

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS**

SHERMAN DIVISION

VIRGINIA INNOVATION SCIENCES,
INC.,

Plaintiff,

v.

HONEYWELL INTERNATIONAL INC.,

Defendant.

Civil Action No. _____

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Virginia Innovation Sciences, Inc. (“VIS” or “Plaintiff”), for its Complaint against Defendant Honeywell International, Inc., (“Honeywell” or “Defendant”) alleges the following:

NATURE OF THE ACTION

1. This is an action for patent infringement arising under the Patent Laws of the United States, 35 U.S.C. § 1 *et seq.*

THE PARTIES

2. Plaintiff is a corporation organized under the laws of the State of Virginia with a place of business at 6301 Edsall Road #517, Alexandria, Virginia 22312.

3. Upon information and belief, Honeywell is a corporation organized and existing under the laws of Delaware, with a place of business at 115 Tabor Rd, Morris Plains, New Jersey 07950, and can be served through its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Upon information and belief, Honeywell sells and offers to sell products and services throughout the United States,

including in this judicial district, and introduces products and services that into the stream of commerce and that incorporate infringing technology knowing that they would be sold in this judicial district and elsewhere in the United States.

JURISDICTION AND VENUE

4. This is an action for patent infringement arising under the Patent Laws of the United States, Title 35 of the United States Code.

5. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

6. Venue is proper in this judicial district under 28 U.S.C. §1400(b). On information and belief, Honeywell has committed acts of infringement in this District and has a regular and established place of business within this District, including, without limitation, at 3801 E. Plano Pkwy, Plano, Texas 75074.

7. On information and belief, Defendant is subject to this Court's general and specific personal jurisdiction because it has sufficient minimum contacts within the State of Texas and this District, pursuant to due process and/or the Texas Long Arm Statute because Defendant purposefully availed itself of the privileges of conducting business in the State of Texas and in this District, because Defendant regularly conducts and solicits business within the State of Texas and within this District, and because Plaintiff's causes of action arise directly from each of Defendant's business contacts and other activities in the State of Texas and this District.

COUNT I – INFRINGEMENT OF U.S. PATENT NO. 9,912,983

8. The allegations set forth in the foregoing paragraphs 1 through 7 are incorporated into this First Claim for Relief.

9. On March 6, 2018, U.S. Patent No. 9,912,983 ("the '983 patent"), entitled "METHOD AND SYSTEM FOR EFFICIENT COMMUNICATION," was duly and legally

issued by the United States Patent and Trademark Office. A true and correct copy of the '983 patent is attached as Exhibit 1.

10. The inventions of the '983 patent resolve technical problems related to the use of a wireless hub used in a detection system. For example, the '983 patent overcomes limitations in the prior art relating to providing alerts as to the status of an item over the internet or other next-generation wireless communication network.

11. In contrast, the inventions allow a user to efficiently set up a system comprising a hub system connected with one or more sensors capable of sensing a status of an item, such that the hub system can be informed of an updated status of the item and notify servers and/or user terminals accordingly. Furthermore, the inventions of the '983 patent enable a user to pair a variety of sensors with a hub system through short-range communications.

12. The claims of the '983 patent recite an invention that is not merely the routine or conventional use of a wireless hub system. Instead, the invention relies on using a network interface and a short-range wireless transmission channel separately to both detect the status of an item being sensed by a sensor and transmit information about the status to a user device. The '983 patent claims thus specify how signals are received and transmitted over both channels to promptly notify servers and/or user terminals of the status.

13. The technology claimed in the '983 patent does not preempt all ways of using wireless hub based detection or monitoring systems, nor preempt the use of all wireless hub based detection or monitoring systems, nor preempt any other well-known or prior art technology.

14. Accordingly, each claim of the '983 patent recites a combination of elements sufficient to ensure that the claim in practice amounts to significantly more than a patent on an ineligible concept.

15. Plaintiff is the assignee and owner of the right, title and interest in and to the '983 patent, including the right to assert all causes of action arising under said patents and the right to any remedies for infringement of them.

16. Upon information and belief, Defendant has and continues to directly infringe at least claims 117, 118, 119, 121, 122, 22, 24, 25, 62, and 65 of the '983 patent (the "Asserted Claims") by making, using, selling, importing and/or providing and causing to be used a wireless hub system, including but not limited to the L5200 and L7000 series security systems, the C2 Wi-Fi Security Camera, Honeywell Smart Home Security System, and associated mobile apps (the "Accused Instrumentalities").

17. In particular, claim 117 of the '983 patent recites a wireless hub system configured to receive, through a wireless transmission channel, a signal transmitted in response to a detection of an updated status of an item having a unique identifier, identify the item, and communicate, through a network communication channel, information about the updated status to a user device.

18. Claim 118 depends from claim 117 and further recites that the configuration setting specifies when and how to notify the user of the updated status.

19. Claim 119 depends from claim 117 and further recites that the signal from the item status sensing device is transmitted in response to an automatic detection, by a sensor included in the item status sensing device, of the updated status.

20. Claim 121 depends from claim 117 and further recites that the user device is a cellular phone.

21. Claim 122 depends from claim 117 and further recites that the wireless hub system is further configured to communicate a video from a video camera to a user terminal through a cellular network.

22. Claim 22 recites a wireless hub system configured to receive a wireless signal through a wireless communication network, a decoder to decompress the wireless signal, and a network interface configured to communicate information for managing an item status of an item in connection with an updated status of the item.

23. Claim 25 depends from claim 22 and further recites that the wireless hub is configured to communicate a video from a video camera to a user's terminal at least in part through a cellular network.

24. Claim 62 recites a wireless hub system configured to receive a wireless signal through a wireless communication network, a decoder to decompress the wireless signal, and a network interface configured to communicate information for managing an item status of an item in connection with an updated status of the item and corresponding to a unique identifier associated with the item.

25. Claim 65 depends from claim 62 and further recites that the wireless hub system is further configured to communicate a video from a video camera to a user's terminal through a cellular network or Internet.

26. The Accused Instrumentalities infringe claim 117 of the '983 patent. By way of example, the Honeywell Security System (series L5200/L7000)



comprises a wireless control panel and one or more wireless sensors.

27. The wireless control panel in each Accused Instrumentality includes a memory (e.g., EEROM) to store information (identifiers) for each of one or more wireless sensors (e.g., entry sensors, fire detectors etc.). (<http://d1unzhqf5a606m.cloudfront.net/documents/honeywell-15200-and-17000-installation-manual-and-setup-guide.pdf> at 23.) For example, when an alarm occurs, the control panel displays the zone number that caused the alarm and the type/name of the alarm (e.g., fire alarm). (https://www.security.honeywell.com/documents/800-16083_L5200_ug.pdf at 27.) Thus, the wireless control panel includes a memory that stores an identifier (e.g., a type/name) of each sensor. The wireless control panel can detect and identify an “item” (e.g., smoke, motion, etc.) associated with each of the sensors. *See, e.g.:*

Zones

- Your system's sensing devices have been assigned to various "zones." For example, the sensing device on your entry/exit door may have been assigned to zone 01, sensing devices on windows in the master bedroom to zone 02, and so on. These numbers appear on the display when an alarm or trouble condition occurs.

(https://www.security.honeywell.com/documents/800-16083_L5200_ug.pdf at 5.)

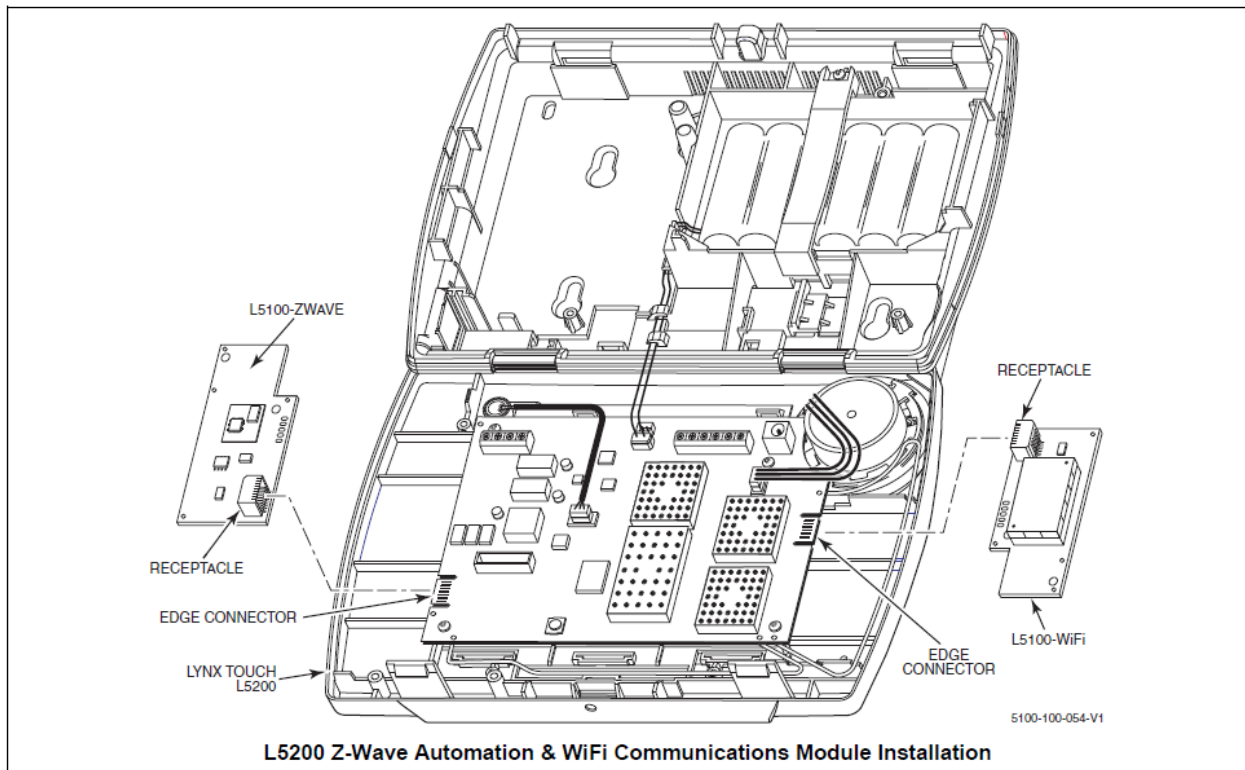
<div style="border: 1px solid black; padding: 5px; width: fit-content; margin: 0 auto;">Zones</div> <p style="font-size: small; margin-top: 5px;">5000-100-133-V0</p>	<ol style="list-style-type: none"> 1. Select “Zones” The System displays the following options: <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">1. New</td> <td style="width: 50%;">2. Front Door</td> </tr> <tr> <td>3. Back Door</td> <td>4. Window</td> </tr> <tr> <td>5. Motion Sensor</td> <td>6. New</td> </tr> </table> 2. Use the down ▼ arrow to scroll to the next page of options. Use the ▲ arrow to return to the previous page. <ul style="list-style-type: none"> 7. – 45. New 46. – 48 New (Main) (reserved for Garage Door Zones) 49. – 64. New 140. – 147. 4 Button 148. – 155. New (Button Zones) 180. – 185. Temperature (Z-Wave Thermostat zones) (L5200 only) 180. – 187. Temperature (Z-Wave Thermostat zones) (L7000 only) 95. Fire 96. Medical 99. Police 3. Select a zone and then select “Edit” or “Add New” to program the next available zone. The following options are displayed (dependant upon Zone Type): <table style="width: 100%; border: none; margin-top: 10px;"> <tr> <td style="width: 33%;">Serial Number *</td> <td style="width: 33%;">Loop Number *</td> <td style="width: 33%; font-size: small;">* This field does not apply to Hardwire Zone 1 or Temperature Zones 80-85.</td> </tr> <tr> <td>Zone Description 1</td> <td>Zone Description 2</td> <td></td> </tr> <tr> <td colspan="3" style="text-align: center; padding: 5px 0;">Device Type</td> </tr> <tr> <td style="width: 33%;">Alarm Report</td> <td style="width: 33%;">Chime</td> <td style="width: 33%;">Response Type</td> </tr> <tr> <td></td> <td></td> <td>Supervision</td> </tr> </table> 4. Select an option to display the next programming field. 	1. New	2. Front Door	3. Back Door	4. Window	5. Motion Sensor	6. New	Serial Number *	Loop Number *	* This field does not apply to Hardwire Zone 1 or Temperature Zones 80-85.	Zone Description 1	Zone Description 2		Device Type			Alarm Report	Chime	Response Type			Supervision
1. New	2. Front Door																					
3. Back Door	4. Window																					
5. Motion Sensor	6. New																					
Serial Number *	Loop Number *	* This field does not apply to Hardwire Zone 1 or Temperature Zones 80-85.																				
Zone Description 1	Zone Description 2																					
Device Type																						
Alarm Report	Chime	Response Type																				
		Supervision																				

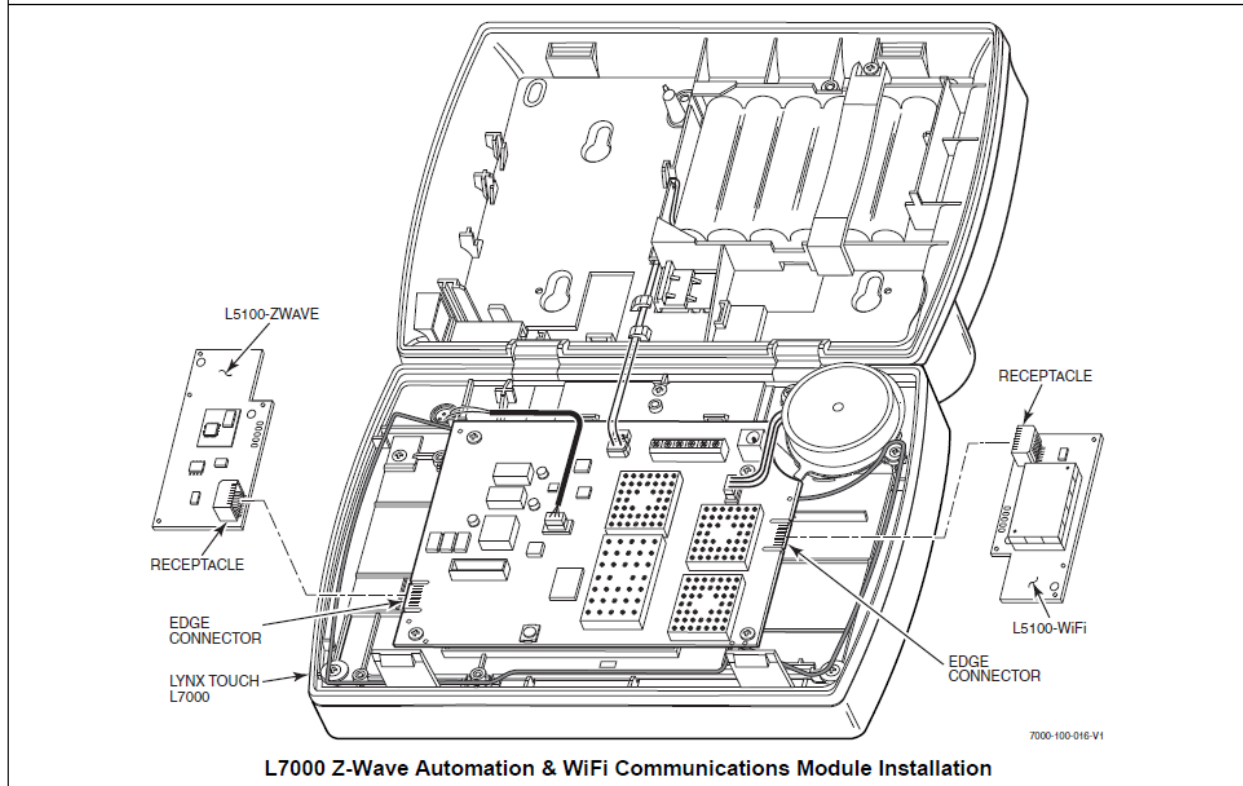
(<http://d1unzhqf5a606m.cloudfront.net/documents/honeywell-l5200-and-l7000-installation-manual-and-setup-guide.pdf> at 35.)

See also, e.g., <http://d1unzhqf5a606m.cloudfront.net/documents/honeywell-l5200-and-l7000-installation-manual-and-setup-guide.pdf> at 18;

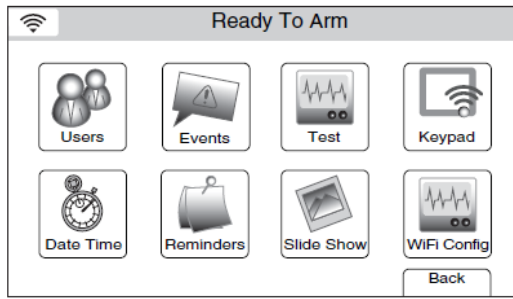
https://www.security.honeywell.com/documents/800-16083_L5200_ug.pdf at 69.

28. When the security system of each Accused Instrumentality detects a triggering event, the wireless control panel transmits a signal to a central monitoring station and/or to a user device such as a phone or tablet device. The wireless control panel includes a network interface configured to provide a communication through a network communication channel (e.g., a network channel between the wireless control panel and the central monitoring station or user device). See, e.g.:





(<http://d1unzhqf5a606m.cloudfront.net/documents/honeywell-15200-and-17000-installation-manual-and-setup-guide.pdf> at 16.)



1. At the Master User screen select the WiFi Config icon. The system displays the WiFi options screen.

(https://www.security.honeywell.com/documents/800-16083_L5200_ug.pdf at 56.)

29. The wireless control panel in each Accused Instrumentality is configured to receive a signal from a sensor (e.g., an item sensing device) through a short-range wireless transmission channel, including, for example, Z-Wave channel.

(<http://d1unzhqf5a606m.cloudfront.net/documents/honeywell-15200-and-17000-installation-manual-and-setup-guide.pdf> at 17-18.)

Walk Test

FAULT ZONES. Open each protected door and window in turn and listen for three beeps from the control, followed by the zone's Voice Descriptor, if it is programmed. Identification of each faulted protection point should appear on the display. The display will clear when the door or window is closed.

Walk in front of any interior motion detectors (if used) and listen for three beeps and/or voice descriptors, if programmed. The identification of the detector should appear on the display when it is activated, and its voice descriptor will be announced (if programmed). The display will clear when no motion is detected. Note that if wireless motion detectors are used, in order to conserve battery life, there is a 3-minute delay between activations.

To test all smoke detectors, follow the manufacturer's instructions. The identification of each detector should appear on the display when each is activated.

If a problem is experienced with any protection point (no confirming sounds, no display), notify your service company.

When all protection points have been checked and are intact (closed), there should be no zone identification numbers displayed on the touch screen.

(https://www.security.honeywell.com/documents/800-16083_L5200 Ug.pdf at 69.)

31. Each sensor in an Accused Instrumentality has an associated identifier (e.g., a name/type) that enables the wireless control panel to identify which of the sensors has been activated. For example, during a sensor test, the name/type of each sensor is displayed at the wireless control panel. Thus, the signal received during the sensor test includes the identifier (corresponding to the name/type) of the sensor. *See, e.g.:*

Transmitter Input Types

Each of the transmitters has one or more unique factory-assigned input (loop) ID codes. Each of the inputs requires a programming zone (e.g., a 5804's four inputs require four button zones). Transmitters can be entered as one of the following types (see transmitter's instructions for appropriate input type):

Type	Description
Supervised RF ("RF")	Sends periodic check-in signals, as well as fault, restore, and low battery signals. The transmitter must remain within the receiver's range.
Unsupervised RF ("UR")	Sends all the signals that the "RF" type does, but the control does not supervise the check-in signals. The transmitter may therefore be carried off-premises.
Unsupervised Button RF ("BR")	Sends only fault signals. They do not send low battery signals until they are activated. The transmitter may be carried off-premises.

(<http://d1unzhqf5a606m.cloudfront.net/documents/honeywell-15200-and-17000-installation-manual-and-setup-guide.pdf> at 17.)

32. The Honeywell Security System is configured to identify each of the sensors connected to it and the "item" they correspond to (e.g., motion, windows, doors). When a sensor transmits information to the control panel, the control panel recognizes the transmitting sensor.

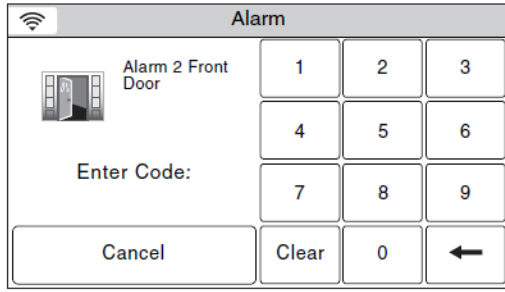
See https://www.security.honeywell.com/documents/800-16083_L5200_ug.pdf at 6. See also,

e.g.:

When an Alarm Occurs

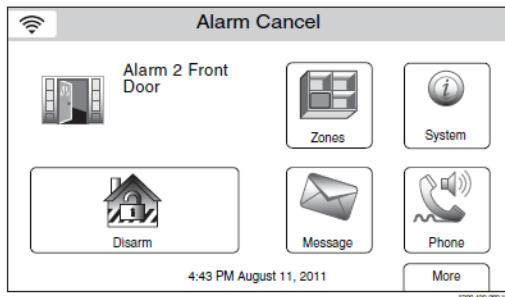
When an alarm has occurred, the touch screen displays the zone number(s) that caused the alarm and the type of alarm (e.g., "Fire Alarm"). These messages remain displayed until cleared by a user. To clear the display, note the zone number that is displayed and enter a valid code. If the fault cannot be corrected, notify your alarm company.

Disarming the System and Silencing Alarms



1. Enter a valid Code. The system beeps once and announces "Disarmed Ready to Arm".











Note: If a valid user code is not entered before the programmed entry delay occurs, the system remains in alarm mode.





















2. "Alarm Cancel" is displayed in a red band along with the zone that caused the alarm. Select the "Disarm" icon and enter a valid code again to clear the alarm. The system beeps once, returns to the Security Screen and announces "Disarmed Ready to Arm".

(https://www.security.honeywell.com/documents/800-16083_L5200_ug.pdf at 27.)

The following icons will be displayed on the Security Screen along with specific zone status information (if applicable) to indicate system status.



DISPLAY	DEFINITION
	AC Loss
	Alarm (intrusion)
	Armed Away
	Armed Stay
	Battery Low
	Check Zones
	CO Alarm
	Disarmed Not Ready to Arm
	Disarmed Ready to Arm
	Door Open



DISPLAY	DEFINITION
	Window Open
	Exit Active
	Fire OR Heat Sensor
	Flood
	Glass Break
	Medical Alarm
	Motion
	Temperature
	Reporter Failure


DISPLAY	DEFINITION
	Cover Tamper
	Trouble
	90 RF Jam
	Automation (Z-Wave Node Failed)
	WiFi source present
	No WiFi source
	Fault * Garage Door
	94 Phone Line Cut
	103 Comm. Trouble

Zone Status Icons

The following icons may be displayed on the Zone Status screen.

ICON	DEFINITION
	Alarm
	Fault (Yellow)

ICON	DEFINITION
	Trouble (red)
	Bypass

ICON	DEFINITION
	Ready

https://www.security.honeywell.com/documents/800-16083_L5200_ug.pdf at 67.)

33. The wireless control panel in each Accused Instrumentality is configured to communicate information about an updated status (e.g., an alert) to a user device (e.g., a phone or tablet). The wireless control is further configured to notify a user of the updated status by sending an alert to the user device according to a configuration setting that specifies when or how to communicate the information to the user. *See, e.g.:*

“Follow Me” System Announcement Feature (L5200/L5200CN Only)

This feature allows the LYNX Touch to deliver a voice system message to the Follow Me Phone numbers programmed by the installer. The LYNX Touch will first transmit reports to the Central Station and after receiving its kiss-off the system will dial the user phone numbers and begin transmitting the welcome message “System Message, Press Star to Play”. The system will dial the user phone numbers a maximum of eight times.

Follow Me Event Triggers	Follow Me Announcement	Follow Me Event Triggers	Follow Me Announcement
AC Loss	AC Loss	Interior Alarm	Interior Alarm
Audible Panic	Panic Alarm	Keypad Panic	Panic Alarm
Automatic Disarmed	Disarmed	Manual Test	System Test
Battery Failed Under Load	System Low Battery	Medical Alarm	Emergency Alarm
Burglary Zone Bypass	Zone ** Bypassed	Perimeter Alarm	Perimeter Alarm
Carbon Monoxide Detected	Carbon Monoxide Alarm	Remote Disarm	Disarmed
Disarmed From AWAY or STAY	Disarmed	RF Sensor Lost	System Trouble
Emergency Alarm	Emergency Alarm	Sensor Low Battery or Tamper	Sensor Trouble
Entry/Exit Alarm	Perimeter Alarm	Silent Burglary	Silent Burglary
Exit Error Alarm (zone)	Perimeter Alarm	Siren Tamper	Tamper Alarm
Expansion Module Tamper	Tamper Alarm	System Inactivity	No Check In
Expansion Module Failure	System Trouble	System Low Battery	System Low Battery
Expansion Module Tamper Alarm	Tamper Alarm	Water Leakage Alarm	Auxiliary Alarm
Expansion Module Tamper Trouble	Tamper Alarm	Zone Bypass	Zone ** Bypassed
Fire Alarm	Fire Alarm	Zone Tamper (Alarm)	Tamper Alarm
Fire Trouble	System Trouble	Zone Trouble	System Trouble

(<http://d1unzhqf5a606m.cloudfront.net/documents/honeywell-l5200-and-17000-installation-manual-and-setup-guide.pdf> at 62.)

Your security system may be capable of providing a series of web-based services that allow you to communicate with your security system remotely in a number of ways. These features are enabled through Total Connect Service and provide the ability to:

- Access to your security system from a computer via website (Remote Access Feature)
- Receive e-mail and text message notification of system events (Multi-Mode Feature)
- Perform system functions and receive confirmations using text messages (SMS Feature)
- Program/operate home automation devices.

(https://www.security.honeywell.com/documents/800-16083_L5200_ug.pdf at 64.)

- *Arm or disarm your security system*
- *Unlock or lock doors*
- *Turn lights off or on*
- *Adjust thermostat temperature*
- *View live video and recorded clips from your Honeywell Total Connect cameras*
- *Check Wi-Fi signal strength indicators for Honeywell Total Connect cameras*
- *Create and control automated scenes for convenience and energy savings*

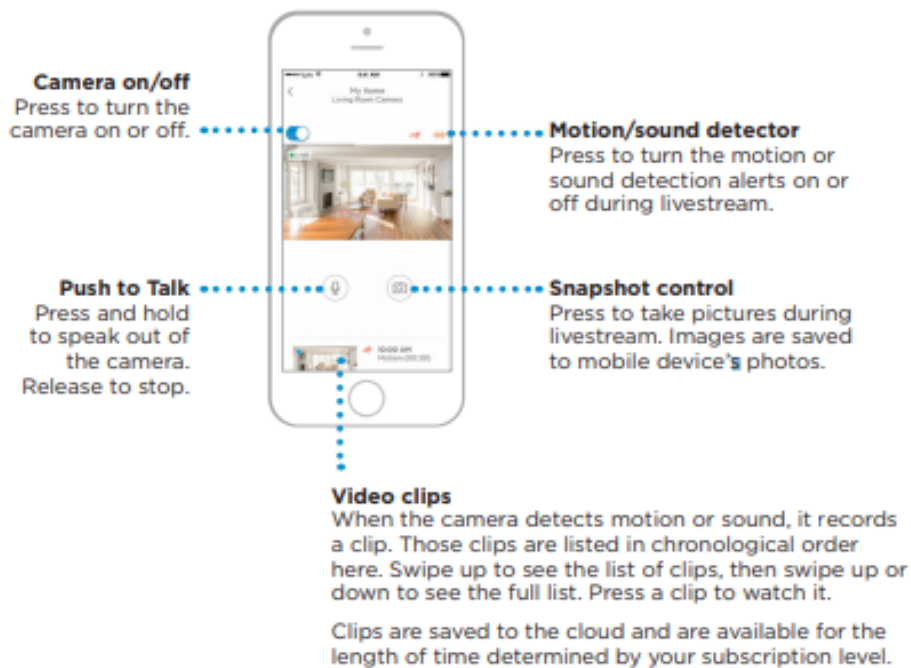


- *Receive email and text alerts about selected events, including extreme temperature changes, motion detected in restricted areas and movement of valuable items*

(<https://yourhome.honeywell.com/en/products/apps/honeywell-total-connect-app>.)

See also, e.g., https://www.security.honeywell.com/documents/800-16083_L5200_ug.pdf at 11, 67.

34. The Accused Instrumentalities further include the C2 Wi-Fi Security Camera. (<https://yourhome.honeywell.com/lyric-c2-wifi-security-camera>.) The C2 Wi-Fi Security Camera is capable of capturing live video from the home and either livestreaming it to a user's smart device or recording it for later viewing. The video home security system includes a decoder for decompressing a compressed MPEG-4 video signal received over a wireless communication network. See, e.g.:



Livestreaming

You can use your security camera to get a live look-in wherever you place the camera. The camera has a 145° field of view and will only show you what is within that range of view in the direction you point the camera. Place the camera so you can see what you want to monitor.

Each livestream session lasts 90 seconds. When one livestream session ends, you can start a new one if you like. Use the Push to Talk button to talk to someone through the camera.

Livestreams are not saved to the SD card, and are not uploaded to your cloud storage. By default, livestreams are in HD. If data limits are a concern, change this setting to Auto or Low, or only use livestreaming when you need to. See "Video quality" on page 13.



(<https://customer.honeywell.com/resources/techlit/TechLitDocuments/33-00000s/33-00292.pdf> at 8-9, 33.)

35. The Accused Instrumentalities further include the Honeywell Smart Home Security System. (<https://smarthomesecurity.honeywell.com/>.) The Honeywell Smart Home Security System is an all-in-one home security system that is capable of sensing motion and sound, captures and sends HD video, recognizes faces and alerts a user of an unfamiliar face in the home via a video clip, and is compatible with smart devices and services such as those using Z-Wave. On information and belief, the video home security system includes a decoder for decompressing a compressed video signal received over a wireless communication network, for instance, in connection with a Honeywell motion viewer. See, e.g.:

Camera Base Station



All-in-One Do-it-Yourself Home Security

Simple to set up and use, it can change modes automatically as you come and go.



Senses Motion & Sound, Captures & Sends HD Video

Stays alert day or night with smart motion detection and night vision all recorded in crisp 1080p HD video, with full audio.



Scheduled Facial Recognition*

Can recognize familiar faces to notify you if they arrive home when expected. If it sees someone it doesn't know, you'll get an alert on your phone to see a video clip of who's there.



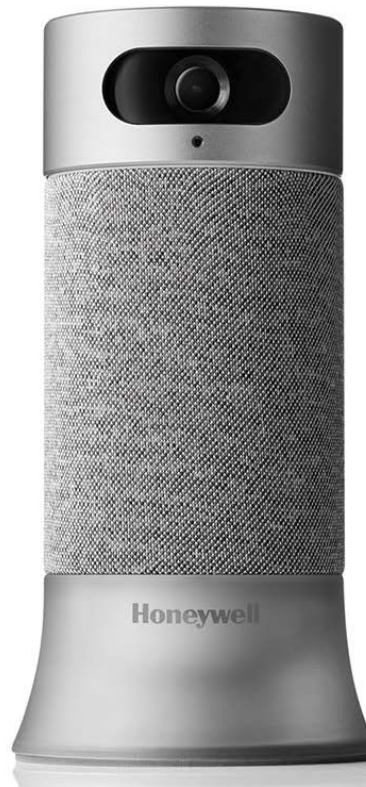
Amazon Alexa & Voice Control Built In

Change modes with your voice, and talk to built-in Amazon Alexa to check the weather, ask questions, control other devices, and more.



Smart Home Integration

It's easy to connect compatible smart devices and services. When used with Outdoor MotionViewers™ your system can even use sounds and Z-Wave lights to deter intruders.



Indoor MotionViewer™

Outdoor MotionViewer™

Motion Sensor

Access Sensor

Key Fob



Indoor MotionViewer™



Intelligent motion detection with video capture



Totally wireless



Battery powered - lasts up to 2 years



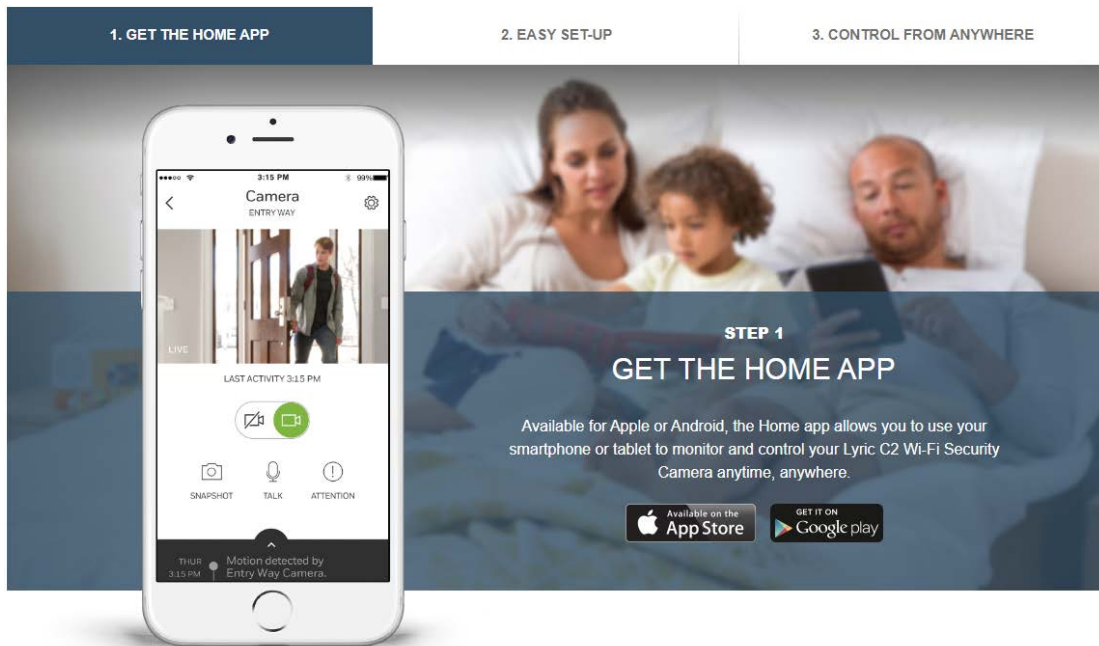
Watch the video



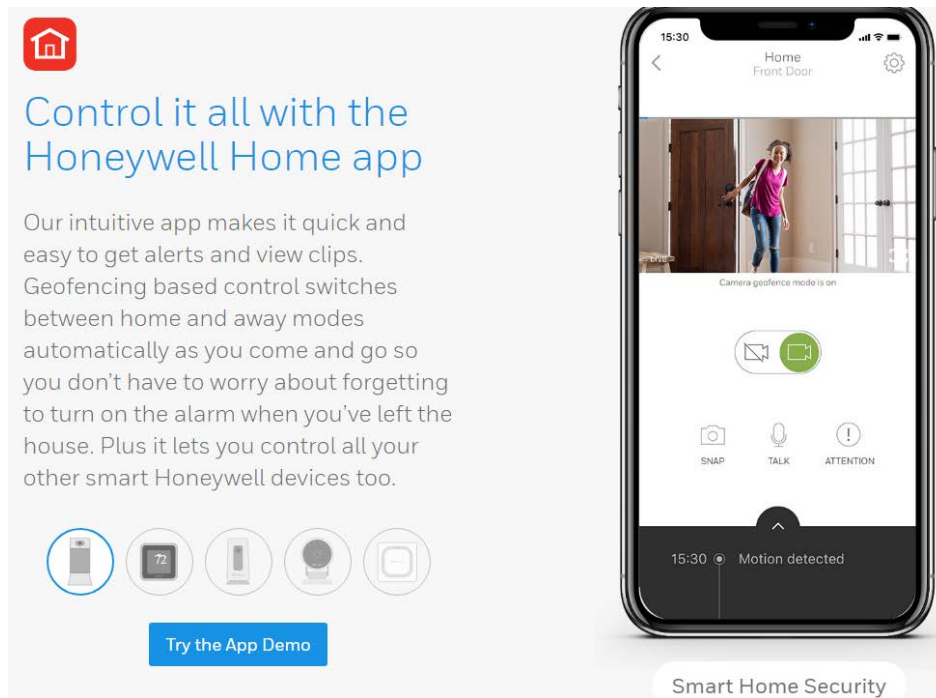
Outdoor MotionViewer™

[\(https://smarthomesecurity.honeywell.com/.\)](https://smarthomesecurity.honeywell.com/)

36. The Accused Instrumentalities are configured to communicate video from a video camera to a user's smart device through a cellular network. See, e.g.:



(<https://yourhome.honeywell.com/lyric-c2-wifi-security-camera>.)



(<https://smarthomesecurity.honeywell.com/>.)

37. Defendant has and continues to jointly infringe one or more of the Asserted Claims by the collective conduct of Honeywell and Amazon.com, Inc. (“Amazon”) in making, using, offering to sell, selling, and importing the aforementioned Honeywell Smart Home Security System, which supports Amazon’s Alexa voice application. *See, e.g.:*



The smartest home there is

Our system already works seamlessly with other smart home brands, including Amazon Alexa, Google Assistant, and IFTTT. Going away? Use it with Z-Wave lights and IFTTT to recreate the brightness and sounds of a busy home to deter unwelcome visitors. There are many possibilities – and we’ll keep adding and improving even more to make your home even smarter.

*Functionality expected in 2018.



[https://smarthomesecurity.honeywell.com/.](https://smarthomesecurity.honeywell.com/))

38. In particular, Honeywell and Amazon have effectively formed a joint enterprise such that the infringing acts are attributable to Honeywell, who provides a home security system with a wireless hub, and Amazon, who provides the Alexa voice application.

39. On information and belief, these Accused Instrumentalities are used, marketed, provided to, and/or used by or for each of Defendant’s partners, clients, customers and end users across the country and in this District.

40. Defendant was made aware of the '983 patent and its infringement thereof at least as early as the filing of this Complaint.

41. Upon information and belief, since at least the time Defendant received notice, Defendant has induced and continues to induce others to infringe at least one claim of the '983 patent under 35 U.S.C. § 271(b) by, among other things, and with specific intent or willful blindness, actively aiding and abetting others to infringe, including but not limited to Defendant's partners, clients, customers, and end users, whose use of the Accused Instrumentalities constitutes direct infringement of at least one claim of the '983 patent.

42. In particular, Defendant's actions that aid and abet others such as its partners, customers, clients, and end users to infringe include advertising and distributing the Accused Instrumentalities and providing instruction materials, training, and services regarding the Accused Instrumentalities. On information and belief, Defendant has engaged in such actions with specific intent to cause infringement or with willful blindness to the resulting infringement because Defendant has had actual knowledge of the '983 patent and knowledge that its acts were inducing infringement of the '983 patent since at least the date Defendant received notice that such activities infringed the '983 patent.

43. Upon information and belief, Defendant is liable as a contributory infringer of the '983 patent under 35 U.S.C. § 271(c) by offering to sell, selling and importing into the United States wireless hub systems to be especially made or adapted for use in an infringement of the '983 patent. The Accused Instrumentalities are a material component for use in practicing the '983 patent and are specifically made and are not a staple article of commerce suitable for substantial non-infringing use.

44. Since at least the filing of this Complaint, Defendant's infringement has been willful.

45. Plaintiff has been harmed by Defendant's infringing activities.

JURY DEMAND

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff demands a trial by jury on all issues triable as such.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands judgment for itself and against Defendant as follows:

- A. An adjudication that Defendant has infringed the '983 patent;
- B. An award of damages to be paid by Defendant adequate to compensate Plaintiff for Defendant's past infringement of the '983 patent and any continuing or future infringement through the date such judgment is entered, including interest, costs, expenses and an accounting of all infringing acts including, but not limited to, those acts not presented at trial;
- C. A declaration that this case is exceptional under 35 U.S.C. § 285, and an award of Plaintiff's reasonable attorneys' fees; and
- D. An award to Plaintiff of such further relief at law or in equity as the Court deems just and proper.

Dated: July 5, 2018

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