UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SIMO HOLDINGS INC.

        Plaintiff

          v.

HONG KONG UCLOUDLINK NETWORK
TECHNOLOGY LIMITED, AND
UCLOUDLINK (AMERICA), LTD.

        Defendants.

--x

CIVIL ACTION NO. 18-cv-5427 (JSR)

JURY TRIAL DEMANDED

FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff SIMO Holdings Inc. ("SIMO" or "Plaintiff"), for its First Amended Complaint

for Patent Infringement and Demand for Jury Trial against Defendants Hong Kong uCloudlink

Network Technology Limited[1] and Ucloudlink (America), Ltd. (collectively, "Defendants" or

"uCloudlink"), states and alleges as follows:

SUMMARY OF THE ACTION

1.   This is an action for patent infringement of United States Patent No. 8,116,735

entitled "System and Method for Mobile Telephone Roaming" ("the '735 patent") and United

States Patent No. 9,736,689 entitled "System and Method for Mobile Telephone Roaming" ("the

'689 patent") (collectively referred to hereinafter as "the patents-in-suit") regarding uCloudlink's

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[1] Based upon the representation of Defendants' counsel and Defendants' Rule 7.1 Statement (DE
16), SIMO hereby sets out the proper name of this Defendant.

WiFi hotspot devices. Upon information and belief, uCloudlink's WiFi hotspot devices and S1 mobile phones infringe Plaintiff SIMO's patents-in-suit.

THE PARTIES

2.   SIMO is a company incorporated under the laws of Cayman Islands and has its principal place of business at Xihai Mingzhu Building, 1001 Nanshan District, Taoyuan Road Shenzhen City, Guangdong Province, China.

3.   Founded in 2008, SIMO is a worldwide leading provider of software-based mobile connectivity solutions. SIMO is a pioneer and innovator in the development of next-generation virtual SIM technologies, which enable mobile communications worldwide through local connectivity. SIMO's innovative technology is available in over 120 countries at over 500 retail locations worldwide.

4.   Upon information and belief, Defendant Hong Kong uCloudlink Network Technology Limited is a company incorporated under the laws of Hong Kong SAR, China and has its principal place of business at 29/F, One Pacific Centre, 414 Kwun Tong Road, Kwun Tong, KLN, Hong Kong.

5.   Defendant Ucloudlink (America), Ltd. is a company incorporated under the laws of the State of New York, and has a service of process address at 119B Hester St., New York, NY 10002. Upon information and belief, Ucloudlink (America), Ltd. is a subsidiary of Hong Kong uCloudlink Network Technology Limited. Defendants collectively make, import, sell and/or offer for sale infringing products in the United States, including in the State of New York and in this District.

6.   Defendants further advertise their physical address on their website

https://www.ucloudlink.com/html/fenzhijigou/ as: 205 East 42nd Street, 20th Floor, New York,

NY 10017.

JURISDICTION AND VENUE

7.   This is an action in law and equity for patent infringement, arising under the

patent laws of the United States, Title 35 of the United States Code.

8.   This Court has jurisdiction over the subject matter of this action pursuant to 28

U.S.C. §§ 1331 and 1338(a).

9.   The Court has personal jurisdiction over Defendants in this action because they

have conducted and do conduct business within the United States and New York State.

Defendants are subject to this Court's specific and general personal jurisdiction pursuant to due

process and/or the New York long-arm Statute because Defendant uCloudlink (America), Ltd. is

incorporated in New York, and due at least to their substantial business conducted in this forum,

directly and/or through intermediaries, including (i) having solicited business in the State of New

York and in this District, transacted business within the State of New York and in this District,

and attempted to derive financial benefit from residents of the State of New York and this

District, including benefits directly related to the patent infringement claims set forth herein; (ii)

having placed their products and services into the stream of commerce throughout the United

States and having been actively engaged in transacting business in New York and in this District;

and (iii) either alone or in conjunction with others, having committed acts of infringement within

New York and in this District, as, on information and belief, the Defendants, directly and/or

through intermediaries, have advertised (including through websites), offered to sell, sold and/or

distributed infringing products, and/or have induced the sale and use of infringing products in the

United States and in New York and in this District. Further, the Defendants have, directly or

through their distribution network, purposefully and voluntarily placed such products in the

stream of commerce knowing and expecting them to be purchased and used by consumers in

New York and in this District. The Defendants have either committed direct infringement in

New York or committed indirect infringement based on acts of direct infringement in New York

and in this District. In addition, on information and belief, the Defendants are subject to the

Court's general jurisdiction, including from regularly doing or soliciting business, engaging in

other persistent courses of conduct, deriving substantial revenue from goods and services

provided to individuals in New York and in this District, and/or based on uCloudlink (America),

Ltd.'s presence and physical location in this Judicial District.

10.   Upon information and belief, the Defendants do one or more of the following with

the Wi-Fi hotspot devices that embody SIMO's patented technology: (a) make these devices in

the United States for sale to customers, including customers in New York; (b) import these

devices into the United States for sale to consumers, including consumers in New York; (c) sell

them or offer them for sale in the United States, including to customers in New York; and/or (d)

sell them to customers who incorporate them into products that such customers import, sell, or

offer for sale in the United States, including in New York.

11.   On information and belief, Defendants, directly or through intermediaries

(including distributors, retailers, and others) ships, distributes, offers for sale, sells, and

advertises products that infringe SIMO's '735 patent and '689 patent in this District. For

example, Defendants, upon information and belief, have offered for sale and sold products that

infringe SIMO's '735 patent and '689 patent in this judicial district, including at least the

Glocalme G2, G3 and U2 Series WiFi hotspot devices (*see* https://www.amazon.com/GlocalMe-

Hotspot-Upgraded-Worldwide-

International/dp/B072KKF37M/ref=sr_1_1?ie=UTF8&qid=1528265125&sr=8-

1&keywords=ucloudlink; https://www.amazon.com/GlocalMe-Hotspot-America-Unlocked-

Roaming/dp/B073PXFWBG/ref=sr_1_3?ie=UTF8&qid=1528265125&sr=8-

3&keywords=ucloudlink) and the S1 mobile phone (*see* https://www.amazon.com/GlocalMe-

G1701-Unlocked-Smartphone-

Global/dp/B07BY2394H/ref=sr_1_1?ie=UTF8&qid=1534286109&sr=8-

1&keywords=ucloudlink+world+phone) . In addition, on information and belief, consumers

from anywhere in the country, including this State, can purchase products that infringe SIMO's

'735 patent and '689 patent through, e.g., Amazon.com. Upon information and belief,

Defendants have purposefully availed themselves of the privileges of conducting business in the

United States, and more specifically in this District. Upon information and belief, Defendants

sought protection and benefit from the laws of this State by placing infringing products into the

stream of commerce through an established distribution channel with the awareness and/or intent

that they will be purchased by consumers in this District.

    12.   Venue is proper in this Court pursuant to 28 U.S.C. § 1391 and/or 28 U.S.C. §

1400(b) because Defendant uCloudlink Network Technology Limited is a foreign corporation

and Defendant uCloudlink (America), Ltd. is a New York corporation with a principal place of

business in this District.

<div align="center">**THE ASSERTED PATENTS**</div>

    13.   On February 14, 2012, the United States Patent and Trademark Office duly and

legally issued the '735 patent, a copy of which is attached as Exhibit A to this First Amended

Complaint. The '735 patent discloses system and method for mobile telephone roaming.

    14.   SIMO is the sole owner and assignee of the '735 patent. It owns all rights, title,

and interest in and to the '735 patent, including all rights to sue and recover for past and future

infringement. The '735 patent has not expired and is currently in full force and effect.

15.   On August 15, 2017, the United States Patent and Trademark Office duly and

legally issued the '689 patent, a copy of which is attached as Exhibit B to this First Amended

Complaint. The '689 patent discloses a system and method for mobile telephone roaming. The

'689 patent is a continuation of Application No. 12/039,646 filed on Feb. 28, 2008, now the '735

patent.

16.   SIMO is the sole owner and assignee of the '689 patent. It owns all rights, title,

and interest in and to the '689 patent, including all rights to sue and recover for past and future

infringement. The '689 patent has not expired and is currently in full force and effect.

COUNT I

INFRINGEMENT OF U.S. PATENT NO. 8,116,735

17.   SIMO incorporates Paragraphs 1–16 of this First Amended Complaint as if set

forth fully herein.

18.   Upon information and belief, Defendants have been and are now directly

infringing the '735 patent by making, using, selling, and/or offering for sale in the United States

and/or importing into the United States WiFi hotspot devices and mobile phones that practice or

embody at least claims 1–4, 8–9 and 12–13 of the '735 patent, including at least the Glocalme

G2, G3 and U2 Series WiFi hotspot devices and S1 mobile phones (the "Accused Products").

Defendants are therefore liable for direct infringement of the '735 patent under 35 U.S.C. §

271(a).

19.   Upon information and belief, Defendants directly practice the methods of at least

claims 1–4, 8–9 and 12–13 of the '735 patent using the Accused Products through, for example,

demonstration and/or testing, as shown below:

> Back at the conference area at CES 2017, the GlocalMe proved to be of great help, especially at large conferences like CES. It was much easier to use your own wifi hotspot rather than logging in to the provided wifi connection with thousands of people hogging the service.

(https://www.glocalme.com/about/newsdetail?id=178)

(https://www.glocalme.com/service/cover)

20.   For example, on information and belief, each Accused Product practices a method of operating a foreign wireless communication device in a local communication network as a virtual local communication device, as shown below:

> "CloudSIM" services (brand-named GlocalMe®)empower travelers who wish to easily get high-speed mobile data access in over100+ countries and regionswithout the high cost of international roaming fees charged by their home mobile carriers. Upon arrival at a destination, GlocalMe customers can simply turn on their devices. Moments later, a "CloudSIM" would be dynamically loaded onto their devices, using the best 4G local carrier available. No need to find a local phone company to purchase a local SIM card, or wait to go through a complex registration process. Users only pay for the actual amount of data used (easily managed viaGlocalMe' s App), at anaffordable ratemuch lower than international data roaming charges. GlocalMe supported devices include a growing number of smartphones (e.g.,Xiaomi, CoolPad, etc.), as well as mobile MiFi hotspot devices (multiple models). The latter (which practically supports all existing smartphones/tablets) is offered by uCloudlink on a purchased (e.g., fromAmazon) orrentalbasis.
>
> The unique technology andarchitecture developed by uCloudlink differentiates it from other competitors. It is protected by over 20 international patents and goes way beyond the eSIM or Virtual SIM others talked about.

(https://www.ucloudlink.com/html/ucloudlink-solution/)

Cloud SIM – The smart switch between mobile networks in over 100 countries

Through our patented Cloud SIM technology, GlocalMe taps into a world's worth of SIM cards that are located throughout the globe. Our SIM cloud continues to grow leaps and bounds as we tap into new countries. By turning on the G2, your device will find the most optimal network and the corresponding SIM card in the cloud SIM which starts to convert the local mobile connection into Wi-Fi signals, making sure that it's within "domestic" roaming boundaries, and saving you, the user, from international charges.

G2 is the world's first global 4G Wi-Fi hotspot. Even as advanced as Google's Project Fi, our competitors don't have the worldwide 4G coverage, and their networks only function at a slow data speed.

(https://www.kickstarter.com/projects/787756203/glocalme-kills-sim-card-and-roaming-pains)

21.   For example, upon information and belief, each Accused Product practices enabling an initial setting of said foreign wireless communication device for enrolling said foreign wireless communication device in service, wherein said initial setting is based on communications between said foreign wireless communication device and a remote administration system, as shown below:

(https://www.glocalme.com/service/instruction)

22.   For example, upon information and belief, with respect to each Accused Product said foreign wireless communication device comprises a foreign wireless client and an extension unit which are coupled with each other, said extension unit wirelessly communicating directly with said foreign wireless client, said local communication network and said remote administration system, as shown below:

(https://www.amazon.com/GlocalMe-Hotspot-Upgraded-Worldwide-International/dp/B072KKF37M/ref=sr_1_3?ie=UTF8&qid=1528224511&sr=8-3&keywords=glocalme)

(https://www.indiegogo.com/projects/glocalme-u2-ultimate-wi-fi-everywhere-you-travel-internet--2#/)

【Travel With GlocalMe】 Be relax and bring a GlocalMe with you

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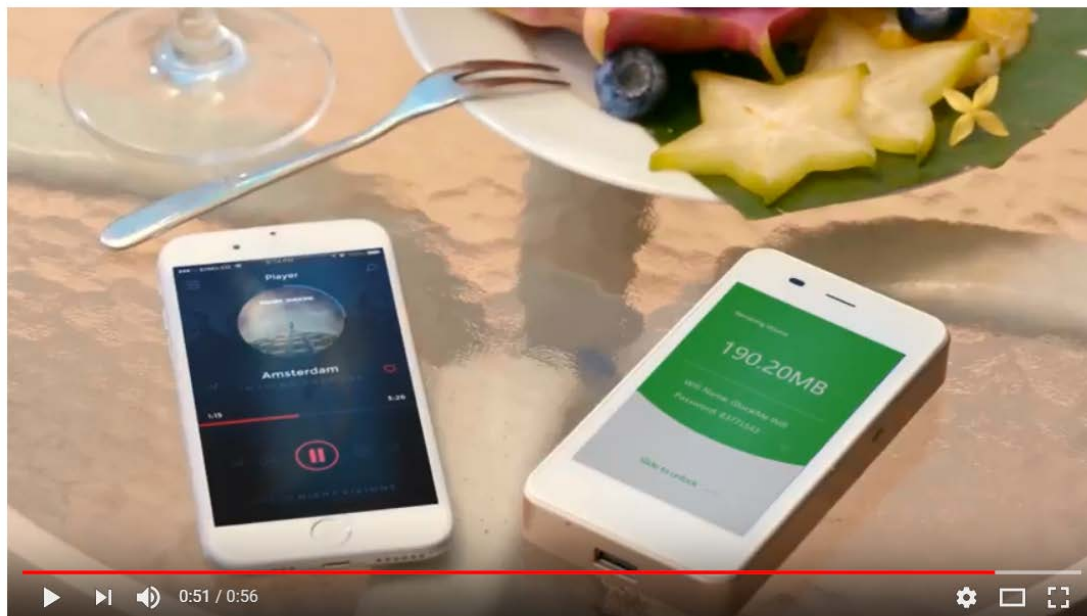
23.   For example, upon information and belief, with respect to each Accused Product said remote administration system further comprises at least one authentication server, at least one provisioning server, at least one communication server, at least one subscriber database, at least one routing database, and at least one authentication bank having a plurality of subscriber identity modules (SIMs), phones and authentication data, and wherein said at least one authentication server and said at least one provision server are coupled to a data network, as shown below:

(https://www.ucloudlink.com/html/hezuomoshi/)
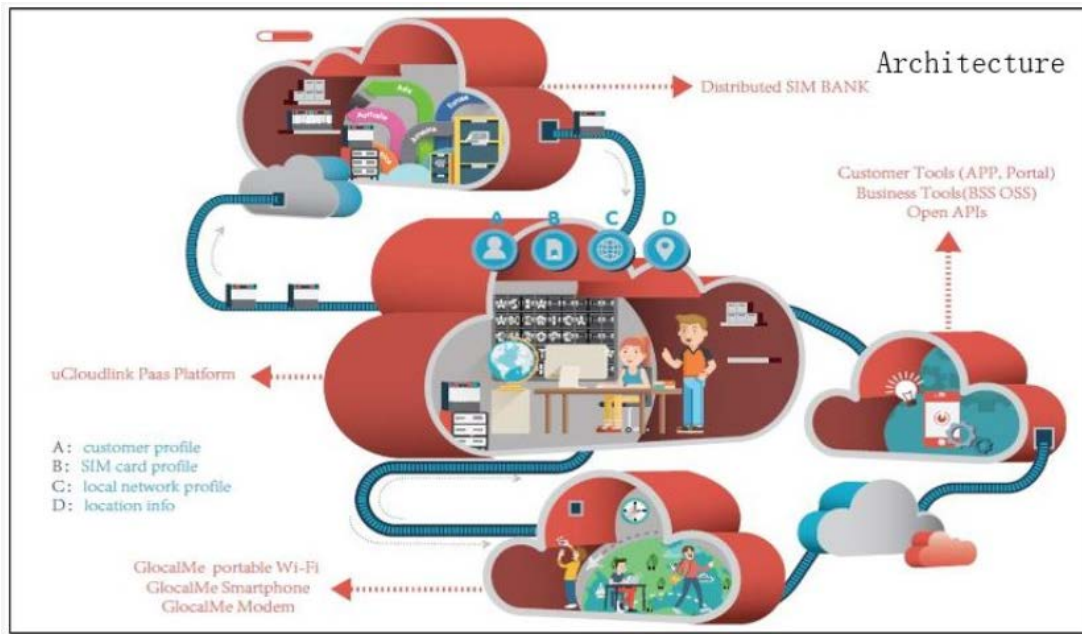
24.   For example, upon information and belief, each Accused Product practices establishing a data communication link to transmit information among said foreign wireless communication device, a service provider in said local communication network, and said remote administration system upon said enabling said initial setting, as shown below:

25.   For example, upon information and belief, with respect to each Accused Product said service provider comprises a plurality of mobile telephone switching centers and base cellular centers, and said service provider further is coupled to said data network and a phone network, as shown below:

(https://engage.att.com/oregon/wirelessbasics/)

26.   For example, upon information and belief, each Accused Product practices

establishing a local authentication information which includes a local number and an

International Mobile Subscriber Identity (IMSI) in response to a local authentication request by

said service provider to said foreign wireless client upon said established data communication

link, wherein said extension unit wirelessly relays said local authentication information request

to said at least one authentication server and obtains a suitable local authentication information

from said at least one authentication bank coupled to said at least one said authentication server,

as shown below:
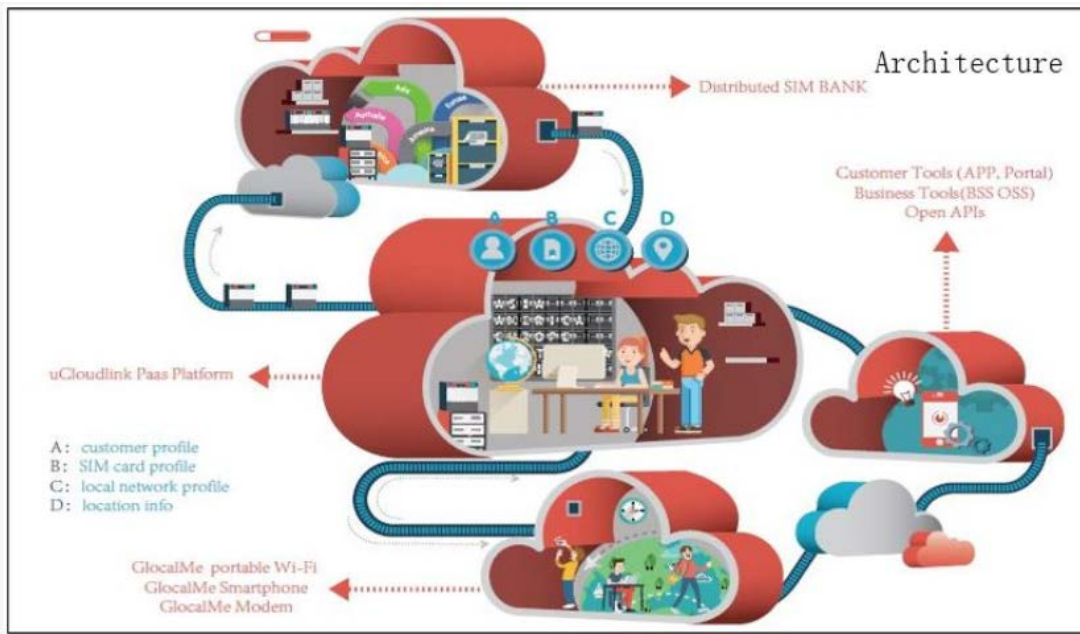
(https://www.ucloudlink.com/html/hezuomoshi/)

Cloud SIM Technology

In order to eliminate the soaring roaming costs when traveling abroad, uCloudlink has developed Cloud SIM technology which helps access different operators' networks, and gives people more freedom and effectiveness when moving from one country to another.

The Cloud SIM technology, requiring no local SIM card to access the Internet, frees people from worrying about data while on the move, or sticking to dodgy hotel and cafe WiFi between meetings.

(https://www.indiegogo.com/projects/glocalme-u2-ultimate-wi-fi-everywhere-you-travel-internet--2#/)

27.   For example, upon information and belief, each Accused Product practices establishing a virtual local wireless service provided by said service provider to said foreign

wireless client according to said obtained suitable local authentication information, wherein said virtual local wireless service is wirelessly requested by said extension unit through said remote administration system, as shown below:

"CloudSIM" services (brand-named GlocalMe®)empower travelers who wish to easily get high-speed mobile data access in over100+ countries and regionswithout the high cost of international roaming fees charged by their home mobile carriers. Upon arrival at a destination, GlocalMe customers can simply turn on their devices. Moments later, a "CloudSIM" would be dynamically loaded onto their devices, using the best 4G local carrier available. No need to find a local phone company to purchase a local SIM card, or wait to go through a complex registration process. Users only pay for the actual amount of data used (easily managed viaGlocalMe's App), at anaffordable ratemuch lower than international data roaming charges. GlocalMe supported devices include a growing number of smartphones (e.g.,Xiaomi, CoolPad, etc.), as well as mobile MiFi hotspot devices (multiple models). The latter (which practically supports all existing smartphones/tablets) is offered by uCloudlink on a purchased (e.g., fromAmazon) orrentalbasis.

The unique technology andarchitecture developed by uCloudlink differentiates it from other competitors. It is protected by over 20 international patents and goes way beyond the eSIM or Virtual SIM others talked about.

(https://www.ucloudlink.com/html/ucloudlink-solution/)

Cloud SIM - The smart switch between mobile networks in over 100 countries

Through our patented Cloud SIM technology, GlocalMe taps into a world's worth of SIM cards that are located throughout the globe. Our SIM cloud continues to grow leaps and bounds as we tap into new countries. By turning on the G2, your device will find the most optimal network and the corresponding SIM card in the cloud SIM which starts to convert the local mobile connection into Wi-Fi signals, making sure that it's within "domestic" roaming boundaries, and saving you, the user, from international charges.

G2 is the world's first global 4G Wi-Fi hotspot. Even as advanced as Google's Project Fi, our competitors don't have the worldwide 4G coverage, and their networks only function at a slow data speed.

(https://www.kickstarter.com/projects/787756203/glocalme-kills-sim-card-and-roaming-pains)

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(https://www.glocalme.com/mall/wifi?type=g3)

28.   For example, upon information and belief, each Accused Product practices providing a communication service to said foreign wireless communication device according to said established virtual wireless service, wherein said foreign wireless client becomes said virtual local wireless communication device acting as a local cellular phone with an assigned local phone number over a voice link via said phone network and/or said data link via said data network through said at least one communication server, as shown below:

15

(https://www.glocalme.com/service/instruction)
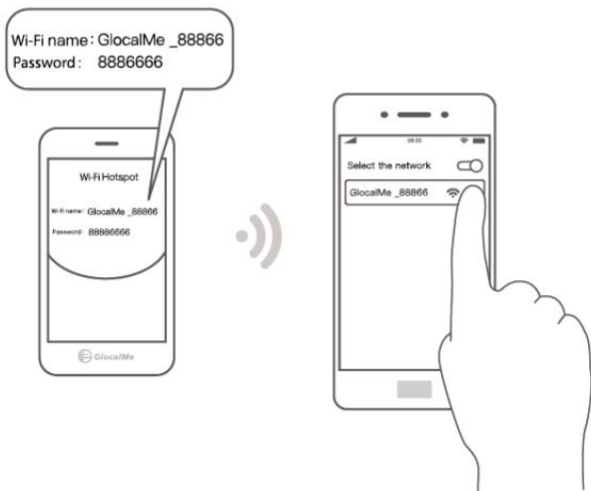
29.   For example, upon information and belief, with respect to each Accused Product

said at least one communication server is coupled to said data network, said phone network and

said at least one routing database having lists of preferred routing details for connections

between different geographic locations, and said assigned local phone number is based on said

obtained suitable local authentication information, as shown below:
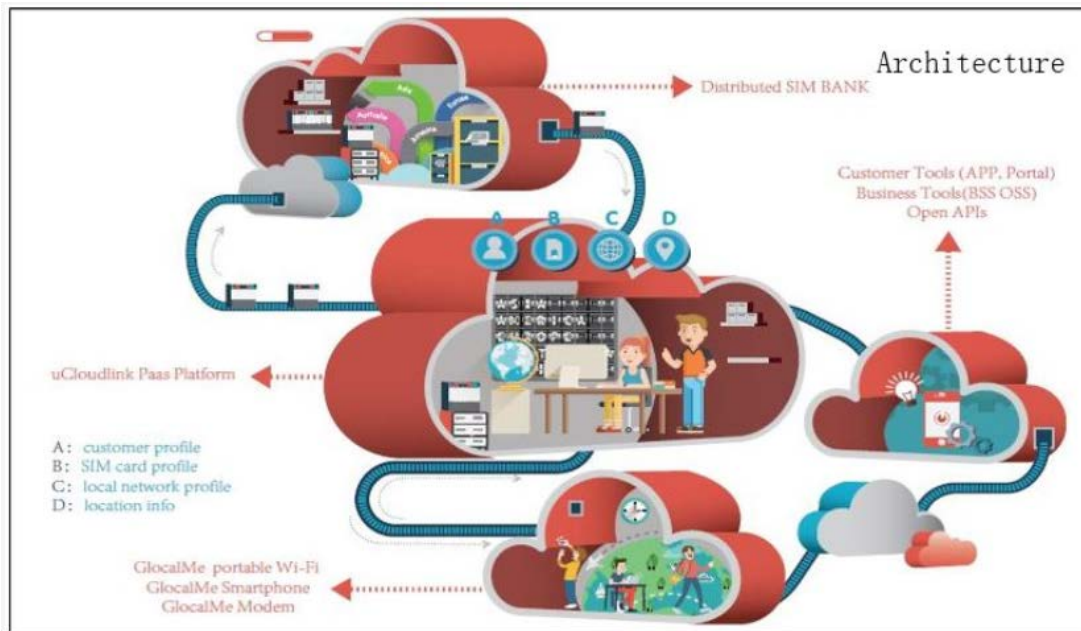
(https://www.ucloudlink.com/html/hezuomoshi/)

30.   For example, upon information and belief, each Accused Product practices sending said obtained suitable local authentication information by said extension unit to said service provider; and authenticating said extension unit as said virtual local wireless communication device, as shown below:

"CloudSIM"   services (brand-named GlocalMe®)empower travelers who wish to easily get high-speed mobile data access in over100+ countries and regionswithout the high cost of international roaming fees charged by their home mobile carriers. Upon arrival at a destination, GlocalMe customers can simply turn on their devices. Moments later, a "CloudSIM"   would be dynamically loaded onto their devices, using the best 4G local carrier available. No need to find a local phone company to purchase a local SIM card, or wait to go through a complex registration process. Users only pay for the actual amount of data used (easily managed viaGlocalMe's App), at anaffordable ratemuch lower than international data roaming charges. GlocalMe supported devices include a growing number of smartphones (e.g.,Xiaomi, CoolPad, etc.), as well as mobile MiFi hotspot devices (multiple models). The latter (which practically supports all existing smartphones/tablets) is offered by uCloudlink on a purchased (e.g., fromAmazon) orrentalbasis.

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(https://www.ucloudlink.com/html/ucloudlink-solution/)

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Through our patented Cloud SIM technology, GlocalMe taps into a world's worth of SIM cards that are located throughout the globe. Our SIM cloud continues to grow leaps and bounds as we tap into new countries. By turning on the G2, your device will find the most optimal network and the corresponding SIM card in the cloud SIM which starts to convert the local mobile connection into Wi-Fi signals, making sure that it's within "domestic" roaming boundaries, and saving you, the user, from international charges.

G2 is the world's first global 4G Wi-Fi hotspot. Even as advanced as Google's Project Fi, our competitors don't have the worldwide 4G coverage, and their networks only function at a slow data speed.

(https://www.kickstarter.com/projects/787756203/glocalme-kills-sim-card-and-roaming-pains)

(https://www.glocalme.com/mall/wifi?type=g3)
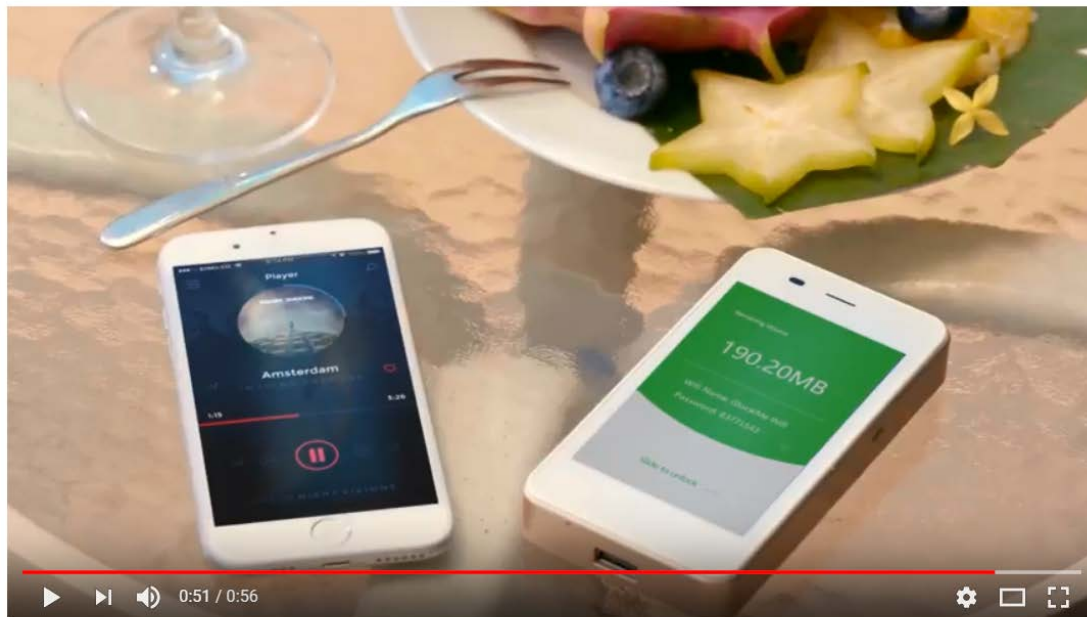
31.   For example, upon information and belief, with respect to each Accused Product practices said foreign wireless client and said extension unit are configured to two individual devices, as shown below:

(https://www.amazon.com/GlocalMe-Hotspot-Upgraded-Worldwide-International/dp/B072KKF37M/ref=sr_1_3?ie=UTF8&qid=1528224511&sr=8-3&keywords=glocalme)

(https://www.indiegogo.com/projects/glocalme-u2-ultimate-wi-fi-everywhere-you-travel-internet--2#/)

【Travel With GlocalMe】 Be relax and bring a GlocalMe with you

(https://www.youtube.com/watch?v=ksLXtsjBLmg)

32.　　Upon information and belief, Defendants also have been and are now indirectly infringing at least claims 1–4, 8–9 and 12–13 of the '735 patent.

33.　　Upon information and belief, Defendants have knowledge of the '735 patent and have been and are now actively inducing others, including their distributors, customers and end-users who use, sell or offer to sell the Accused Products, to directly infringe at least claims 1–4, 8–9 and 12–13 of the '735 patent.

34.　　Upon information and belief, Defendants provide and continue to provide manuals, training, guides, videos and/or demonstrations that induce their distributors, customers and/or end-users to perform acts intended by Defendants to directly infringe the '735 patent, for example as shown below. Defendants are therefore liable for inducing infringement of the '735 patent under 35 U.S.C. § 271(b).

20
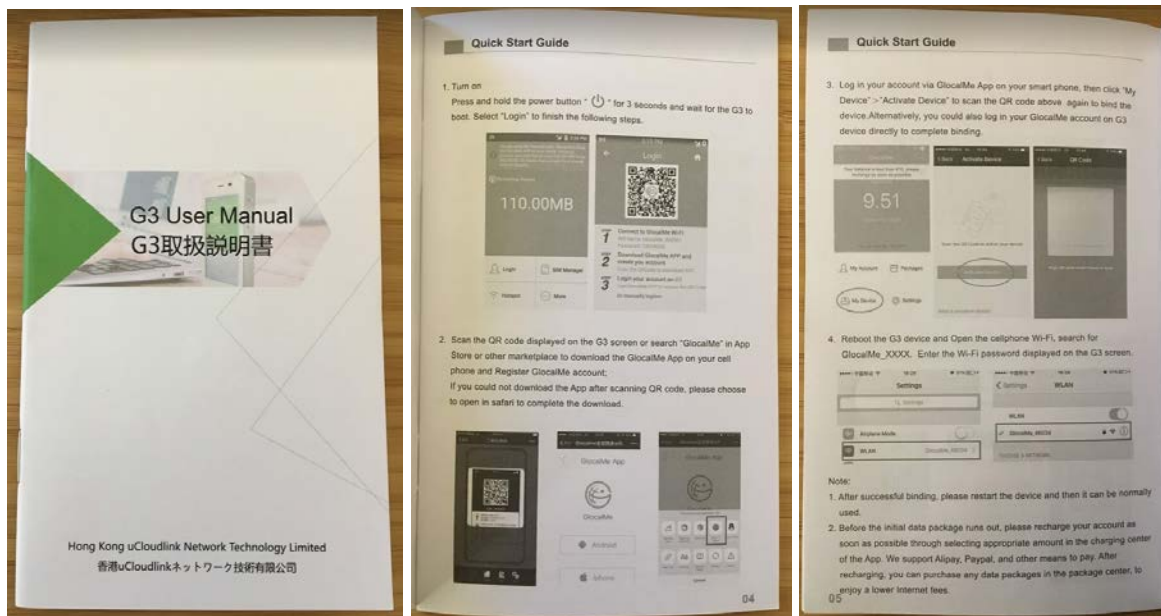
35.   Upon information and belief, Defendants have knowledge of the '735 patent and have been and are now contributing to infringement of at least claims 1–4, 8–9 and 12–13 of the '735 patent by others, including their distributors, customers and end-users. Upon information and belief, Defendants contribute to such infringement by providing and continuing to provide the Accused Products to their distributors, customers and end-users, which are specially made or adapted for use in a manner that infringes the '735 patent and are not staple articles of commerce suitable for substantial non-infringing use.

36.   Upon information and belief, Defendants have knowledge of the fact that the Accused Products are specially made or adapted for use to infringe the '735 patent and are not staple articles of commerce suitable for substantial non-infringing use. Defendants are therefore liable for contributory infringement of the '735 patent under 35 U.S.C. § 271(c).

37.   As a result of their infringement of the '735 patent, Defendants have damaged SIMO. Defendants are liable to SIMO in an amount to be determined at trial that adequately compensates SIMO for the infringement, which by law can be no less than a reasonable royalty.

38.   Defendants' acts have caused, and unless restrained and enjoined, will continue to

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cause, irreparable injury and damage to SIMO for which there is no adequate remedy at law.

39.   Upon information and belief, unless enjoined by this Court, Defendants will continue to infringe, both directly and indirectly, the '735 patent.

COUNT II

INFRINGEMENT OF U.S. PATENT NO. 9,736,689

40.   SIMO incorporates Paragraphs 1–39 of this First Amended Complaint as if set forth fully herein.

41.   Upon information and belief, Defendants have been and are now directly infringing the '689 patent by making, using, selling, and/or offering for sale in the United States and/or importing into the United States WiFi hotspot devices and mobile phones that practice or embody at least claims 1, 5–8, 10–14, and 19–20 of the '689 patent, including at least the Accused Products. Defendants are therefore liable for direct infringement of the '689 patent under 35 U.S.C. § 271(a).

42.   Upon information and belief, Defendants directly practice the methods of at least claims 1, 5–8, 10–14, and 19–20 of the '689 patent using the Accused Products through, for example, demonstration and/or testing, as shown below:

> Back at the conference area at CES 2017, the GlocalMe proved to be of great help, especially at large conferences like CES. It was much easier to use your own wifi hotspot rather than logging in to the provided wifi connection with thousands of people hogging the service.

(https://www.glocalme.com/about/newsdetail?id=178)

(https://www.glocalme.com/service/cover)

43.   For example, upon information and belief, each Accused Product requires an authentication bank comprising a plurality of physical identification modules.   Specifically, according to uCloudlink.com, "in addition to operating its own large CloudSIM data centers, uCloudlink also offers smaller "Local SIM Banks" that partners all over the world can operate locally."   (https://www.ucloudlink.com/html/sim-banks/).

44.   For example, upon information and belief, each Accused Product requires an authentication bank, wherein a physical identification module includes one or more memory, processors, programs, and computer readable media storing subscriber identity module and authentication information, at least one of the one or more programs stored in the memory comprises instructions executable by at least one of the one or more processors, as shown below:
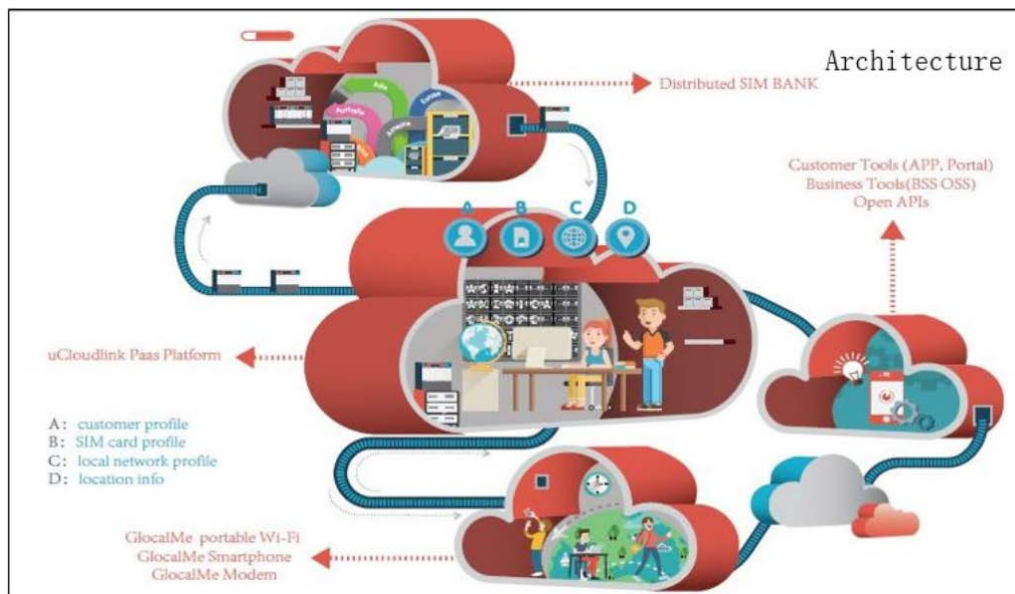
(Source: https://www.ucloudlink.com/html/paas-platform/)
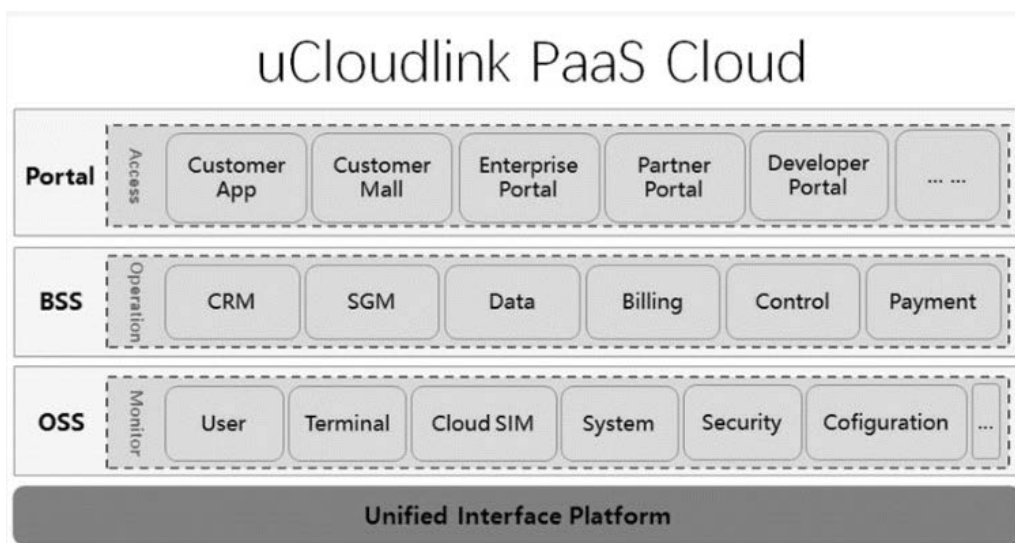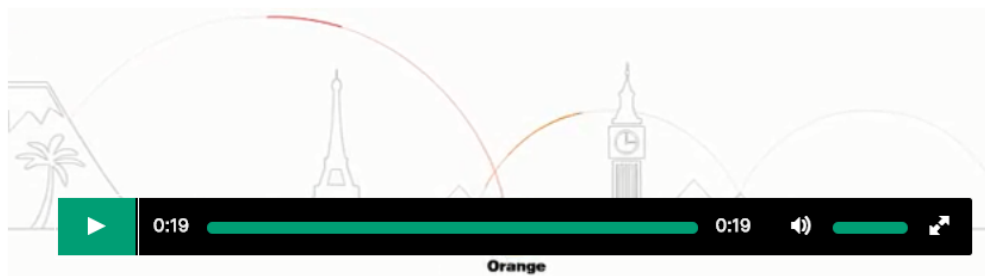
45.   For example, upon information and belief, each Accused Product practices

receiving a first request for authentication information, wherein the first request was transmitted

over a data channel, for associating a subscriber identity module (SIM) with a foreign wireless

communication client or an extension unit, wherein the SIM is subscribed to a local carrier for a

current location of the foreign wireless communication client or the extension unit, wherein the

foreign wireless communication client or the extension unit is a wireless device not subscribed to the local carrier, and wherein the first request for authentication information comprises information regarding a second request for local authentication information received by the foreign wireless communication client or the extension unit from the local carrier over a local cellular communication network, as shown below:
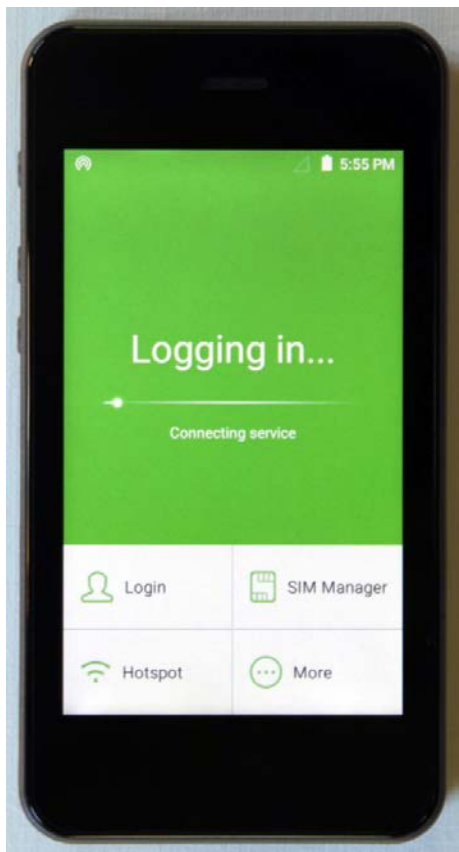
How it works

Cloud SIM - The smart switch between mobile networks in over 100 countries

Through our patented Cloud SIM technology, GlocalMe taps into a world's worth of SIM cards that are located throughout the globe. Our SIM cloud continues to grow leaps and bounds as we tap into new countries. By turning on the G2, your device will find the most optimal network and the corresponding SIM card in the cloud SIM which starts to convert the local mobile connection into Wi-Fi signals, making sure that it's within "domestic" roaming boundaries, and saving you, the user, from international charges.

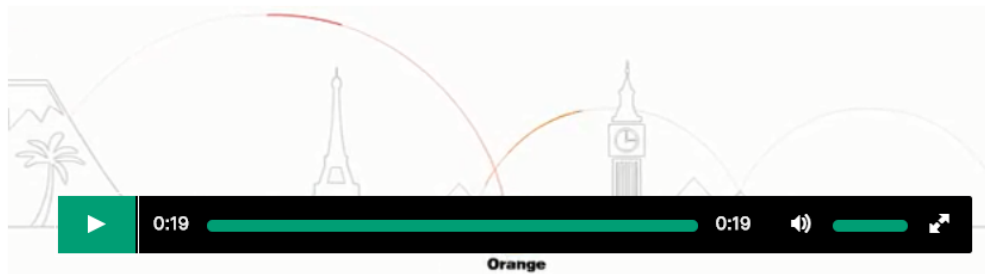(https://www.kickstarter.com/projects/787756203/glocalme-kills-sim-card-and-roaming-pains/description)

(GlocalMe G3)

(https://www.glocalme.com/mall/wifi?type=g3&giso=US)

46. For example, upon information and belief, each Accused Product practices retrieving subscriber identity information and authentication information for the foreign wireless communication client or the extension unit from the SIM, as shown below:

How it works

Cloud SIM - The smart switch between mobile networks in over 100 countries

Through our patented Cloud SIM technology, GlocalMe taps into a world's worth of SIM cards that are located throughout the globe. Our SIM cloud continues to grow leaps and bounds as we tap into new countries. By turning on the G2, your device will find the most optimal network and the corresponding SIM card in the cloud SIM which starts to convert the local mobile connection into Wi-Fi signals, making sure that it's within "domestic" roaming boundaries, and saving you, the user, from international charges.
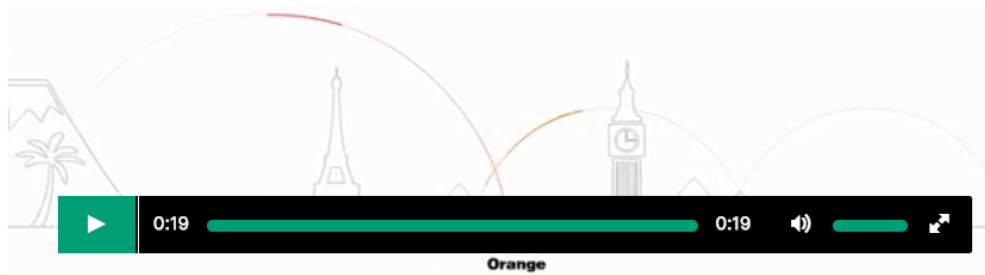
(https://www.kickstarter.com/projects/787756203/glocalme-kills-sim-card-and-roaming-pains/description)

27

(GlocalMe G3)

47.   For example, upon information and belief, each Accused Product practices

sending the subscriber identity information and the authentication information to the foreign

wireless communication client or the extension unit over the data channel, wherein the data

channel is distinct from local wireless services of the local carrier and wherein the authentication

information for the foreign wireless communication client or the extension unit retrieved from

the SIM is configured to be sent by the foreign wireless communication client or the extension

unit to the local carrier over signal link of the local cellular communication network to provision

a communication function from the local carrier for the foreign wireless communication client or

the extension unit, as shown below:
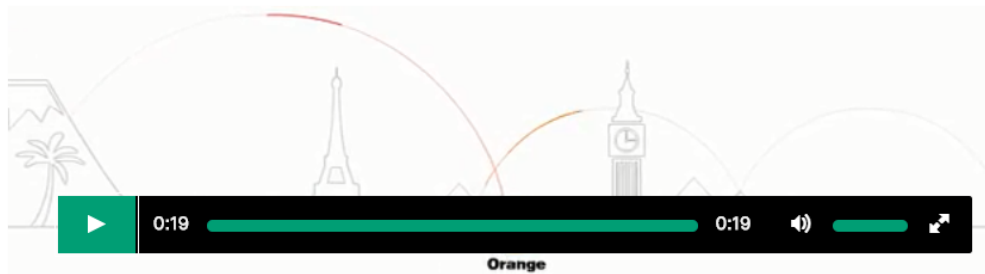
How it works

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(https://www.kickstarter.com/projects/787756203/glocalme-kills-sim-card-and-roaming-pains/description)

48.   For example, upon information and belief, each Accused Product practices sending the subscriber identity information and the authentication information to the foreign wireless communication client or the extension unit, wherein the subscriber identity information and the authentication information are stored by the foreign wireless communication client or the extension unit, as shown below:
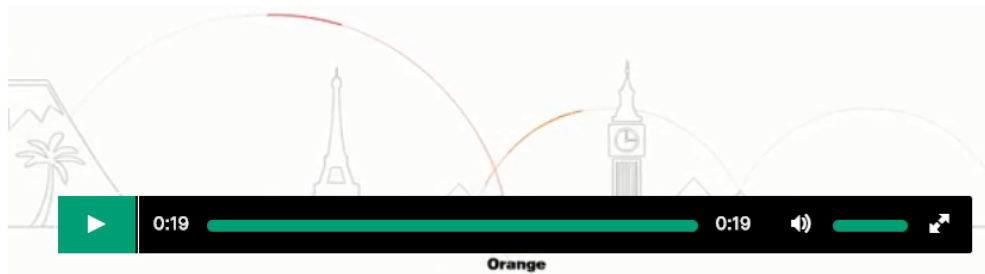
How it works

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(https://www.kickstarter.com/projects/787756203/glocalme-kills-sim-card-and-roaming-pains/description)

49.   For example, upon information and belief, each Accused Product practices determining a local wireless account to associate with the foreign wireless communication client or an extension unit, the local wireless account having a corresponding local telephone number, as shown below:
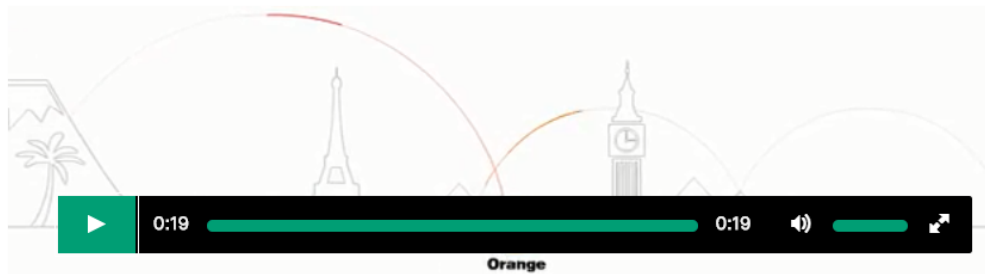
How it works

Cloud SIM - The smart switch between mobile networks in over 100 countries

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(https://www.kickstarter.com/projects/787756203/glocalme-kills-sim-card-and-roaming-pains/description)

50.   For example, upon information and belief, each Accused Product requires the authentication bank, wherein the first request for authentication information further comprises at least one of a unique subscriber identifier, a wireless communication client identifier, a password, and a current location of the foreign wireless communication client or the extension unit, as shown below:

How it works

Cloud SIM - The smart switch between mobile networks in over 100 countries
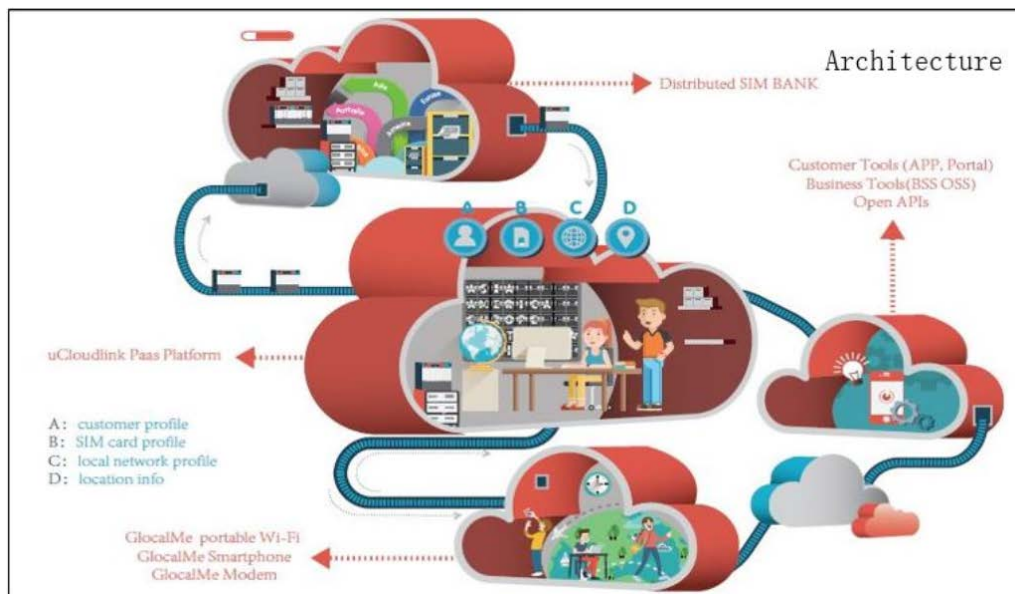
Through our patented Cloud SIM technology, GlocalMe taps into a world's worth of SIM cards that are located throughout the globe. Our SIM cloud continues to grow leaps and bounds as we tap into new countries. By turning on the G2, your device will find the most optimal network and the corresponding SIM card in the cloud SIM which starts to convert the local mobile connection into Wi-Fi signals, making sure that it's within "domestic" roaming boundaries, and saving you, the user, from international charges.

(https://www.kickstarter.com/projects/787756203/glocalme-kills-sim-card-and-roaming-pains/description)
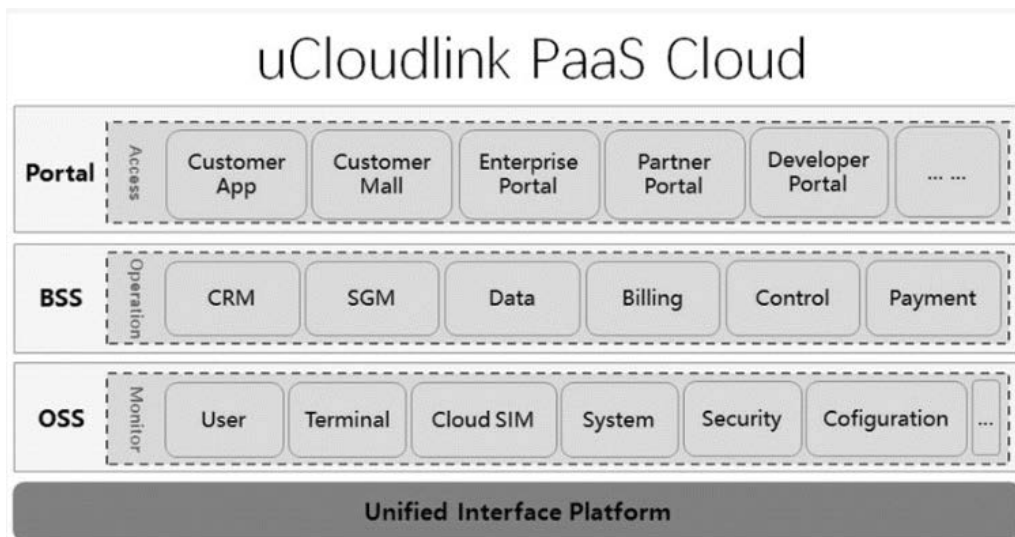
(GlocalMe G3)

51.   For example, upon information and belief, each Accused Product includes a

wireless communication client or extension unit comprising a plurality of memory, processors,

programs, communication circuitry, authentication data stored on a subscribed identify module

(SIM) card and/or in memory and non-local calls database, at least one of the plurality of

programs stored in the memory comprises instructions executable by at least one of the plurality

of processors. For example, according to uCloudlink.com, "in addition to operating its own large

CloudSIM data centers, uCloudLink also offers smaller "Local SIM Banks" that partners all over

the world can operate locally." (https://www.ucloudlink.com/html/sim-banks/). Further:

(https://www.ucloudlink.com/html/paas-platform/)

(https://www.ucloudlink.com/html/paas-platform/)
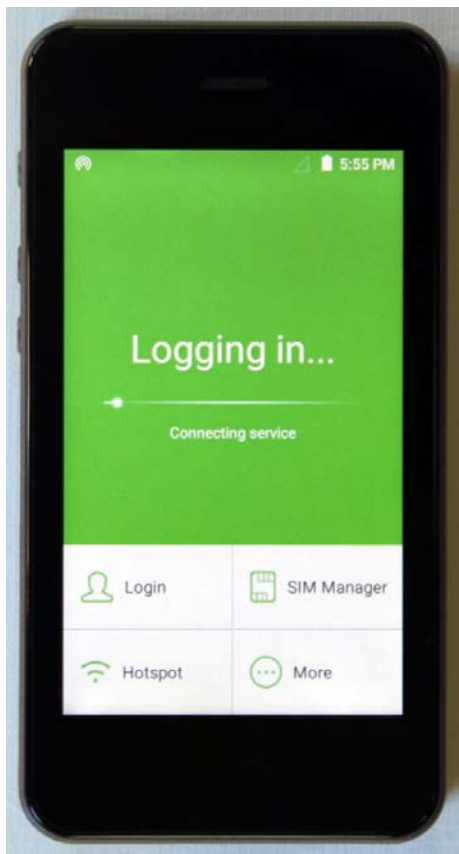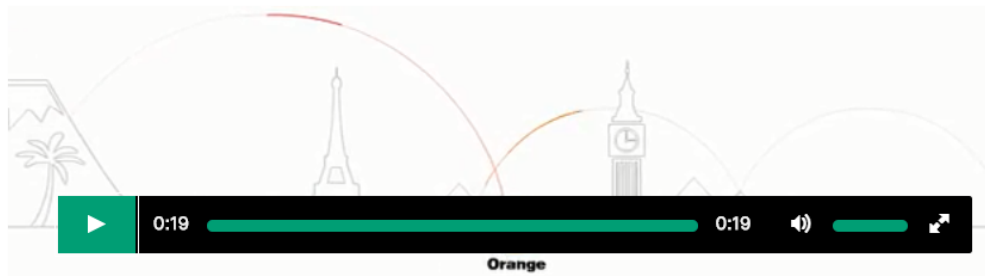
52. For example, upon information and belief, each Accused Product practices enabling an initial setting of the wireless communication client or the extension unit and a remote administration system, in addition to establishing a data communication link to transmit information among the wireless communication client or the extension unit, and the remote administration system, as shown below:

34

35

(GlocalMe G3)

53.   For example, upon information and belief, each Accused Product practices establishing a local authentication information request in response to a local authentication request by a local cellular communication network, wherein the local authentication information request comprises information regarding the local authentication request for local authentication information received by the foreign wireless communication client or the extension unit from the local cellular communication network, and wherein the data communication link is distinct from the local cellular communication network, as shown below:
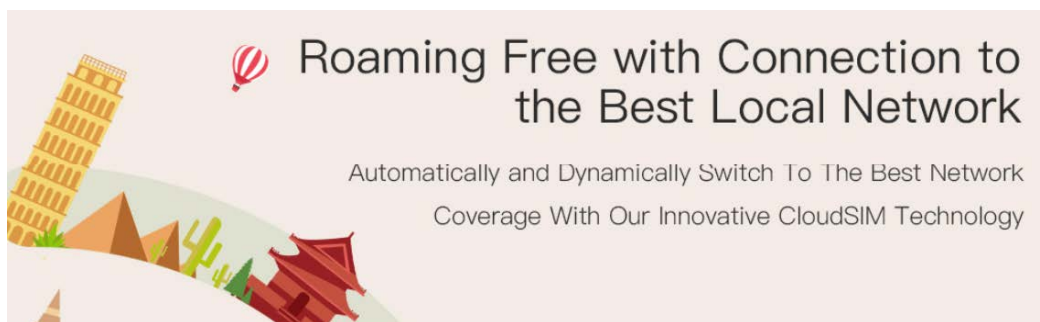
How it works

Cloud SIM - The smart switch between mobile networks in over 100 countries

Through our patented Cloud SIM technology, GlocalMe taps into a world's worth of SIM cards that are located throughout the globe. Our SIM cloud continues to grow leaps and bounds as we tap into new countries. By turning on the G2, your device will find the most optimal network and the corresponding SIM card in the cloud SIM which starts to convert the local mobile connection into Wi-Fi signals, making sure that it's within "domestic" roaming boundaries, and saving you, the user, from international charges.

(https://www.kickstarter.com/projects/787756203/glocalme-kills-sim-card-and-roaming-pains/description)

Roaming Free with Connection to the Best Local Network

Automatically and Dynamically Switch To The Best Network Coverage With Our Innovative CloudSIM Technology
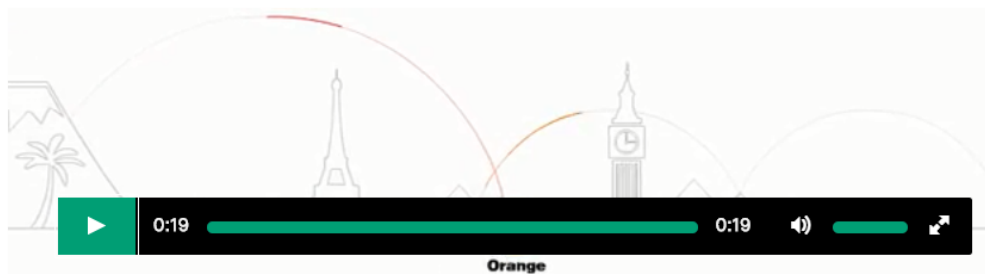
(https://www.glocalme.com/mall/wifi?type=g3&giso=US)

54.   For example, upon information and belief, each Accused Product practices establishing a local authentication information request in response to a local authentication request by a local cellular communication network, wherein the local authentication information request comprises information regarding the local authentication request for local authentication information received by the foreign wireless communication client or the extension unit from the

local cellular communication network, and wherein the data communication link is distinct from

the local cellular communication network, as shown below:

How it works

Orange

Cloud SIM - The smart switch between mobile networks in over 100 countries

Through our patented Cloud SIM technology, GlocalMe taps into a world's worth of SIM
cards that are located throughout the globe. Our SIM cloud continues to grow leaps and
bounds as we tap into new countries. By turning on the G2, your device will find the most
optimal network and the corresponding SIM card in the cloud SIM which starts to convert
the local mobile connection into Wi-Fi signals, making sure that it's within "domestic"
roaming boundaries, and saving you, the user, from international charges.

(https://www.kickstarter.com/projects/787756203/glocalme-kills-sim-card-and-roaming-
pains/description)

Roaming Free with Connection to
the Best Local Network

Automatically and Dynamically Switch To The Best Network
Coverage With Our Innovative CloudSIM Technology

(https://www.glocalme.com/mall/wifi?type=g3&giso=US)

    55.   For example, upon information and belief, each Accused Product practices

relaying the local authentication information request to the remote administration system via the

data communication link and obtaining suitable local authentication information from the remote

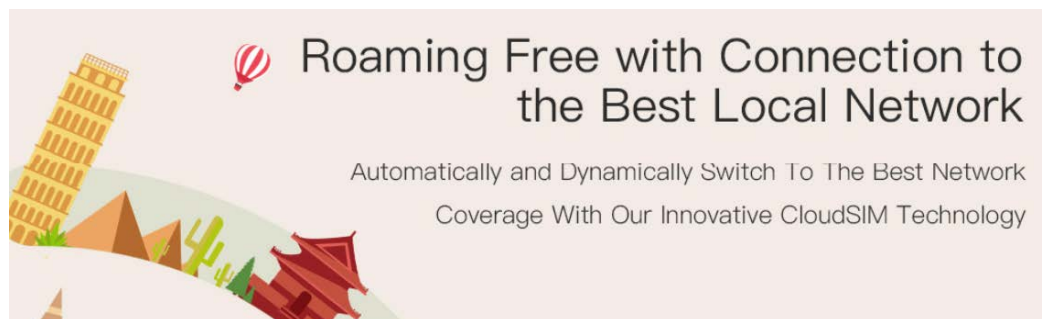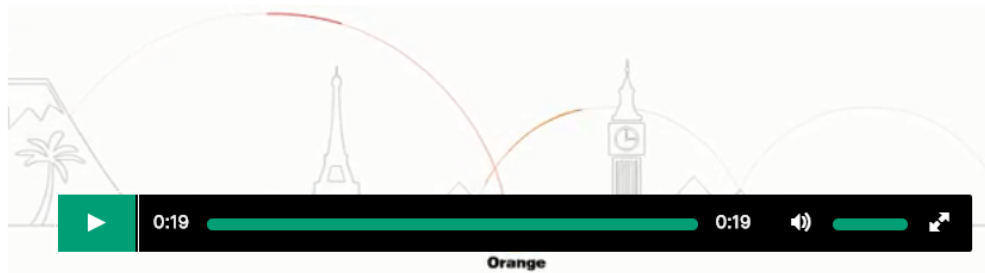administration system via the data communication link, as shown below:

How it works

Cloud SIM - The smart switch between mobile networks in over 100 countries

Through our patented Cloud SIM technology, GlocalMe taps into a world's worth of SIM cards that are located throughout the globe. Our SIM cloud continues to grow leaps and bounds as we tap into new countries. By turning on the G2, your device will find the most optimal network and the corresponding SIM card in the cloud SIM which starts to convert the local mobile connection into Wi-Fi signals, making sure that it's within "domestic" roaming boundaries, and saving you, the user, from international charges.

(https://www.kickstarter.com/projects/787756203/glocalme-kills-sim-card-and-roaming-pains/description)

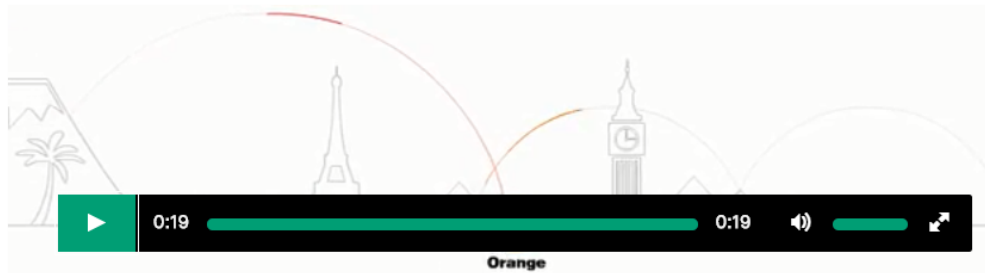(https://www.glocalme.com/mall/wifi?type=g3&giso=US)

56.   For example, upon information and belief, each Accused Product practices establishing local wireless services provided by the local cellular communication network to the wireless communication client or the extension unit by sending the local authentication information obtained from the remote administration system to the local cellular communication
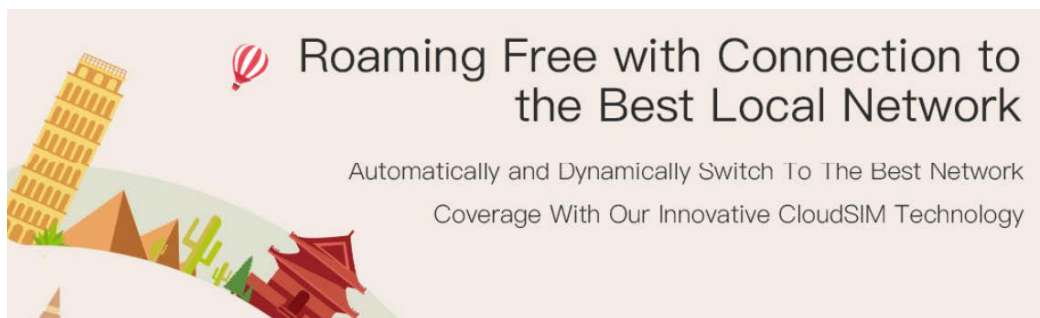
network over signal link, as shown below:

How it works

Orange

Cloud SIM - The smart switch between mobile networks in over 100 countries

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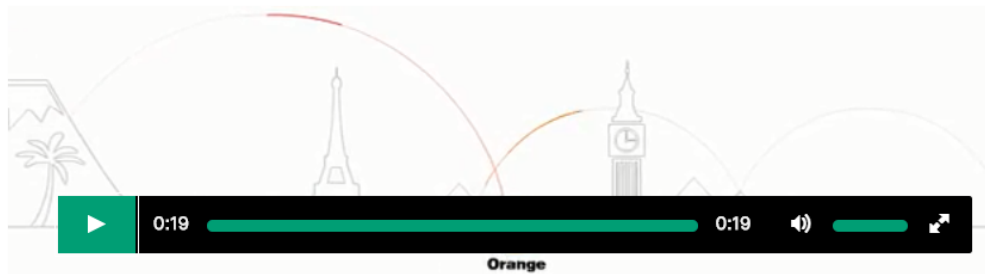
(https://www.kickstarter.com/projects/787756203/glocalme-kills-sim-card-and-roaming-pains/description)

Roaming Free with Connection to the Best Local Network

Automatically and Dynamically Switch To The Best Network Coverage With Our Innovative CloudSIM Technology

(https://www.glocalme.com/mall/wifi?type=g3&giso=US)

    57.   For example, upon information and belief, each Accused Product practices

providing a communication service to the wireless communication client or the extension unit

according to the established local wireless services, as shown below:

39

How it works

Orange

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Through our patented Cloud SIM technology, GlocalMe taps into a world's worth of SIM cards that are located throughout the globe. Our SIM cloud continues to grow leaps and bounds as we tap into new countries. By turning on the G2, your device will find the most optimal network and the corresponding SIM card in the cloud SIM which starts to convert the local mobile connection into Wi-Fi signals, making sure that it's within "domestic" roaming boundaries, and saving you, the user, from international charges.

(https://www.kickstarter.com/projects/787756203/glocalme-kills-sim-card-and-roaming-pains/description)

https://www.glocalme.com/mall/wifi?type=g3&giso=US)

    58.   For example, upon information and belief, each Accused Product practices storing the local authentication information and relaying the stored local authentication information to the local cellular communication network when the local cellular communication network attempts to re-authenticate the local authentication information, as shown below:
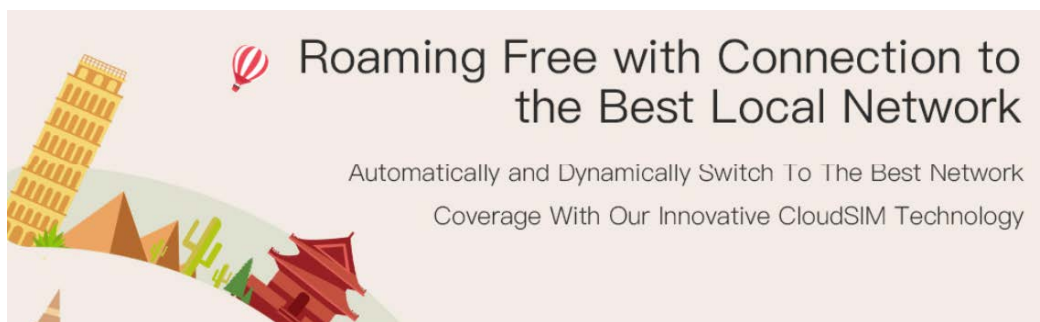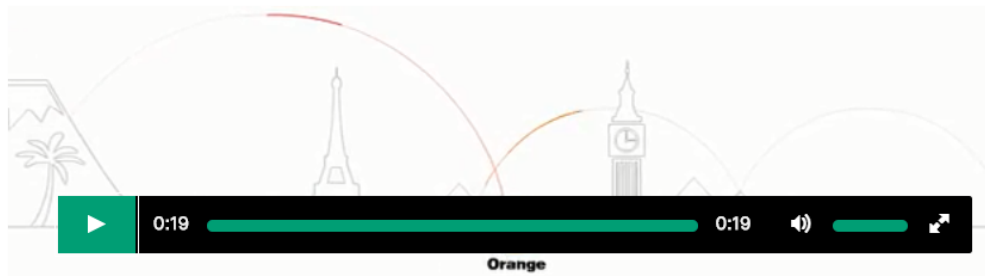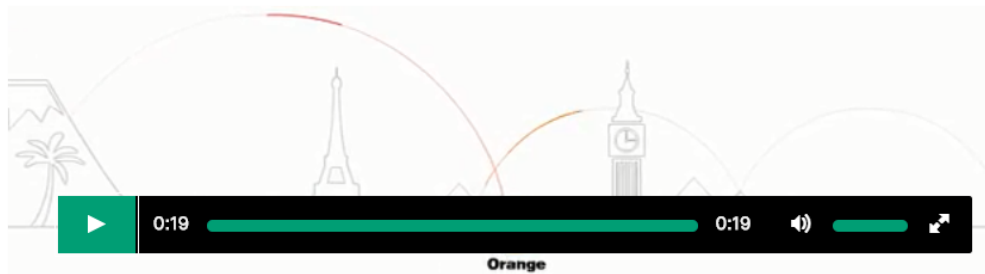
40

How it works

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(https://www.kickstarter.com/projects/787756203/glocalme-kills-sim-card-and-roaming-pains/description)

59.   For example, upon information and belief, each Accused Product practices relaying verification information to the remote administration system, wherein the verification information identifies the wireless communication client or extension unit as being associated with a user account of the remote administration system, as shown below:

How it works

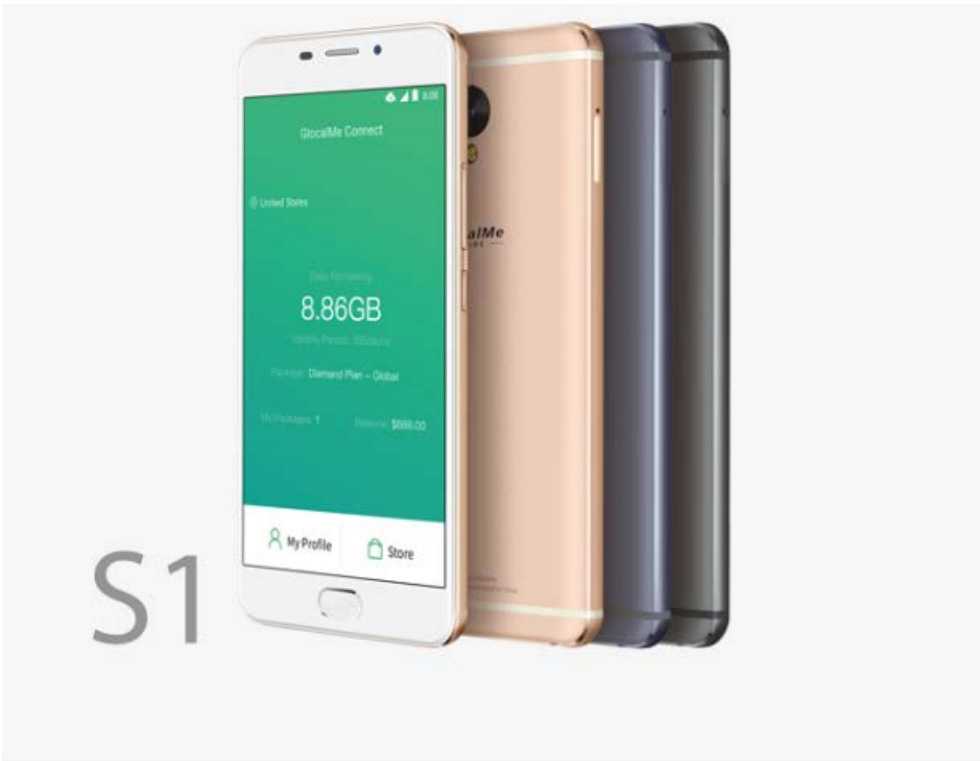Cloud SIM - The smart switch between mobile networks in over 100 countries

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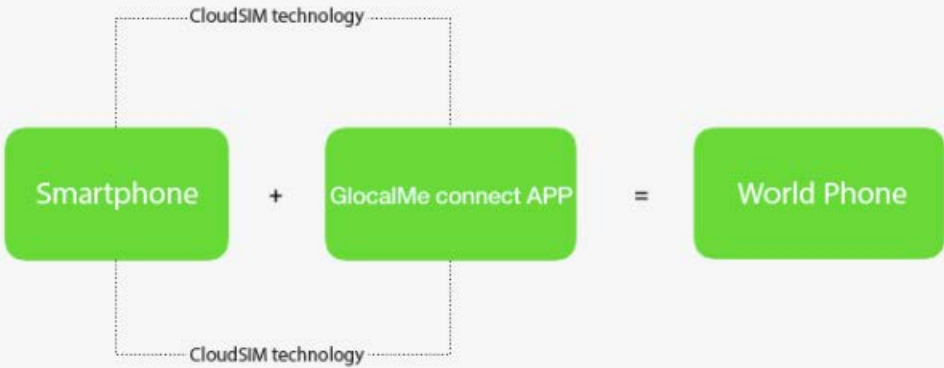(https://www.kickstarter.com/projects/787756203/glocalme-kills-sim-card-and-roaming-pains/description)

60.   For example, upon information and belief, each Accused Product includes the wireless communication client or the extension unit, comprising a foreign wireless communication device not subscribed to the local network, as shown below:

Global Private Wi–Fi
The New GlocalMe G3

(https://www.glocalme.com/mall/wifi?type=g3&giso=US)\

42

43

(https://www.ucloudlink.com/html/world-phone/)

      61.   For example, upon information and belief, each Accused Product practices requesting access to a desired local wireless service by sending a request to the local cellular communication network over a signal link, as shown below:

How it works

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(https://www.kickstarter.com/projects/787756203/glocalme-kills-sim-card-and-roaming-pains/description)

(https://www.glocalme.com/mall/wifi?type=g3&giso=US)
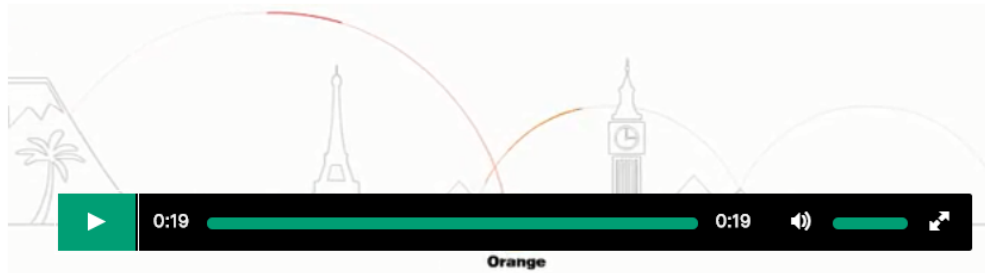
62.   For example, upon information and belief, each Accused Product includes the local authentication information request for authentication information, comprising at least one of a unique subscriber identifier, a wireless communication client identifier, a password, and a current location of the foreign wireless communication client or the extension unit, as shown

44

below:

How it works

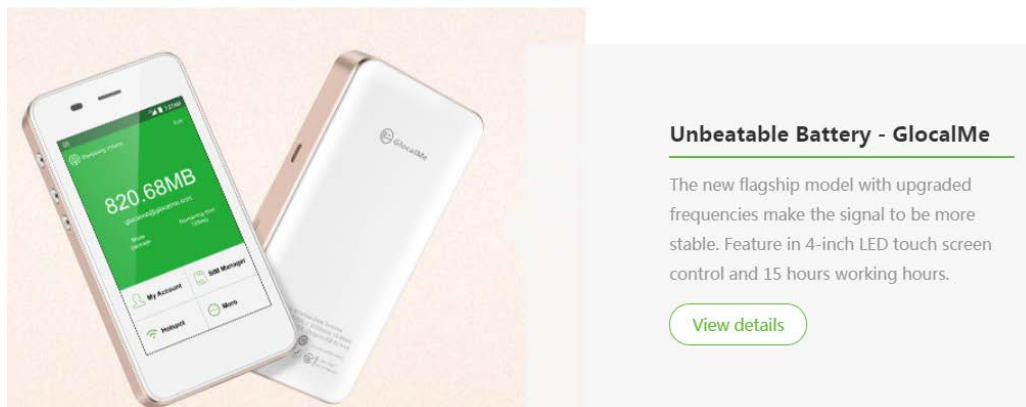Cloud SIM - The smart switch between mobile networks in over 100 countries

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(https://www.kickstarter.com/projects/787756203/glocalme-kills-sim-card-and-roaming-pains/description)

63.   For example, upon information and belief, each Accused Product practices a method for operating a mobile telecommunications device in a communication network, as shown below:
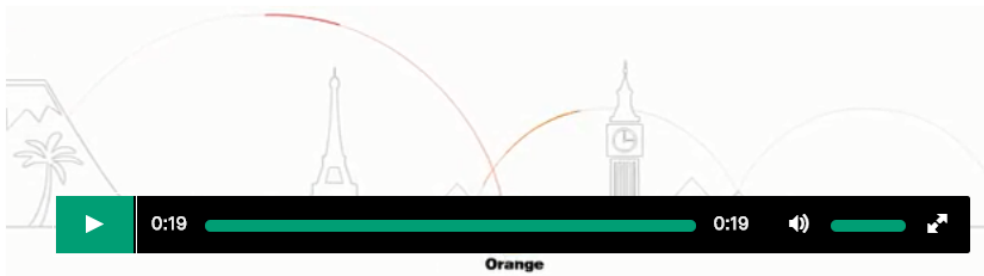
The Best Mobile Wi-Fi Hotspot
— INNOVATIVE TRAVEL TECHNOLOGY AND COMPANION —

Unbeatable Battery - GlocalMe

The new flagship model with upgraded frequencies make the signal to be more stable. Feature in 4-inch LED touch screen control and 15 hours working hours.

(View details)

(https://www.glocalme.com/)

    64.   For example, upon information and belief, each Accused Product practices receiving a first request, via a data channel, for associating a subscriber identity module (SIM) with a mobile telecommunications device, wherein the SIM is subscribed to a local carrier for a current location of the mobile telecommunications device and the mobile telecommunications device is not subscribed to the local carrier, and wherein the first request comprises information regarding a second request from the local carrier received by the mobile telecommunications device over a local cellular communication network for local authentication information, as shown below:

How it works

Orange

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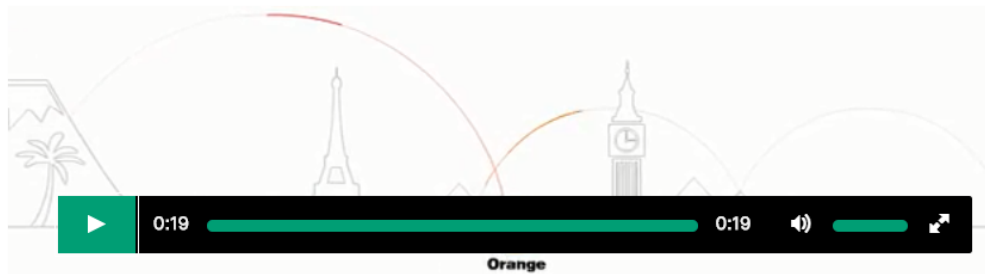
(https://www.kickstarter.com/projects/787756203/glocalme-kills-sim-card-and-roaming-pains/description)

(https://www.glocalme.com/mall/wifi?type=g3&giso=US)

65.   For example, upon information and belief, each Accused Product practices retrieving authentication information for the mobile telecommunications device from the SIM in response to receiving the first request for associating the SIM with the mobile telecommunications device, as shown below:
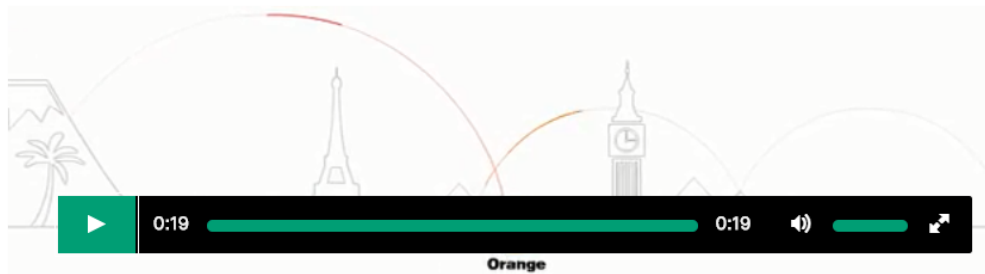
47

How it works

Cloud SIM - The smart switch between mobile networks in over 100 countries

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(https://www.kickstarter.com/projects/787756203/glocalme-kills-sim-card-and-roaming-pains/description)

66.   For example, upon information and belief, each Accused Product practices sending the authentication information to the mobile telecommunications device over the data channel, wherein the data channel is not associated with a local wireless service provided to a subscriber of the local carrier and wherein the authentication information for the mobile telecommunications device retrieved from the SIM is configured to be sent by the foreign wireless communication client or the extension unit to the local carrier over signal link of the local cellular communication network to provision a communication service from the local carrier for the mobile telecommunications device, as shown below:

How it works

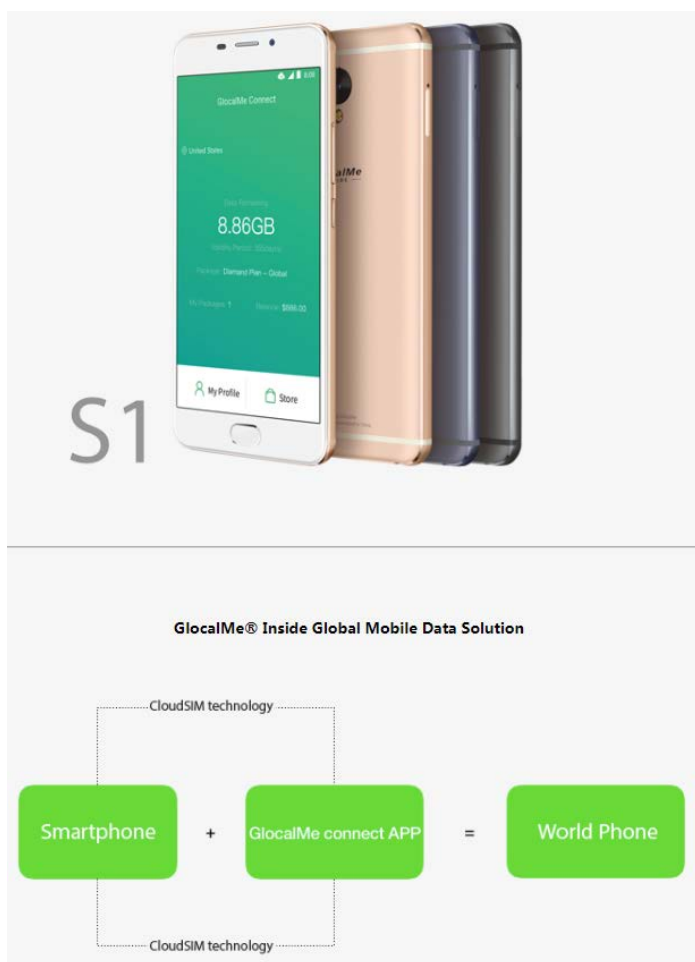## Cloud SIM - The smart switch between mobile networks in over 100 countries

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(https://www.kickstarter.com/projects/787756203/glocalme-kills-sim-card-and-roaming-pains/description)

67.   For example, upon information and belief, each Accused product also includes a

mobile telecommunications device that is a foreign wireless communications client or an

extension unit, as shown below:

(https://www.glocalme.com/mall/wifi?type=g3&giso=US)

GlocalMe® Inside Global Mobile Data Solution

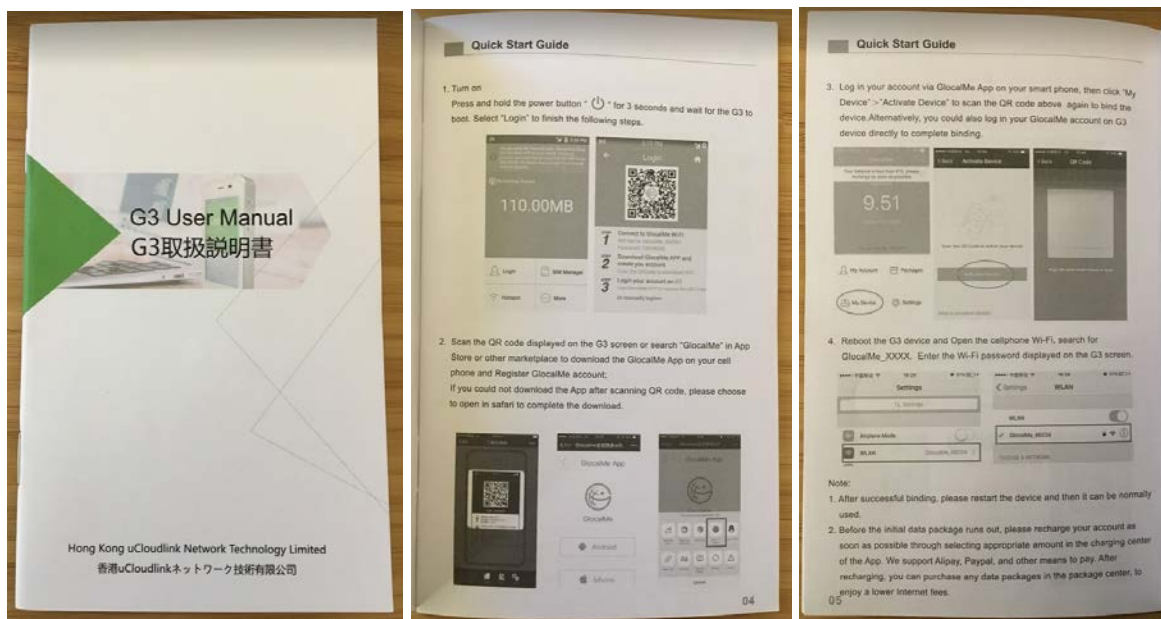(https://www.ucloudlink.com/html/world-phone/)

68.   Upon information and belief, Defendants also have been and are now indirectly infringing at least claims 1, 5–8, 10–14, and 19–20 of the '689 patent.

69.   At least as early as August 13, 2018, Defendants had and continue to have knowledge of the '689 patent and have been and are now actively inducing others, including their distributors, customers and end-users who use, sell or offer to sell the Accused Products, to directly infringe at least claims 1, 5–8, 10–14, and 19–20 of the '689 patent.

70.   Upon information and belief, Defendants provide and continue to provide manuals, training, guides, videos and/or demonstrations that induce their distributors, customers and/or end-users to perform acts intended by Defendants to directly infringe the '689 patent, for

example as shown below. Defendants are therefore liable for inducing infringement of the '689

patent under 35 U.S.C. § 271(b).

71.   At least as early as August 13, 2018, Defendants had and continue to have

knowledge of the '689 patent and have been and are now contributing to infringement of at least

claims 1, 5–8, 10–14, and 19–20 of the '689 patent by others, including their distributors,

customers and end-users. Upon information and belief, Defendants contribute to such

infringement by providing and continuing to provide the Accused Products to their distributors,

customers and end-users, which are specially made or adapted for use in a manner that infringes

the '689 patent and are not staple articles of commerce suitable for substantial non-infringing

use.

72.   Upon information and belief, Defendants have knowledge of the fact that the

Accused Products are specially made or adapted for use to infringe the '689 patent and are not

staple articles of commerce suitable for substantial non-infringing use. Defendants are therefore

liable for contributory infringement of the '689 patent under 35 U.S.C. § 271(c).

73.   As a result of their infringement of the '689 patent, Defendants have damaged

SIMO. Defendants are liable to SIMO in an amount to be determined at trial that adequately

compensates SIMO for the infringement, which by law can be no less than a reasonable royalty.

74.   Defendants' acts have caused, and unless restrained and enjoined, will continue to

cause, irreparable injury and damage to SIMO for which there is no adequate remedy at law.

75.   Upon information and belief, unless enjoined by this Court, Defendants will

continue to infringe, both directly and indirectly, the '689 patent.

PRAYER FOR RELIEF

WHEREFORE, SIMO prays that this Court:

A.   Enter judgment that Defendants have infringed the '735 patent and the '689

patent;

B.   Enter an order preliminarily and permanently enjoining Defendants, their officers,

agents, servants, employees, attorneys, and all persons acting in concert or participation with it,

from infringing the '735 patent and the '689 patent;

C.   Award SIMO its damages resulting from Defendants' patent infringement

pursuant to 35 U.S.C. § 284, including its lost profits;

D.   Find that Defendants' patent infringement has been willful and increase the

damages awarded to SIMO up to three times the amount assessed, pursuant to 35 U.S.C. § 284;

E.   Find this to be an exceptional case and award SIMO its attorneys' fees and costs,

pursuant to 35 U.S.C. § 285;

F.   Award SIMO its prejudgment interest and post judgment interest on its damages,

attorneys' fees and cost; and

G.   Award SIMO such other and further relief as this Court deems just and proper,

including but not limited to an accounting for pre-judgment infringements made but not

otherwise awarded to SIMO.

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JURY DEMAND

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SIMO hereby demands a trial by jury on all issues triable to a jury in this case.

Dated: August 20, 2018   Respectfully submitted,

/s/ Matthew J. Weldon

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