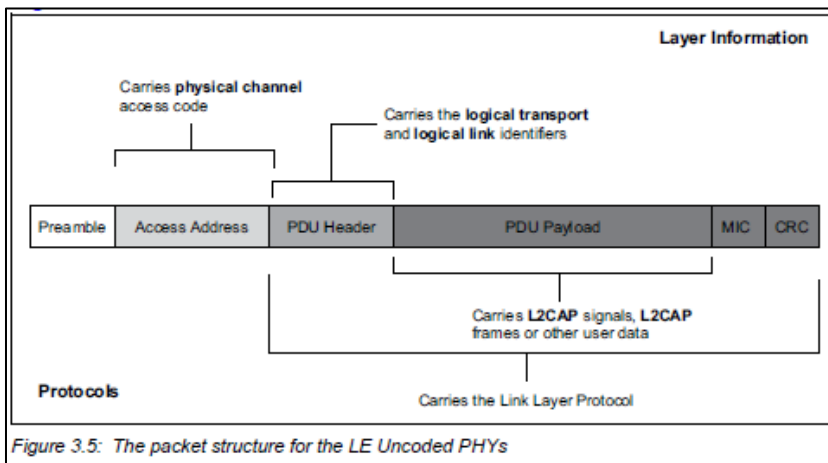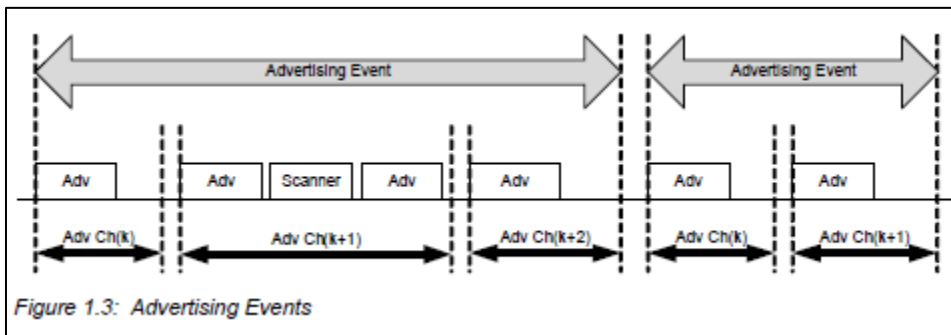
Bluetooth Core Specification 5.0 (Page 197, Volume 1).

16.   The Accused Products implement a communications system wherein the beacon is arranged to broadcast a series of inquiry messages each in the form of a plurality of predetermined data fields arranged according to a first communications protocol. For example, the beacon devices broadcast a series of three advertising messages a predetermined intervals, the advertising messages consisting of predetermined fields such as a Preamble, Access Address, PDU Header and CRC, as illustrated below.
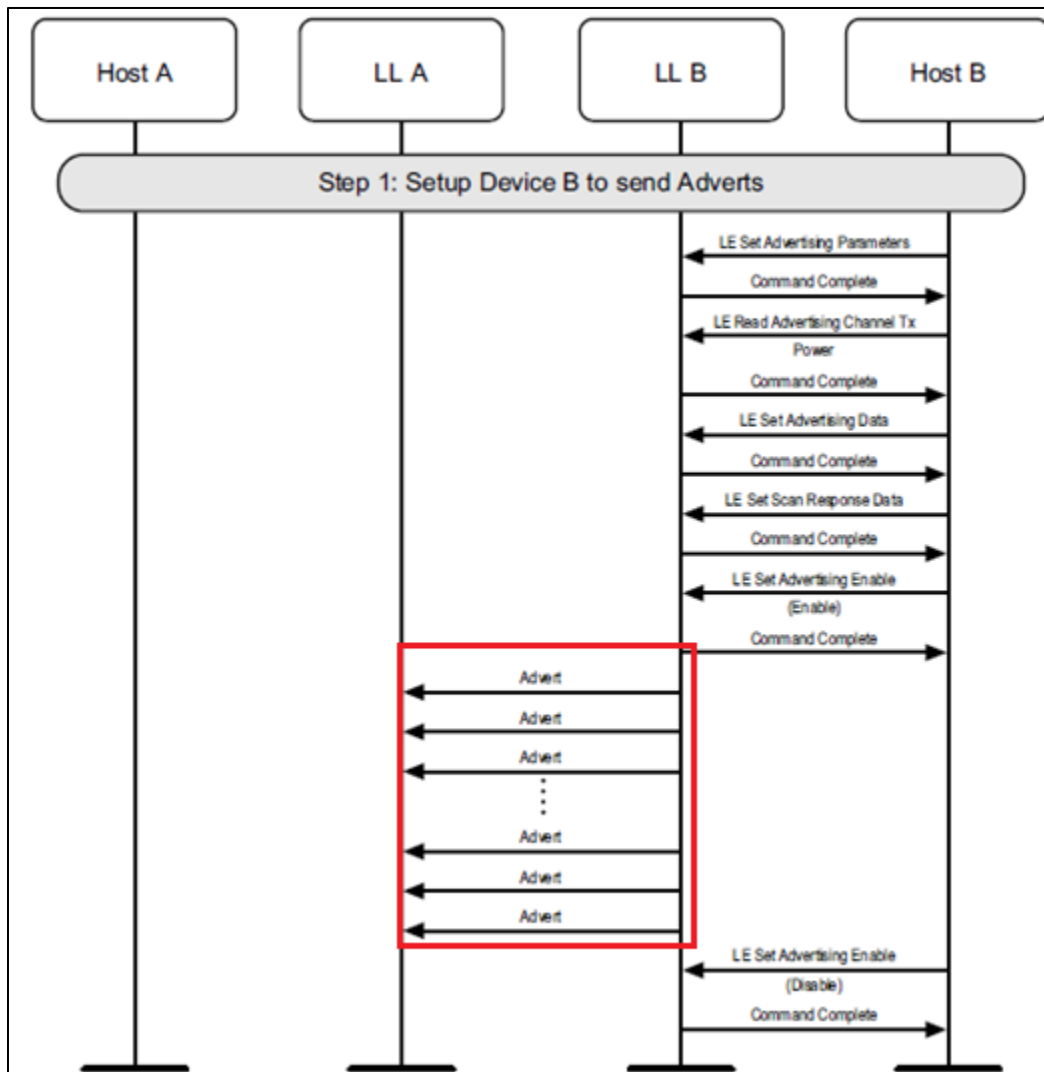
Bluetooth Core Specification 5.0 (Page 2717, Volume 6). Above, the Link Layer ("LL B") of advertiser ("Host B") is shown broadcasting a series of advertising (inquiry) message packets ("Advert") to "LL A" of scanner ("Host A"), at predetermined intervals (T_advEvent time interval). The advertising message

packets (Adv) are transmitted during advertising events and on multiple advertising channels such as

"Adv Ch(k)", "Adv Ch(k+1)" and "Adv Ch(k+2)" during the first advertising event, and on two

advertising channels ("Adv Ch(k)" and "Adv Ch(k+1)") during the second advertising event, as

illustrated below

Figure 1.3: Advertising Events

Bluetooth Core Specification 5.0 (Page 170, Volume 1)

4.4.2.2.1 Advertising Interval

For all undirected advertising events or connectable directed advertising events used in a low duty cycle mode, the time between the start of two consecutive advertising events (*T_advEvent*) for the same advertising data set (see Section 4.4.2.10) is computed as follows for each advertising event:

$$T\_advEvent = advInterval + advDelay$$

The *advInterval* shall be an integer multiple of 0.625 ms in the range of 20 ms to 10,485.759375 s.

The *advDelay* is a pseudo-random value with a range of 0 ms to 10 ms generated by the Link Layer for each advertising event.

As illustrated in Figure 4.3, the advertising events are perturbed in time using the advDelay.

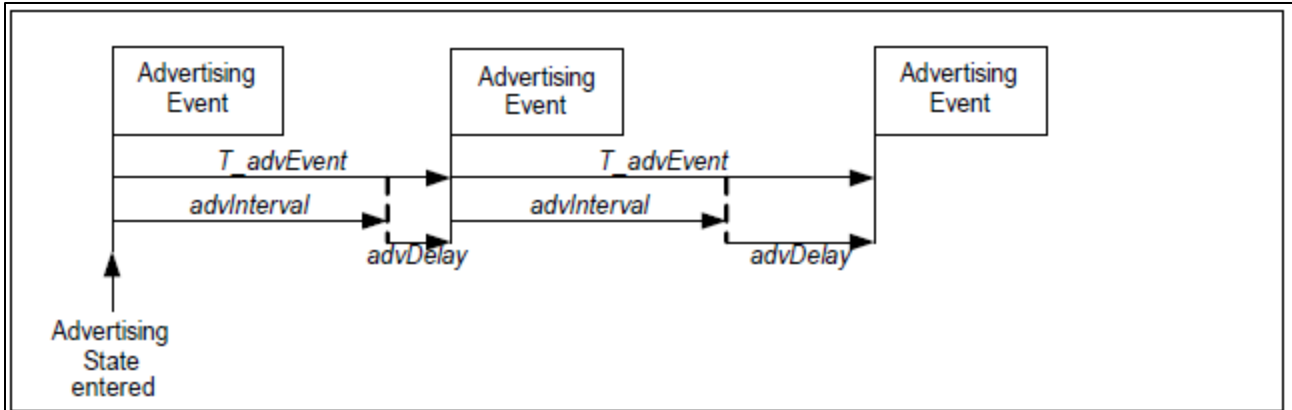Bluetooth Core Specification 5.0 (Page 2610-2611, Volume 6)

Figure 4.3: Advertising events perturbed in time using advDelay

Bluetooth Core Specification 5.0 (Page 2611, Volume 6). In addition, as can be seen below, the

advertising packets consists of predetermined fields such as Preamble, Access address, PDU header and
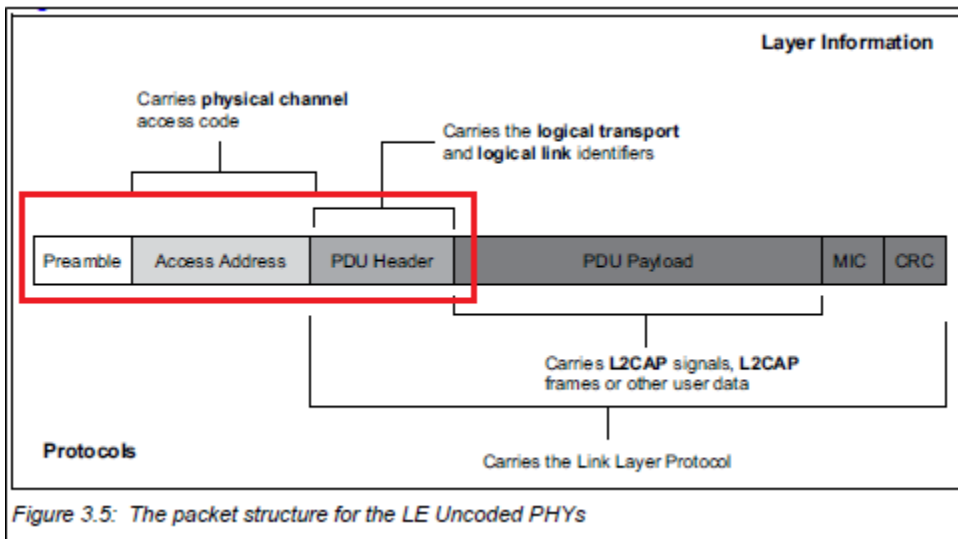
CRC.

Figure 3.5: The packet structure for the LE Uncoded PHYs

Bluetooth Core Specification 5.0 (Page 197, Volume 1)

All LE packets include a PDU header. The PDU header determines the type of advertisement broadcast or logical link carried over the physical channel.

For advertising channel PDUs, the PDU header contains the type of advertisement payload, the device address type for addresses contained in the advertisement, and the advertising channel PDU payload length. Most advertising channel PDU payloads contain the advertiser's address and advertising data. One advertising channel PDU payload only contains the advertiser's device address and the initiator's device address in which the advertisement is directed. Advertising channel PDUs with scan requests payloads contain the scanner's device address and the advertiser's device address. Advertising channel PDUs with scan responses contain advertiser's device address and the scan response data. Advertising channel PDUs with connection request payloads contain the initiator's device address, advertiser's device address and connection setup parameters.

Bluetooth Core Specification 5.0 (Page 199, Volume 1)

The advertising channel PDU has a 16-bit header and a variable size payload. Its format is as shown in Figure 2.4. The 16-bit Header field of the advertising channel PDU is as shown in Figure 2.5.
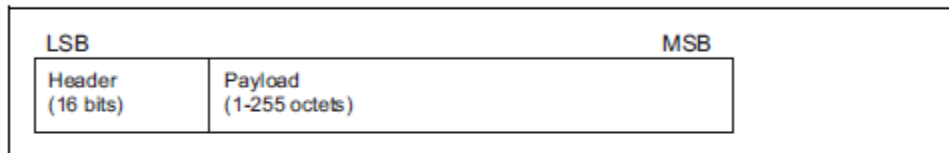
LSB		MSB
Header (16 bits)	Payload (1-255 octets)	

Figure 2.4: Advertising channel PDU

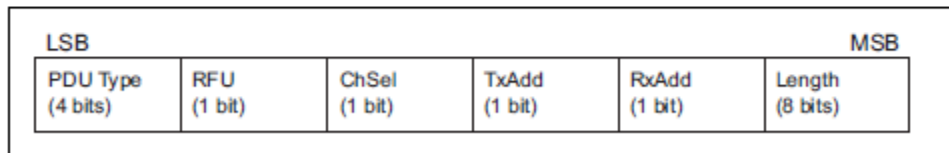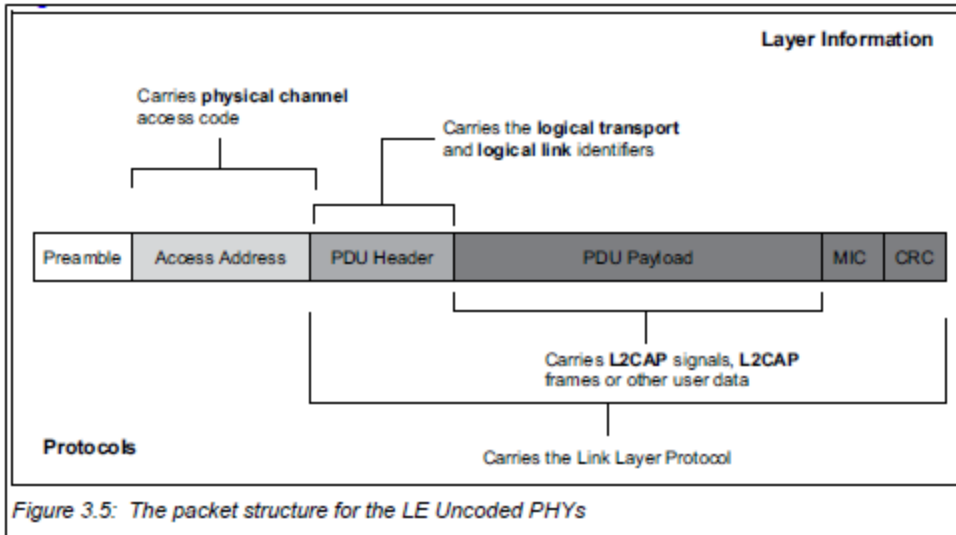| LSB					MSB
PDU Type (4 bits)	RFU (1 bit)	ChSel (1 bit)	TxAdd (1 bit)	RxAdd (1 bit)	Length (8 bits)

Figure 2.5: Advertising channel PDU Header

Bluetooth Core Specification 5.0 (Page 2567, Volume 6).

17.   The Accused Infringing Devices implement a communications system wherein the beacon is further arranged to add to each inquiry message prior to transmission an additional data field. For example, a variable PDU Payload field is added after the Preamble, Access Address, and PDU Header. In addition, in the instance that the packet is an iBeacon packet, the additional field of PDU Payload further contains iBeacon data, which includes iBeacon prefix, UUID, Major and Minor fields and TX power.

Figure 3.5: The packet structure for the LE Uncoded PHYs

Bluetooth Core Specification 5.0 (Page 197, Volume 1).

All LE packets include a PDU header. The PDU header determines the type of advertisement broadcast or logical link carried over the physical channel.

For advertising channel PDUs, the PDU header contains the type of advertisement payload, the device address type for addresses contained in the advertisement, and the advertising channel PDU payload length. Most advertising channel PDU payloads contain the advertiser's address and advertising data. One advertising channel PDU payload only contains the advertiser's device address and the initiator's device address in which the advertisement is directed. Advertising channel PDUs with scan requests payloads contain the scanner's device address and the advertiser's device address. Advertising channel PDUs with scan responses contain advertiser's device address and the scan response data. Advertising channel PDUs with connection request payloads contain the initiator's device address, advertiser's device address and connection setup parameters.

Bluetooth Core Specification 5.0 (Page 199, Volume 1)

The advertising channel PDU has a 16-bit header and a variable size payload. Its format is as shown in Figure 2.4. The 16-bit Header field of the advertising channel PDU is as shown in Figure 2.5.
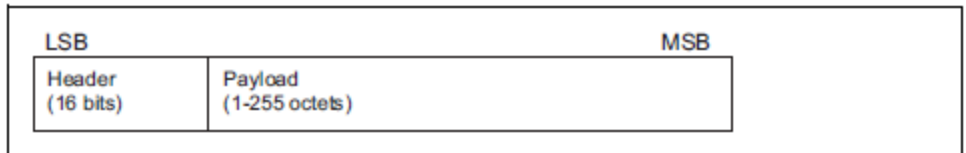
LSB					MSB
Header (16 bits)	Payload (1-255 octets)				

Figure 2.4: Advertising channel PDU

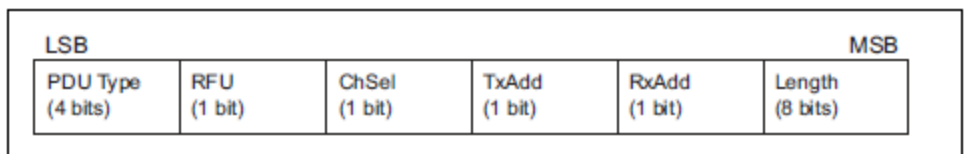| LSB					MSB
PDU Type (4 bits)	RFU (1 bit)	ChSel (1 bit)	TxAdd (1 bit)	RxAdd (1 bit)	Length (8 bits)

Figure 2.5: Advertising channel PDU Header

Bluetooth Core Specification 5.0 (Page 2567, Volume 6)

The PDU Type field of the advertising channel PDU that is contained in the header indicates the PDU type as defined in Table 2.3. This table also shows which channel and which PHYs the packet may appear on.

PDU Type	PDU Name	Channel	Permitted PHYs		
			LE 1M	LE 2M	LE Coded
0000b	ADV_IND	Primary Advertising	•		
0001b	ADV_DIRECT_IND	Primary Advertising	•		
0010b	ADV_NONCONN_IND	Primary Advertising	•		
0011b	SCAN_REQ	Primary Advertising	•		
	AUX_SCAN_REQ	Secondary Advertising	•	•	•
0100b	SCAN_RSP	Primary Advertising	•		
0101b	CONNECT_IND	Primary Advertising	•		
	AUX_CONNECT_REQ	Secondary Advertising	•	•	•
0110b	ADV_SCAN_IND	Primary Advertising	•		

Table 2.3: Advertising channel PDU Header's PDU Type field encoding

Bluetooth Core Specification 5.0 (Page 2567, Volume 6). As noted above, the payload of iBeacon advertising messages further includes an iBeacon prefix, UUID, Major and Minor fields and TX power.

12

18.   The Accused Products implement a communications system wherein the beacon is further arranged to include an indication in one of said predetermined data fields, said indication denoting the presence of said additional data field. For example, the PDU Header field contains a "Length" field which indicates the presence of the advertising data payload, among other things, as illustrated below.

> All LE packets include a PDU header. The PDU header determines the type of advertisement broadcast or logical link carried over the physical channel.
>
> For advertising channel PDUs, the PDU header contains the type of advertisement payload, the device address type for addresses contained in the advertisement, and the advertising channel PDU payload length. Most advertising channel PDU payloads contain the advertiser's address and advertising data. One advertising channel PDU payload only contains the advertiser's device address and the initiator's device address in which the advertisement is directed. Advertising channel PDUs with scan requests payloads contain the scanner's device address and the advertiser's device address. Advertising channel PDUs with scan responses contain advertiser's device address and the scan response data. Advertising channel PDUs with connection request payloads contain the initiator's device address, advertiser's device address and connection setup parameters.

Bluetooth Core Specification 5.0 (Page 199, Volume 1)

> The ADV_IND PDU has the Payload as shown in Figure 2.6. The PDU shall be used in connectable and scannable undirected advertising events. The TxAdd in the advertising channel PDU header indicates whether the advertiser's address in the AdvA field is public (TxAdd = 0) or random (TxAdd = 1). The ChSel field in the advertising channel PDU header shall be set to 1 if the advertiser supports the LE Channel Selection Algorithm #2 feature (see Section 4.5.8.3).
>
> | Payload | |
> |---|---|
> | AdvA | AdvData |
> | (6 octets) | (0-31 octets) |
>
> Figure 2.6: ADV_IND PDU Payload
>
> The Payload field consists of AdvA and AdvData fields. The AdvA field shall contain the advertiser's public or random device address as indicated by TxAdd. The AdvData field may contain Advertising Data from the advertiser's Host.

Bluetooth Core Specification 5.0 (Page 2569, Volume 6)

The ADV_SCAN_IND PDU has the Payload as shown in Figure 2.9. The PDU shall be used in scannable undirected advertising events. The TxAdd in the advertising channel PDU header indicates whether the advertiser's address in the AdvA field is public (TxAdd = 0) or random (TxAdd = 1).

Payload	
AdvA (6 octets)	AdvData (0-31 octets)

Figure 2.9: ADV_SCAN_IND PDU Payload

The Payload field consists of AdvA and AdvData fields. The AdvA field shall contain the advertiser's public or random device address as indicated by TxAdd. The AdvData field may contain Advertising Data from the advertiser's Host.

Bluetooth Core Specification 5.0 (Page 2571, Volume 6)

The advertising channel PDU has a 16-bit header and a variable size payload. Its format is as shown in Figure 2.4. The 16-bit Header field of the advertising channel PDU is as shown in Figure 2.5.

LSB   MSB

Header (16 bits)	Payload (1-255 octets)

Figure 2.4: Advertising channel PDU

LSB   MSB

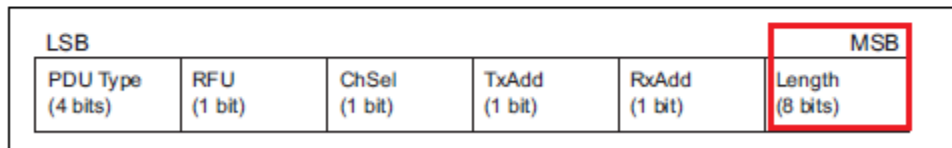| PDU Type (4 bits)	RFU (1 bit)	ChSel (1 bit)	TxAdd (1 bit)	RxAdd (1 bit)	Length (8 bits)
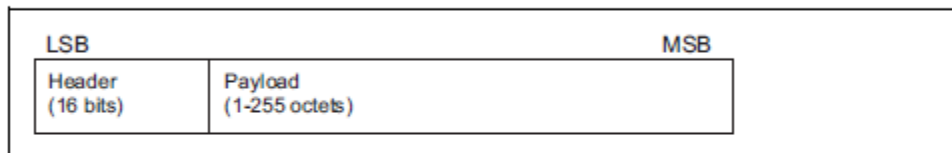
Figure 2.5: Advertising channel PDU Header

Bluetooth Core Specification 5.0 (Page 2567, Volume 6)

The Length field of the advertising channel PDU header indicates the payload field length in octets. The valid range of the Length field shall be 1 to 255 octets.

Bluetooth Core Specification 5.0 (Page 2568, Volume 6)

19.   The Accused Products implement a communications system wherein the at least one portable device is arranged to receive the transmitted inquiry messages and read data from said additional data field, the additional data field including location information. See paragraphs 17-19 above. In addition, for example, the payload data included in the advertising packets PDU field is read by the receiving smartphone which responds accordingly, for instance, in the case of Apple's iBeacon implementation, by passing the information to a smartphone application that checks the UUID and TX Power data, determines the phones relative location and displays a message to the user.

In addition to the UUID, an application can optionally supply the major and minor fields to further specify a beacon region to be monitored. Continuing with our retail chain example, if the app only specifies a UUID for the beacon region then it will be notified when the user enters or leaves *any* of the retail stores. Since the major field is being used to determine specific stores, if the user only wanted to be notified when entering a specific store, the application could configure the beacon region using the UUID + major value. Or perhaps the user is only interested in being notified when they have entered a specific department in that store. In that case the app would configure the beacon using UUID + major + minor values. This level of granularity is up to the app developer and can be specified dynamically at runtime.

https://developer.apple.com/ibeacon/Getting-Started-with-iBeacon.pdf

BLE communication consists primarily of "Advertisements", or small packets of data, broadcast at a regular interval by Beacons or other BLE enabled devices via radio waves.

BLE Advertising is a one-way communication method. Beacons that want to be "discovered" can broadcast, or "Advertise" self-contained packets of data in set intervals. These packets are meant to be collected by devices like smartphones, where they can be used for a variety of smartphone applications to trigger things like push messages, app actions, and prompts.

Apple's iBeacon standard calls for an optimal broadcast interval of 100 ms. Broadcasting more frequently uses more battery life but allows for quicker discovery by smartphones and other listening devices.

http://www.ibeacon.com/what-is-ibeacon-a-guide-to-beacons/

20.   Apple has been on notice of the '207 patent since, at the latest, the service of the original Complaint. Apple has also been on notice of Uniloc's infringement allegations and theory of infringement since that date, and thus has known that its continued actions would contribute to the infringement of claims of the '207 patent.

21.   Apple has actively induced, and continues to actively induce, infringement by others, including customers using the Accused Infringing Devices, by encouraging them to use,
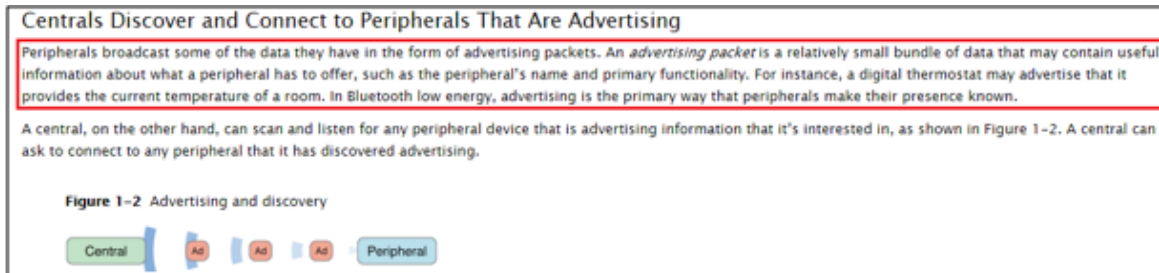
and instructing them how to use, those devices that Apple has intentionally designed and programmed to operate in accordance with the Bluetooth Low Energy 4.0 and above protocols and iBeacon technology whereby the devices infringe the asserted claims of the '207 Patent.

22.   Apple's customers who use those devices in accordance with Apple's design and intentions infringe claims of the '207 Patent. Apple intentionally instructs its customers to infringe through training videos, demonstrations, brochures, specifications and installation and user guides, such as those located at:

- www.apple.com/iphone-x/specs/

- www.apple.com/iphone-8/specs/

- www.apple.com/iphone-7/specs/

- www.apple.com/iphone-6s/specs/

- www.apple.com/iphone-se/specs/

- www.apple.com/ipad-pro/specs/

- www.apple.com/ipad-9.7/specs/

- www.apple.com/ipad-mini-4/specs/

- www.apple.com/watch/

- https://developer.apple.com/ibeacon/

- https://developer.apple.com/documentation/corelocation/turning_an_ios_device_into_an_ibeac on

- https://developer.apple.com/ibeacon/Getting-Started-with-iBeacon.pdf

- https://support.apple.com/kb/sp766?locale=en-US

- https://support.apple.com/kb/sp744?locale=en-US

- https://support.apple.com/kb/sp709?locale=en-US

- https://support.apple.com/en-US/specs/macnotebooks/

23.   In its marketing and instructional materials, including those identified above, Apple specifically and intentionally instructs its customers to use the Apple Wireless Devices in an infringing manner:

Source: https://developer.apple.com/library/content/documentation/NetworkingInternetWeb/Conceptual/CoreBluetooth_concepts/CoreBluetoothOverview/CoreBluetoothOverview.html#//apple_ref/doc/uid/TP40013257-CH2-SW1

Source: https://developer.apple.com/ibeacon/Getting-Started-with-iBeacon.pdf

Source: https://developer.apple.com/ibeacon/Getting-Started-with-iBeacon.pdf

24.   Apple has intentionally designed and sells the Accused Infringing Devices to automatically operate in normal mode in compliance with the Bluetooth Low Energy 4.0 and above protocols and using iBeacon technology in violation of the '207 Patent.

25.   Apple intends and knows that its customers use the Accused Infringing Devices to operate in compliance with the Bluetooth Low Energy 4.0 and above protocols and using iBeacon technology. When the Accused Infringing Devices are used as intended by Apple, Apple intentionally induces such infringement.

26.   Apple has known and intended, since service of the original Complaint, that its continuing encouragement and instructions to perform those infringing acts would induce performance of the infringing acts by others, including customers. Despite that knowledge, and as evidence of its intent, Apple has refused to discontinue the inducing acts and refused to remove the infringing functionality from the Accused Infringing Devices.

27.   Apple has also infringed, and continues to infringe, claims 1-3, and 5-11 of the '207 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 '207 patent, and constitute a material part of the invention. For example, the Accused Infringing Devices include software for implementing the claimed communications system comprising at least one beacon device capable of wireless message transmission and at least one portable device capable of receiving such a message transmission ("Infringing Software"), which is packaged with other software in the Accused Infringing Devices.   Apple knows that the Infringing Software is especially made or especially adapted for use in infringement of the '207 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 '207 Patent under 35 U.S.C. § 271(c).

28.   Apple has been on notice of the '207 Patent and of its and its customers' infringement thereof, since at the latest the service of the original 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, and 5-11 of the

'207 Patent.

29.   Apple may have infringed the '207 Patent through other software and devices

utilizing the same or reasonably similar functionality, including other versions of the Accused

Infringing Devices.

30.   Uniloc has been damaged by Apple's infringement of the '207 Patent.

PRAYER FOR RELIEF

 Uniloc requests that the Court enter judgment against Apple:

(A)   declaring that Apple has infringed the '207 Patent;

(B)   awarding Uniloc its damages suffered as a result of Apple's infringement of the

'207 Patent;

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

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

Date: May 30, 2018

Respectfully submitted,

/s/ Kevin Gannon
Kevin Gannon
Massachusetts State Bar No. 640931
James J. Foster
Massachusetts State Bar No. 553285
Aaron Jacobs
Massachusetts State Bar No. 677545
PRINCE LOBEL TYE LLP
One International Place, Suite 3700
Boston, MA 02110
Tel: (617) 456-8000
Fax: (617) 456-8100
Email: kgannon@princelobel.com
Email: jfoster@princelobel.com
Email: ajacobs@princelobel.com

Edward R. Nelson III
ed@nelbum.com
Texas State Bar No. 00797142
Anthony M. Vecchione
anthony@nelbum.com
Texas State Bar No. 24061270
NELSON BUMGARDNER PC
3131 West 7th Street, Suite 300
Fort Worth, TX 76107
Tel: (817) 377-9111
Fax: (817) 377-3485

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 May 30, 2018.

/s/ Kevin Gannon
Kevin Gannon