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9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**
11 **SOUTHERN DIVISION**

12 SOCKEYE LICENSING TX LLC,
13 Plaintiff,
14 vs.
15 VIZIO, INC.,
16 Defendant.

CASE:
COMPLAINT FOR PATENT
INFRINGEMENT
JURY TRIAL DEMANDED

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18
19
20 Plaintiff Sockeye Licensing TX LLC (“Sockeye”), sues Defendant, Vizio,
21 Inc. (“Vizio”), and alleges the following:

22 **PARTIES**

23 1. Plaintiff Sockeye Licensing TX LLC, is a limited liability company
24 organized and existing under the laws of Texas with its principal place of business
25 at 320 Wilmette Avenue, Glenview, IL 60025.

26 2. Defendant Vizio, Inc. is a corporation organized and existing under
27 the laws of California with its principal place of business at 39 Tesla, Irvine, CA
28 92618.

1
2 **JURISDICTION**

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

5 4. This Court has exclusive subject matter jurisdiction under 28 U.S.C.
6 §§ 1331 and 1338(a).

7 5. This Court has personal jurisdiction over Vizio because it has
8 engaged in systematic and continuous business activities in the Central District of
9 California. Specifically, Vizio provides its full range of services to residents in
10 this District. As described below, Vizio has committed acts of patent infringement
11 giving rise to this action within this District.

12 **VENUE**

13 6. Venue is proper in this District under 28 U.S.C. § 1400(b) because
14 Vizio is incorporated in California. In addition, Sockeye has suffered harm in this
15 District.

16 **PATENTS-IN-SUIT**

17 7. Sockeye is the assignee of all right, title, and interest in United
18 States Patent Nos. 9,547,981 (the “’981 Patent”) and 8,135,342 (the “’342 Patent”)
19 (collectively, the “Patents-in-Suit”), including all rights to enforce and prosecute
20 actions for infringement and to collect damages for all relevant times against
21 infringers of the Patent-in-Suit. Accordingly, Sockeye possesses the exclusive
22 right and standing to prosecute the present action for infringement of the Patents-
23 in-Suit by Panasonic.

24 8. On January 17, 2017, the United States Patent and Trademark Office
25 issued the ’981 Patent. The ’981 Patent is titled “System, Method and Apparatus
26 for Using a Wireless Device to Control Other Devices.” The application leading
27 to the ’981 Patent was filed on November 3, 2014, which is a continuation of U.S.
28 Application No. 13/418,829; which was filed on March 13, 2012; which is a

1 divisional application of U.S. Application No. 11/898,912, now the '342 Patent,
2 which was filed on September 17, 2007; which claims priority from provisional
3 application number 60/844,645, which was filed on September 15, 2006. A true
4 and correct copy of the '981 Patent is attached hereto as **Exhibit A** and
5 incorporated herein by reference. A true and correct copy of the parent patent, the
6 '342 Patent, is attached hereto as **Exhibit B** and incorporated herein by reference.

7 9. Prior to the filing of the applications that matured into the '981
8 patent and its parent '342 patent in 2006, state of the art cell phone designs
9 emphasized their use as standalone devices. In the industry it was widely expected
10 that, as the multimedia capabilities of the cell phone became richer, the cell phone
11 itself would serve as a multimedia player and alternative to traditional modes of
12 viewing video, such as via television screens. Accordingly, cell phone
13 manufacturers at the time of filing focused on developing the “onboard”
14 capabilities of their products, rather than adapting them to connect with and
15 control a higher resolution device. Thus, for example, the Nokia N92 mobile
16 device announced in 2005 was marketed as a phone for watching TV. The Nokia
17 N92, while capable of playing “mobile TV,” was designed as an alternate platform
18 for watching television, and it operated as a standalone device, wholly-
19 independent of television sets of the period. The '981 patent went further. In
20 contrast to the standalone approach of the Nokia N92, the '981 patent taught
21 particular methods by which the cell phone could connect with and control a
22 higher resolution display device, streaming video thereto. The state-of-the-art cell
23 phones of the day were not equipped to operate in this way, nor was this their goal.
24 Indeed, as Nokia stated at the time, the “Nokia N92 offers easy access to TV
25 programs *without* having to sit in front of a television set.” **Exhibit C**. Notably,
26 so-called “[t]hird generation mobile phones” or “3G mobiles” which were capable
27 of “multi-media communication” of this kind—i.e., “viewing TV on a mobile
28 phone”—were far from the norm in 2006. **Exhibit D**. As NEC stated at the time,

1 although such devices were “expected to be extremely popular,” using a cell phone
2 to view television was itself a “groundbreaking way to use mobile phones.” *Id.*
3 Still more groundbreaking was the inventive approach of the ’981 patent, which
4 went beyond the cell phones merely equipped to play television, such as the Nokia
5 N92 and the NEC e636, and taught particular methods by which the cell phone
6 could connect with and control a higher resolution display device for streaming
7 video. The claimed inventions would have been inoperable on even the most
8 sophisticated cell phones of the period, such as the Nokia N92 and NEC e636,
9 because they required significant technical advancements and improvements to the
10 hardware and software “stack” of the cell phone in order to enable their inventive
11 functionality. *See Exhibit E.*

12 **The ’981 Patent**

13 10. The ’981 patent taught the hardware and software “stack” necessary to
14 implement the particular methods claimed in the patents. For example, Figure 3D
15 illustrates the relationships between the hardware and software components of the
16 cell phone itself, as well as the internet and a high-resolution display device, in
17 terms of their hierarchy and I/O requirements and functions. Figure 3D teaches a
18 cell phone operating system that supports TCP/IP services, a desktop browser and
19 operating system within the cell phone, and the device drivers necessary to manage
20 streaming media as it is received from the network, rendered by the operating
21 system, and communicated to external devices. Figure 3D teaches that the cell
22 phone’s device drivers interact with the peripheral communications hardware and
23 software that, in turn, communicates with external display devices. Further, Figure
24 3B shows that the peripheral communications hardware and software interacts
25 with multichannel USB, and IEEE 1394 and IEEE 802.11 protocols that, in turn,
26 use a multiport wireless interface to communicate with a high-resolution digital
27 display device. Without the hardware and software stack (or its equivalents)
28 disclosed, *inter alia*, in Figures 3B and 3D of the ’981 patent, the claimed

1 inventions would have been inoperable. The hardware and software stack
2 disclosed in the patent was absent from the more advanced cell phones of the day
3 (e.g., the Nokia N92 and NEC e636), which were designed as mere standalone
4 devices—a completely different paradigm than disclosed in the '981 patent, which
5 teaches the cell phone connecting with and controlling a higher resolution display
6 device on which media may be streamed.

7 11. In the few prior art examples where a cell phone was actually
8 connected to another device, the cell phone was used in a manner completely
9 different than that claimed in the '981 patent, and for different purposes. As the
10 inventor pointed out during prosecution of the parent '342 patent, the prior art
11 merely “describe[d] a conventional tethering operation of a cell phone to a
12 computer, and not peripheral cell phone control of the claimed invention.”

13 **Exhibit F** [Prosecution History of '342 Parent Patent, Amendment, May 31, 2011,
14 at 11]. According to the “conventional tethering operation[s]” of the prior art, the
15 “PC or laptop connects to the internet via another PC’s or a cell phone’s wireless
16 Internet connection, providing a bridge connection but not ceding control.” *Id.* By
17 contrast, the “instant invention,” the inventor explained, “does not use a cell phone
18 to connect a ‘computer’ to the Internet” — “[q]uite the reverse, the instant
19 invention connects peripheral devices (connected to the computer) to the cell
20 phone to create a desktop computing environment on the cell phone.” *Id.* As the
21 inventor described it in a later amendment during prosecution of the '342 parent
22 patent, the “present invention” was one “directed to an innovative approach to
23 employ a cell phone or like PDA . . . to create a media center controlled by the
24 user through the cell phone – without the usage of the computing power of the
25 peripherals’ PC.” **Exhibit G.** [Prosecution History of '342 Patent, Amendment,
26 January 17, 2012, at 31]. The inventor emphasized that in the prior art “the
27 portable device is a mere tether” and “has zero control – the network server is
28 running things directly” in the “traditional client/server relationship.” *Id.* at 32. By

1 contrast, the parent '342 patent “expressly involves and claims control of the
2 peripheral device by the portable device, not at network control.” *Id.* Thus, at
3 best, the prior art contemplated the “conventional tethering” of the cell phone to
4 the computer for the purpose of improving the functionality of the computer
5 according to the “traditional client/server relationship.” The '981 patent,
6 however—which shares a specification with the parent '342 patent--teaches
7 improvements in the cell phone hardware and software “stack” enabling it to
8 control the high-resolution display device, in a clear reversal of the “traditional
9 client/server relationship” and departure from “conventional tethering.” As the
10 inventor stated during prosecution of the '981 patent, quoting the summary of the
11 invention, “ [t]he user may access’ the movies and videos ‘using the desktop
12 monitor’ because, for example the ‘user interfaces’ of the web site providing this
13 content ‘can be displayed through’ the ‘desktop monitor’ ” and “[t]hose ‘user
14 interfaces are sent to the ‘desktop monitor’ by means of the ‘wireless cell phone.’ ”
15 **Exhibit H** [Prosecution History of '981 Patent, Sept. 7, 2016, Declaration of
16 Michael D. Harold, at pages 3-4, para 7(a)(4)]. None of the prior art discloses the
17 hardware and software “stack” necessary to execute this novel functionality or to
18 accomplish the objectives of the '981 patent.

19 12. As the inventor pointed out during prosecution of the '981 patent, the
20 methods employed in the prior art failed to disclose the claimed step of
21 “transmitting by the mobile communications device of at least some of the
22 particular movie or video to the display device for display thereon **simultaneously**
23 while at least some of the particular movie or video is being downloaded from the
24 server to the mobile communications device.” **Exhibit I** [Prosecution History of
25 '981 Patent, Sept. 9, 2016 Amendment, at 8] (emphasis added). This step of claim
26 1 of the '981 patent not only distinguishes it from prior art methods but constitutes
27 one of the '981 patent’s “inventive concepts,” both in its own right as well as in
28 combination with other claim elements, rendering the patent eligible under 35

1 U.S.C. § 101. Indeed, the inventor pointed out that this step “teaches away” from
2 the prior art which merely “discloses that a document must be fully downloaded
3 before it can be accessed,” from prior art wherein “content is fully downloaded
4 *before* the mobile device ‘detects’ the display” or from prior art wherein “a video
5 conference is received or initiated *before* it is routed to the external display.”
6 (Emphasis added). As such, the inventor noted, the prior art “teach[es] away from
7 the claimed methods.” *Id.* at 8-9.

8 13. As the inventor further noted during prosecution of the ’981 patent, the
9 “claims are specifically limited to the field of consumer electronic entertainment,
10 as contemplated by the specification.” For example, claim 1 specifically limits the
11 “electrical coupling” between the display device and the mobile communications
12 device to be “for consumer electronic entertainment purposes,” which puts
13 “limitations . . . on the type of electrical couplings that are covered by the claims.”
14 *Id.* at 10-11.

15 14. The PTO issued the ’981 patent on January 17, 2017, without ever
16 having rejected any of the claims under 35 U.S.C. § 101 during prosecution.

17 15. The inventor of the ’981 patent conceived of the inventions disclosed
18 and claimed therein and worked to commercialize them for several years. Among
19 his goals (and later those of his company, Zamboola) was to provide hardware and
20 software solutions for the mobile market to allow the interfacing of user
21 information between devices in an enhanced way. Accordingly, after filing in
22 2006 the applications that eventually issued as the ’981 patent and its parent ’342
23 patent, he set to work prototyping solutions that reduced the claimed inventions to
24 practice. Mr. Harold began by modifying an “open source” cell phone released
25 after filing, the Openmoko “Neo,” which had an operating system and some of the
26 hardware necessary to support streaming media from the Internet to a high-
27 resolution display device. However, because the software on the Neo proved to be
28 too unstable for the purposes of the claimed inventions, the inventor was forced to

1 migrate to an “Android” operating system. Still more modifications were
2 necessary after migrating to the Android OS, which was not designed for the
3 purpose of streaming media to a high-resolution display device, and lacked the
4 architecture for concurrent, multi-threaded operations and inter-process
5 communications. Subsequently, the inventor adapted open source device drivers
6 to these purposes. Additionally, because the Neo had a USB port, the inventor
7 developed a USB-to-VGA connector that allowed the cell phone to display media
8 at the higher resolution VGA, controlled by the user via the Neo touchscreen.
9 Thus, the conventional software and hardware components available required
10 significant modifications from their original form before it was possible to
11 integrate them into a prototype incorporating the claimed inventions.

12 16. The ’981 Patent is valid and enforceable.

13 17. The ’981 Patent describes a need to provide an improved paradigm
14 for using a wireless cell phone or other such communications device as a central
15 component of a desktop or other such computing environment. Ex. A, 2:61-64.

16 18. The ’981 Patent describes a system, method and apparatus in which
17 the user of a wireless cell phone device establishes a direct connection with a
18 desktop computer monitor, keyboard, mouse or other component using any
19 combination of wireline connections and wireless connections. *Id.* at 1:30-36.

20 19. The ’981 Patent is not directed to a method of organizing human
21 activity or to a fundamental economic practice long prevalent in commerce. The
22 ’981 Patent describes a system that addresses a technical problem-using a wireless
23 cell phone as a central component of a desktop or other computing environment
24 that includes, in addition to a desktop computer monitor and a desktop keyboard
25 and mouse, the use of desktop speakers and a desktop printer. *Id.* at 3:7-12-with a
26 technical solution: increasing the use of a cell phone as a connections,
27 communications and controlling device for desktop computers, digital display
28 monitor and keyboard and mouse. *Id.* at 3:41-48.

1 20. The '981 Patent does not preempt the field or preclude the use of
2 other wireless cell phones. For example, many companies offer currently offer
3 rudimentary products that allow a cell phone to project images, presentations and
4 movies onto a nearby wall or surface. *Id.* at 2:9-12. The prior art also only uses cell
5 phones as computing devices and not as a full-sized computer monitor or other
6 full-size digital output device for manipulating data or issuing commands remotely
7 through the handheld communications devices. *Id.* at 3:20-27.

8 21. The '981 Patent does not take a well-known or established business
9 method or process and apply it to a general-purpose computer. Instead, in an
10 exemplary embodiment, it uses a wireless cell phone as a central component of a
11 desktop or other computing environment that includes, in addition to a desktop
12 computer monitor and a desktop keyboard and mouse, the use of desktop speakers
13 and a desktop printer. *Id.* at 3:7-12. The desktop computer monitor or other full-
14 size digital display device is also used as a visual output device, and a full-size
15 keyboard and mouse are used as user input devices. *Id.* 2:66-3:1.

16 22. In the application leading to the '981 Patent, the Examiner expressly
17 considered all of the IPR petitions filed against the '342 Patent, *see* ¶ 29 *infra*, and
18 allowed the '981 Patent to issue over all the prior art cited in those IPR petitions.

19 **The '342 Patent:**

20 23. The '342 Patent is valid and enforceable.

21 24. The '342 Patent describes a need to provide an improved paradigm
22 for using a wireless cell phone or other such communications device as a central
23 component of a desktop or other such computing environment. Ex. B, 2:51-54.

24 25. The '342 Patent describes a system, method and apparatus in which
25 the user of a wireless cell phone device establishes a direct connection with a
26 desktop computer monitor, keyboard, mouse or other component using any
27 combination of wireline connections and wireless connections. *Id.* at 1:10-16.

28

1 26. The '342 Patent is not directed to a method of organizing human
2 activity or to a fundamental economic practice long prevalent in commerce. The
3 '342 Patent describes a system that addresses a technical problem-using a wireless
4 cell phone as a central component of a desktop or other computing environment
5 that includes, in addition to a desktop computer monitor and a desktop keyboard
6 and mouse, the use of desktop speakers and a desktop printer. *Id.* at 3:38-45-with a
7 technical solution: increasing the use of a cell phone as a connections,
8 communications and controlling device for desktop computers, digital display
9 monitors and keyboard and mouse. *Id.* at 3:30-37.

10 27. The '342 Patent does not preempt the field or preclude the use of
11 other wireless cell phones. For example, many companies offer currently offer
12 rudimentary products that allow a cell phone to project images, presentations and
13 movies onto a nearby wall or surface. *Id.* at 1:65-2:1. The prior art also only uses
14 cell phones as computing devices and not as a full-sized computer monitor or other
15 full-size digital output device for manipulating data or issuing commands remotely
16 through the handheld communications devices. *Id.* at 2:10-17.

17 28. The '342 Patent does not take a well-known or established business
18 method or process and apply it to a general-purpose computer. Instead, in an
19 exemplary embodiment, it uses a wireless cell phone as a central component of a
20 desktop or other computing environment that includes, in addition to a desktop
21 computer monitor and a desktop keyboard and mouse, the use of desktop speakers
22 and a desktop printer. *Id.* at 3:38-45. The desktop computer monitor or other full-
23 size digital display device is also used as a visual output device, and a full-size
24 keyboard and mouse are used as user input devices. *Id.* at 2:54-63.

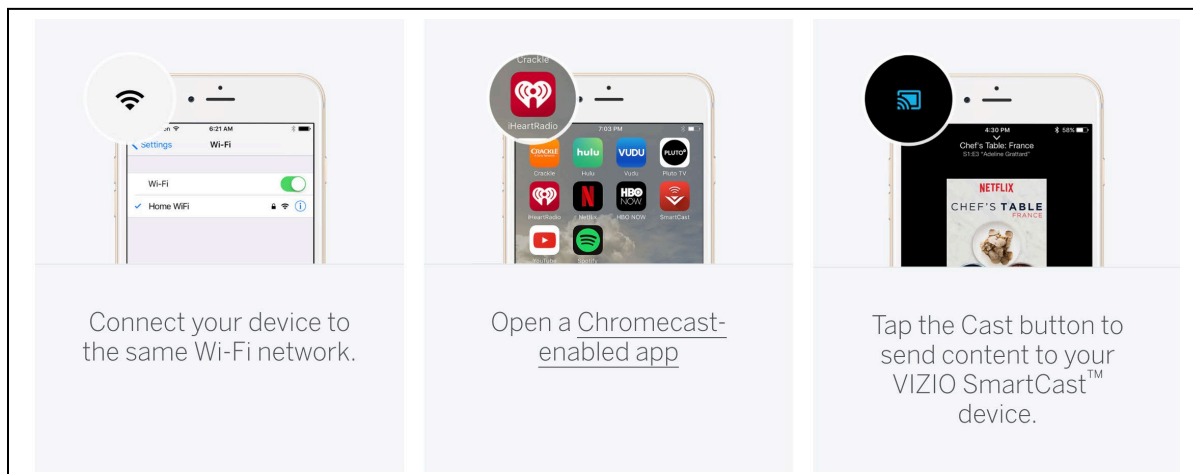
25 29. The PTAB declined to institute an IPR against the asserted claim 21
26 of the '342 Patent in IPR2016-00989, and therefore determined that there was not
27 a reasonable likelihood of unpatentability on the given grounds. *See RPX Corp. v.*
28 *Sockeye Licensing TX, LLC*, IPR2016-00989 (P.T.A.B. 2016) (declining to

1 institute an IPR as to claims 21, 22, 25 and 26). In IPR2016-01052, the Petitioner
2 did not seek to instate an IPR of claim 21. *See RPX Corp. v. Sockeye Licensing TX,*
3 *LLC*, IPR2016-01052 (P.T.A.B. 2016) (requesting an IPR for claims 11-19 and 58-
4 76 and denying institution of an IPR for claims 60-61 and 69).

5 **COUNT I: INFRINGEMENT OF THE '981 Patent**

6 30. Sockeye incorporates the above paragraphs herein by reference.

7 31. **Direct Infringement.** Vizio has been and continues to directly
8 infringe at least claim 1 of the '981 Patent in this District and elsewhere in the
9 United States by making the Vizio Smartcast, which performs the steps found in
10 the preamble of claim 1 “[a] method for downloading and viewing a movie or
11 video on a display device.” For example, each Vizio TV includes casting circuitry
12 that provides a screen mirroring or casting functionality. This allows a user to
13 cause a Netflix movie to be downloaded from a Netflix server to the user’s
14 smartphone, and then wirelessly cast from the smartphone to the casting circuitry
15 for display on the TV. Upon information and belief, Vizio directly also infringes
16 both by using and internally testing the Vizio Smartcast:



Available at: <https://www.vizio.com/smartcast-how-to-cast>; webpage attached
hereto as **Exhibit J**.

1 32. The Vizio Smartcast performs the steps of claim element 1(a):
2 “electrically coupling for consumer electronic entertainment purposes a display
3 device suitable for use in a media center environment with a mobile
4 communications device that does not form a party of the media center
5 environment.” For example, the Vizio TV forms a “display device” that is suitable
6 for use in a home media center environment.” The smartphone is not a part of that
7 environment which contains items such as amplifiers and pre-amplifiers. The
8 smartphone is coupled to the casting circuitry inside the Vizio TV by means of a
9 wireless network connection. *See Ex. J.*

10 33. The Vizio Smartcast performs the steps of claim element 1(b):
11 “causing a first graphic user interface to be displayed on the display device that
12 conveys information to a viewer of the display device about movies or videos that
13 are individually downloadable from a server for display on the display device for
14 consumer electronic entertainment purposes.” For example, when selecting a
15 movie, the Netflix GUI is cast from the smartphone to the casting circuitry which
16 then causes it to be displayed to the user on the TV. By viewing the Netflix GUI,
17 the user can select a movie to watch on the TV. By viewing the Netflix GUI, the
18 user can select a movie to watch on the TV:



1
2 Available at: <https://www.vizio.com/smartcast-how-to-cast>; webpage attached
3 hereto as **Exhibit K**.

4 34. The Vizio Smartcast satisfies claim element 1(c): “receiving
5 entertainment selection commands by the mobile communications device to allow
6 a particular one of the movies or videos to be selected for downloading from the
7 server based on visual feedback the viewer receives by reading or interacting with
8 the first graphic user interface shown on the display device.” For example, the
9 user selects a movie to watch by entering commands into the smartphone. The user
10 makes the selection by reading the Netflix GUI that is displayed on the TV in the
11 user’s home media center environment. *See* Ex. J.

12 35. The Vizio Smartcast satisfies claim element 1(d): “receiving by the
13 mobile communications device of the particular movie or video that is sent to it
14 from the server based on the viewer’s reading or interaction with the first graphic
15 user interface shown on the display device.” For example, by selecting a particular
16 movie to be watched, the user’s smartphone indicates to the Netflix servers that the
17 particular movie should be sent to the user’s smartphone. The user makes the
18 selection by reading the Netflix GUI that is displayed on the TV in the user’s home
19 media center environment. *See* Exs. J, K.

20 36. The Vizio Smartcast satisfies claim element 1(e): “transmitting by
21 the mobile communications device of at least some of the particular movie or
22 video to the display device for display thereon simultaneously while at least some
23 of the particular movie or video is being downloaded from the server to the mobile
24 communications device.” For example, the particular movie that the user selected
25 is streamed from the Netflix server to the user’s TV via the casting circuitry inside
26 the Vizio TV. *See* Exs. J, K.

27 37. The Vizio Smartcast satisfies claim element 1(f): “wherein the
28 electrical coupling between the mobile communications device and the display

1 Vizio directly also infringes both by using and internally testing the Vizio
2 Smartcast. *See* Ex. J.

3 42. The Vizio Smartcast performs the steps of claim element 21(a):
4 “means for receiving, at said peripheral device, a wireless communication
5 containing said downloaded user information transmitted from said wireless
6 device.” For example, the casting circuitry allows the Netflix movie to be cast
7 from the user’s smartphone via a wireless connection to the casting circuitry for
8 display on the Vizio TV. *See* Ex. K.

9 43. The Vizio Smartcast performs the steps of claim element 21(b):
10 “means for employing, at said peripheral device, said downloaded user
11 information.” For example, the Vizio TV includes a screen and circuitry
12 connecting the screen to the casting circuitry that allows the Netflix movie to be
13 shown on the screen of the Vizio TV. *See* Ex. J.

14 44. **Induced Infringement.** Vizio has also actively induced, and
15 continues to induce, the infringement of at least claim 21 of the ’342 Patent by
16 actively inducing its customers, including merchants and end-users, to use the
17 Vizio product in an infringing manner as described above. Upon information and
18 belief, Vizio has specifically intended that its customers use the Vizio product that
19 infringes at least claim 21 of the ’342 Patent by, at a minimum, providing access
20 to, support for, training and instructions for its website to its customers to enable
21 them to infringe at least claim 21 of the ’342 Patent, as described above. Even
22 where performance of the steps required to infringe at least claim 21 of the ’342
23 Patent is accomplished by Vizio and a Vizio customer jointly, Vizio is responsible
24 for the actions that cause each of the steps of at least claim 21 of the ’342 Patent to
25 be performed.

26 45. Sockeye is entitled to recover damages adequate to compensate it for
27 such infringement in an amount no less than a reasonable royalty under 35 U.S.C.
28 § 284.

1 **JURY DEMAND**

2 Under Rule 38(b) of the Federal Rules of Civil Procedure, Sockeye
3 respectfully requests a trial by jury on all issues so triable.

4 **PRAYER FOR RELIEF**

5 **WHEREFORE**, Sockeye asks this Court to enter judgment against
6 Panasonic, granting the following relief:

- 7 A. A declaration that Vizio has infringed the Patent-in-Suit;
8 B. An award of damages to compensate Sockeye for Panasonic's direct
9 infringement of the Patent-in-Suit;
10 C. An award of damages, including trebling of all damages, sufficient to
11 remedy Panasonic's infringement of the Patent-in-Suit under 35 U.S.C.
12 § 284;
13 D. A declaration that this case is exceptional, and an award to Sockeye of
14 reasonable attorneys' fees, expenses and costs under 35 U.S.C. § 285;
15 E. An award of prejudgment and post-judgment interest; and

16 Such other relief as this Court or jury may deem proper and just.

17
18 **DATED** on December 4, 2018

19
20 Respectfully submitted,

21 WATSON LLP

22
23 */s/ Coleman Watson*

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