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15 *Attorneys for Plaintiffs*

16 Cellular Transitions, LLC

17 UNITED STATES DISTRICT COURT

18 SOUTHERN DISTRICT OF CALIFORNIA

19 CELLULAR TRANSITIONS, LLC,

20 Plaintiff,

21 v.

22 LG ELECTRONICS, INC., LG
23 ELECTRONICS U.S.A., INC.; LG
24 ELECTRONICS MOBILECOMM
25 U.S.A., INC.,

26 Defendants.

Case No. '18CV1955 BTM JMA

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

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1 Plaintiff Cellular Transitions, LLC (“CellTran”), by and through the
2 undersigned counsel, hereby brings this action and makes the following allegations
3 of patent infringement relating to U.S. Patent Nos. 8,855,637 (“the ’637 patent”)
4 and 9,888,425 (“the ’425 patent”) against one or more of LG Electronics, Inc., LG
5 Electronics U.S.A., Inc. and LG Electronics Mobilecomm U.S.A., Inc.
6 (collectively, “LG”), and alleges as follows upon actual knowledge with respect to
7 itself and its own acts, and upon information and belief as to all other matters.

8 **NATURE OF THE ACTION**

9 1. This is an action for patent infringement. CellTran alleges that LG
10 infringes one or more claims of the ’637 patent and the ’425 patent, copies of which
11 are attached as Exhibits A-B, respectively (collectively “the Asserted Patents”).

12 **THE PARTIES**

13 2. Plaintiff CellTran is a Texas limited liability company with its
14 principal place of business in Plano, Texas.

15 3. Upon information and belief, LG Electronics, Inc. is incorporated
16 under the laws of South Korea with its principal place of business at LG Twin
17 Towers 20, Yeouido-dong, Yeongdeunspo-gu, Seoul 150-721, South Korea. Upon
18 information and belief, LG Electronics, Inc. owns and controls, directly and/or
19 indirectly, LG Electronics U.S.A., Inc. and LG Electronics Mobilecomm U.S.A.,
20 Inc.

21 4. Upon information and belief, LG Electronics U.S.A., Inc. is a
22 Delaware corporation with its principal place of business at 1000 Sylvan Ave.,
23 Englewood Cliffs, New Jersey 07632.

24 5. Upon information and belief, LG Electronics Mobilecomm U.S.A.,
25 Inc. is a California corporation with its principal place of business at 10225 Willow
26 Creek Rd., San Diego, California, 92131. LG Electronics Mobilecomm U.S.A.,
27 Inc. may be served via its registered agent, Corporation Service Company (which
28

1 will do business in California as CSC – Lawyers Incorporating Service), 2710
2 Gateway Oaks Dr., Suite 150N, Sacramento, California 95833.

3 **JURISDICTION AND VENUE**

4 6. This action for patent infringement arises under the Patent Laws of the
5 United States, 35 U.S.C. § 1 et. seq. This Court has original jurisdiction under 28
6 U.S.C. §§ 1331 and 1338.

7 7. This Court has both general and specific personal jurisdiction over LG
8 because LG has committed acts within the Southern District of California giving
9 rise to this action and has established minimum contacts with this forum such that
10 the exercise of jurisdiction over LG would not offend traditional notions of fair play
11 and substantial justice. LG, directly and through subsidiaries and intermediaries
12 (including distributors, retailers, franchisees and others), has committed and
13 continues to commit acts of infringement in this District by, among other things,
14 making, using, testing, selling, importing, and/or offering for sale products that
15 infringe the Asserted Patents.

16 8. Venue is proper in this district and division under 28 U.S.C.
17 §§1391(b)-(d) and 1400(b) because LG transacts business in the Southern District
18 of California, has committed and continues to commit acts of direct infringement in
19 the Southern District of California, and has established places of business in the
20 Southern District of California.

21 **COUNT 1: INFRINGEMENT OF THE '637 PATENT**

22 9. The allegations of paragraphs 1-8 of this Complaint are incorporated
23 by reference as though fully set forth herein.

24 10. CellTran owns by assignment the entire right, title, and interest in the
25 '637 patent.

26 11. The '637 patent was issued by the United States Patent and Trademark
27 Office on October 7, 2014, and is titled "Methods and Apparatus for Performing
28 Handoff Based on the Mobility of a Subscriber Station." A true and correct copy of

1 the '637 patent is attached as Exhibit A.

2 12. Upon information and belief, LG has infringed at least claim 13 of the
3 '637 patent by making, using, testing, selling, offering for sale, importing and/or
4 licensing in the United States licensed assisted access (LAA) mobile devices,
5 including at least the V30 & V30+, V30S ThinQ, G7 ThinQ, V35 ThinQ, and V40
6 ThinQ smartphones (collectively the "Accused Infringing Devices") in an
7 exemplary manner as described below.

8 13. The Accused Infringing Devices are subscriber stations, sometimes
9 referred to as user equipment ("UE"), which support LTE-Advanced connectivity
10 and LAA technology.



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19 [https://www.qualcomm.com/news/onq/2017/10/13/lg-v30-and-snapdragon-835-](https://www.qualcomm.com/news/onq/2017/10/13/lg-v30-and-snapdragon-835-unite-premium-photography-security-and-mobile-vr)
20 [unite-premium-photography-security-and-mobile-vr](https://www.qualcomm.com/news/onq/2017/10/13/lg-v30-and-snapdragon-835-unite-premium-photography-security-and-mobile-vr)

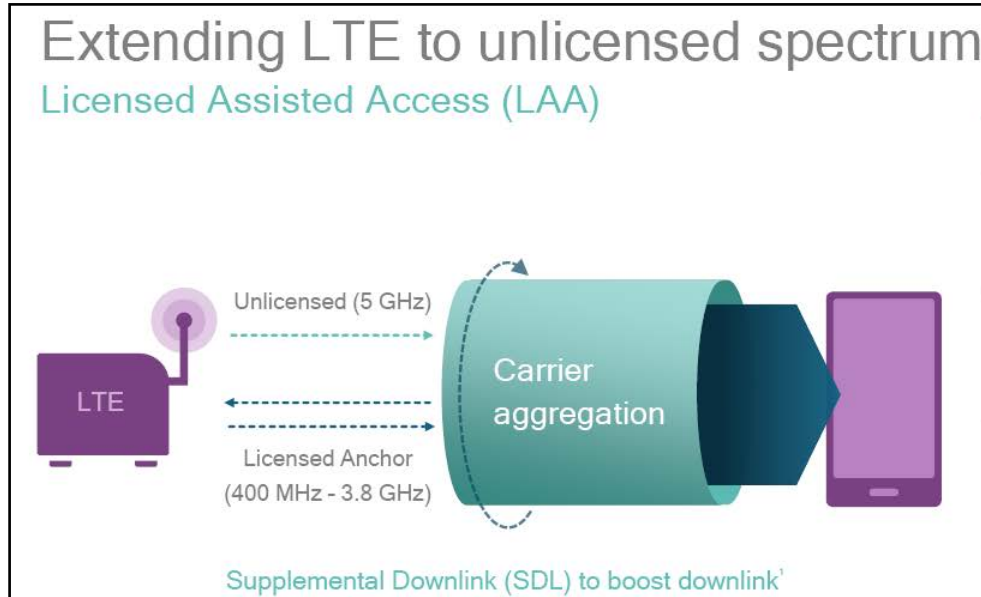
21 14. The Accused Infringing Devices contain a front end module
22 configured to establish a service with a base station via a non-licensed spectrum.
23 For example, the Accused Infringing Devices contain front end components that
24 convert information into radio signals that can be transmitted and received over the
25 air.

26 **RFFE (RF Front-End):**

27 RF Front End (RFFE) refers to a set of mobile device components that convert
28 information into radio signals that can be transmitted and received over the air. RFFE
components work in conjunction with a device's modem and antenna.

1 [https://www.qualcomm.com/news/onq/2017/02/23/mwc-2017-fundamentals-cheat-](https://www.qualcomm.com/news/onq/2017/02/23/mwc-2017-fundamentals-cheat-sheet)
2 [sheet](https://www.qualcomm.com/news/onq/2017/02/23/mwc-2017-fundamentals-cheat-sheet)

3 15. Being LAA-enabled UE, the Accused Infringing Devices are
4 configured to establish a service with a base station (“eNB”) in a non-licensed
5 (alternatively referred to as “unlicensed”) spectrum.



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15 <https://www.qualcomm.com/media/documents/files/laa-webinar-feb-2016.pdf>

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17 16. The Accused Infringing Devices contain a mobility monitoring
18 module. For example, the Accused Infringing Devices include a mobility
19 monitoring module within its cellular baseband processor, such as the Qualcomm
20 Snapdragon x16 LTE modem.

21 [https://www.qualcomm.com/news/onq/2017/10/13/lg-v30-and-snapdragon-835-](https://www.qualcomm.com/news/onq/2017/10/13/lg-v30-and-snapdragon-835-unite-premium-photography-security-and-mobile-vr)
22 [unite-premium-photography-security-and-mobile-vr](https://www.qualcomm.com/news/onq/2017/10/13/lg-v30-and-snapdragon-835-unite-premium-photography-security-and-mobile-vr)

23 17. The mobility monitoring module in the Accused Infringing Devices is
24 configured to determine a first value of a mobility factor indicative of a relative
25 motion of the subscriber station communicating using non-licensed spectrum. For
26 example, the Accused Infringing Devices will make radio resource management
27 measurements representing one or more values of a mobility factor and report them
28 to LTE LAA-enabled base stations.

1 5.5 Measurements

2 5.5.1 Introduction

3 The UE reports measurement information in accordance with the measurement configuration as provided by E-
 4 UTRAN. E-UTRAN provides the measurement configuration applicable for a UE in RRC_CONNECTED by means of
 dedicated signalling, i.e. using the *RRCCongestionReconfiguration* or *RRCCongestionResume* message.

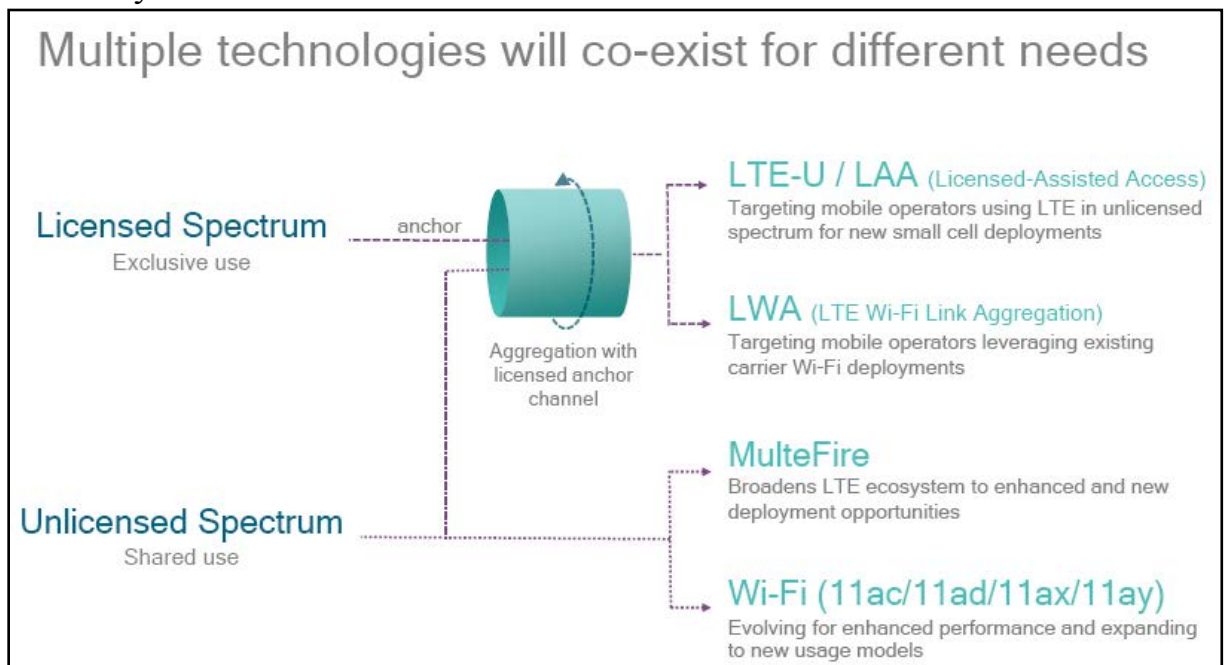
5 The UE can be requested to perform the following types of measurements:

- 6 - Intra-frequency measurements: measurements at the downlink carrier frequency(ies) of the serving cell(s).
- 7 - Inter-frequency measurements: measurements at frequencies that differ from any of the downlink carrier
 frequency(ies) of the serving cell(s).
- 8 - Inter-RAT measurements of UTRA frequencies.
- 9 - Inter-RAT measurements of GERAN frequencies.
- 10 - Inter-RAT measurements of CDMA2000 HRPD or CDMA2000 1xRTT or WLAN frequencies.

11 ETSI TS 136 331 V13.8.1 (2018-01)

12 https://www.etsi.org/deliver/etsi_ts/136300_136399/136331/13.08.01_60/ts_136331v130801p.pdf

13 18. The mobility monitoring module in the Accused Infringing Devices is
 14 configured to determine availability of the service via a licensed spectrum. For
 15 example, the mobility monitoring module within the Qualcomm Snapdragon
 16 processors within the Accused Infringing Devices is also configured to
 17 communicate with a base station (“eNB”) in a licensed spectrum to determine
 18 availability of the service.



1 [https://www.qualcomm.com/documents/progress-laa-and-its-relationship-lte-u-and-](https://www.qualcomm.com/documents/progress-laa-and-its-relationship-lte-u-and-multefire)
 2 [multefire](https://www.qualcomm.com/documents/progress-laa-and-its-relationship-lte-u-and-multefire)

3 19. The front end module in the Accused Infringing Devices is further
 4 configured to initiate transfer of the service to the licensed spectrum associated with
 5 the base station if the first value of the mobility factor indicates that the subscriber
 6 station has been in a high mobility state for at least a predetermined period of time.
 7 For example, an Accused Infringing Device (“UE”) will trigger a measurement
 8 event that produces measurement results which, when processed by the base station
 9 (“eNB”), indicate that the UE is in a high mobility state, e.g., a UE’s
 10 measurement results may indicate fast signal fades or rapidly increasing (or
 11 decreasing) received power from a neighbor cell (or serving cell). The reporting of
 12 these measurements by the UE’s front end module will initiate a transfer of the
 13 service to the licensed spectrum. The UE will not report measurement results
 14 unless the UE has experienced conditions for triggering a measurement event for a
 15 predetermined period of time (referred to as the TimeToTrigger).

16 5.5.4.4 Event A3 (Neighbour becomes offset better than PCell/ PSCell)

17 The UE shall:

18 1> consider the entering condition for this event to be satisfied when condition A3-1, as specified below, is fulfilled;

19 1> consider the leaving condition for this event to be satisfied when condition A3-2, as specified below, is fulfilled;

20 1> if *usePSCell* of the corresponding *reportConfig* is set to *true*:

21 2> use the PSCell for *Mp*, *Qfp* and *Ocp*;

22 1> else:

23 2> use the PCell for *Mp*, *Qfp* and *Ocp*;

24 NOTE The cell(s) that triggers the event is on the frequency indicated in the associated *measObject* which may
 25 be different from the frequency used by the PCell/ PSCell.

26 *Mn* is the measurement result of the neighbouring cell, not taking into account any offsets.

27 *Mp* is the measurement result of the PCell/ PSCell, not taking into account any offsets.

28 https://www.etsi.org/deliver/etsi_ts/136300_136399/136331/13.08.01_60/ts_136331v130801p.pdf

– *TimeToTrigger*

The IE *TimeToTrigger* specifies the value range used for time to trigger parameter, which concerns the time during which specific criteria for the event needs to be met in order to trigger a measurement report. Value *ms0* corresponds to 0 ms and behaviour as specified in 7.3.2 applies, *ms40* corresponds to 40 ms, and so on.

TimeToTrigger information element

```

-- ASN1START
TimeToTrigger ::=
    ENUMERATED {
        ms0, ms40, ms64, ms80, ms100, ms128, ms160, ms256,
        ms320, ms480, ms512, ms640, ms1024, ms1280, ms2560,
        ms5120}
-- ASN1STOP

```

ETSI TS 136 331 V13.8.1 (2018-01) at 6.3.5 (p. 437)

https://www.etsi.org/deliver/etsi_ts/136300_136399/136331/13.08.01_60/ts_136331v130801p.pdf

5.5.4 Measurement report triggering

5.5.4.1 General

If security has been activated successfully, the UE shall:

- 1> for each *measId* included in the *measIdList* within *VarMeasConfig*:
- 2> if the *triggerType* is set to *event* and if the entry condition applicable for this event, i.e. the event corresponding with the *eventId* of the corresponding *reportConfig* within *VarMeasConfig*, is fulfilled for one or more applicable cells for all measurements after layer 3 filtering taken during *timeToTrigger* defined for this event within the *VarMeasConfig*, while the *VarMeasReportList* does not include an measurement reporting entry for this *measId* (a first cell triggers the event):

ETSI TS 136 331 V13.8.1 (2018-01)

20. LG has thus infringed and continues to infringe at least claim 13 of the '637 patent by making, using, testing, selling, offering for sale, importing and/or licensing the Accused Infringing Devices.

21. LG's acts of direct infringement have caused, and continue to cause, damage to CellTran, and CellTran is entitled to recover damages sustained as a result of LG's wrongful acts in an amount subject to proof at trial.

COUNT 2: INFRINGEMENT OF THE '425 PATENT

22. The allegations of paragraphs 1-8 of this Complaint are incorporated by reference as though fully set forth herein.

23. CellTran owns by assignment the entire right, title, and interest in the '425 patent.

24. The '425 patent was issued by the United States Patent and Trademark Office on February 6, 2018, and is titled "Methods and Apparatus for Performing

1 Handoff Based on the Mobility of a Subscriber Station.” A true and correct copy of
2 the ’425 patent is attached as Exhibit B.

3 25. Upon information and belief, LG has infringed at least claim 7 of the
4 ’425 patent by making, using, testing, selling, offering for sale, importing and/or
5 licensing in the United States licensed assisted access (LAA) mobile devices,
6 including at least the V30 & V30+, V30S ThinQ, G7 ThinQ, V35 ThinQ, and V40
7 ThinQ smartphones (collectively the “Accused Infringing Devices”) in an
8 exemplary manner as described below.

9 26. The Accused Infringing Devices are subscriber stations, sometimes
10 referred to as user equipment (“UE”), which support LTE-Advanced connectivity
11 and LAA technology.



Connectivity

The V30 is equipped with the Qualcomm Snapdragon X16 LTE modem, and it supports some the most advanced LTE features of any smartphone. This includes Gigabit LTE for incredibly fast download speeds that enhance all connected apps, 4x4 MIMO technology with double the number of antennas of typical smartphones for fast speeds in weak signal areas, and LAA technology for fast speeds in crowded places. In addition, it's the first phone to support LTE connections in the 600-MHz band, giving it superior coverage on compatible networks. In all, these advanced wireless features are designed to provide users the speed and coverage they need for high-quality video and music streaming, VR immersion, and near-instantaneous access to files in the cloud.

<https://www.qualcomm.com/news/onq/2017/10/13/lg-v30-and-snapdragon-835-unite-premium-photography-security-and-mobile-vr>

27. The Accused Infringing Devices contain a front end module

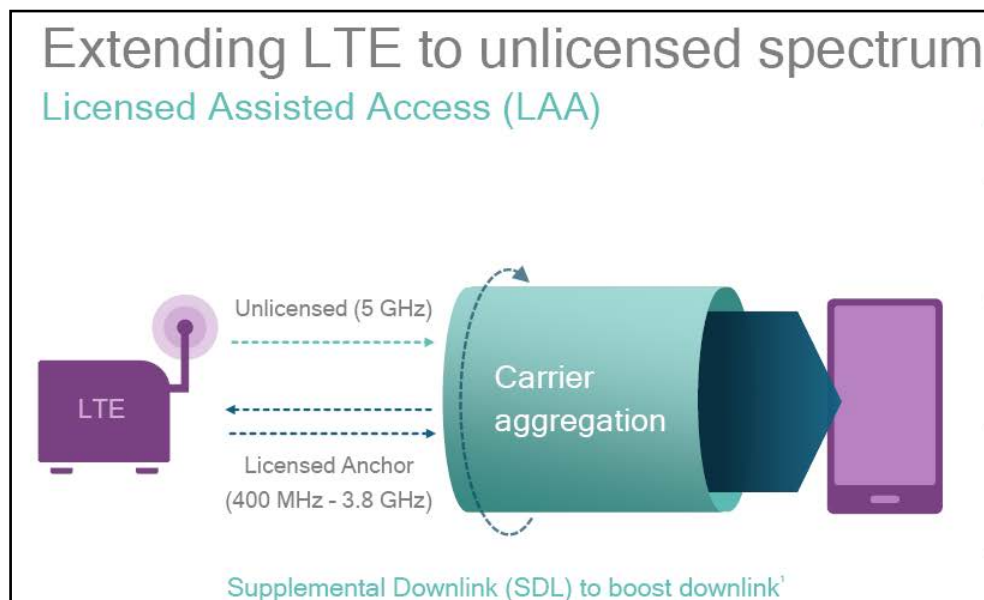
1 configured to establish a service with a base station in a licensed spectrum and to
2 transmit a message to the base station to determine availability of the service via a
3 non-licensed (alternatively referred to as “unlicensed”) spectrum. For example, the
4 Accused Infringing Devices contain front end components that convert information
5 into radio signals that can be transmitted and received over the air.

6 **RFFE (RF Front-End):**

7 RF Front End (RFFE) refers to a set of mobile device components that convert
8 information into radio signals that can be transmitted and received over the air. RFFE
9 components work in conjunction with a device’s modem and antenna.

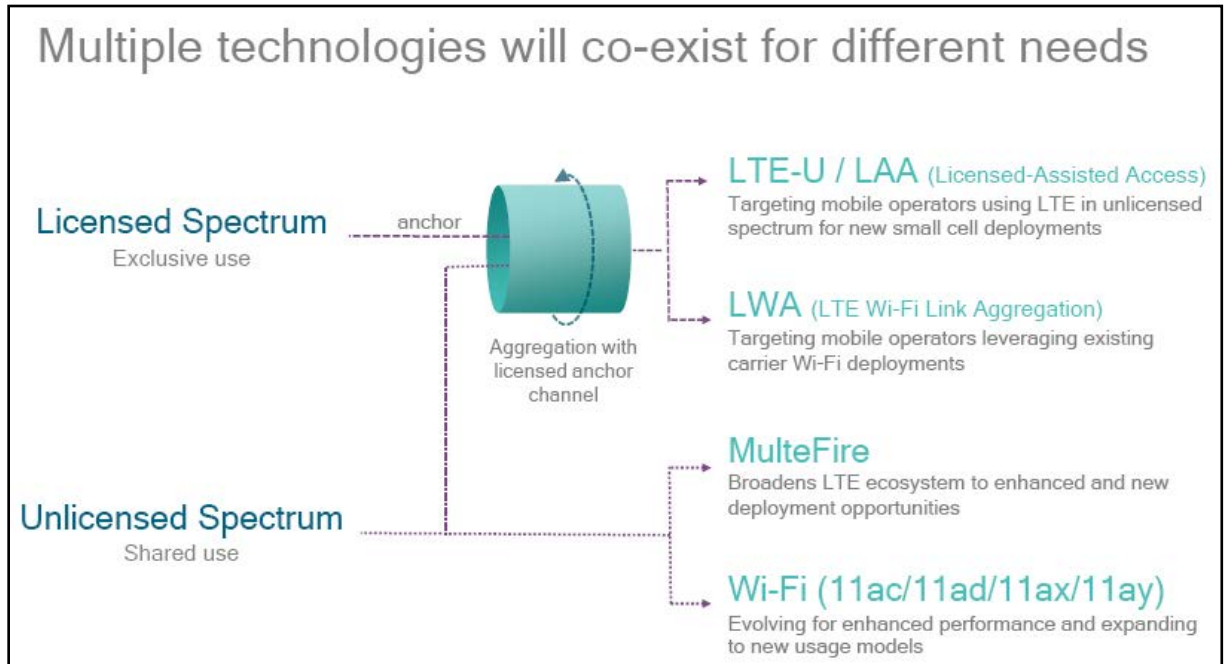
10 <https://www.qualcomm.com/news/onq/2017/02/23/mwc-2017-fundamentals-cheat-sheet>

11 28. Being LAA-enabled UE, the Accused Infringing Devices are
12 configured to establish a service with a base station (“eNB”) in a licensed spectrum
13 and to transmit a message to the base station to determine availability of the service
14 via a non-licensed spectrum.



15 <https://www.qualcomm.com/media/documents/files/laa-webinar-feb-2016.pdf>

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<https://www.qualcomm.com/documents/progress-laa-and-its-relationship-lte-u-and-multefire>

29. The Accused Infringing Devices contain a mobility monitoring module. For example, the Accused Infringing Devices include a mobility monitoring module within its cellular baseband processor, such as the Qualcomm Snapdragon x16 LTE modem.

<https://www.qualcomm.com/news/onq/2017/10/13/lg-v30-and-snapdragon-835-unite-premium-photography-security-and-mobile-vr>

30. The Accused Infringing Devices contain a mobility monitoring module configured to determine a first value of a mobility factor of the subscriber station where in the mobility factor is determined from values of one or more metrics concerning communications between the base station and the subscriber station. For example, the Accused Infringing Devices will make radio resource management measurements representing values of one or more metrics that are reported to LTE LAA-enabled base stations.

5.5 Measurements

5.5.1 Introduction

The UE reports measurement information in accordance with the measurement configuration as provided by E-UTRAN. E-UTRAN provides the measurement configuration applicable for a UE in RRC_CONNECTED by means of dedicated signalling, i.e. using the *RRCCoordinateReconfiguration* or *RRCCoordinateResume* message.

The UE can be requested to perform the following types of measurements:

- Intra-frequency measurements: measurements at the downlink carrier frequency(ies) of the serving cell(s).
- Inter-frequency measurements: measurements at frequencies that differ from any of the downlink carrier frequency(ies) of the serving cell(s).
- Inter-RAT measurements of UTRA frequencies.
- Inter-RAT measurements of GERAN frequencies.
- Inter-RAT measurements of CDMA2000 HRPD or CDMA2000 1xRTT or WLAN frequencies.

ETSI TS 136 331 V13.8.1 (2018-01)

https://www.etsi.org/deliver/etsi_ts/136300_136399/136331/13.08.01_60/ts_136331v130801p.pdf

31. The Accused Infringing Devices use metrics including one or more of frequency offsets, correlations of known signals, and variation of received signal power. For example, the Accused Infringing Devices use metrics such as RSSI, RSPR, and RSRQ, which represent and/or provide one or more frequency offsets, correlations of known signals and variation of signal power.

6.3.6 Other information elements

- *UE-EUTRA-Capability*

The IE *UE-EUTRA-Capability* is used to convey the E-UTRA UE Radio Access Capability Parameters, see TS 36.306 [5], and the Feature Group Indicators for mandatory features (defined in Annexes B.1 and C.1) to the network. The IE *UE-EUTRA-Capability* is transferred in E-UTRA or in another RAT.

crossCarrierSchedulingLAA-DL

Indicates whether the UE supports cross-carrier scheduling from a licensed carrier for LAA cell(s) for downlink. This field can be included only if *downlinkLAA* is included.

csi-RS-DRS-RRM-MeasurementsLAA

Indicates whether the UE supports performing RRM measurements on LAA cell(s) based on CSI-RS-based DRS. This field can be included only if *downlinkLAA* is included.

downlinkLAA

Presence of the field indicates that the UE supports downlink LAA operation including identification of downlink transmissions on LAA cell(s) for full downlink subframes, decoding of common downlink control signalling on LAA cell(s), CSI feedback for LAA cell(s), RRM measurements on LAA cell(s) based on CRS-based DRS.

rssi-AndChannelOccupancyReporting

Indicates whether the UE supports performing measurements and reporting of RSSI and channel occupancy. This field can be included only if *downlinkLAA* is included.

1 ETSI TS 136 331 V13.8.1 (2018-01)

2 https://www.etsi.org/deliver/etsi_ts/136300_136399/136331/13.08.01_60/ts_136331v130801p.pdf

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4 3GPP TS 36.214 version 13.5.0 Release 13 8 ETSI TS 136 214 V13.5.0 (2017-10)
5.1.1 Reference Signal Received Power (RSRP)

Definition	Reference signal received power (RSRP), is defined as the linear average over the power contributions (in [W]) of the resource elements that carry cell-specific reference signals within the considered measurement frequency bandwidth. For RSRP determination the cell-specific reference signals R_s according to TS 36.211 [3] shall be used. If the UE can reliably detect that R_s is available it may use R_s in addition to R_o to determine RSRP. If higher layers indicate measurements based on discovery signals, the UE shall measure RSRP in the subframes in the configured discovery signal occasions. For frame structure 1 and 2, if the UE can reliably detect that cell-specific reference signals are present in other subframes, the UE may use those subframes in addition to determine RSRP. The reference point for the RSRP shall be the antenna connector of the UE. If receiver diversity is in use by the UE, the reported value shall not be lower than the corresponding RSRP of any of the individual diversity branches.
Applicable for	RRC_IDLE intra-frequency, RRC_IDLE inter-frequency, RRC_CONNECTED intra-frequency, RRC_CONNECTED inter-frequency

NOTE 1: The number of resource elements within the considered measurement frequency bandwidth and within the measurement period that are used by the UE to determine RSRP is left up to the UE implementation with the limitation that corresponding measurement accuracy requirements have to be fulfilled.

NOTE 2: The power per resource element is determined from the energy received during the useful part of the symbol, excluding the CP.

3GPP TS 36.214 version 13.5.0 Release 13 9 ETSI TS 136 214 V13.5.0 (2017-10)
5.1.3 Reference Signal Received Quality (RSRQ)

Definition	Reference Signal Received Quality (RSRQ) is defined as the ratio $N \times \text{RSRP} / (\text{E-UTRA carrier RSSI})$, where N is the number of RBs of the E-UTRA carrier RSSI measurement bandwidth. The measurements in the numerator and denominator shall be made over the same set of resource blocks. E-UTRA Carrier Received Signal Strength Indicator (RSSI), comprises the linear average of the total received power (in [W]) observed only in certain OFDM symbols of measurement subframes, in the measurement bandwidth, over N number of resource blocks by the UE from all sources, including co-channel serving and non-serving cells, adjacent channel interference, thermal noise etc. Unless indicated otherwise by higher layers, RSSI is measured only from OFDM symbols containing reference symbols for antenna port 0 of measurement subframes. If higher layers indicate all OFDM symbols for performing RSRQ measurements, then RSSI is measured from all OFDM symbols of the DL part of measurement subframes. If higher layers indicate certain subframes for performing RSRQ measurements, then RSSI is measured from all OFDM symbols of the DL part of the indicated subframes. If higher layers indicate measurements based on discovery signals, RSSI is measured from all OFDM symbols of the DL part of the subframes in the configured discovery signal occasions. The reference point for the RSRQ shall be the antenna connector of the UE. If receiver diversity is in use by the UE, the reported value shall not be lower than the corresponding RSRQ of any of the individual diversity branches.
Applicable for	RRC_IDLE intra-frequency, RRC_IDLE inter-frequency, RRC_CONNECTED intra-frequency, RRC_CONNECTED inter-frequency

11 ETSI TS 136 214 V13.5.0 (2017-10)

12 http://www.etsi.org/deliver/etsi_ts/136200_136299/136214/13.05.00_60/ts_136214v130500p.pdf

13 32. The Accused Infringing Devices initiate transfer of the service from
14 the licensed spectrum to the non-licensed spectrum associated with the base station
15 based on the first value of the mobility factor. For example, an Accused Infringing
16 Device (“UE”) can initiate transfer of the service from a licensed to non-licensed
17 spectrum via a measurement report triggering event. One such exemplary
18 triggering is Event A3, which specifies that a UE will initiate transfer if RRC
19 conditions for a neighbor cell (a Secondary Cell (“SCell”) on non-licensed
20 spectrum) become better than those of the Primary Cell (“PCell”) (on licensed
21 spectrum) to which the UE is presently camped.

22 5.5.4 Measurement report triggering

23 5.5.4.1 General

24 If security has been activated successfully, the UE shall:

25 1> for each *measId* included in the *measIdList* within *VarMeasConfig*:

26 2> if the *triggerType* is set to *event* and if the entry condition applicable for this event, i.e. the event
27 corresponding with the *eventId* of the corresponding *reportConfig* within *VarMeasConfig*, is fulfilled for one
28 or more applicable cells for all measurements after layer 3 filtering taken during *timeToTrigger* defined for
this event within the *VarMeasConfig*, while the *VarMeasReportList* does not include an measurement
reporting entry for this *measId* (a first cell triggers the event):

28 ETSI TS 136 331 V13.8.1 (2018-01)

1 33. LG has thus infringed and continues to infringe at least claim 7 of the
2 '425 patent by making, using, testing, selling, offering for sale, importing and/or
3 licensing the Accused Infringing Devices.

4 34. LG's acts of direct infringement have caused, and continue to cause,
5 damage to CellTran, and CellTran is entitled to recover damages sustained as a
6 result of LG's wrongful acts in an amount subject to proof at trial.

7 **PRAYER FOR RELIEF**

8 WHEREFORE, CellTran respectfully requests the following relief:

- 9 A. A judgment that LG has infringed the '637 patent;
10 B. A judgment that LG has infringed the '425 patent;
11 C. A judgment that CellTran be awarded damages adequate to
12 compensate it for LG's past infringement and any continuing or future infringement
13 of the '637 patent and the '425 patent, including pre-judgment and post-judgment
14 interest costs and disbursements as justified under 35 U.S.C. § 284 and an
15 accounting;
16 D. That this be determined to be an exceptional case under 35 U.S.C. §
17 285 and that CellTran be awarded enhanced damages up to treble damages for
18 willful infringement as provided by 35 U.S.C. § 284;
19 E. That CellTran be granted its reasonable attorneys' fees in this action;
20 F. That this Court award CellTran its costs; and
21 G. That this Court award CellTran such other and further relief as the
22 Court deems proper.

23 **DEMAND FOR JURY TRIAL**

24 Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, CellTran
25 demands a trial by jury for all issues so triable.
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Dated: August 23, 2018

By /s/ Marc Belloli

Marc Belloli (SBN 244290)

mbelloli@feinday.com

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LLP

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