

1 H. James Abe (CA Bar. No. 265534)
james.abe@alston.com
2 ALSTON & BIRD LLP
333 South Hope Street, 16th Floor
3 Los Angeles, CA 90071
Telephone: (213) 576-1000
4 Facsimile: (213) 576-1100

5 Patrick J. Flinn (CA Bar. No. 104423)
patrick.flinn@alston.com
6 Holly Hawkins Saporito (admitted *pro hac vice*)
holly.saporito@alston.com
7 Daniel L. Huynh (admitted *pro hac vice*)
daniel.huynh@alston.com
8 Sean B. Bedford (admitted *pro hac vice*)
sean.bedford@alston.com
9 ALSTON & BIRD LLP
1201 West Peachtree Street
10 Atlanta, GA 30309
Telephone: (404) 881-7000
11 Facsimile: (404) 881-7777

12 *Attorneys for Plaintiff*
International Technologies & Systems Corporation

14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**
16 **SOUTHERN DIVISION**

17 INTERNATIONAL TECHNOLOGIES &
18 SYSTEMS CORPORATION, d/b/a/ ID
TECH,

19 PLAINTIFF,

20 v.

21 SAMSUNG ELECTRONICS CO., LTD.
22 and SAMSUNG ELECTRONICS
AMERICA, INC.,

23 DEFENDANTS.

Case No. 8:17-cv-01748-DOC-JDE

**SECOND AMENDED COMPLAINT
FOR PATENT INFRINGEMENT**

DEMAND FOR JURY TRIAL

1 International Technologies & Systems Corporation, d/b/a ID TECH (“ID
2 TECH”), by its attorneys, Alston & Bird LLP, files this Second Amended Complaint
3 for Patent Infringement against Defendants Samsung Electronics Co., Ltd. and
4 Samsung Electronics America, Inc. (collectively, “Defendants” or “Samsung”), and, in
5 support thereof, alleges as follows:

6 **NATURE OF THE SUIT**

7 1. This is a claim for patent infringement arising under the patent laws of the
8 United States, Title 35 of the United States Code.

9 **PARTIES**

10 2. Plaintiff ID TECH is a corporation organized under the laws of Delaware,
11 with its principal place of business at 10721 Walker Street, Cypress, California 90630.

12 3. Upon information and belief, Defendant Samsung Electronics Co., Ltd.
13 (“Samsung Ltd.”) is a company organized and existing under the laws of South Korea,
14 with its principal place of business at 129 Samsung-Ro, Yeongtong-Gu, Suwon-Shi,
15 16677, South Korea.

16 4. Upon information and belief, Defendant Samsung Electronics America,
17 Inc. (“Samsung America”) is a corporation organized under the laws of New York, with
18 its principal place of business at 85 Challenger Road, Ridgefield Park, New Jersey
19 07660.

20 **JURISDICTION AND VENUE**

21 5. This Court has jurisdiction over the subject matter of this action pursuant
22 to 28 U.S.C. §§ 1331, 1332, and 1338 because this case arises under the patent laws of
23 the United States, Title 35 of the United States Code.

24 6. This Court has personal jurisdiction over Defendants because they have
25 substantial, systematic, and continuous contacts with this judicial district. Samsung has
26 offices and facilities in this judicial district, including an office and distribution facility
27 in Compton, California, and a service center in Los Angeles, California. Further,
28 Samsung has committed and continues to commit acts of infringement in violation of

1 35 U.S.C. § 271 by placing infringing products into the stream of commerce with the
2 knowledge, understanding, and expectation that such products will be sold in the state
3 of California and in this judicial district. Moreover, events giving rise to this suit
4 occurred in this judicial district, including Samsung's acts of infringement.

5 7. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(c)
6 and 1400(b) because Samsung has committed acts of infringement in this judicial
7 district and has a regular and established place of business in this judicial district. More
8 specifically, Samsung has committed acts of infringement in this judicial district by
9 making, importing, offering for sale, and/or selling to customers in this judicial district
10 Samsung devices configured to perform the Samsung Pay functionality, and by
11 instructing customers in this judicial district to use the Samsung Pay functionality. In
12 addition, upon information and belief, Samsung provides Samsung Pay Merchant kits
13 to retailers in the judicial district to inform customers that the Samsung Pay
14 functionality is accepted at certain retailers.

15 8. Venue is also proper in this judicial district because Samsung maintains a
16 permanent and continuous presence in this judicial district where it sells products and
17 provides services incorporating and/or related to the infringing technology to
18 consumers. Samsung maintains regular and established places of business at least at
19 18600 S. Broadwick St., Compton, California 90220-6434, 14251 Firestone Blvd., La
20 Mirada, California 90638-5525, and 3150 Wilshire Blvd. #206, Los Angeles,
21 California, 90010. In addition, Samsung America employs a number of full-time
22 employees in the Central District of California.

23 **FACTUAL BACKGROUND**

24 **A. FACTS RELATED TO PLAINTIFF ID TECH**

25 9. Since its founding in 1985, ID TECH has been—and continues to be—an
26 innovator in the field of identification and payment products and systems.

27 10. ID TECH designs, manufactures, and sells a wide range of automatic
28 identification and payment systems products and components, including magstripe

1 readers, smart and contactless card readers and writers, bar code readers, point-of-sale
2 keyboards, and secure PIN entry products. ID TECH supports its customers with both
3 standard products and custom solutions for the point-of-sale, hospitality, access control,
4 transportation, gaming, and kiosk industries.

5 **B. THE PATENT-IN-SUIT**

6 11. On October 3, 2005, U.S. Patent Application No. 11/243,008, entitled
7 “External Adaptor for Magnetic Stripe Card Reader,” was filed with the United States
8 Patent & Trademark Office (“USPTO”), naming Bruce Lyle Moullette, Mohammad A.
9 Khan, Jorge M. Fernandes, Ahmer Ali Khan, and Anna C. Stockel as inventors.

10 12. Also on October 3, 2005, the USPTO recorded an assignment of U.S.
11 Patent Application No. 11/243,008 from its inventors to VIVOtech, Inc. (“VIVOtech”),
12 a software and payment systems company based in Santa Clara, California. At the time
13 of that assignment, each of the inventors was employed by VIVOtech.

14 13. On October 3, 2006, the USPTO duly and legally issued U.S. Patent
15 No. 7,114,652 (“the 652 Patent”), entitled “External Adaptor for Magnetic Stripe Card
16 Reader.” A true and correct copy of the 652 Patent is attached hereto as Exhibit A.

17 14. The 652 Patent contains 10 claims, which recite methods for
18 communicating with reader heads of a magnetic stripe device.

19 15. Each claim of the 652 Patent is valid and enforceable.

20 16. On August 3, 2012, VIVOtech assigned the 652 Patent to ID TECH. The
21 assignment was recorded with the USPTO on February 13, 2013.

22 17. ID TECH is the current assignee to the 652 Patent, with the right to sue
23 and recover for past infringement of the 652 Patent and any and all causes of action and
24 remedies, either legal and/or equitable, related thereto.

25 **C. FACTS RELATED TO SAMSUNG DEFENDANTS**

26 18. Samsung Ltd. is a Korean company that researches, manufactures,
27 markets, distributes, imports, and sells Samsung products worldwide, including
28

1 smartphones, tablets, smartwatches, and other mobile devices. Samsung Ltd. and its
2 subsidiaries collectively comprise one of the largest mobile device makers in the world.

3 19. Samsung America is a wholly owned subsidiary of Samsung Ltd. that is
4 responsible for researching, marketing, distributing, and selling Samsung products in
5 the United States. Samsung America markets, offers for sale, and sells mobile devices,
6 including the Samsung Galaxy series of smartphones and tablets and Samsung Gear
7 series of smartwatches, in the United States.

8 20. LoopPay, Inc. (“LoopPay”) was founded as a mobile payment startup
9 company in 2012. LoopPay developed and sold aftermarket mobile device products
10 incorporating “Magnetic Secure Transmission” (“MST”) technology, which is designed
11 to interact with conventional magnetic stripe credit carder readers to enable users to
12 conduct commercial transactions using a mobile device.

13 21. Upon information and belief, in or around February 2015, Samsung Ltd.
14 acquired LoopPay.

15 22. Upon information and belief, in or around September 23, 2015, LoopPay’s
16 name was changed to Samsung Pay, Inc. (“SPI”).

17 23. Effective June 1, 2018, Samsung America merged with SPI, resulting in a
18 consolidation of SPI into Samsung America. As a result of the merger, SPI is no longer
19 in existence.

20 24. Upon information and belief, Samsung America has assumed all of SPI’s
21 liabilities as a result of this merger.

22 25. Upon information and belief, Samsung America develops MST
23 technology and products, and configures MST components for use in certain Samsung
24 devices.

25 26. Upon information and belief, Defendants have developed and offer a
26 mobile payment system called “Samsung Pay,” which Samsung makes available to its
27 customers for use with certain Samsung mobile devices (“the Samsung Pay System”).
28

1 27. The Samsung Pay System allows users to transmit card information from
2 their mobile devices using MST to communicate with the reader heads of payment
3 terminal card readers.

4 **D. BACKGROUND OF THE TECHNOLOGY**

5 28. According to the 652 Patent, magnetic stripe credit cards were embraced
6 by merchants and consumers by the 1970s. Since that time, the increased speed and
7 reduced size of electronic devices has resulted in portable personal trusted devices (*e.g.*,
8 PDAs and cellular phones) being able to accomplish a variety of functions, for example,
9 remote banking and mobile transaction authorization and processing. However, despite
10 this advancement, millions of merchants worldwide still have only magnetic stripe card
11 acceptance systems. Thus, at the time that the application for the 652 Patent was filed,
12 there was a need in the art for methods which enabled older legacy point of sale card
13 acceptance systems to interact with newer portable personal trusted devices.

14 29. The 652 Patent thus discloses methods for conducting transactions
15 between a card reader and a device by communicating a signal from the device to the
16 reader heads of a magnetic stripe reader device.

17 **E. THE ACCUSED DEVICES**

18 30. Samsung currently manufactures and sells at least 14 products compatible
19 with its Samsung Pay System utilizing the MST functionality. These products include:
20 the Samsung (i) Galaxy S9; (ii) Galaxy S9+; (iii) Galaxy S8; (iv) Galaxy S8+; (v)
21 Galaxy S7; (vi) Galaxy S7 edge; (vii) Galaxy S6; (viii) Galaxy S6 edge; (ix) Galaxy S6
22 edge+; (x) Galaxy S6 active; (ix) Galaxy Note5; (xii) Galaxy Note 8; (xiii) Gear S3;
23 and (xiv) Gear S2 (collectively, the “Accused Devices”).

24 **F. SAMSUNG’S INFRINGEMENT OF THE 652 PATENT**

25 31. The Samsung Pay System is a method of communicating with a reader
26 head of a magnetic stripe reader device (*see, e.g.*, “Samsung Pay: Everything You Need
27 to Know,” available at: <https://www.youtube.com/watch?v=1EQDAgM7HsE&t=>).

28

1 More specifically, the Samsung Pay System comprises a method for conducting
2 transactions between a card reader and a mobile device by communicating a signal from
3 the mobile device to the reader heads of a magnetic stripe reader device.

4 32. Samsung infringes at least claims 1–5 of the 652 Patent by practicing,
5 making, using, selling, or offering for sale in this judicial district and elsewhere the
6 inventions claimed in the 652 Patent through the use of the Samsung Pay System in the
7 Accused Devices.

8 33. Samsung has had knowledge of the 652 Patent since at least the filing of
9 the original Complaint on October 6, 2017.

10 **COUNT I**

11 **Infringement of the 652 Patent**

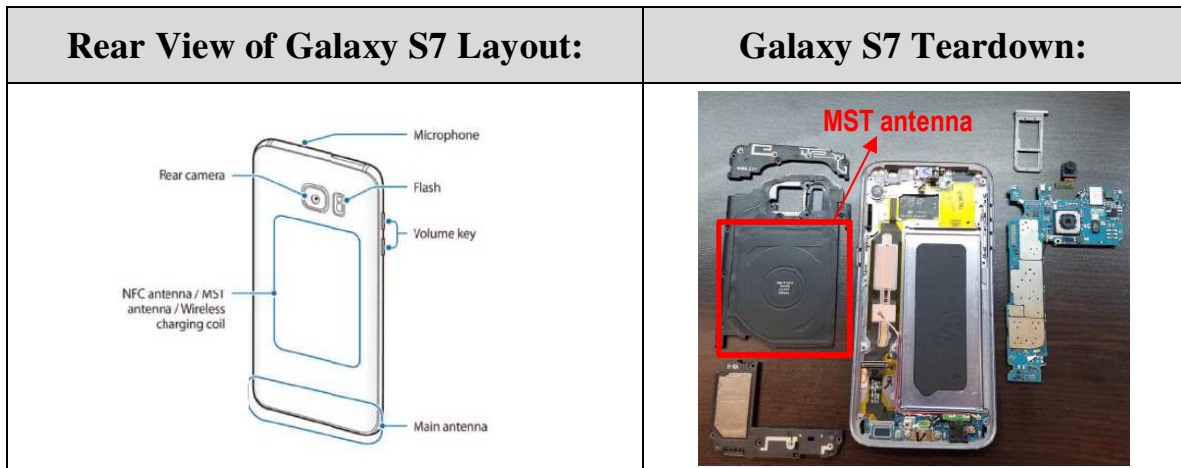
12 34. Plaintiff incorporates herein by reference each and every allegation
13 contained in paragraphs 1–33, above.

14 35. Samsung has infringed and continues to infringe, directly or indirectly, at
15 least claims 1–5 of the 652 Patent in violation of 35 U.S.C. § 271(a), either literally or
16 under the doctrine of equivalents, by practicing, making, using, selling, offering to sell,
17 manufacturing, testing, demonstrating, and/or using the Accused Devices compatible
18 with the Samsung Pay System in the United States and by importing the Accused
19 Devices into the United States.

20 36. More specifically, the Samsung Pay System comprises a method for
21 conducting transactions between a magnetic stripe reader and a mobile device by
22 communicating a signal from the mobile device to the reader heads of a magnetic stripe
23 reader device. For example, Samsung advertises that the Samsung Pay System includes
24 “technology that emits a magnetic signal that mimics the magnetic strip on a traditional
25 payment card. MST [Magnetic Secure Transmission] sends a magnetic signal from your
26 device to the payment terminal's card reader (to emulate swiping a physical card without
27 having to upgrade the terminal’s software or hardware)” (<https://www.samsung.com/us/support/answer/ANS00043865/>; *see, e.g.,* <https://www.samsung.com/us/>

1 support/answer/ANS00043949/; <https://www.samsung.com/us/support/answer/ANS>
 2 00043790/ (“Samsung Pay uses NFC and MST technologies.”). The claims of the patent
 3 provide that the method is performed with magnetic stripe readers with multiple
 4 magnetic reader heads, with at least two heads having “a different sensitivity to
 5 magnetic fields.” This is a characteristic found in traditional magnetic stripe readers
 6 with which the Samsung Pay System is designed to function, with which it does
 7 function, and with which Samsung intends its consumers to use the Accused Devices.

8 37. The first element of the patented method recited in claim 1 calls for
 9 “positioning a module comprising an inductor element proximate to a housing of a
 10 magnetic stripe reader device.” The Accused Devices contain an inductor element, *e.g.*,
 11 a “metal coil bent into a loop,” that creates a magnetic field when electricity passes
 12 through it (*see, e.g.*, [http://www.businessinsider.com/how-magnetic-secure-](http://www.businessinsider.com/how-magnetic-secure-transmission-works-on-samsung-pay-2015-9)
 13 [transmission-works-on-samsung-pay-2015-9](http://www.businessinsider.com/how-magnetic-secure-transmission-works-on-samsung-pay-2015-9)). The inductor element in the Galaxy S7,
 14 an exemplary Accused Device, is shown below:



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(*see, e.g.*, [https://gadgetguideonline.com/s7/galaxy-s7-online-manual/galaxy-s7-](https://gadgetguideonline.com/s7/galaxy-s7-online-manual/galaxy-s7-layout-and-galaxy-s7-edge-layout/)
[layout-and-galaxy-s7-edge-layout/](https://gadgetguideonline.com/s7/galaxy-s7-online-manual/galaxy-s7-layout-and-galaxy-s7-edge-layout/)). When Samsung tests and/or demonstrates the
 MST functionality of the Samsung Pay System, or when customers use the MST
 functionality of the Samsung Pay System as designed, used, and instructed by Samsung,
 the Accused Device (and thus the inductor element in the Accused Device) is positioned

1 proximate to the housing of a magnetic stripe reader device. Samsung distributes
2 advertisements that include multiple examples of positioning Accused Devices
3 proximate to a housing of a magnetic stripe reader device (*see, e.g.*,
4 <https://www.youtube.com/watch?v=1EQDAgM7HsE&t=> at 1:40-2:05;
5 <https://www.samsung.com/us/support/answer/ANS00043865/> (“Simply select a card
6 from Samsung Pay, and transmit the payment information by moving your device
7 within an inch of the payment terminal.”).

8 38. The second element of the patented method calls for “applying a current to
9 the inductor element to generate a magnetic field of sufficient strength to penetrate the
10 housing and be sensed by a head of the reader device.” When the Samsung Pay System
11 uses the MST technology as designed, used, and instructed by Samsung, a current is
12 applied to the inductor element (*see, e.g.*, [https://www.samsung.com/us/support/
13 answer/ANS00043865/](https://www.samsung.com/us/support/answer/ANS00043865/) (“MST sends a magnetic signal from your device to the
14 payment terminal's card reader (to emulate swiping a physical card without having to
15 upgrade the terminal's software or hardware”); [http://www.businessinsider.com/how-
16 magnetic-secure-transmission-works-on-samsung-pay-2015-9](http://www.businessinsider.com/how-magnetic-secure-transmission-works-on-samsung-pay-2015-9) (“When electricity
17 passes through the coil, it creates a magnetic field that can talk to standard magnetic
18 credit card readers.”).

19 39. The current generates a magnetic field (*see, e.g.*
20 <https://www.samsung.com/us/support/answer/ANS00043865/> (“Magnetic Secure
21 Transmission (MST) is a technology that emits a magnetic signal that mimics the
22 magnetic strip on a traditional payment card.”); [http://www.businessinsider.com/how-
23 magnetic-secure-transmission-works-on-samsung-pay-2015-9](http://www.businessinsider.com/how-magnetic-secure-transmission-works-on-samsung-pay-2015-9) (“When electricity
24 passes through the coil, it creates a magnetic field that can talk to standard magnetic
25 credit card readers.”). The magnetic field is sufficiently strong enough to penetrate the
26 housing of a magnetic stripe reader device and be sensed by a head of the reader device
27 (*see, e.g.*, [https://www.youtube.com/watch?v=1EQDAgM7HsE&t=at 1:40-2:05](https://www.youtube.com/watch?v=1EQDAgM7HsE&t=at%201:40-2:05)).

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1 40. The third element of the patented method recites “wherein the magnetic
2 stripe reader device further comprises a second magnetic reader head exhibiting a
3 different sensitivity to magnetic fields than the magnetic head, generating a second
4 magnetic field of sufficient strength to penetrate the housing and be sensed by the
5 second magnetic reader head.” As stated above, having at least two heads having “a
6 different sensitivity to magnetic fields” is a characteristic found in traditional magnetic
7 stripe readers with which the Samsung Pay System is designed to function, with which
8 it does function, and with which Samsung intends its consumers to use the Accused
9 Devices.

10 41. Moreover, for example, the exemplary Galaxy S7 Accused Device
11 generates a series of transmissions as part of each transaction made with the MST
12 functionality of the Samsung Pay System, which are sufficiently strong to penetrate the
13 housing of a magnetic stripe reader device. Thus, any one of transmissions after the first
14 transmission may be considered a second magnetic field. Accordingly, when the
15 Samsung Pay System uses the MST technology as designed, used, and instructed by
16 Samsung, the inductor element in the Accused Devices generates a second magnetic
17 field of sufficient strength to penetrate the housing and be sensed by the second
18 magnetic reader head in the magnetic stripe reader.

19 42. In dependent claim 2, the method includes an additional step in which “the
20 second magnetic field is generated immediately after the magnetic field in order to
21 communicate a continuous data packet to the reader device.” Upon information and
22 belief, for example, the exemplary Galaxy S7 Accused Device generates a series of
23 transmissions in succession, such that the magnetic stripe reader head reads the data in
24 a continuous data packet. Thus, when the Samsung Pay System uses the MST
25 technology as designed, used, and instructed by Samsung, the inductor element in the
26 Accused Devices generates a second field immediately after the first field in order to
27 communicate a continuous data packet to the reader device.

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1 43. In dependent claim 3, the method includes the additional step of
2 “generating the second magnetic field having a greater intensity than the first magnetic
3 field.” Upon information and belief, for example, when using the Samsung Pay System,
4 the inductor element of the exemplary Galaxy S7 Accused Device generates multiple
5 magnetic fields. Upon information and belief, the multiple magnetic fields have a range
6 of different intensities. Therefore, when the Samsung Pay System uses the MST
7 technology as designed, used, and instructed by Samsung, the inductor element in the
8 Accused Devices can generate, and does generate a second magnetic field having a
9 greater intensity than the first magnetic field.

10 44. In dependent claim 4, the method includes the additional step calling for
11 “the method comprising generating the second magnetic field having a lesser intensity
12 than the first magnetic field.” Upon information and belief, for example, when using
13 the Samsung Pay System, the inductor element of the exemplary Galaxy S7 Accused
14 Device generates multiple magnetic fields. Upon information and belief, the multiple
15 magnetic fields have a range of different intensities. Therefore, when the Samsung Pay
16 System uses the MST technology as designed, used, and instructed by Samsung, the
17 inductor element in the Accused Devices can generate, and does generate a second
18 magnetic field having a lesser intensity than the first magnetic field.

19 45. In dependent claim 5, the method includes an additional limitation wherein
20 the second magnetic field is “generated with sufficient intensity to be sensed by the
21 second magnetic reader head configured to read Track 1 data.” Upon information and
22 belief, standard credit card magnetic stripe reader devices have multiple track heads that
23 can receive information such as Track 1 and Track 2 information. Upon information
24 and belief, for example, when using the MST functionality of the Samsung Pay System,
25 the inductor element in the exemplary Galaxy S7 Accused Device generates magnetic
26 fields that can be read by magnetic reader heads that are configured to read Track 1
27 data. Thus, when the Samsung Pay System uses the MST technology as designed, used,
28 and instructed by Samsung, the inductor element in the Accused Devices can generate,

1 and does generate a second magnetic field of sufficient intensity to be sensed by the
2 second magnetic reader head configured to read Track 1 data.

3 46. Claims 1-5 of the 652 Patent are directly infringed in violation of 35 U.S.C.
4 § 271(a) by Samsung when Samsung tests and/or demonstrates the Accused Devices in
5 the United States. On information and belief, Samsung has tested and has demonstrated
6 the Samsung Pay feature of the Accused Devices in the United States. These claims are
7 also directly infringed when purchasers and users of the Accused Devices use the
8 Samsung Pay System of the Accused Devices in the United States.

9 47. Samsung actively induces others to infringe claims 1–5 of the 652 Patent
10 in violation of 35 U.S.C. § 271(b) by importing and selling the Accused Devices
11 configured to use the Samsung Pay System and by instructing its customers and retailers
12 through its marketing, advertising, customer assistance, and direct instructions to use
13 the Samsung Pay System, and by accepting payments made with the Samsung Pay
14 System, in a manner that infringes the 652 Patent (*see, e.g.,*
15 <https://www.youtube.com/watch?v=1EQDAgM7HsE&t=> (instructing consumers how
16 to use the MST functionality in the Accused Devices), when Samsung had knowledge
17 (or willful blindness thereto) of the 652 Patent since at least the October 6, 2017 filing
18 date of the Original Complaint, and that the activities it was inducing would result in
19 direct infringement by others, and Samsung intended that its actions would induce direct
20 infringement by others. Samsung is aware that the normal and customary use of
21 Samsung Pay System utilizing MST technology in the Accused Devices directly
22 infringes the 652 Patent but instructs and supports the direct infringement nonetheless.

23 48. Samsung has contributed to, and continues to contribute to, the
24 infringement of at least claims 1–5 of the 652 Patent in violation of 35 U.S.C. § 271(c)
25 by importing and selling Accused Devices configured to use the Samsung Pay System.
26 Upon information and belief, the components implementing the MST functionality in
27 the Samsung Pay System in the Accused Device have no substantial use that does not
28 infringe claims 1-5 of the 652 Patent (*see, e.g.,* <https://news.samsung.com/us/431-2/>

1 (“[T]he acclaimed mobile wallet solutions provider [] turns existing magnetic stripe
2 readers into secure, contactless receivers. LoopPay’s technology has the potential to
3 work in approximately 90% of existing point-of-sale (POS) terminals)). The
4 components implementing the MST functionality in the Samsung Pay System in the
5 Accused Devices are a material part of the invention described in claims 1-5 of the 652
6 Patent (*see, e.g., id.*; <https://www.samsung.com/us/support/owners/app/samsung-pay>
7 (listing Accused Devices compatible with Samsung Pay)). Since at least the October 6,
8 2017 filing date of the Original Complaint, Samsung has been aware of the 652 Patent
9 and of the direct infringement caused by the use of the Accused Devices and nonetheless
10 imports and sells them to customers intending them to be used in an infringing way.

11 49. ID TECH has been damaged by Samsung’s past and continuing
12 infringement of the 652 Patent in an amount to be determined at trial.

13 50. ID TECH has been and continues to be irreparably injured by Samsung’s
14 past and continuing infringement of the 652 Patent, and Samsung’s infringing activities
15 will continue unless enjoined by this Court pursuant to 35 U.S.C. § 283.

16 51. ID TECH has suffered and is suffering money damages from Samsung’s
17 unauthorized infringement that are compensable under 35 U.S.C. § 284 in an amount to
18 be determined at trial or hearing.

19 **DEMAND FOR JURY TRIAL**

20 52. ID TECH requests a jury trial of all issues triable of right by a jury.

21 **PRAYER FOR RELIEF**

22 WHEREFORE, ID TECH respectfully requests judgment against Samsung as
23 follows:

- 24 a) For a judgment in favor of ID TECH that Samsung has infringed the 652
25 Patent, as described herein;
- 26 b) For an award of such damages in an amount sufficient to compensate ID
27 TECH for losses it has sustained as a consequence of Samsung’s unlawful
28 acts, as well as profits attributable to Samsung’s unlawful acts;

- 1 c) For an accounting for all profits derived by Samsung from its unlawful acts;
- 2 d) For an order under 35 U.S.C. § 283 permanently enjoining Samsung from
- 3 continuing to make, use, sell, or offer to sell the Accused Devices in the
- 4 United States and from importing the Accused Devices into the United
- 5 States;
- 6 e) For an order declaring this to be an exceptional case pursuant to 35 U.S.C.
- 7 § 285;
- 8 f) For an award to ID TECH of its reasonable attorney fees and full costs; and
- 9 g) For such further relief as the Court may deem just and appropriate.

10 DATED: July 9, 2018

ALSTON & BIRD LLP

/s/ H. James Abe

H. James Abe (Cal. Bar. No. 265534)

james.abe@alston.com

ALSTON & BIRD LLP

333 South Hope Street, 16th Floor

Los Angeles, CA 90071

Telephone: (213) 576-1000

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Sean B. Bedford (admitted *pro hac vice*)

sean.bedford@alston.com

ALSTON & BIRD LLP

1201 West Peachtree Street

Atlanta, GA 30309

Telephone: (404) 881-7000

Facsimile: (404) 881-7777

Attorneys for Plaintiff

International Technologies & Systems Corporation

1 **DEMAND FOR JURY TRIAL**

2 Plaintiff demands a trial by jury on all issues so triable.

3
4 DATED: July 9, 2018

ALSTON & BIRD LLP

5
6 /s/ H. James Abe

H. James Abe (Cal. Bar. No. 265534)

james.abe@alston.com

ALSTON & BIRD LLP

333 South Hope Street, 16th Floor

Los Angeles, CA 90071

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Facsimile: (213) 576-1100

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ALSTON & BIRD LLP

1201 West Peachtree Street

Atlanta, GA 30309

Telephone: (404) 881-7000

Facsimile: (404) 881-7777

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21 ***Attorneys for Plaintiff***

International Technologies & Systems Corporation

1 **CERTIFICATE OF SERVICE**

2 I, Lidia Gamez, certify and declare as follows:

3 I am over the age of 18 and not a party to the within action. My business address
4 is Alston & Bird LLP, 333 South Hope Street, Sixteenth Floor, Los Angeles, CA 90071.

5 On **July 9, 2018**, I caused a copy of the **SECOND AMENDED COMPLAINT**
6 **FOR PATENT INFRINGEMENT - DEMAND FOR JURY TRIAL** to be served
7 electronically via email to the following attorney representing Defendants, SAMSUNG
8 ELECTRONICS CO, LTD.; SAMSUNG PAY, INC.; and SAMSUNG ELECTRONIC
9 AMERICA, INC.:

10 Elizabeth L. Brann
11 **PAUL HASTINGS LLP**
12 4747 Executive Drive, Twelfth Floor
13 San Diego, CA 92121
14 Telephone: (858) 458-3000
Facsimile: (858) 458-3005
Email: elizabethbrann@paulhastings.com
[Email: TeamSamsungIDTECH@paulhastings.com](mailto:TeamSamsungIDTECH@paulhastings.com)

15 I declare under penalty of perjury under the laws of the United States of America
16 that the foregoing is true and correct.

17 Executed on **July 9, 2018** at Los Angeles, California.

18
19 /s/ Lidia Gamez

20 _____
Lidia Gamez