IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BECK BRANCH LLC, Plaintiff, **v.** **UNIFY INC. DBA UNIFY ENTERPRISE COMMUNICATIONS INC.** Defendant.	**CIVIL ACTION NO** **JURY TRIAL DEMANDED**

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

1. This is an action for patent infringement in which Beck Branch LLC makes the following allegations against Unify Inc. dba Unify Enterprise Communications Inc.

PARTIES

2. Plaintiff Beck Branch LLC ("Plaintiff") is a Texas limited liability company with its principal place of business at 101 E. Park Blvd, Suite 600, Plano, TX 75074.

3. On information and belief, Unify Inc. dba Unify Enterprise Communications Inc. ("Defendant" or "Unify") is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in Boca Raton, FL.

JURISDICTION AND VENUE

4. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

5. Venue is proper in this district under 28 U.S.C. §§ 1391(c) and 1400(b). Unify is a Delaware corporation, and, thus, resides in Delaware for purposes of venue.

6. On information and belief, Defendant is subject to this Court's specific and general personal jurisdiction pursuant to due process and/or the Delaware Long Arm Statute, due at least to its substantial business in this forum, 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 Delaware and in this Judicial District.

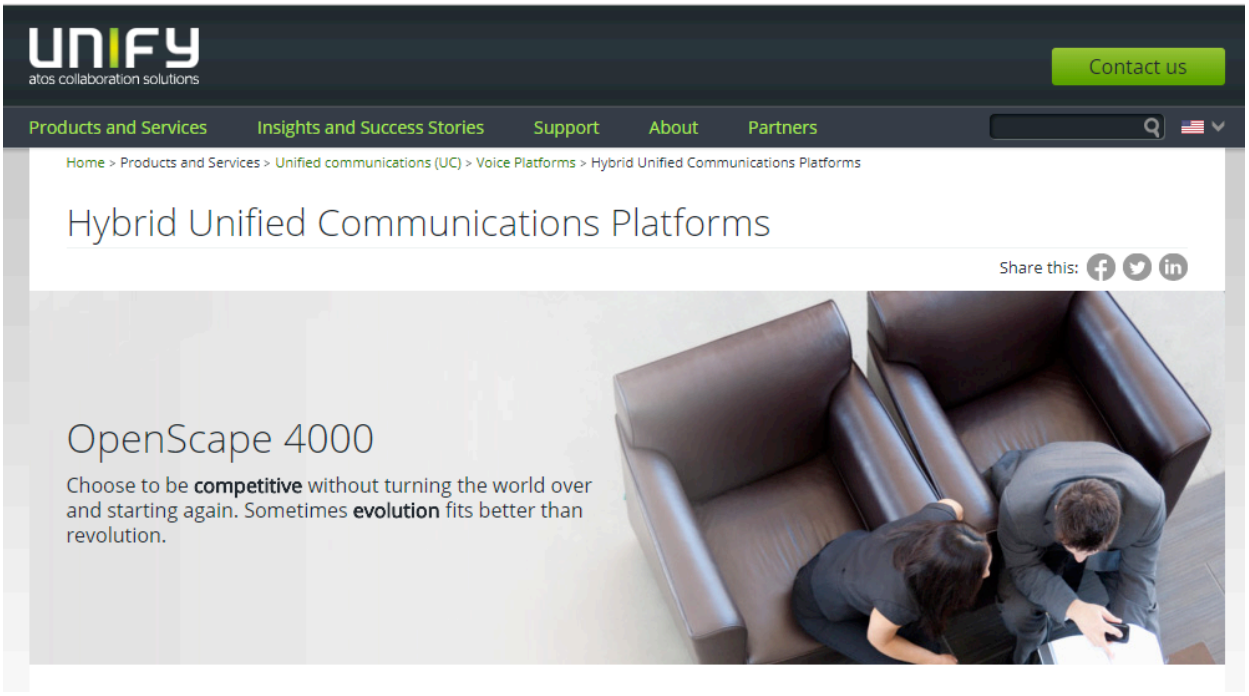
COUNT I
INFRINGEMENT OF U.S. PATENT NO. 6,873,620

7. Plaintiff is the owner of United States Patent No. 6,873,620 ("the '620 patent") entitled "Communication Server Including Virtual Gateway to Perform Protocol Conversion and Communication System Incorporating the Same." The '620 Patent issued on March 29, 2005. A true and correct copy of the '620 Patent is attached as Exhibit A.

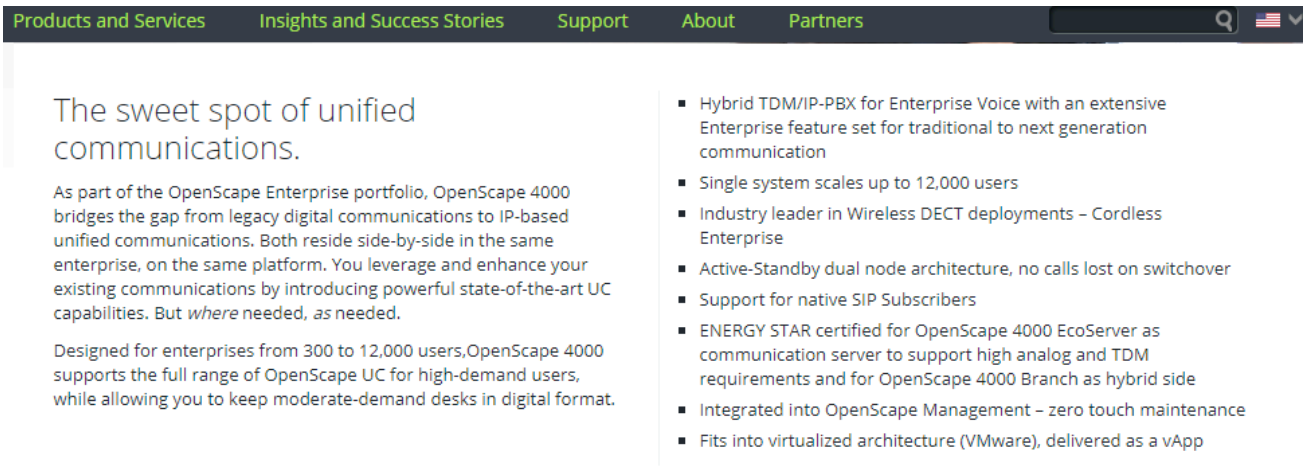
8. Defendant owns, uses, operates, advertises, controls, sells, and otherwise provides products and/or services that infringe the '620 patent. The '620 patent provides, among other things, " A communication server acting as a gateway for the transmission of messages between two virtual devices communicating with networks implementing different protocols, said communication server comprising: a knowledge base comprising a registry identifying each physical device registered to deliver messages for transmission between said virtual devices and through said gateway, a logical table identifying each registered connection available between physical devices and protocol conversion information required for each registered connection to convert messages of one protocol to a different protocol and a dynamic database identifying the current status of each actual connection between physical devices; and a virtual gateway accessing said knowledge base for protocol conversion information upon receipt of a message to be transmitted between said virtual devices and converting the protocol of said message to a protocol compatible with the network to which said message is being sent wherein said virtual gateway updates the protocol conversion information and the current status information in said knowledge base based on message traffic therethrough."

9. Defendant directly and/or through intermediaries, made, has made, used, imported, provided, supplied, distributed, sold, and/or offered for sale products and/or services that infringed one or more claims of the '620 patent, including at least Claim 23, in this district and elsewhere in the United States. By making, using, importing, offering for sale, and/or selling such products and services, and all like products and services, Defendant has injured Plaintiff and is thus liable for infringement of the '620 patent pursuant to 35 U.S.C. § 271.

10. Based on present information and belief, Unify makes, uses, sells and/or offers for sale a communication server acting as a gateway for the transmission of messages between two virtual devices communicating with networks implementing different protocols. For example, Unify provides OpenScape as a hybrid unified communications platforms for IP based communication, including but not limited to Session Initiation Protocol (SIP) based communication. When an SIP based call is placed to a Public Switched Telephone Network (PSTN) using Unify's OpenScape Voice software (which when installed on a computer, smartphone or other computing device comprise one or more "virtual devices"), the call is routed via the Session Border Controller (SBC) and integrated PSTN Gateway included in the OpenScape Branch Server ("communication server"). The SIP Gateway acts as a gateway for transmission of the messages between Unify's OpenScape Voice software and the PSTN.



Source: https://www.unify.com/us/products-services/unified-communications/voice-platforms/hybrid-unified-communications-platforms.aspx



Source: https://www.unify.com/us/products-services/unified-communications/voice-platforms/hybrid-unified-communications-platforms.aspx

OpenScape Voice V9

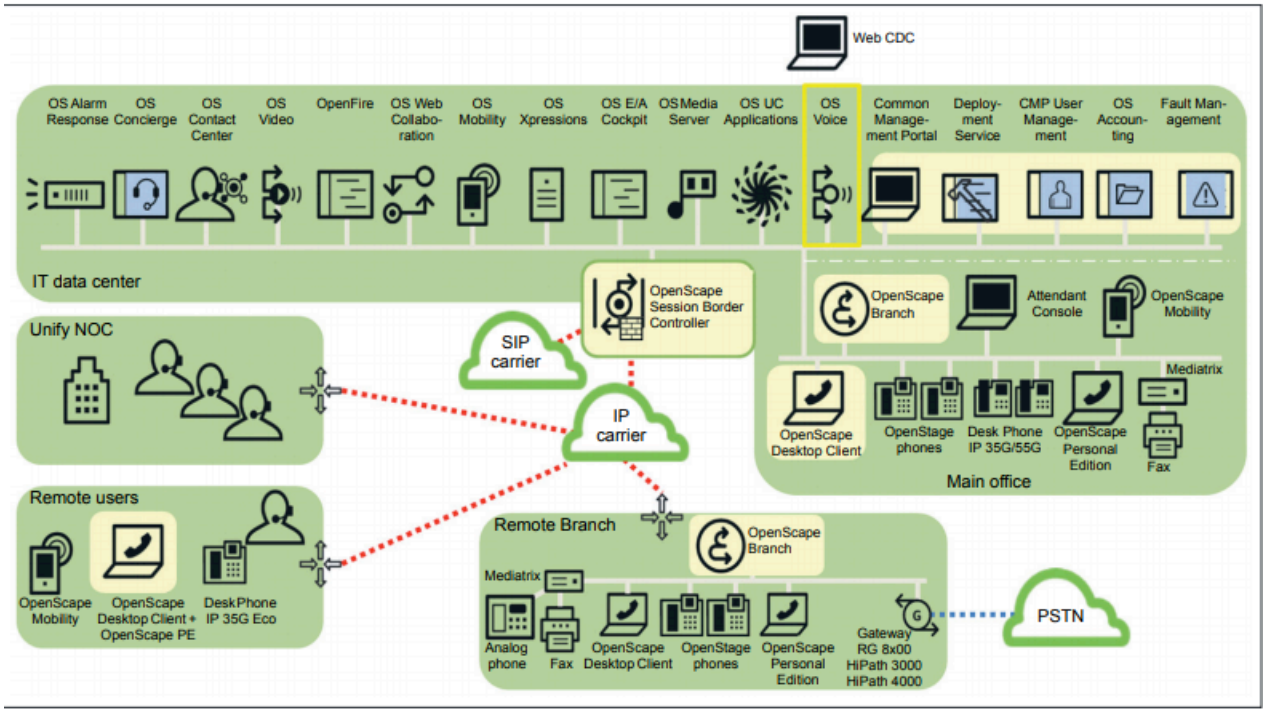
Start with the right platform.
The leading software-based voice communications system

OpenScape Voice is a native SIP-based real-time Voice over IP system scalable up to 100,000 users per system and a virtually unlimited number of users when OpenScape Voice systems are networked. It runs on highly reliable, redundant and fault-tolerant hardware. It provides a complete and feature-rich set of business class features and can be deployed on premise, in a data center (as a private cloud), or as a multi-tenant hosted/public cloud solution.

OpenScape Voice is a carrier-grade enterprise voice solution meaning 99.999% reliability – that translates to less than 5 1/2 minutes of downtime per year! The server nodes are designed so that if one fails, the other server node is capable of supporting 100% of the call load. The server nodes can operate with 100 % call failover support even when they are geographically separated, greatly reducing the costs, and the amount of time implementing a disaster recovery strategy. And remote offices can be protected with an OpenScape Branch solution – a survivable branch office solution for OpenScape Voice. OpenScape Branch not only offers survivability, but it includes a media server, firewall, Session Border Controller, and integrated PSTN gateway, all in a single appliance form factor. The value of OpenScape Branch goes beyond survivability, its activity contributes to lower the overall deployment, bandwidth and service costs.

OpenScape Voice can be deployed in a virtualized architecture, and can be delivered as a virtual appliance (vApp).

Source: https://www.unify.com/~/media/internet-2012/documents/data-sheet/OpenScape_Voice.pdf, page 1



OpenScape Enterprise architecture overview

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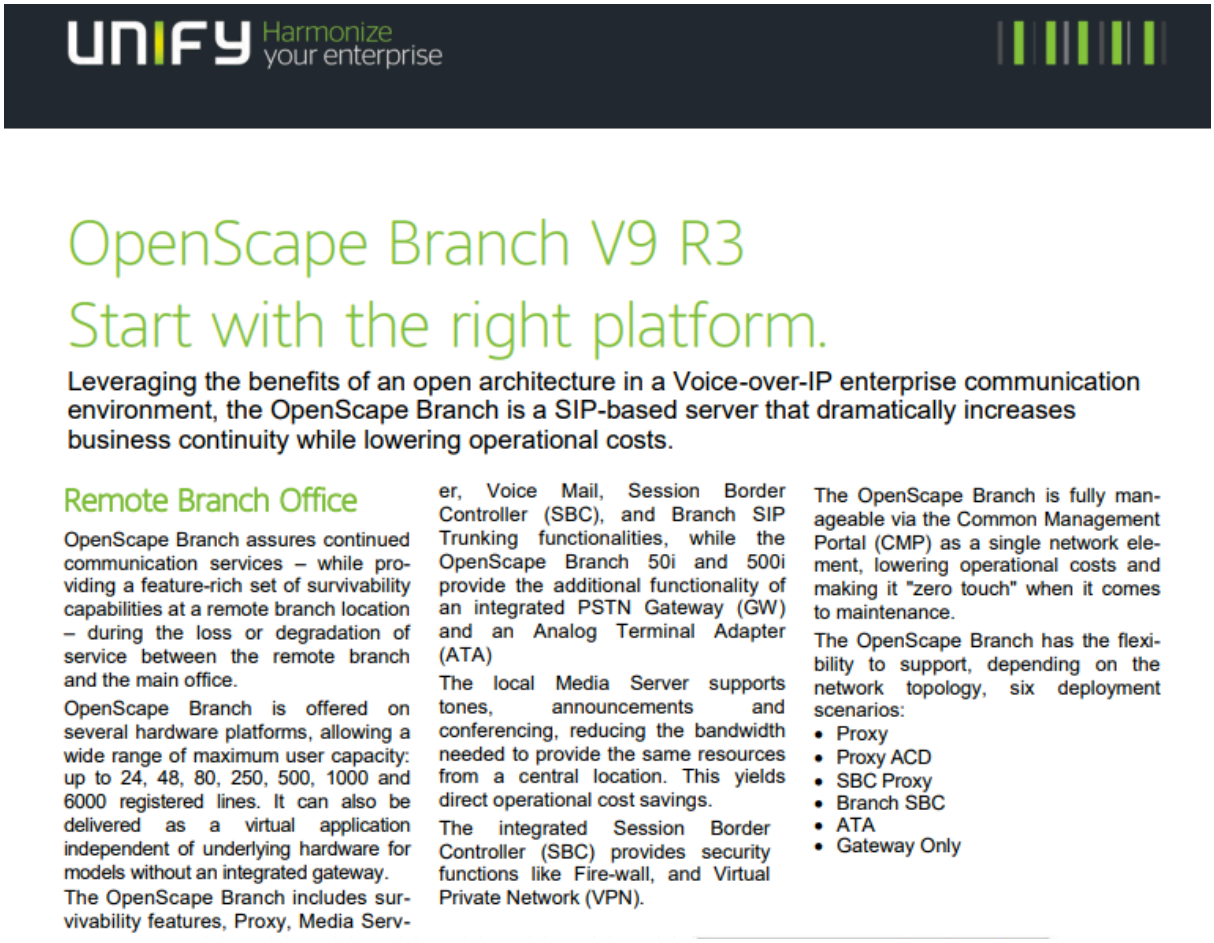


UNIFY Harmonize your enterprise

OpenScape Branch V9 R3
Start with the right platform.

Leveraging the benefits of an open architecture in a Voice-over-IP enterprise communication environment, the OpenScape Branch is a SIP-based server that dramatically increases business continuity while lowering operational costs.

Remote Branch Office

OpenScape Branch assures continued communication services – while providing a feature-rich set of survivability capabilities at a remote branch location – during the loss or degradation of service between the remote branch and the main office.

OpenScape Branch is offered on several hardware platforms, allowing a wide range of maximum user capacity: up to 24, 48, 80, 250, 500, 1000 and 6000 registered lines. It can also be delivered as a virtual application independent of underlying hardware for models without an integrated gateway.

The OpenScape Branch includes survivability features, Proxy, Media Server, Voice Mail, Session Border Controller (SBC), and Branch SIP Trunking functionalities, while the OpenScape Branch 50i and 500i provide the additional functionality of an integrated PSTN Gateway (GW) and an Analog Terminal Adapter (ATA)

The local Media Server supports tones, announcements and conferencing, reducing the bandwidth needed to provide the same resources from a central location. This yields direct operational cost savings.

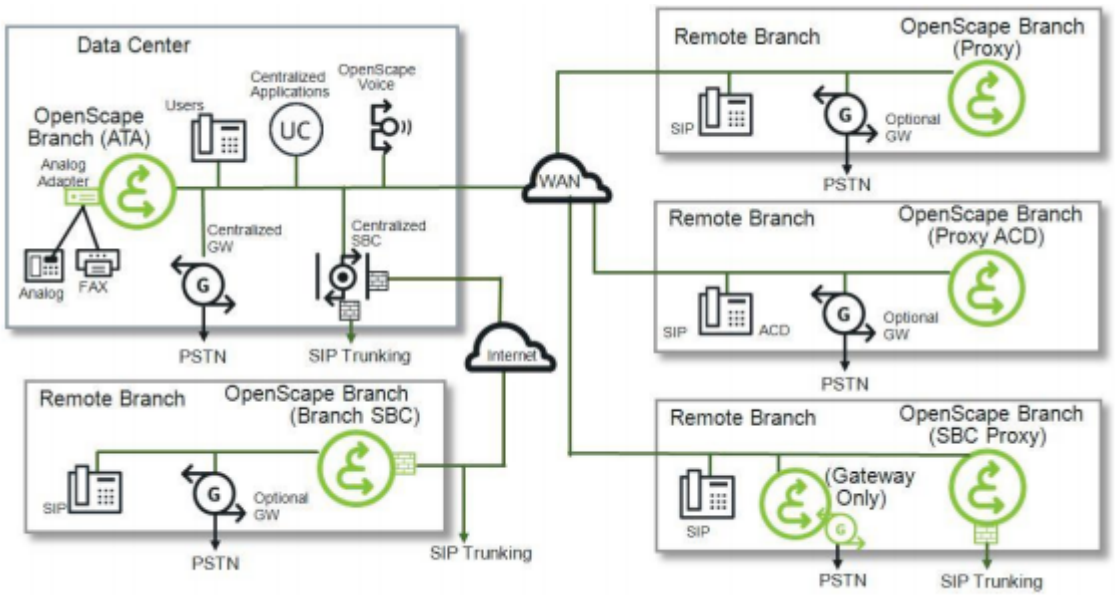
The integrated Session Border Controller (SBC) provides security functions like Fire-wall, and Virtual Private Network (VPN).

The OpenScape Branch is fully manageable via the Common Management Portal (CMP) as a single network element, lowering operational costs and making it "zero touch" when it comes to maintenance.

The OpenScape Branch has the flexibility to support, depending on the network topology, six deployment scenarios:

- Proxy
- Proxy ACD
- SBC Proxy
- Branch SBC
- ATA
- Gateway Only

Source: https://www.unify.com/us/~/media/ecrp-documents/communication-systems/openscape-branch/openscape-branch/openscape-branch-v9_data-sheet_issue-1_en.pdf, page 1



Source: https://www.unify.com/us/~/media/ecrp-documents/communication-systems/openscape-branch/openscape-branch/openscape-branch-v9_data-sheet_issue-1_en.pdf, page 1

Deployment scenarios

1. SIP trunking to a SIP Service Provider (SSP)

- Provides secure connection of OpenScape Voice and OpenScape 4000 IP telephony solution to carrier-based SIP trunking services that provide access to the Public Switched Telephone Network (PSTN).
- OpenScape SBC also provides for compatibility with the SIP signaling variations support by different SSPs.
- Used also for private SIP trunking connections between enterprise VoIP networks.

Source: https://www.unify.com/us/~/media/ecrp-documents/applications/openscape-sbc/openscape-sbc/openscape-sbc-v9_data-sheet_issue-1_en.pdf, page 1

4.2 Enterprise System Connection Scenarios

The following figures show typical scenarios of how an OpenScape Voice system can be connected to the SIP Service Provider network.

4.2.1 Connection via Session Border Controller (SBC)

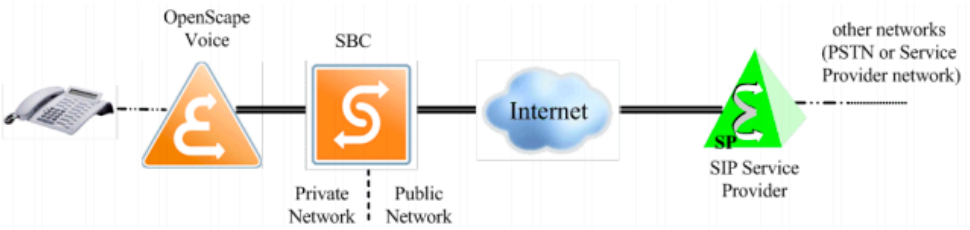


Figure 4 Service provider Connection via Session Border Controller

The scenario depicted in Figure 4 utilizes a session border controller at the boundaries of the OpenScape Voice network. SIP messages that traverse the network boundary through the SBC are modified so that only public IP addresses and ports are visible outside the Enterprise system. The Session Border Controller may be:

- Acme Packet 3820 or Acme Packet 4500 Session Border Controller
- OpenScape Session Border Controller
- OpenScape Branch with integrated Session Border Controller

Source: http://wiki.unify.com/images/f/f9/OpenScape_Voice_V9%2C_SIP_to_SP_Interface_Manual.pdf, page 19

11. Based on present information and belief, Unify makes, uses, sells and/or offers for sale a knowledge base comprising a registry identifying each physical device registered to deliver messages for transmission between said virtual devices and through said gateway. For example, Unify and/or its customers utilize OpenScape Branch Server SIP functionality which comprises a SIP Registrar ("Registry") to identify the registered physical devices. The server uses SBC to transmit messages from Unify's OpenScape Voice software to the PSTN through PSTN Gateway.

The OpenScape Branch is a fully RFC 3261- compliant SIP device and provides:

- Proxy/Registrar
- Call routing functionality
- Survivable Proxy
- Alternative routing capabilities in case of network outages
- TLS/TCP/UDP connections
- Local announcement capabilities to reduce the WAN usage
- Full management integration in OpenScape Voice management
- SBC functionality
- Local Voice Mail
- PSTN Gateway support
- Analog Adapter support
- Billing/CDR capabilities in survivability mode
- OpenScape UC Geo-Redundancy support
- High serviceability for installation, upgrade, and configuration

OpenScape Branch provides a secure and reliable branch configuration by supporting:

- VPN, IPSec

Voice Features

- Proxy
- SIP Proxy Server (RFC 3261)
- SIP Registrar
- SIP Redirect/Routing Server
- SIP TLS
- OpenScape Voice-controlled Media Server for announcements and conference
- Supported codecs: G.711 A-law, G.711 μ-law, G.722, G.722-1, G.729

SBC

- SBC Header manipulation for topology hiding
- SIP Session aware RTP Proxy for VoIP NAT support
- SBC trunk to SIP service providers, including Skype

Media Server

- Media Server for announcements, tones, and conference

Survivability

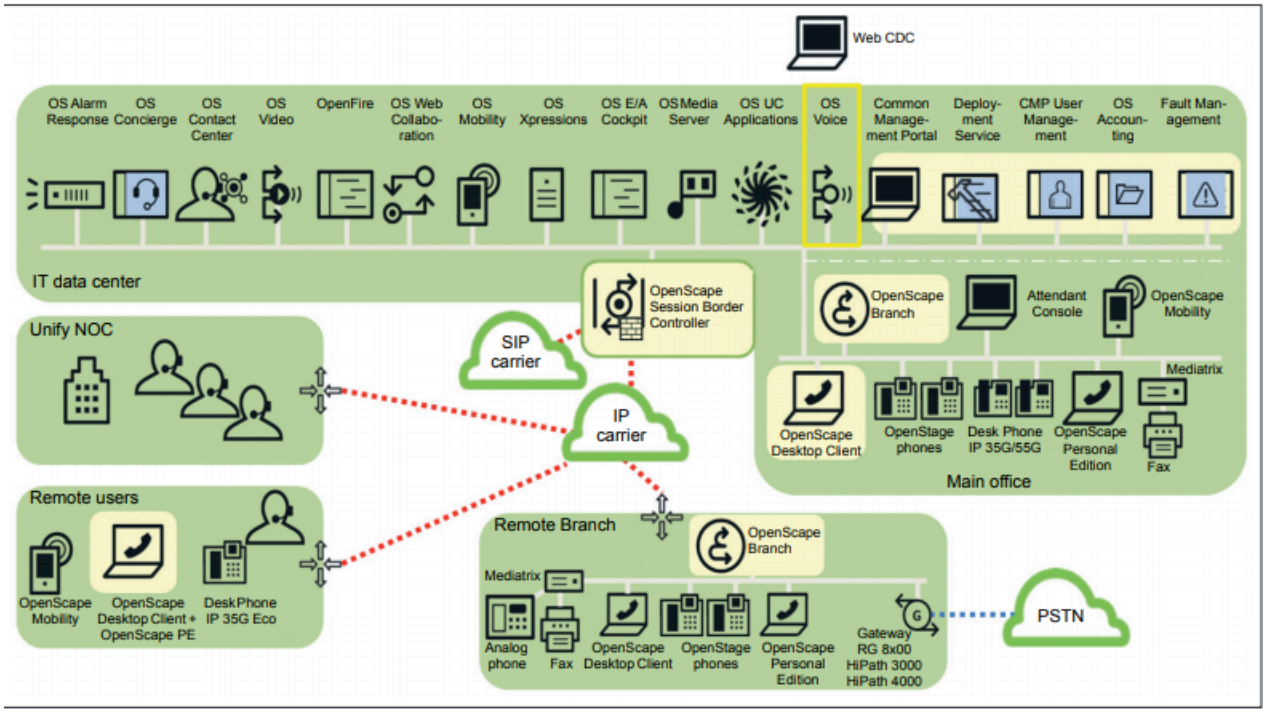
- Multi-line Hunt Group support
- Call forward and call transfer
- Media Server for tones, announcements, and conferencing
- CDR creation, storage, and transmission
- Basic Automatic Call Distribution (ACD)
- Selectable ACD Agent Logon/Logoff Language
- ACD Agent Activation without Logon
- Digit manipulation
- Emergency call support for multiple numbers, based on subnet with LIN or CPM support
- Source-based Routing of Emergency Calls
- Auto Attendant
- Backup data channel via PSTN
- Meshing of multiple OpenScape Branches in a branch
- Music on Hold
- Support for Servers with Dual Power Supplies

Source: https://www.unify.com/us/~/media/ecrp-documents/communication-systems/openscape-branch/openscape-branch/openscape-branch-v9_data-sheet_issue-1_en.pdf, page 2

Gateway

A protocol converter (that is between IP protocols and TDM protocols, or between one IP protocol and another IP protocol) that resides at the network edge and provides translation in both directions, for example SIP messages and RTP media streams are converted to other protocols like ISDN signaling over T1/E1 trunking facility.

Source: http://wiki.unify.com/images/f/f9/OpenScape_Voice_V9%2C_SIP_to_SP_Interface_Manual.pdf, page 152



OpenScape Enterprise architecture overview

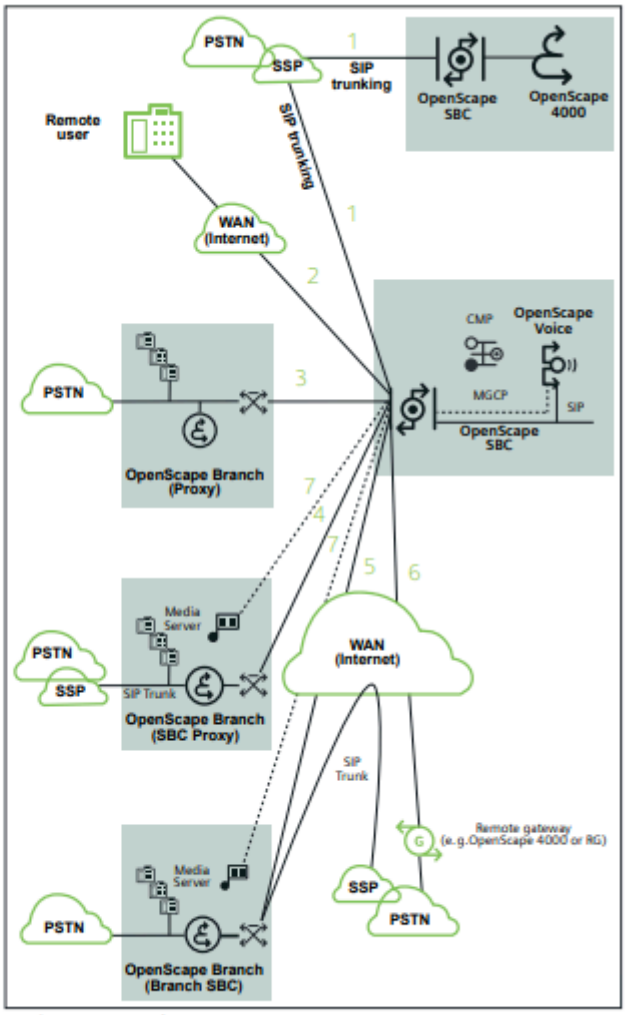
Source: https://www.unify.com/~/media/internet-2012/documents/data-sheet/OpenScape_Voice.pdf, page 1

3. Remote OpenScape Branch (Proxy)

- Facilitates the connection of remote branch offices that use OpenScape Branch operating in proxy mode connected with the headquarters via the private enterprise network, and is therefore using the same IP address space.
- OpenScape SBC is optional in this configuration since there is no NAT-ing to be performed; however, the SBC may be desired for serviceability and/or security reasons.

4. Remote OpenScape Branch (SBC Proxy)

- Facilitates the connection of remote branch offices that use OpenScape Branch operating in proxy mode connected to the central headquarters via the enterprise network, and is therefore using the same IP address space.
- OpenScape SBC is optional in this configuration since there is no NAT-ing to be performed; however, the SBC may be desired for serviceability and/or security reasons.



Deployment scenarios

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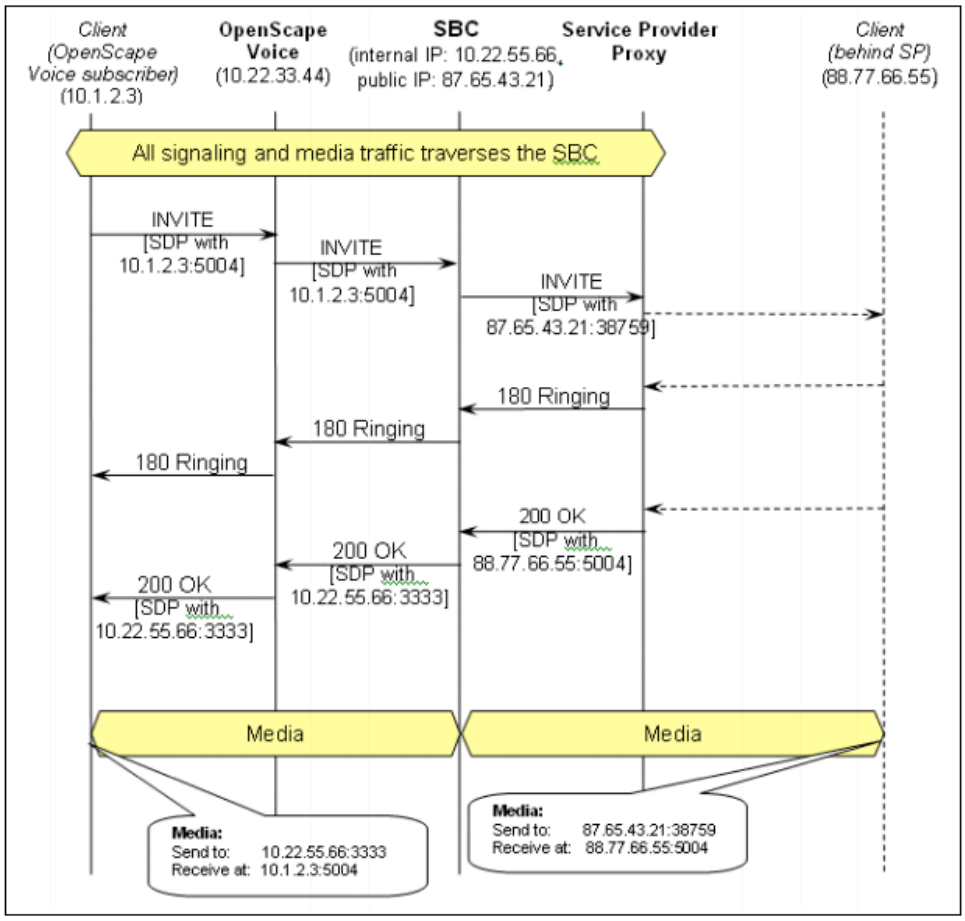

Figure 9 Example SBC at the OpenScape Voice System Boundary

Source: http://wiki.unify.com/images/f/f9/OpenScape_Voice_V9%2C_SIP_to_SP_Interface_Manual.pdf, page 27

Further, OpenScape Branch Server also maintains a knowledge base comprising a registry identifying the phones and devices within the customers' network.

12. Based on information and belief, Unify makes, uses, sells and/or offers for sale a logical table identifying each registered connection available between physical devices and protocol conversion information required for each registered connection to convert messages of one protocol to a different protocol. For example, Unify and/or its customers utilize OpenScape Branch Server SIP functionality which comprises a Session Border Controller (SBC) to identify the type of connection and selects PSTN Gateway to convert messages from Session Initiation Protocol (SIP) to PSTN.

3. Remote OpenScape Branch (Proxy)

- Facilitates the connection of remote branch offices that use OpenScape Branch operating in proxy mode connected with the headquarters via the private enterprise network, and is therefore using the same IP address space.
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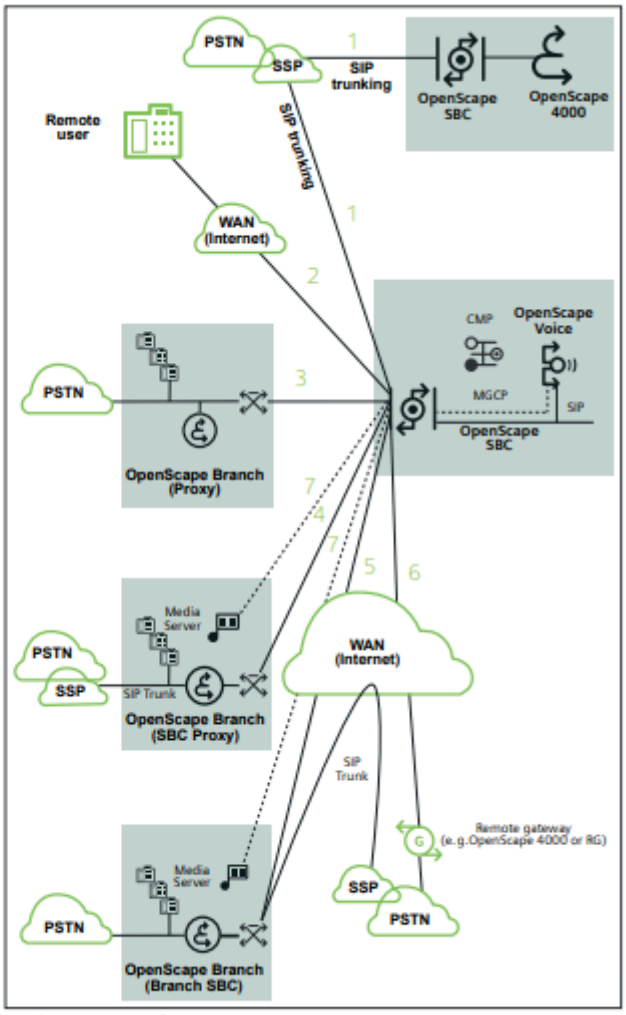

Deployment scenarios

Source: https://www.unify.com/us/~/media/ecrp-documents/applications/openscape-sbc/openscape-sbc/openscape-sbc-v9_data-sheet_issue-1_en.pdf, page 2

Gateway

A protocol converter (that is between IP protocols and TDM protocols, or between one IP protocol and another IP protocol) that resides at the network edge and provides translation in both directions, for example SIP messages and RTP media streams are converted to other protocols like ISDN signaling over T1/E1 trunking facility.

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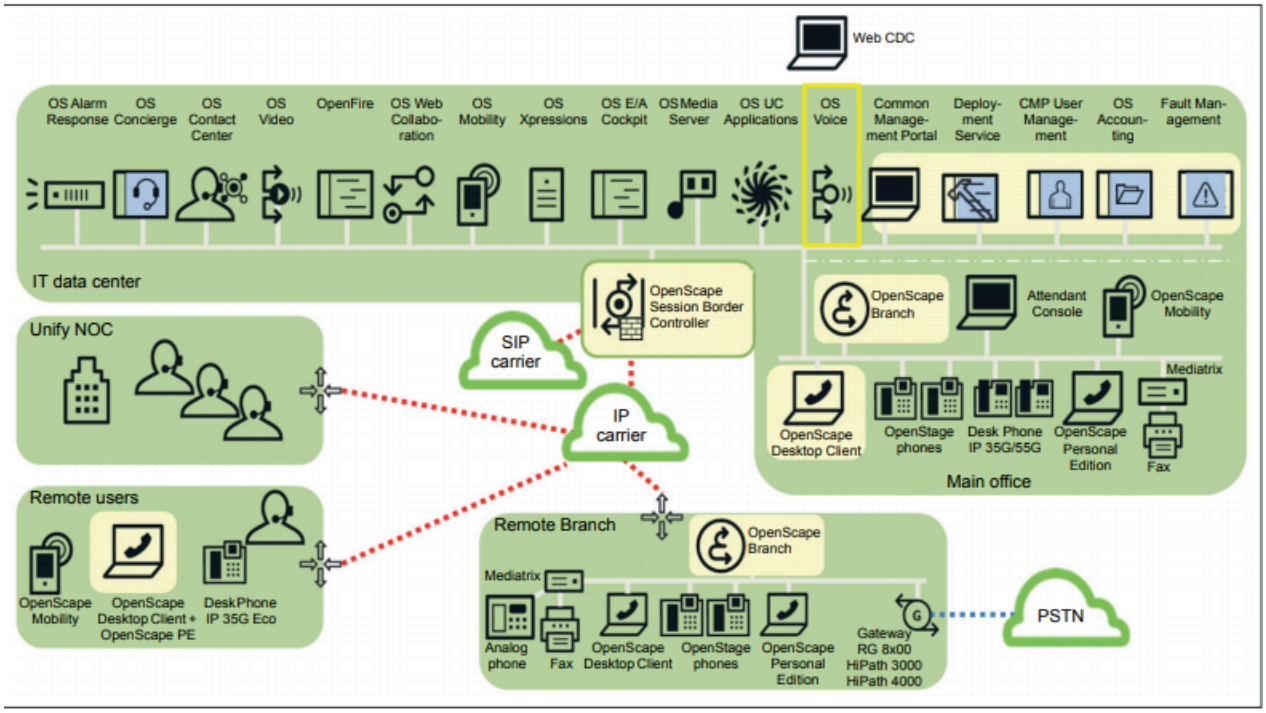

OpenScape Enterprise architecture overview

Source: https://www.unify.com/~/media/internet-2012/documents/data-sheet/OpenScape_Voice.pdf, page 1

6 Building Blocks and Protocol Compliance

This section contains *normative* statements about SIP signaling building blocks like SIP methods, header fields, event packages, and so on, which are relevant in trunking scenarios.

This SIP trunking specification does not require new extensions to SIP because the capability to interconnect provider networks is already provided by the SIP RFC3261 [8] and SIP extension RFCs (see Section 1.2.1, "Normative References"). It rather describes procedures and best practice methods using available SIP mechanisms towards the Service Provider.

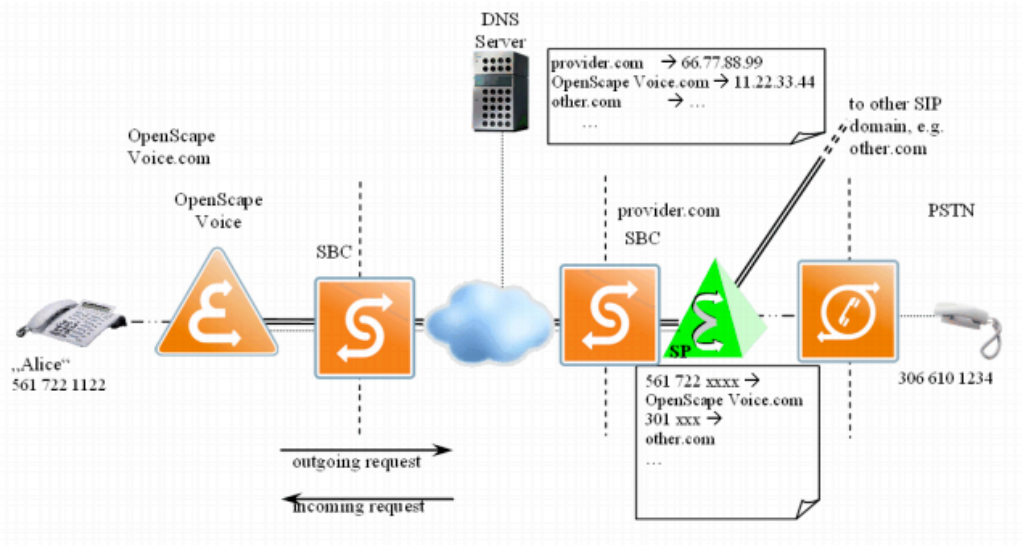

Figure 33 Example OpenScape Voice - Service Provider Configuration

Figure 33 shows an example OpenScape Voice—Service Provider configuration including example telephone numbers for reference purposes only. All examples are informative only and not normative.

Source: http://wiki.unify.com/images/f/f9/OpenScape_Voice_V9%2C_SIP_to_SP_Interface_Manual.pdf, page 84

The OpenScape Branch is a fully RFC 3261- compliant SIP device and provides:

- Proxy/Registrar
- Call routing functionality
- Survivable Proxy
- Alternative routing capabilities in case of network outages
- TLS/TCP/UDP connections
- Local announcement capabilities to reduce the WAN usage
- Full management integration in OpenScape Voice management
- SBC functionality
- Local Voice Mail
- PSTN Gateway support
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- Billing/CDR capabilities in survivability mode
- OpenScape UC Geo-Redundancy support
- High serviceability for installation, upgrade, and configuration

OpenScape Branch provides a secure and reliable branch configuration by supporting:

- VPN, IPSec

Voice Features

- Proxy
- SIP Proxy Server (RFC 3261)
- SIP Registrar
- SIP Redirect/Routing Server
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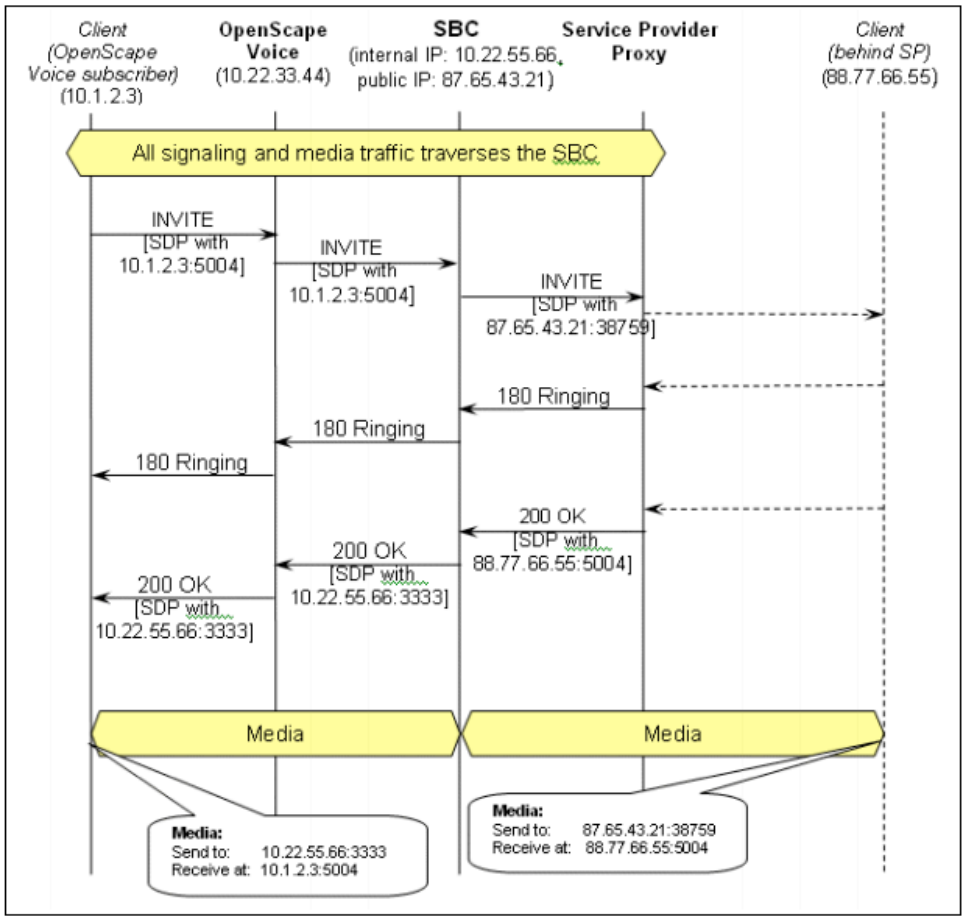

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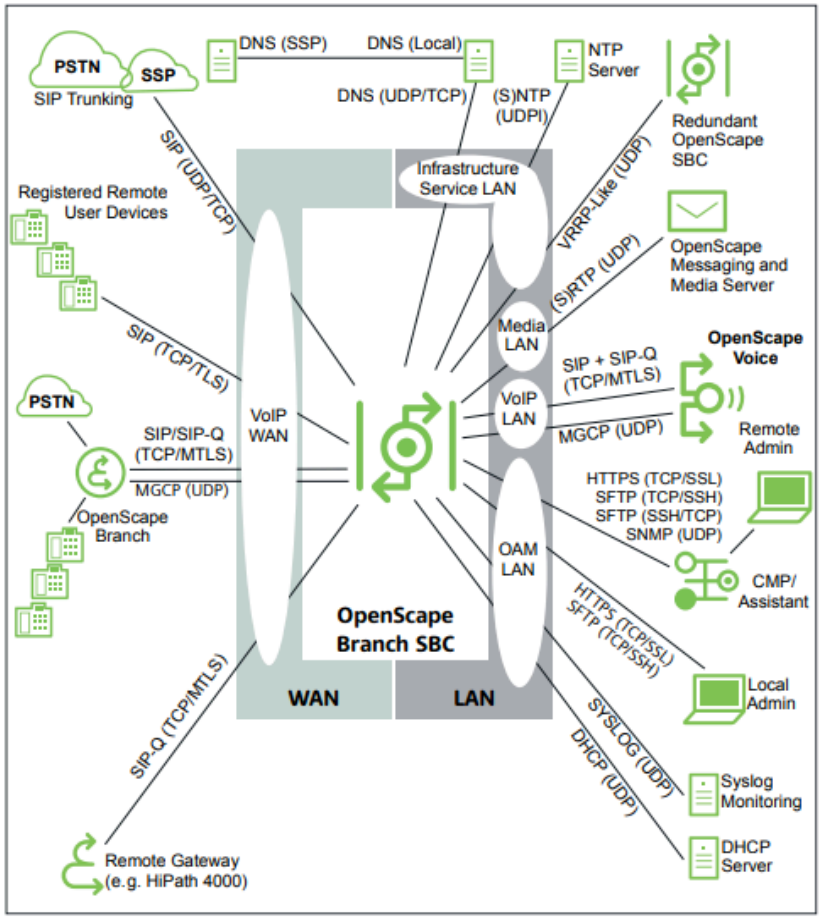

Interfaces and Protocols

Source: https://www.unify.com/us/~/media/ecrp-documents/applications/openscape-sbc/openscape-sbc/openscape-sbc-v9_data-sheet_issue-1_en.pdf, page 4

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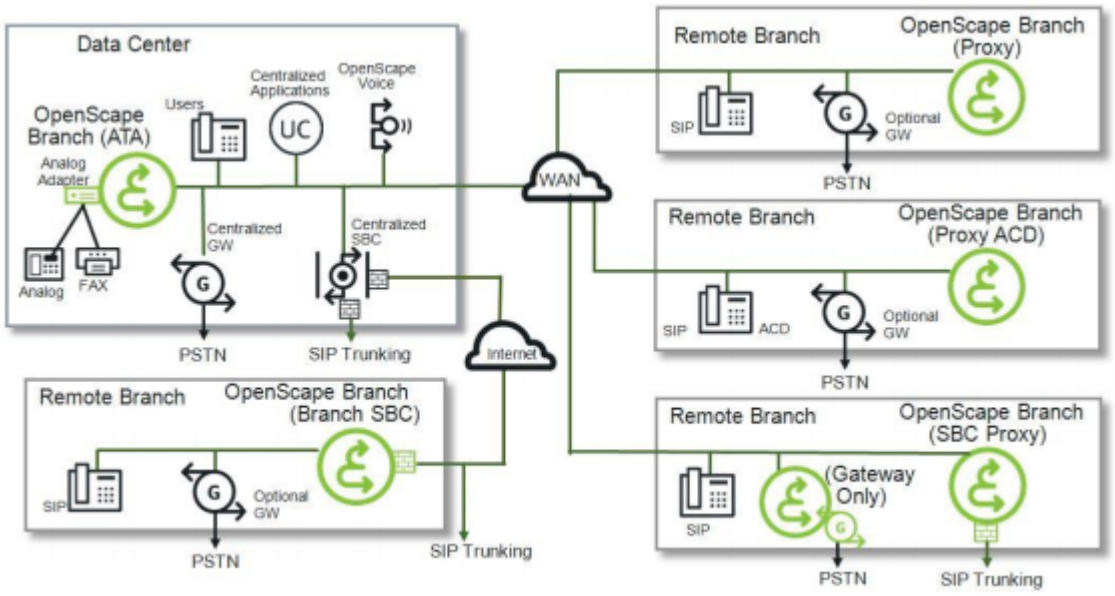

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- Source-based Routing of Emergency Calls
- Auto Attendant
- Backup data channel via PSTN
- Meshing of multiple OpenScape Branches in a branch
- Music on Hold
- Support for Servers with Dual Power Supplies

Source: https://www.unify.com/us/~/media/ecrp-documents/communication-systems/openscape-branch/openscape-branch/openscape-branch-v9_data-sheet_issue-1_en.pdf, page 2

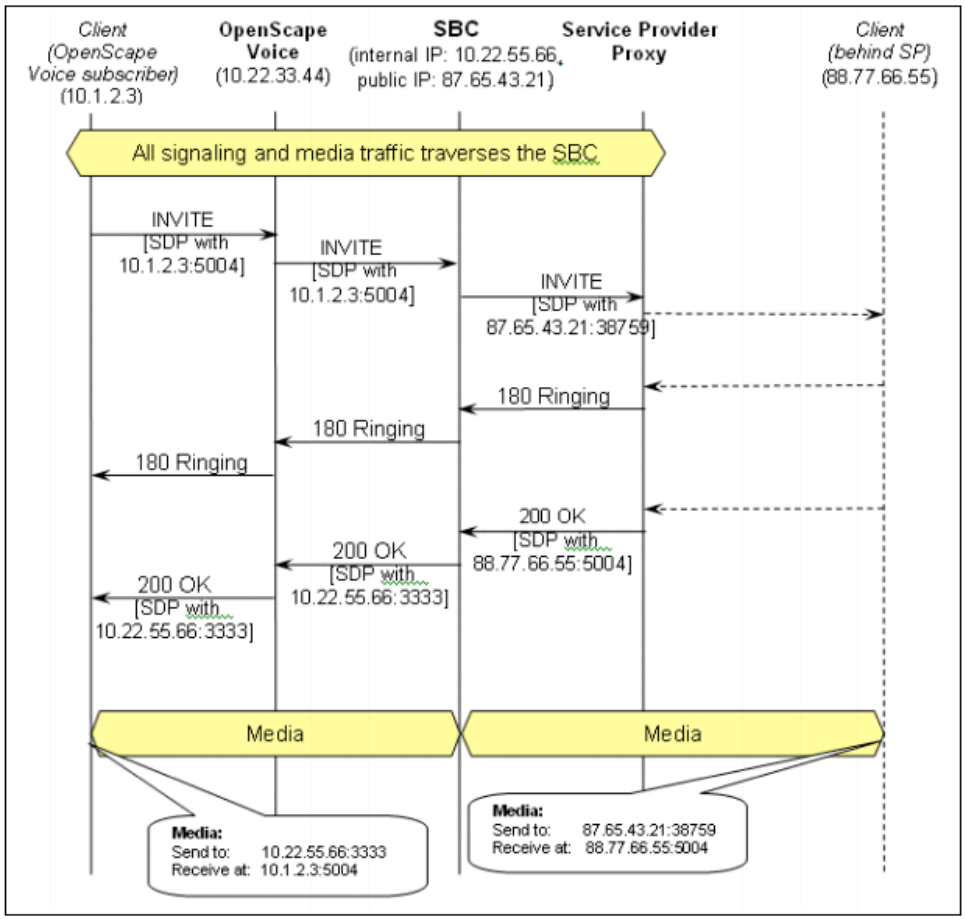

Figure 9 Example SBC at the OpenScape Voice System Boundary

Source: http://wiki.unify.com/images/f/f9/OpenScape_Voice_V9%2C_SIP_to_SP_Interface_Manual.pdf, page 27

14. Based on present information and belief, Unify makes, uses, sells and/or offers for sale a virtual gateway accessing said knowledge base for protocol conversion information upon receipt of a message to be transmitted between said virtual devices. For example, Unify and/or its customers utilize OpenScape Branch Server SIP functionality comprising a SIP Proxy ("Virtual gateway") which uses the PSTN Gateway for protocol conversion upon receiving the message to be transmitted from Unify's OpenScape Voice software to the PSTN.

The OpenScape Branch is a fully RFC 3261- compliant SIP device and provides:

- Proxy/Registrar
- Call routing functionality
- Survivable Proxy
- Alternative routing capabilities in case of network outages
- TLS/TCP/UDP connections
- Local announcement capabilities to reduce the WAN usage
- Full management integration in OpenScape Voice management
- SBC functionality
- Local Voice Mail
- PSTN Gateway support
- Analog Adapter support
- Billing/CDR capabilities in survivability mode
- OpenScape UC Geo-Redundancy support
- High serviceability for installation, upgrade, and configuration

OpenScape Branch provides a secure and reliable branch configuration by supporting:

- VPN, IPSec

Voice Features

- Proxy
- SIP Proxy Server (RFC 3261)
- SIP Registrar
- SIP Redirect/Routing Server
- SIP TLS
- OpenScape Voice-controlled Media Server for announcements and conference
- Supported codecs: G.711 A-law, G.711 μ-law, G.722, G.722-1, G.729

SBC

- SBC Header manipulation for topology hiding
- SIP Session aware RTP Proxy for VoIP NAT support
- SBC trunk to SIP service providers, including Skype

Media Server

- Media Server for announcements, tones, and conference

Survivability

- Multi-line Hunt Group support
- Call forward and call transfer
- Media Server for tones, announcements, and conferencing
- CDR creation, storage, and transmission
- Basic Automatic Call Distribution (ACD)
- Selectable ACD Agent Logon/Logoff Language
- ACD Agent Activation without Logon
- Digit manipulation
- Emergency call support for multiple numbers, based on subnet with LIN or CPM support
- Source-based Routing of Emergency Calls
- Auto Attendant
- Backup data channel via PSTN
- Meshing of multiple OpenScape Branches in a branch
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Source: https://www.unify.com/us/~/media/ecrp-documents/communication-systems/openscape-branch/openscape-branch/openscape-branch-v9_data-sheet_issue-1_en.pdf, page 2

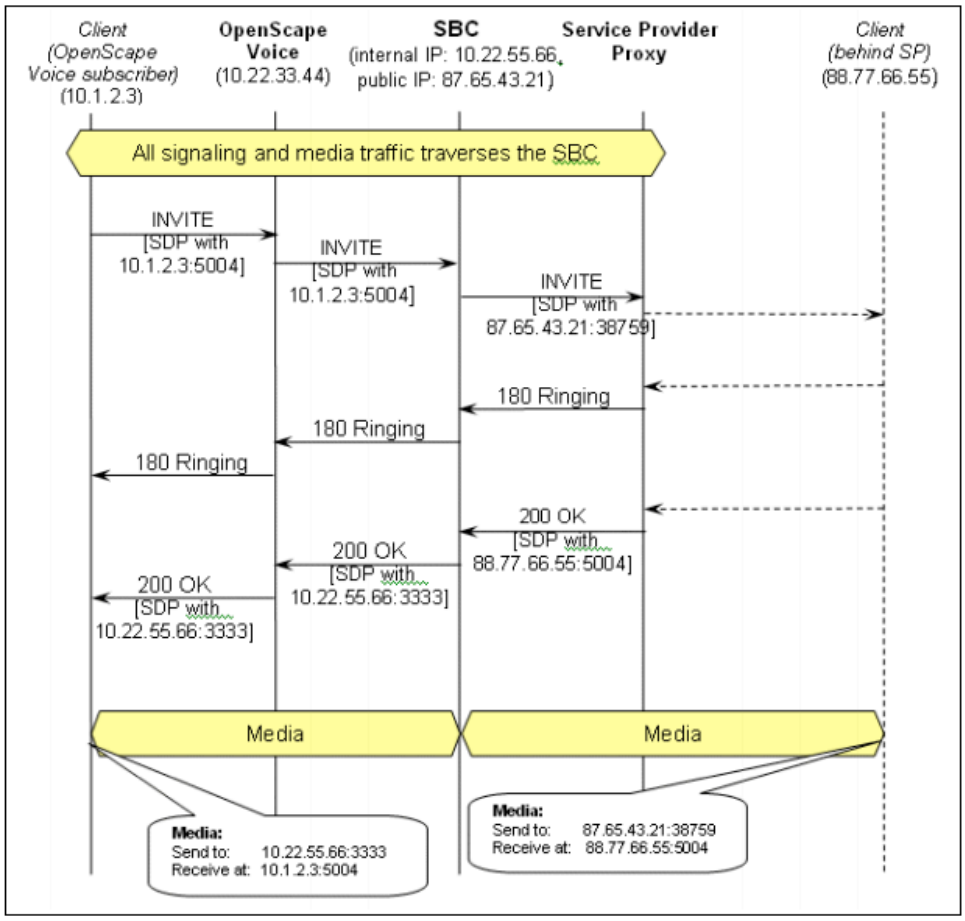


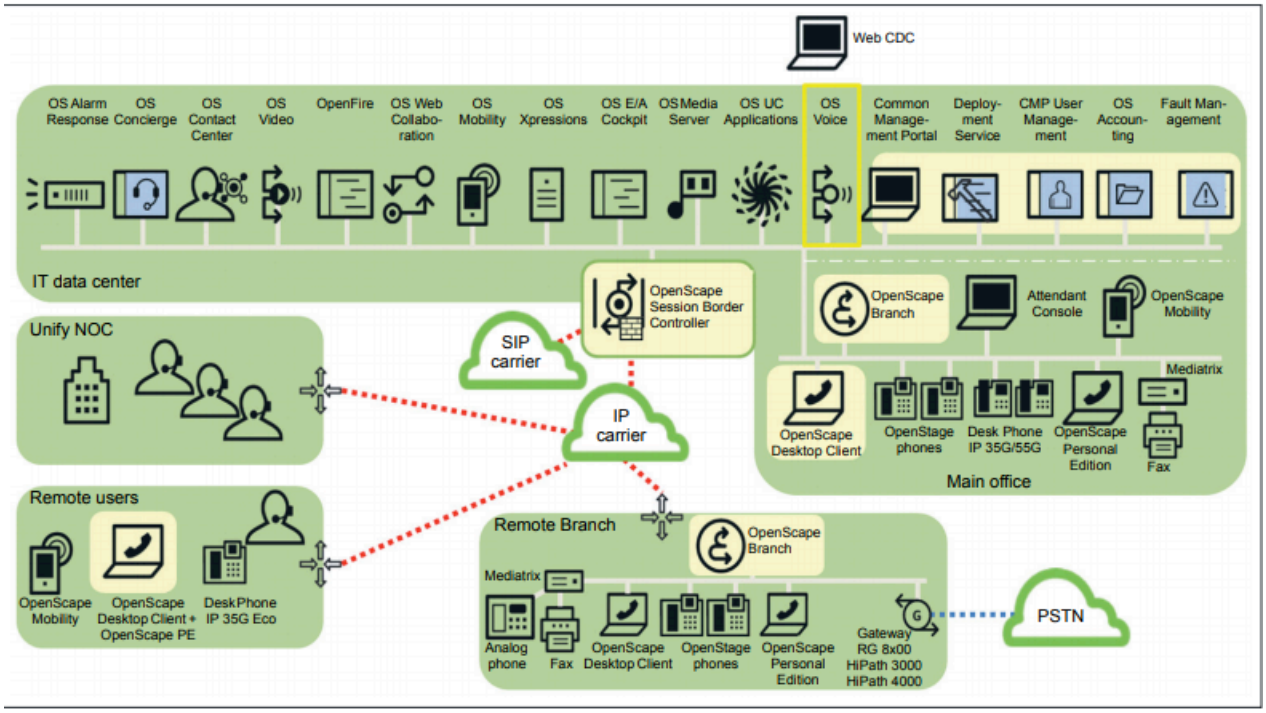
Figure 9 Example SBC at the OpenScape Voice System Boundary

Source: http://wiki.unify.com/images/f/f9/OpenScape_Voice_V9%2C_SIP_to_SP_Interface_Manual.pdf, page 27

Gateway

A protocol converter (that is between IP protocols and TDM protocols, or between one IP protocol and another IP protocol) that resides at the network edge and provides translation in both directions, for example SIP messages and RTP media streams are converted to other protocols like ISDN signaling over T1/E1 trunking facility.

Source: http://wiki.unify.com/images/f/f9/OpenScape_Voice_V9%2C_SIP_to_SP_Interface_Manual.pdf, page 152



OpenScape Enterprise architecture overview

Source: https://www.unify.com/~/media/internet-2012/documents/data-sheet/OpenScape_Voice.pdf, page 1

6 Building Blocks and Protocol Compliance

This section contains *normative* statements about SIP signaling building blocks like SIP methods, header fields, event packages, and so on, which are relevant in trunking scenarios.

This SIP trunking specification does not require new extensions to SIP because the capability to interconnect provider networks is already provided by the SIP RFC3261 [8] and SIP extension RFCs (see Section 1.2.1, "Normative References"). It rather describes procedures and best practice methods using available SIP mechanisms towards the Service Provider.

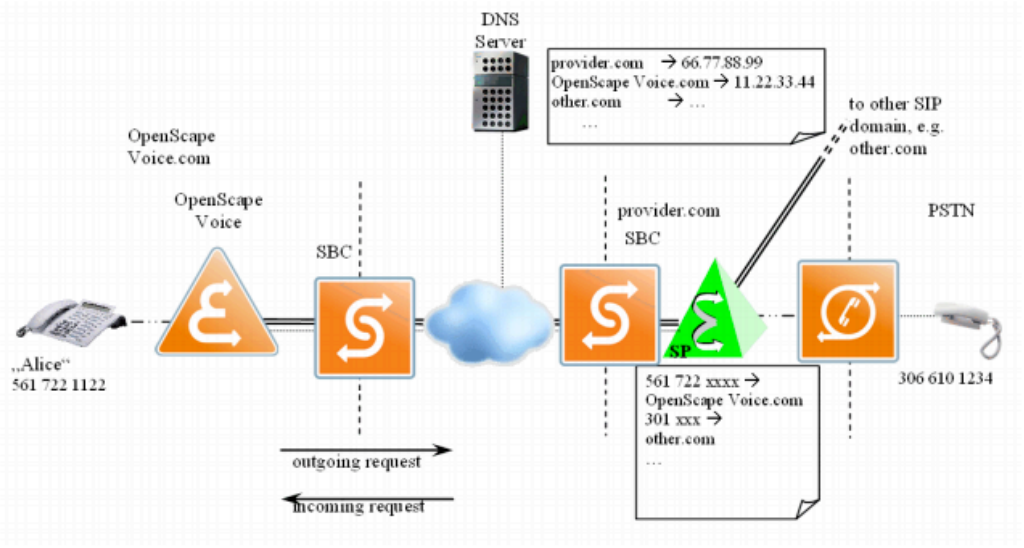


Figure 33 Example OpenScape Voice - Service Provider Configuration

Figure 33 shows an example OpenScape Voice—Service Provider configuration including example telephone numbers for reference purposes only. All examples are informative only and not normative.

Source: http://wiki.unify.com/images/f/f9/OpenScape_Voice_V9%2C_SIP_to_SP_Interface_Manual.pdf, page 84

15. Based on present information and belief, Unify makes, uses, sells and/or offers for sale a virtual gateway converting the protocol of said message to a protocol compatible with the network to which said message is being sent. For example, Unify and/or its customers utilize OpenScape Branch Server SIP functionality comprising a PSTN Gateway which converts the protocol of the messages sent from Unify UC to the protocol used within the PSTN.

The OpenScape Branch is a fully RFC 3261- compliant SIP device and provides:

- Proxy/Registrar
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- Survivable Proxy
- Alternative routing capabilities in case of network outages
- TLS/TCP/UDP connections
- Local announcement capabilities to reduce the WAN usage
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Source: https://www.unify.com/us/~/media/ecrp-documents/communication-systems/openscape-branch/openscape-branch/openscape-branch-v9_data-sheet_issue-1_en.pdf, page 2

Gateway

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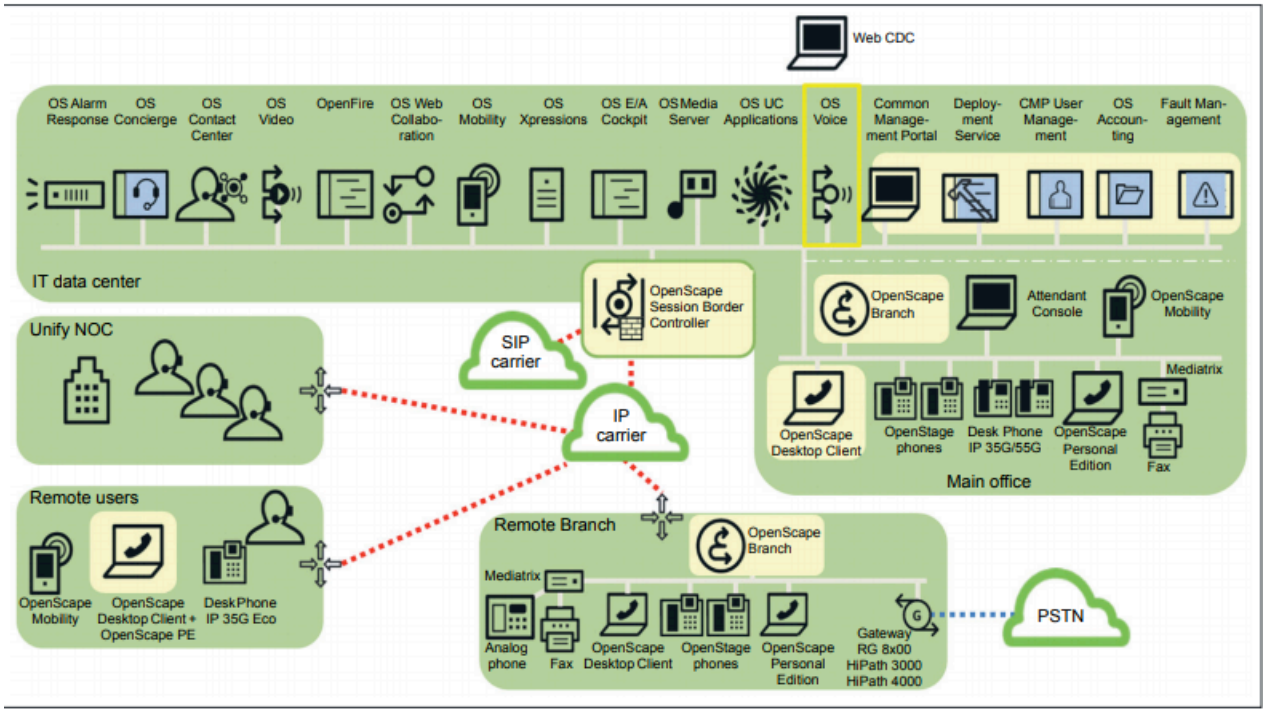

OpenScape Enterprise architecture overview

Source: https://www.unify.com/~/media/internet-2012/documents/data-sheet/OpenScape_Voice.pdf, page 1

16. Based on present information and belief, Unify makes, uses, sells and/or offers for sale a virtual gateway wherein said virtual gateway updates the protocol conversion information and the current status information in said knowledge base based on message traffic there through. For example, Unify and/or its customers utilize OpenScape Branch Server SIP functionality comprising Proxy server accesses and updates the information stored in the SIP Registrar based on the communicating virtual devices.

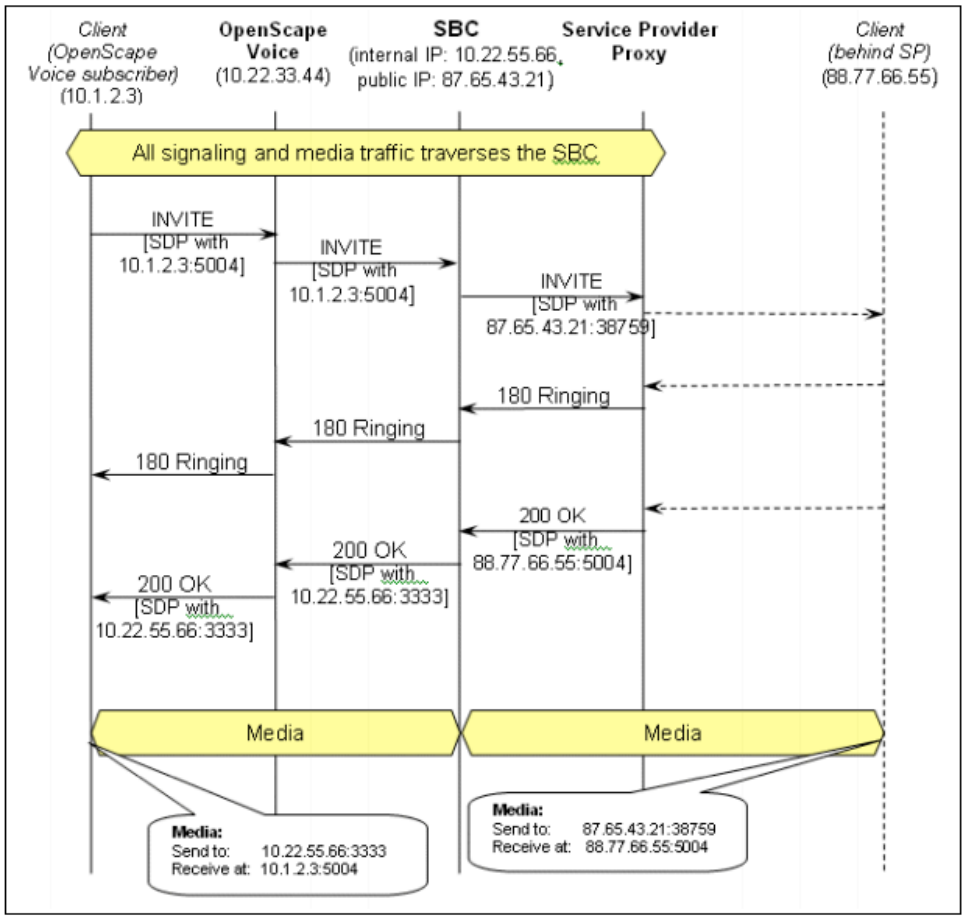

Figure 9 *Example SBC at the OpenScape Voice System Boundary*

Source: http://wiki.unify.com/images/f/f9/OpenScape_Voice_V9%2C_SIP_to_SP_Interface_Manual.pdf, page 27

17. In the alternative, because the manner of use by Defendant differs in no substantial way from language of the claims, if Defendant is not found to literally infringe, Defendant infringes under the doctrine of equivalents.

18. Defendant's aforesaid activities have been without authority and/or license from Plaintiff.

19. In addition to what is required for pleadings in patent cases, and to the extent any marking was required by 35 U.S.C. § 287, Plaintiff and all predecessors in interest to the '620 Patent complied with all marking requirements under 35 U.S.C. § 287.

20. Plaintiff is entitled to recover from Defendant the damages sustained by Plaintiff as a result of the Defendant's wrongful acts 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.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter:

1. A judgment in favor of Plaintiff that Defendant has infringed the '620 Patent;

2. A judgment and order requiring Defendant to pay Plaintiff its damages, costs, expenses, and prejudgment and post-judgment interest for Defendant's infringement of the '620 Patent as provided under 35 U.S.C. § 284;

3. An award to Plaintiff for enhanced damages resulting from the knowing, deliberate, and willful nature of Defendant's prohibited conduct with notice being made at least as early as the date of the filing of this Complaint, as provided under 35 U.S.C. § 284;

4. A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to Plaintiff its reasonable attorneys' fees; and

5. Any and all other relief to which Plaintiff may show itself to be entitled.

DEMAND FOR JURY TRIAL

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

Respectfully Submitted,

BECK BRANCH LLC

Dated: July 1, 2018

By: ___*/s/Stamatios Stamoulis*_____

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