

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

CANATELO LLC

Plaintiff,

v.

**LOREX TECHNOLOGY, INC.
LOREX CORPORATION,**

Defendantss.

CIVIL NUM.:

TRIAL BY JURY DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Canatelo LLC (“Canatelo” or Plaintiff), through the undersigned attorneys, and respectfully alleges, states, and prays as follows:

NATURE OF THE ACTION

1. This is an action for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code (“U.S.C.”) to prevent and enjoin Defendants Lorex Technology, Inc. and Lorex Corporation (“Defendants”) from infringing and profiting, in an illegal and unauthorized manner and without authorization and/or consent from Canatelo, from U.S. Patent No. 7,310,111 (the “111 patent”) and 6,476,858 (the “858 patent”) (collectively, the “Asserted Patents”) (attached hereto as Exhibits A and B), pursuant to 35 U.S.C. §271, and to recover damages, attorneys’ fees, and costs.

THE PARTIES

2. Plaintiff Canatelo is a Puerto Rico limited liability company with its principal place of business at 208 Ave Juan Ponce De León, Oficina #1431, San Juan, PR 00917.

3. Upon information and belief, Defendant Lorex Technology, Inc. is a corporation organized and existing under the laws of Canada, with its principal place of business located at

250 Royal Crest Court, Markham, Ontario, Canada L3R3S1. Upon information and belief, Defendant Lorex Technology, Inc. may be served with process at 250 Royal Crest Court, Markham, Ontario, Canada L3R3S1.

4. Upon information and belief, Defendant Lorex Corporation is a corporation organized under the laws of the State of Delaware, with its principal place of business at 3700 Koppers Street, Suite 504, Baltimore, MD 21227. Upon information and belief, Defendant Lorex Corporation may be served with process at Corporation Trust Center, 1209 Orange St., Wilmington, DE 19801.

JURISDICTION AND VENUE

5. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§1331 and 1338(a) because the action arises under the patent laws of the United States, 35 U.S.C. §1 et seq.

6. This Court has personal jurisdiction over Defendants by virtue of their systematic and continuous contacts with this jurisdiction, as well as because of the injury to Canatelo and the cause of action Canatelo has raised, as alleged herein.

7. Defendants are subject to this Court's specific and general personal jurisdiction pursuant to due process and/or the Delaware Long-Arm Statute, *Del Code. Ann. Tit. 3, §3104*, due to at least its substantial business in this forum, including: (i) at least a portion of the infringement 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 Delaware.

8. Upon information and belief, Defendants, directly and/or through their employees or agents, and/or their customers, use and sell products, as defined below, that contain every

element of at least one claim of the ‘111 and ‘858 patents (collectively, the “Asserted Patents”) with the knowledge and/or understanding that such products are used or will be used in this District. For example, the accused instrumentality enables users to monitor a facility against an intrusion through a computer operationally coupled with a video camera and configured to receive a video signal. Upon information and belief, Defendants have engaged in substantial and not isolated activity within this District. Therefore, exercise of jurisdiction over Defendants will not offend traditional notions of fair play and substantial justice.

9. In addition to Defendants’ continuously and systematically conducting business in Delaware, the causes of action against Defendants are connected (but not limited) to Defendants’ purposeful acts committed in the state of Delaware, including Defendants’ making, using, importing, offering for sale, advertising (including the use of web pages with promotional material) products or services, or use or induce others to use services or products in or selling products which include features that fall within the scope of at least one claim of the ‘111 and ‘858 patents.

10. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1400(b) because Defendant Lorex Corporation is a resident of this district.

FACTUAL ALLEGATIONS

The ‘111 Patent

11. On December 18, 2007, the United States Patent and Trademark Office (“USPTO”) duly and legally issued the ‘111 patent, entitled “Video monitoring and security system” after a full and fair examination (Exhibit A).

12. Canatelo is presently the owner of the ‘111 patent, having received all right, title and interest from the previous assignee of record. Canatelo owns all rights of recovery under the

'111 patent, including the exclusive right to recover for past infringement. The '111 patent is valid and enforceable.

13. The '111 patent contains four independent claims and nine dependent claims. Defendants commercialize, *inter alia*, methods that perform all the elements recited in one or more claims of the '111 patent.

14. The invention claimed in the '111 patent includes a method of operating a video surveillance system. The method of operating a video surveillance system includes the steps of detecting motion in a video signal; compressing a portion of the video signal that includes the detected motion; and transmitting the compressed portion of the video signal that includes the detected motion as part of an e-mail, only after the step of detecting motion. The method also includes the steps of accepting a user-defined mask having active and inactive cells, wherein any motion that occurs in the inactive cells remain undetected; and transmitting an alarm message independent from the e-mail but approximately simultaneous to the transmission of said email.

The '858 Patent

15. On November 11, 2002, the United States Patent and Trademark Office ("USPTO") duly and legally issued the '858 patent, entitled "Video monitoring and security system" after a full and fair examination (Exhibit B).

16. Canatelo is presently the owner of the patent and possesses all right, title and interest in and to the '858 patent. Canatelo owns all rights of recovery under the '858 patent, including the exclusive right to recover for past infringement. The '858 patent is valid and enforceable.

17. The '858 Patent contains three independent claims and thirty four dependent claims.

18. The invention described in the '858 Patent includes a video monitoring system especially suitable to monitor the security of a facility against an intrusion.

19. The video monitoring system includes at least one video camera that generates a video signal. In addition, the video monitoring system includes a computer operationally coupled with the at least one video camera and configured to receive the video signal, wherein the video signal includes a plurality of frames each having a plurality of cells. The computer described in the '858 Patent is configured to perform the following functions: detect motion as between a first and a second frame of the video signal by comparing a plurality of the cells of the first frame to a plurality of the cells of the second frame, wherein the plurality of cells of the first and second frames exclude a user-defined insensitive area, which is completely surrounded by an active area containing the plurality of the cells of the first and second frames; automatically transmit an electronic message upon detection of the motion wherein the electronic message includes a recorded and compressed copy of the video signal beginning approximately coincident with the detection of motion; and automatically transmit an alarm message separate from the electronic message that alerts a user of the electronic message.

DEFENDANTS' PRODUCTS

20. Defendants make, use, sell, offer to sell and/or import network video recorders (NVRs) including Defendants' models DV704 – 4 Channel DV700 Series DVR, DV708 – 8 Channel DV700 Series DVR, and DV716 – 16 Channel DV700 Series DVR. Defendants make, use, sell, offer to sell and/or import cameras including LW2287 Series, LW2297 Series, LW3211 Series, LBV2521 Series, LBV2531 Series, LBV2561U Series, LBV2711(s) Series, LBV2723 Series, LEV2522 Series, LEV2712S Series, LEV 2724 Series, LEV2750AB Series, LZV2622 Series, and LZV2722 Series. All these products will be hereinafter identified as the “Infringing

Products.” Defendants’ Infringing Products encompass one or more of the features recited and which contain all the elements comprised in the patented claims.

21. Defendants offer video surveillance systems for individuals and businesses, such as the DV700 Series DVR and LBV2531 Series Camera (collectively hereinafter “the Accused System”), that enable a method for operating video surveillance systems, as recited in the preamble of claim 13 of the ‘111 patent.¹

22. As recited in the first step of claim 13 of the ‘111 patent, the Accused System enables detecting motion in a video signal. For example, the Accused System includes a motion detection feature that will detect motion a video signal.²

23. As recited in the second step of claim 13 of the ‘111 patent, the Accused System enables detecting compressing a portion of the video signal that includes the detected motion. For example, the Accused System is configurable to automatically send an email message in response to detected motion³, which contains an attached image for which the size and quality can be adjusted.⁴

24. As recited in the third step of claim 13 of the ‘111 patent, the Accused System enables transmitting the compressed portion of the video signal that includes the detected motion as part of an e-mail, only after the step of detecting motion. For example, the Accused System is configurable to automatically send an email message in response to detected motion⁵, which contains an attached image for which the size and quality can be adjusted.⁶

¹DV700 Series DVR manual - https://www.lorextechnology.com/downloads/security-dvr/DV700-Series/DV700_SERIES_MANUAL_EN_R1.pdf

² *Id.*, p. 173

³ *Id.*, p. 49

⁴ *Id.*, p. 59

⁵ *Id.*, p. 49

⁶ *Id.*, p. 59

25. As recited in the fourth step of claim 13 of the '111 patent, the Accused System enables accepting a user-defined mask having active and inactive cells, wherein any motion that occurs in the inactive cells remain undetected. For example, the Accused System includes a motion detection feature and is configurable to only detect motion in specific areas by providing users with a configurable image map that defines cells that are relevant and irrelevant to motion⁷. After a user configures said image map, the DVR will accept and retain the image map.⁸

26. As recited in the fifth step of claim 13 of the '111 patent, the Accused System enables transmitting an alarm message independent from the e-mail but approximately simultaneous to the transmission of said email. For example, the Accused System can also transmit alarm messages that can alert a user of the email in the form of triggering an alarm, showing a pop up message, triggering a buzzer and more.⁹

27. The elements described in paragraphs 19-25 are covered by at least claim 13 of the '111 patent. Thus, Defendants' use of the Accused System is enabled by the method described in the '111 patent.

28. Defendants offer video monitoring systems for individuals and businesses, such as the Accused System, especially suitable to monitor the security of a facility against an intrusion, as recited in the preamble of claim 26 of the '858 patent.¹⁰

29. As recited in claim 26 of the '858 patent, the Accused System includes at least one video camera that generates a video signal. For example, the Accused System includes the LBV2531 Series (Camera), which is a Video Camera that generates an NTSC or PAL standard

⁷ *Id.*, p. 173

⁸ *Id.*, p. 61

⁹ *Id.*, p. 60

¹⁰LBV2531 Series Camera specifications - https://www.lorextechnology.com/downloads/security-cameras/LBV2531/LBV2531_Series_Spec_R1.pdf

video signal in which each frame is 1920 pixels wide by 1080 pixels tall and transmits said video signal to a computer via BNC connected cable.¹¹

30. The Accused System include a computer operationally coupled with the at least one video camera and configured to receive the video signal, wherein the video signal includes a plurality of frames each having a plurality of cells. For example, the DV700 Series DVR is a Computer with a processor that performs a variety of processes on incoming video signals¹² such as simultaneous view, record, playback, backup & remote monitoring processing for VGA and/or HDMI display output, motion detection and more, i.e., it is a computer programmed to process data.¹³ The LBV2531 Series Camera generates an NTSC or PAL standard video signal¹⁴ in which each frame is 1920 pixels wide by 1080 pixels tall¹⁵. Pixels, or groups of pixels, in each image comprise cells.

31. The computer in the Accused System is configured to detect motion as between a first and a second frame of the video signal by comparing a plurality of the cells of the first frame to a plurality of the cells of the second frame, wherein the plurality of cells of the first and second frames exclude a user-defined insensitive area, which is completely surrounded by an active area containing the plurality of the cells of the first and second frames. For example, the DV700 Series DVR is configurable to only detect motion in specific areas by providing users with a configurable image map that defines cells that are relevant and irrelevant to motion.¹⁶

¹¹ *Id.*

¹² DV700 Series DVR manual - https://www.lorextechnology.com/downloads/security-dvr/DV700-Series/DV700_SERIES_MANUAL_EN_R1.pdf, p. 7

¹³ *Id.*, p. 173

¹⁴ LBV2531 Series Camera specifications - https://www.lorextechnology.com/downloads/security-cameras/LBV2531/LBV2531_Series_Spec_R1.pdf

¹⁵ *Id.*

¹⁶ DV700 Series DVR manual - https://www.lorextechnology.com/downloads/security-dvr/DV700-Series/DV700_SERIES_MANUAL_EN_R1.pdf, p. 61

32. The computer in the Accused System is configured to automatically transmit an electronic message upon detection of the motion wherein the electronic message includes a recorded and compressed copy of the video signal beginning approximately coincident with the detection of motion. For example, the DV700 Series DVR is configurable automatically send an email message (an electronic message) in response to detected motion.¹⁷ Furthermore, the DV700 Series DVR can send a picture of the event with the email if the snapshot function is enabled. When utilizing snapshots there are configurable size and quality options for the snapshots.¹⁸

33. The computer in the Accused System is configured to automatically transmit an alarm message separate from the electronic message that alerts a user of the electronic message. For example, the DV700 Series DVR can also transmit alarm messages that can alert a user of the electronic message in the form of triggering an alarm, showing a pop up message, triggering a buzzer and more.¹⁹

34. The elements described in paragraphs 28-33 are covered by at least claim 13 of the '111 patent. Thus, Defendants' use of the Accused System is enabled by the method described in the '111 patent.

DEFENDANTS' INFRINGEMENT

Count I: DIRECT INFRINGEMENT

35. Canatelo realleges and incorporates by reference the allegations set forth in paragraphs 1- 34.

The '111 Patent

¹⁷ *Id.*, p. 49

¹⁸ *Id.*, p. 59

¹⁹ *Id.*, p. 60

36. In violation of 35 U.S.C. § 271, Defendants are now, and have been directly infringing the '111 patent by making and using a product, at least during internal testing, that performs all the steps required by the method recited in claim 13 of the '111 patent, as outlined in paragraphs 20-26 of the present complaint.

37. Defendants have had knowledge of infringement of the '111 patent at least as of the service of the present complaint.

38. Defendants have directly infringed and continues to directly infringe at least claim 13 of the '111 patent by using the Accused System without authority in the United States, and will continue to do so unless enjoined by this Court. As a direct and proximate result of Defendants' direct infringement of the '111 patent, Plaintiff has been and continues to be damaged.

39. By engaging in the conduct described herein, Defendants have injured Canatelo and are thus liable for infringement of the '111 patent, pursuant to 35 U.S.C. § 271.

40. As a result of Defendants' infringement of the '111 patent, Canatelo has suffered monetary damages and is entitled to a monetary judgment in an amount adequate to compensate for Defendants' past infringement, together with interests and costs.

41. Canatelo will continue to suffer damages in the future unless Defendants' infringing activities are enjoined by this Court. As such, Canatelo is entitled to compensation for any continuing and/or future infringement up until the date that Defendants are finally and permanently enjoined from further infringement.

The '858 Patent

42. In violation of 35 U.S.C. § 271, Defendants are now, and have been directly infringing the '858 patent by making and using a product, at least during internal testing, that contains all the elements recited in claim 26 of the '858 patent, as outlined in paragraphs 28-33 of the present complaint.

43. Defendants have had knowledge of infringement of the '858 patent at least as of the service of the present complaint.

44. Defendants have directly infringed and continue to directly infringe at least claim 26 of the '858 patent by using the Accused System without authority in the United States, and will continue to do so unless enjoined by this Court. As a direct and proximate result of Defendants' direct infringement of the '858 patent, Plaintiff has been and continues to be damaged.

45. By engaging in the conduct described herein, Defendants have injured Canatelo and are thus liable for infringement of the '858 patent, pursuant to 35 U.S.C. § 271.

46. As a result of Defendants' infringement of the '858 patent, Canatelo has suffered monetary damages and is entitled to a monetary judgment in an amount adequate to compensate for Defendants' past infringement, together with interests and costs.

47. Canatelo will continue to suffer damages in the future unless Defendants' infringing activities are enjoined by this Court. As such, Canatelo is entitled to compensation for any continuing and/or future infringement up until the date that Defendants are finally and permanently enjoined from further infringement.

Count II: INDUCING INFRINGEMENT

48. Canatelo realleges and incorporates by reference the allegations set forth in paragraphs 1-47.

49. Defendants have had knowledge of the Asserted Patents and therefore of its infringement at least as of service of this Complaint.

The '111 Patent

50. Defendants indirectly infringe one or more claims of the '111 patent by actively inducing the infringement of their respective customers, buyers, users, subscribers and licensees who directly infringe by performing the patented methods in violation of 35 USC § 271(b).

51. Defendants indirectly infringe at least Claim 13 of the '111 patent by actively inducing their customers, buyers, users, subscribers and/or licensees to infringe on the '111 Patent at least by using the Accused System, in violation of 35 U.S.C. § 271(b). Furthermore, at least through instruction manuals for the Accused System, Defendants instruct their customers to directly infringe the '111 patent specifically intending that its customers use the Accused System in an infringing manner. Additionally, Defendants' customers' use of the Accused System is facilitated by the use of the methods described in the '111 patent. As a direct and proximate result of Defendants' indirect infringement by inducement of the '111 patent, Plaintiff has been and continues to be damaged.

52. Defendants actively induce others, such as their customers, users, subscribers, and/or licensees, to use the Infringing Products, which perform every step of the method recited in one or more claims of the '111 patent.

53. By engaging in the conduct described herein, Defendants have injured Canatelo and are thus liable for infringement of the '111 Patent, pursuant to 35 U.S.C. § 271.

54. Defendants have committed these acts of infringement without license or

authorization.

55. To the extent that facts learned in discovery show that Defendants' infringement of the '111 Patent is or has been willful, Canatelo reserves the right to request such a finding at the time of trial.

56. As a result of Defendants' infringement of the '111 Patent, Canatelo has suffered harm and monetary damages and is entitled to a monetary judgment in an amount adequate to compensate for Defendants' past infringement, together with interests and costs.

57. Canatelo will continue to suffer harm and damages in the future unless Defendants' infringing activities are enjoined by this Court. As such, Canatelo is entitled to compensation for any continuing or future infringement up until the date that Defendants are finally and permanently enjoined from further infringement.

The '858 Patent

58. Defendants indirectly infringe one or more claims of the '858 patent by actively inducing the infringement of their respective customers, buyers, users, subscribers and licensees who directly infringe by using the patented systems in violation of 35 USC § 271(b).

59. Defendants indirectly infringe at least Claim 26 of the '858 patent by actively inducing their customers, buyers, users, subscribers and/or licensees to infringe on the '858 Patent at least by using the Accused System, in violation of 35 U.S.C. § 271(b). Furthermore, at least through instruction manuals for the Accused System, Defendants instruct their customers to directly infringe the '858 patent specifically intending that their customers use the Accused System in an infringing manner. As a direct and proximate result of Defendants' indirect infringement by inducement of the '858 patent, Plaintiff has been and continues to be damaged.

60. Defendants actively induce others, such as their customers, users, subscribers, and/or licensees, to use the infringing products, which contain every element recited in one or more claims of the '858 patent.

61. By engaging in the conduct described herein, Defendants have injured Canatelo and are thus liable for infringement of the '858 Patent, pursuant to 35 U.S.C. § 271.

62. Defendants have committed these acts of infringement without license or authorization.

63. To the extent that facts learned in discovery show that Defendants' infringement of the '858 Patent is or has been willful, Canatelo reserves the right to request such a finding at the time of trial.

64. As a result of Defendants' infringement of the '858 Patent, Canatelo has suffered harm and monetary damages and is entitled to a monetary judgment in an amount adequate to compensate for Defendants' past infringement, together with interests and costs.

65. Canatelo will continue to suffer harm and damages in the future unless Defendants' infringing activities are enjoined by this Court. As such, Canatelo is entitled to compensation for any continuing or future infringement up until the date that Defendants is finally and permanently enjoined from further infringement.

Count III: CONTRIBUTORY INFRINGEMENT

66. Canatelo realleges and incorporates by reference the allegations set forth in paragraphs 1-65.

67. Defendants have had knowledge of the Asserted Patents and therefore of its infringement at least as of service of this Complaint.

The '111 Patent

68. Defendants' models DV704 – 4 Channel DV700 Series DVR, DV708 – 8 Channel DV700 Series DVR, and DV716 – 16 Channel DV700 Series DVR are components of a patented machine covered by one or more of claims of the '111 patent. Such components constitute a material part of the invention as they are the main focus of Defendants' advertisement. Such components are part of a surveillance system and, due to specific design of such technology, are not a staple article or commodity of commerce suitable for non-infringing use. Also, Defendants advertise no use for such components other than as part the of surveillance system.

69. Defendants' models DV704 – 4 Channel DV700 Series DVR, DV708 – 8 Channel DV700 Series DVR, and DV716 – 16 Channel DV700 Series DVR are apparatuses for use in practicing a patented process covered by at least Claim 13 of the '111 patent. Such components constitute a material part of the invention as they are the main focus of Defendants' advertisement. Such components are part of a surveillance method and, due to specific design of such technology, are not a staple article or commodity of commerce suitable for non-infringing use. Also, Defendants advertise no use for such components other than as part of surveillance method.

70. Defendants' software included in, or sold as part of Defendants' Infringing Products is an apparatus for use in practicing a patented process covered by at least Claim 13 of the '111 patent. Such component is part of a surveillance method and, due to specific design of the software, is not a staple article or commodity of commerce suitable for non-infringing use. Also, Defendants advertise no use for such component other than as part of surveillance method.

71. Defendants have known that their models DV704 – 4 Channel DV700 Series DVR, DV708 – 8 Channel DV700 Series DVR, and DV716 – 16 Channel DV700 Series DVR were especially designed or especially adapted for use in infringement of the '111 Patent at least as of service of the Complaint.

72. Defendants contribute to the direct infringement of at least claim 13 of the '111 Patent by offering to sell, selling and/or importing Defendants' models DV704 – 4 Channel DV700 Series DVR, DV708 – 8 Channel DV700 Series DVR, and DV716 – 16 Channel DV700 Series DVR in violation of 35 U.S.C. § 271(c).

73. By engaging in the conduct described herein, Defendants have injured Canatelo and are thus liable for infringement of the '111 Patent, pursuant to 35 U.S.C. § 271.

74. Defendants have committed these acts of infringement without license or authorization.

75. To the extent that facts learned in discovery show that Defendants' infringement of the '111 Patent is or has been willful, Canatelo reserves the right to request such a finding at the time of trial.

76. As a result of Defendants' infringement of the '111 Patent, Canatelo has suffered harm and monetary damages and is entitled to a monetary judgment in an amount adequate to compensate for Defendants' past infringement, together with interests and costs.

77. Canatelo will continue to suffer harm and damages in the future unless Defendants' infringing activities are enjoined by this Court. As such, Canatelo is entitled to compensation for any continuing or future infringement up until the date that Defendants are finally and permanently enjoined from further infringement.

The '858 Patent

78. Defendants' models DV704 – 4 Channel DV700 Series DVR, DV708 – 8 Channel DV700 Series DVR, and DV716 – 16 Channel DV700 Series DVR are components of a patented machine covered by one or more claims of the '858 patent. Such components constitute a material part of the invention as they are the main focus of Defendants' advertisement. Such components are part of a surveillance system and, due to specific design of such technology, are not a staple article or commodity of commerce suitable for non-infringing use. Also, Defendants advertise no use for such components other than as part the of surveillance system.

79. Defendants' models DV704 – 4 Channel DV700 Series DVR, DV708 – 8 Channel DV700 Series DVR, and DV716 – 16 Channel DV700 Series DVR are apparatuses for use in practicing a patented method covered by one or more claims of the '858 patent. Such components constitute a material part of the invention as they are the main focus of Defendants' advertisement. Such components are part of a surveillance method and, due to specific design of such technology, are not a staple article or commodity of commerce suitable for non-infringing use. Also, Defendants' advertise no use for such components other than as part the of surveillance method.

80. Defendants have known that their models DV704 – 4 Channel DV700 Series DVR, DV708 – 8 Channel DV700 Series DVR, and DV716 – 16 Channel DV700 Series DVR were especially designed or especially adapted for use in infringement of the '858 patent at least as of service of the Complaint.

81. Defendants contribute to the infringement of one or more claims of the '858 Patent by offering to sell, selling and/or importing Defendants' model DV704 – 4 Channel DV700 Series DVR, DV708 – 8 Channel DV700 Series DVR, and DV716 – 16 Channel DV700 Series DVR in violation of 35 U.S.C. § 271(c).

82. Defendants contribute to the direct infringement by others of one or more claims of the Asserted Patents in violation of 35 U.S.C. § 271(c). The class of such direct infringers includes, but is not limited to, the purchasers and end users of Defendants' models DV704 – 4 Channel DV700 Series DVR, DV708 – 8 Channel DV700 Series DVR, and DV716 – 16 Channel DV700 Series DVR.

DEMAND FOR JURY TRIAL

83. Canatelo demands a trial by jury of any and all causes of action.

PRAYER FOR RELIEF

Canatelo respectfully prays for the following relief:

1. That Defendants be adjudged to have infringed directly and/or indirectly, by inducing others and/or contributing to infringe, the '111 and '858 patents, literally and/or under the doctrine of equivalents;
2. An accounting of all infringing sales including, but not limited to, those sales not presented at trial;
3. That Defendants, their officers, directors, agents, servants, employees, attorneys, affiliates, divisions, branches, parents, and those persons in active concert or participation with any of them, be preliminarily and permanently restrained and enjoined from directly and/or indirectly infringing the '111 and '858 patents;
4. An award of damages pursuant to 35 U.S.C. §284 sufficient to compensate Canatelo for Defendants' past infringement and/or any continuing and/or future infringement up until the date that Defendants is finally and permanently enjoined from further infringement, including compensatory damages;

5. An assessment of pre-judgment and post-judgment interests and costs against Defendants, together with an award of such interests and costs, in accordance with 35 U.S.C. §284; and

6. That Canatelo have such other and further relief as this Court may deem just and proper.

Dated: May 31, 2018

Respectfully Submitted,

STAMOULIS & WEINBLATT LLC

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**ATTORNEYS FOR PLAINTIFF
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