

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

<p><b>Flectere LLC,</b>  Plaintiff,  v.  <b>FedEx Corporation,</b>  Defendant.</p>	<p>Case No. _____  Patent Case  Jury Trial Demanded</p>
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**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Flectere LLC (“Flectere”), through its attorney, complains of FedEx Corporation (“FedEx”), and alleges the following:

**PARTIES**

1. Plaintiff Flectere LLC is a corporation organized and existing under the laws of Texas and maintains its principal place of business at 1400 Preston Road, Suite 400, Suite 300, Plano, TX 75093.

2. Defendant FedEx Corporation is a corporation organized and existing under the laws of Delaware that maintains its principal place of business at 942 South Shady Grove Road, Memphis, TN 38120.

**JURISDICTION**

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

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

5. This Court has personal jurisdiction over FedEx because it has engaged in systematic and continuous business activities in the Eastern District of Texas. Specifically, FedEx provides its full range of services to residents in this District. As described below, FedEx has committed acts of patent infringement giving rise to this action within this District.

#### VENUE

6. Venue is proper in this District under 28 U.S.C. § 1400(b) because FedEx has committed acts of patent infringement in this District and has a regular and established place of business in this District. Specifically, FedEx has retail stores in this location, including a store located at 1200 Capital Ave, Plano, TX 75074. In addition, Flectere has suffered harm in this district.

#### PATENTS-IN-SUIT

7. Flectere is the assignee of all right, title and interest in United States Patent Nos. 6,272,506 (the "'506 Patent"), and 6,401,094 (the "'094 Patent") (collectively, the "Patents-in-Suit"), including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the Patents-in-Suit. Accordingly, Flectere possesses the exclusive right and standing to prosecute the present action for infringement of the Patents-in-Suit by FedEx.

#### **The '506 Patent**

8. On August 7, 2001, the United States Patent and Trademark Office issued the '506 Patent. The '506 Patent is titled "Computerized Verification Form Processing System and Method." The application leading to the '506 Patent was filed on September 12, 1997. A true and correct copy of the '506 Patent is attached hereto as Exhibit A and incorporated herein by reference.

9. The '506 Patent is valid and enforceable.

10. The inventors recognized that there was a need for improving computerized form processing systems that complied with current manufacturing procedures. Ex. A, 2:46-48.

11. The invention in the '506 Patent provides an improved computerized form processing system and method. Ex. A, 2:15-18.

12. To this end, the inventors recognized the importance of automatically keeping track of changes and complying with government regulations. Ex. A, 4:48-52. (“Thus, system 20, FIG. 2 provides an improved computerized form processing System and method which automatically keeps track of all changes made to data entries in a computerized form and therefore complies with FDA requirements concerning data changes.”).

### **The '094 Patent**

13. On June 4, 2002, the United States Patent and Trademark Office issued the '094 Patent. The '094 Patent is titled “System and Method for Presenting Information in Accordance with User Preference.” The application leading to the '094 Patent was filed on May 27, 1999. A true and correct copy of the '094 Patent is attached hereto as Exhibit B and incorporated herein by reference.

14. The '094 Patent is valid and enforceable.

15. The inventors recognized that there was a need for users to dynamically format web pages according to their preferences. Ex. B, 2:2–12.

16. To this end, the inventors created a system and method of web pages that allow users to customize based on preference. Ex. B, 2:13–20. (“To achieve the above and other objects, the present invention is directed to a system and method. . . for delivering information to a user in a format selected by the user. The information, instead of being stored in a static HTML document, is dynamically formatted for each user. . . .”).

**COUNT I: INFRINGEMENT OF THE '506 PATENT**

17. Flectere incorporates the above paragraphs herein by reference.

18. **Direct Infringement.** FedEx has been and continues to directly infringe at least Claim 11 of the '506 Patent in this District and elsewhere in the United States by providing a “computerized form processing system,” for example, FedEx’s Ship Manager Lite portal, that is a computerized form processing system allowing users to fill in their contact information. See Figure 1, available at: [https://www.fedex.com/lite/lite-ship.html?locale=en\\_us&cntry\\_code=us#address](https://www.fedex.com/lite/lite-ship.html?locale=en_us&cntry_code=us#address).

The screenshot displays the FedEx Ship Manager Lite interface. At the top is a purple navigation bar with the FedEx logo and menu items: Shipping, Tracking, Printing Services, Locations, and Support. Below this is a dark grey header for 'FedEx Ship Manager Lite' with links for Login, Advanced Shipping, and Help. The main content area is titled '1. Address Information' and contains the instruction: 'Enter your (From) address and the recipient's (To) address.' The form is divided into two columns: 'From Address' and 'To Address'. Each column has input fields for: Name, Company (optional), Country/Location (dropdown menu), Address (Street address and Apt, Floor, Suite, etc. optional), ZIP, City, State (dropdown menu), and Phone (with optional extension). There are also radio buttons for 'Shipment notifications (optional)' (Email or Text Message (SMS)) and 'Email notifications (optional)'. A checkbox for 'This is a residential address' is present, along with a 'Perform detailed address check' link and a 'Continue' button.

Figure 1. FedEx’s Ship Manager Lite portal allows users to fill in their contact information.

19. FedEx’s Ship Manager Lite portal has Claim element 11(a): “a database for storing at least one form including one or more fields.” For example, FedEx’s Ship Manager Lite

portal comprises a database for storing at least one form including one or more fields. *See* Figure 2, available at: [https://www.fedex.com/lite/lite-ship.html?locale=en\\_us&cntry\\_code=us#address](https://www.fedex.com/lite/lite-ship.html?locale=en_us&cntry_code=us#address).

```


    To Address
  </div>
  <div id="fx-to-hideable-addr-section" class="fxlay-hideable-section fxis-hidden">
    <div class="fxlay-field-container">
      <label for="fx-to-name" class="fx-input-text">Recipient name</label>
      <input name="fx-to-name" id="fx-to-name" data-error-field="AddressInformationModel.toAddress Contac
      value aria-required="true" aria-label="Recipient's full name">
    </div>
    <div class="fxlay-field-container">
      <label for="fx-to-co" class="fx-input-text">Company</label>
      <input name="fx-to-co" id="fx-to-co" data-error-field="AddressInformationModel.toAddress.compan
      placeholder="(optional)" value aria-label="Recipient's Company">
    </div>
    <div class="fxlay-field-container">
      <label for="fx-to-country" tagnotation-error-field="REQUESTEDSHIPMENT.RECIPIENTLIST.0.RECIPIENT.ADR
      ><select name="fx-to-country" id="fx-to-country" data-error-field="AddressInformationModel.toAddress
      </select>
    </div>
    <div class="fxlay-field-container" id="fx-to-address-search-section" style="display:none;"></div>
    <div class="fxlay-field-container">
      <label for="fx-to-addr1" class="fx-input-text">Address</label>
      <input name="fx-to-addr1" id="fx-to-addr1" data-error-field="AddressInformationModel.toAddress.addr
      "REQUESTEDSHIPMENT.RECIPIENTLIST.0.RECIPIENT.ADDRESS.STREETLINELIST.0.STREETLINE RECIPIENT.STREETLI
      "true" aria-label="Recipient's Address Line number one">
    </div>
    <div class="fxlay-field-container">
      ><label for="fx-to-addr2" class="fx-input-text"></label>
      <input name="fx-to-addr2" id="fx-to-addr2" tagnotation-error-field="REQUESTEDSHIPMENT.RECIPIENTLIST
      (optional)" maxlength="35" class="fx-input-text" style="margin-top: 0.1em;" value aria-label="Recip
    </div>
    <div class="fxlay-field-container"></div>
    <div class="fxlay-field-container"></div> == $0
    <div id="fx-to-state-section" class="fxlay-field-container" style="display:block;"></div>
    <div class="fxlay-field-container fxlay-phone clearfix">
      ><div class="fxlay-phone-container"></div>
      ><div class="fxlay-ext-container"></div>
    </div>
  
```

Figure 2. FedEx’s Ship Manager Lite portal comprises a database for storing at least one form including one or more fields.

20. FedEx’s Ship Manager Lite portal has Claim element 11(b): “a viewer for viewing a stored form.” For example, FedEx’s Ship Manager Lite portal allows users to see the data they enter into the form. *See* Figure 3, available at: [https://www.fedex.com/lite/lite-ship.html?locale=en\\_us&cntry\\_code=us#address](https://www.fedex.com/lite/lite-ship.html?locale=en_us&cntry_code=us#address).

**To Address**

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Recipient name	<input type="text"/>
Company	<input type="text" value="(optional)"/>
Country / Location	<input style="border-bottom: 1px solid black;" type="text" value="United States"/>
Address	<input type="text" value="Street address"/>
	<input type="text" value="Apt, Floor, Suite, etc.. (optional)"/>
ZIP	<input type="text"/>
City	<input type="text"/>
State	<input style="border-bottom: 1px solid black;" type="text" value="Select"/>
Phone	<input type="text"/> Ext. <input type="text" value="(optional)"/>
Email notifications	<input type="text" value="(optional)"/> 

*Figure 3. FedEx’s Ship Manager Lite portal allows users to see the data they enter into the form.*

21. FedEx’s Ship Manager Lite portal has Claim element 11(c): “a data entry device for allowing a user to enter information into the fields of the form.” For example, FedEx’s Ship Manager Lite portal allows users to enter in data, such as street address, into the form. *See* Figure 4, available at: [https://www.fedex.com/lite/lite-ship.html?locale=en\\_us&cntry\\_code=us#address](https://www.fedex.com/lite/lite-ship.html?locale=en_us&cntry_code=us#address).

**To Address**

---

Recipient name	<input type="text" value="Jon Doe"/>	
Company	<input type="text" value="(optional)"/>	
Country / Location	<input style="border-bottom: 1px solid black;" type="text" value="United States"/>	
Address	<input type="text" value="1400 Preston Rd Ste 403"/>	
	<input type="text" value="Apt, Floor, Suite, etc.. (optional)"/>	
ZIP	<input type="text" value="75093"/>	
City	<input type="text" value="PLANO"/>	
State	<input style="border-bottom: 1px solid black;" type="text" value="Texas"/>	
Phone	<input type="text"/>	Ext. <input type="text" value="(optional)"/>
Email notifications	<input type="text" value="(optional)"/> 	

*Figure 4. FedEx's Ship Manager Lite portal allows users to enter in data, such as street address, into the form.*

22. FedEx's Ship Manager Lite portal has Claim element 11(d): "a monitoring routine configured to actively monitor whether previously entered information in a field of the form is being changed by the user." For example, FedEx's Ship Manager Lite portal monitors whether previously entered information is being changed by users. *See* Figure 4; *see also* Figure 5, available at: [https://www.fedex.com/en-us/quick-help/saac/address\\_check.html](https://www.fedex.com/en-us/quick-help/saac/address_check.html).

### **How does FedEx Address Checker work?**

1. Checks if the street exists in the city and state/province entered, or in the ZIP or postal code entered.
2. Checks if the street number is within a valid range for the street entered.
3. Provides an exact match (or possible alternatives) based upon the street number, street name, city, state/province and ZIP or postal code entered.

*Figure 5. FedEx's Ship Manager Lite portal monitors whether previously entered information is being changed by users.*

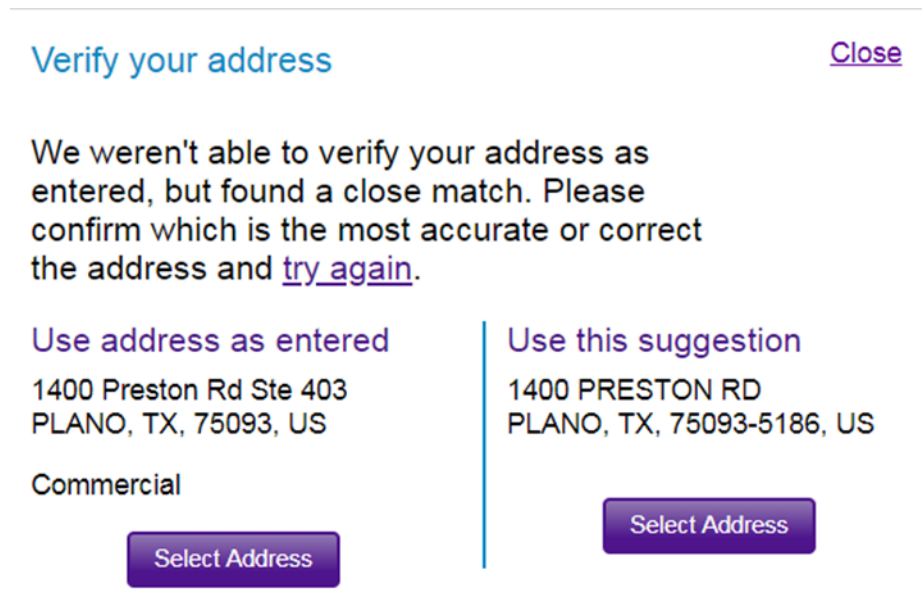
23. FedEx's Ship Manager Lite portal has Claim element 11(e): "a field modification verification routine configured to, on the viewer, prompt the user to sign off on any such change." For example, FedEx's Ship Manager Lite portal will ask users whether they want to use a verified shipping address instead of the address they manually entered and is configured to then prompt the user to sign off on a change to the address information. Figure 5; See Figure 6, available at:

[https://www.fedex.com/us/developer/WebHelp/ws/2015/html/WebServicesHelp/WSDVG/8\\_Address\\_Validation\\_Service.htm](https://www.fedex.com/us/developer/WebHelp/ws/2015/html/WebServicesHelp/WSDVG/8_Address_Validation_Service.htm); See also Figure 7, available at: [https://www.fedex.com/lite/lite-ship.html?locale=en\\_us&cntry\\_code=us#](https://www.fedex.com/lite/lite-ship.html?locale=en_us&cntry_code=us#).

## 8.6 Address Checking Process

Address Validation Service (AVS) is the new central database for address-related information across FedEx. Address Validation returns the "best" address in the response—one that has been validated against reference data.

*Figure 6. FedEx's Ship Manager Lite portal will ask users whether they want to use a verified shipping address instead of the address they manually entered.*



The screenshot shows a dialog box titled "Verify your address" with a "Close" link in the top right corner. The main text reads: "We weren't able to verify your address as entered, but found a close match. Please confirm which is the most accurate or correct the address and [try again](#)." Below this, there are two columns of options. The left column is titled "Use address as entered" and shows the address "1400 Preston Rd Ste 403 PLANO, TX, 75093, US" with the label "Commercial" underneath. A purple "Select Address" button is at the bottom of this column. The right column is titled "Use this suggestion" and shows the address "1400 PRESTON RD PLANO, TX, 75093-5186, US". A purple "Select Address" button is at the bottom of this column.

*Figure 7. FedEx's Ship Manager Lite portal will ask users whether they want to use a verified shipping address instead of the address they manually entered.*



24. **Induced Infringement.** FedEx has also actively induced, and continues to induce, the infringement of at least Claim 11 of the '506 Patent by actively inducing its customers, including merchants and end-users to use FedEx's website in an infringing manner as described above. Upon information and belief, FedEx has specifically intended that its customers use its website that infringe at least Claim 11 of the '506 Patent by, at a minimum, providing access to support for, training and instructions for, its website to its customers to enable them to infringe at least Claim 11 of the '506 Patent, as described above. Even where performance of the steps required to infringe at least Claim 11 of the '506 Patent is accomplished by FedEx and FedEx's customer jointly, FedEx's actions have solely caused all of the steps to be performed.

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

26. Flectere will continue to be injured, and thereby caused irreparable harm, unless and until this Court enters an injunction prohibiting further infringement.

## COUNT II: INFRINGEMENT OF THE '094 PATENT

27. Flectere incorporates the above paragraphs herein by reference.

28. **Direct Infringement.** FedEx has been and continues to directly infringe at least Claim 13 of the '094 Patent in this District and elsewhere in the United States by providing a method for "presenting information to a user on a workstation operated by the user in accordance with a preference specified by the user through the workstation," for example, FedEx's InSight software provides a method for allowing a user to display shipment records according to preferences set by users. Figures 8, 9, available at: <https://www.fedex.com/en-us/tracking/insight.html>; see Figure 10, available at: <https://www.fedex.com/en-us/tracking/insight.html#faq>; see also Figure 11, available at: <https://www.fedex.com/insight/demo/start.html>.

## FedEx InSight®

With FedEx InSight, you can proactively monitor all of your inbound and outbound shipments, as well as third-party shipments billed to your account, all without a tracking number. You can also receive automatic notifications of shipment status. The result? You can more effectively manage your supply chain. More efficiently plan staffing and inventory, and proactively manage customer expectations. The cost? Absolutely nothing.

Not a registered user? [Sign up now.](#)

*Figure 8. FedEx's InSight software provides a method for allowing a user to display shipment records according to preferences set by users.*

### Features & Benefits

#### Custom views:

Create and save multiple ways to see just the info you want to see.

#### Preferences:


Change screen configuration, number of shipments shown and more.

*Figure 9. FedEx's InSight software provides a method for allowing a user to display shipment records according to preferences set by users.*

How can I see shipments sorted the way I want to see them in a saved view? ^

You have complete flexibility to create a view that contains only the data you want and organize it so it is easiest for you to use. You can create, modify or delete a customized view via a simple wizard. The state of the view is shown at the bottom of the page as you build it, allowing you complete control over the results. After you've created and saved a customized view, click on Customized Views and select a name for a refreshed view of the shipments.


*Figure 10. FedEx's InSight software provides a method for allowing a user to display shipment records according to preferences set by users.*



**FedEx InSight® Demonstration**  
Overview

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**FedEx InSight®  
Customized View Wizard**



*See your Information the way you want it!*

InSight just became easier! By creating a Customized View, you will be able to see your information the way you want it. Customized Views allow you flexibility to view only the information that you need to better manage your business. Create Customized Views as you want!

**Create a New View**  
Select the button below to begin creating your Customized View.

[Create a View](#)

**Modify or Delete**  
Select the view name from the list below and click the appropriate button to modify or delete one of your current Customized Views.

## Overview

With FedEx InSight, you have complete control and total flexibility to create views that contain only the shipment information that you'd like to see.


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Overview
Getting Started
Using InSight
Options

Progress 1 2 3 4 5 pause sound

All Rights Reserved. © 2005 FedEx

register exit



**FedEx InSight® Demonstration**  
Options

---

FedEx InSight

Welcome
My Op

**FedEx InSight®  
Preferences**

Notifications
Invitations
Shipments

**Preferences**

Listed below are screen options to view your information. Choose the display that best meet your needs. Please note that if you print your screen, you will be in a portrait setting.

Layout Landscape

Rows to Display 50

[Global Home](#) | [fedex.com](#) [Terms of Use](#) | [Contact Us](#)

## Preferences

You can also change the way you see information on every screen within FedEx InSight.

Overview
Getting Started
Using InSight
Options
Notifications
Invitations
Shipments
Preferences

Progress 1 2 3 4 5 pause sound

All Rights Reserved. © 2005 FedEx

register exit

The screenshot displays the FedEx InSight web application. At the top left is the FedEx logo. To the right, it says 'FedEx InSight® Demonstration Using InSight'. Below this is a navigation bar with tabs: 'Welcome', 'My Options', 'Inbound View' (selected), 'Outbound View', 'Third Party View', and 'Customized Views'. A 'Quick Help' button is also present. The main content area is titled 'FedEx InSight® Inbound View' and features a 'Jump to' dropdown menu. A table of shipment records is shown below, with columns: Tracking Nbr, Ship (P/U) Date, Svc Type, Shipper Company Name, ST, Ctry, Nbr Pcs, and Status +. The table is divided into sections by estimated delivery dates: 01/06/2005 and 12/30/2004. Below the table are navigation tabs: 'Overview', 'Getting Started', 'Using InSight' (selected), and 'Options'. Under 'Options', there are sub-tabs: 'Shipment Visibility', 'View Options' (selected), and 'Download & Customized Views'.

Tracking Nbr	Ship (P/U) Date	Svc Type	Shipper Company Name	ST	Ctry	Nbr Pcs	Status +
Est. Delivery Date: 01/06/2005							
463204862	01/02/2005	FR	J. Smith	CA	US	10	Out for delivery; STOCKTON, CA; On trailer 2849573 Manifest Num
472390457931	01/02/2005	PO	Computer Shippers Inc		CN	5	On FedEx vehicle for delivery; RANCHO CORDOVA, CA
462948506912849	01/02/2005	FG	Jane Doe	FL	US	1	Package data transmitted to FedEx
Est. Delivery Date: 12/30/2004							
473829102938	12/29/2004	SO	Tom's Air Conditioning		US	17	Delivered: 12/30/2004 10:05 AM Signed for By: L. Covell
485938522934	12/28/2004	ES	Furniture Shippers Inc	FL	US	1	Delivery Exception; RANCHO CORDOVA, CA; Return tracking num
574839203946	12/29/2004	IP	John Doe		CN	1	In transit; SHANGHAI, CN

Figure 11. FedEx's InSight software provides a method for allowing a user to display shipment records according to preferences set by users.

29. FedEx's InSight software performs the step of Claim 13(a): "storing the information." For example, FedEx's InSight software provides shipment records and tracking information that are stored on FedEx's secure database servers. Figure 12, available at: <https://www.fedex.com/insight/demo/start.html>; see Figure 13, available at: <https://image.slidesharecdn.com/fedexpptcrm-090401231602-phpapp01/95/fed-exppt-crm-30-728.jpg?cb=1238627813>; see also Figure 14, available at: [https://www.fedex.com/us/developer/webhelp/ws/2018/Docs/FedEx\\_WebServices\\_TrackService\\_WSDLGuide\\_v2018.pdf](https://www.fedex.com/us/developer/webhelp/ws/2018/Docs/FedEx_WebServices_TrackService_WSDLGuide_v2018.pdf).

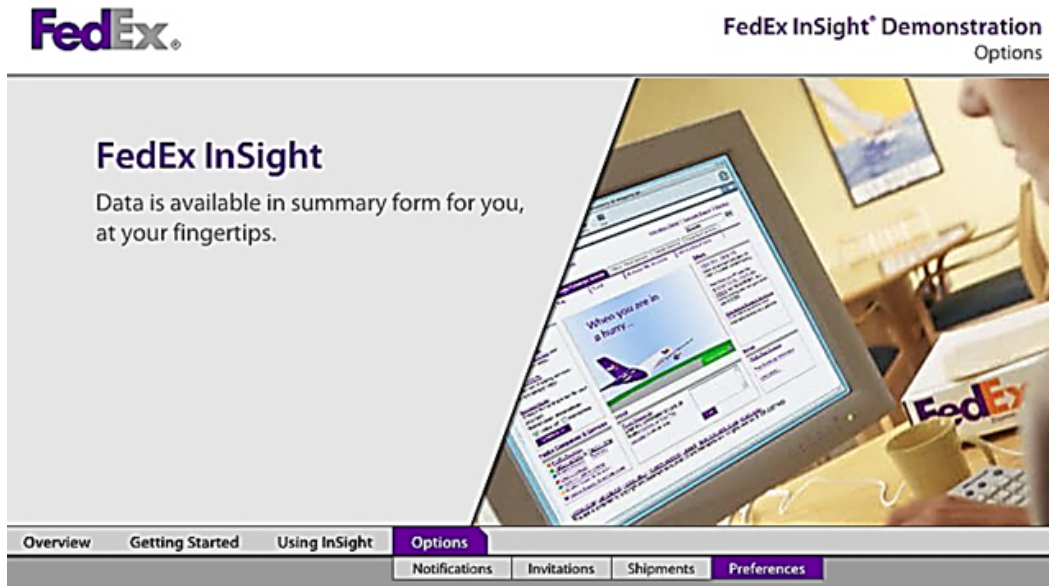


Figure 12. FedEx's InSight software provides shipment records and tracking information that are stored on FedEx's secure database servers.

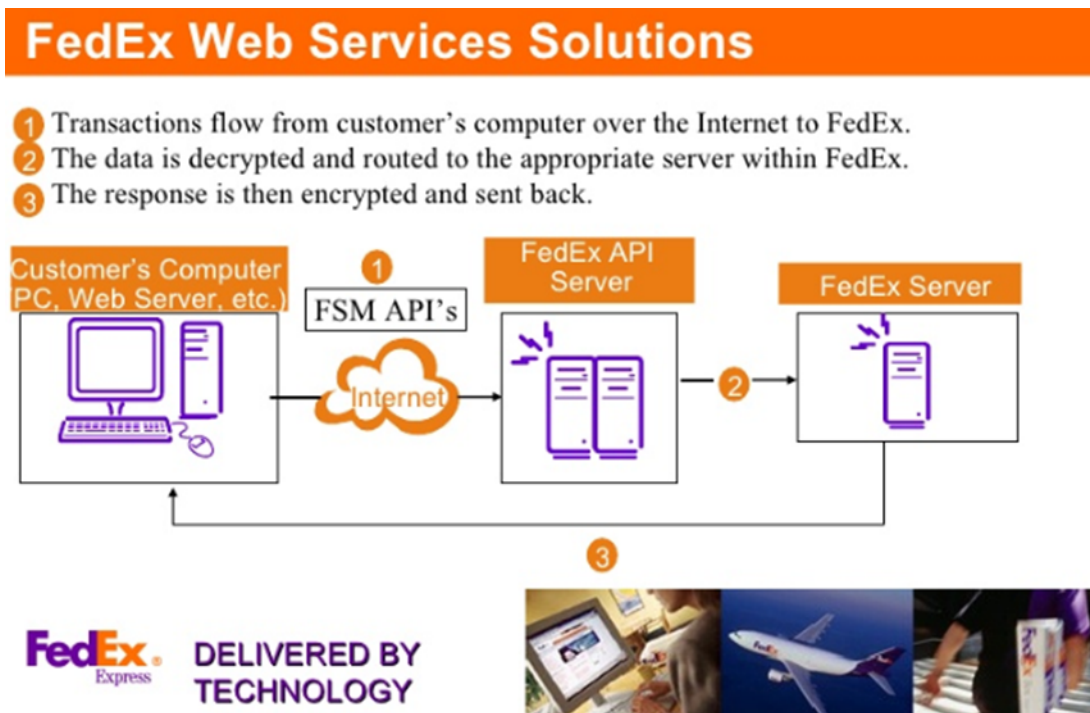


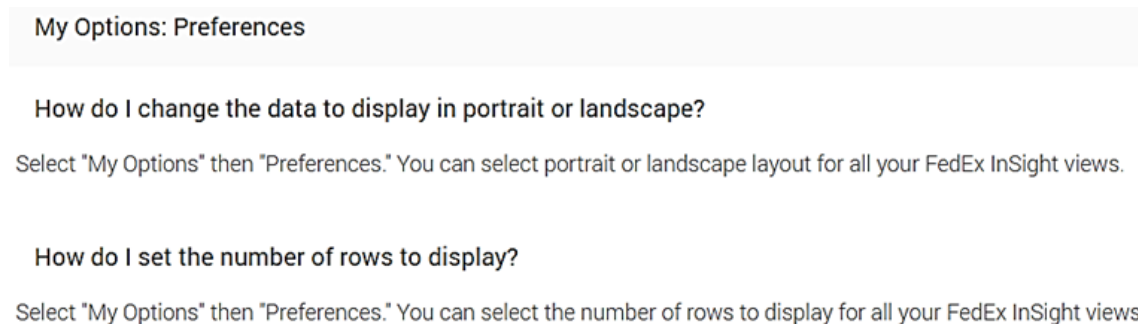
Figure 13. FedEx's InSight software provides shipment records and tracking information that are stored on FedEx's secure database servers.

## 2.5 Plain XML Web Services

FedEx offers a plain XML web services solution that you can use to send transactions without having to use tools that provide SOAP protocol support for web services. This may be convenient for developers using environments that do not provide support for SOAP. With this interface, XML documents are sent directly to the FedEx servers via the HTTP POST command. FedEx provides a set of specifications and examples to help with the development of this type of communications method.

*Figure 14. FedEx's InSight software provides shipment records and tracking information that are stored on FedEx's secure database servers.*

30. FedEx's InSight software performs the step of Claim 13(b): "permitting the user to specify the preference through the workstation and receiving from the workstation a request for the information and an indication of the preference which has been specified by the user through the workstation." For example, FedEx's InSight software allows users to set preferences according to their needs to get a specific view every time they request for information such as by selecting either portrait or landscape layouts to display shipment records, and preferences set by the user are saved each time a page containing shipment records is to be displayed on user's request. See Figure 15, available at: <https://www.fedex.com/en-us/tracking/insight.html#faq>; see also Figures 16-21, available at: <https://www.fedex.com/insight/demo/start.html>.



*Figure 15. FedEx's InSight software allows users to set preferences according to their needs to get a specific view every time they request for information.*

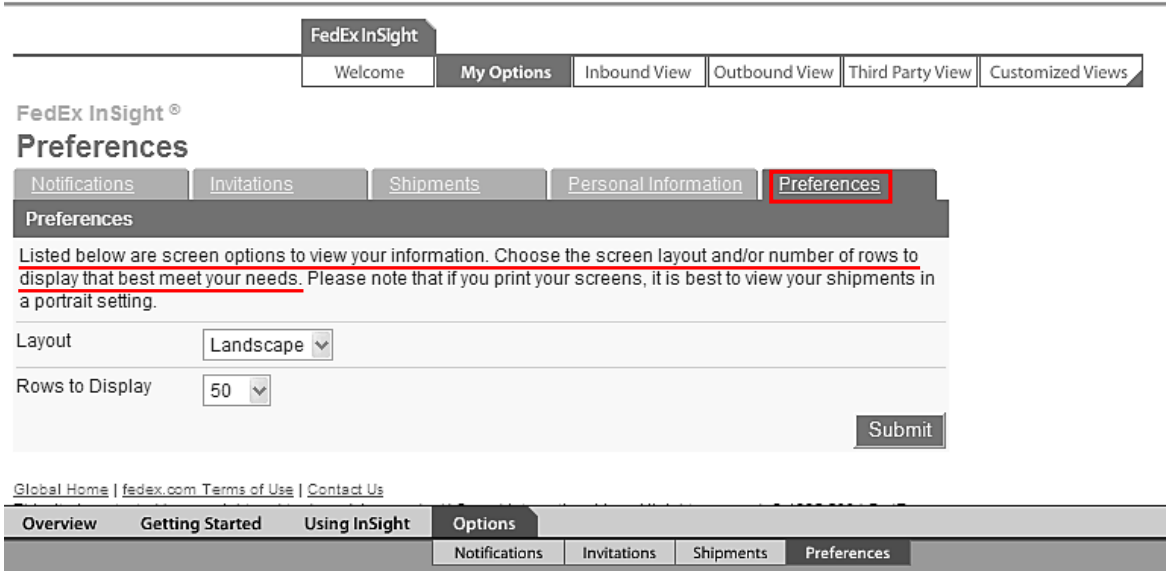
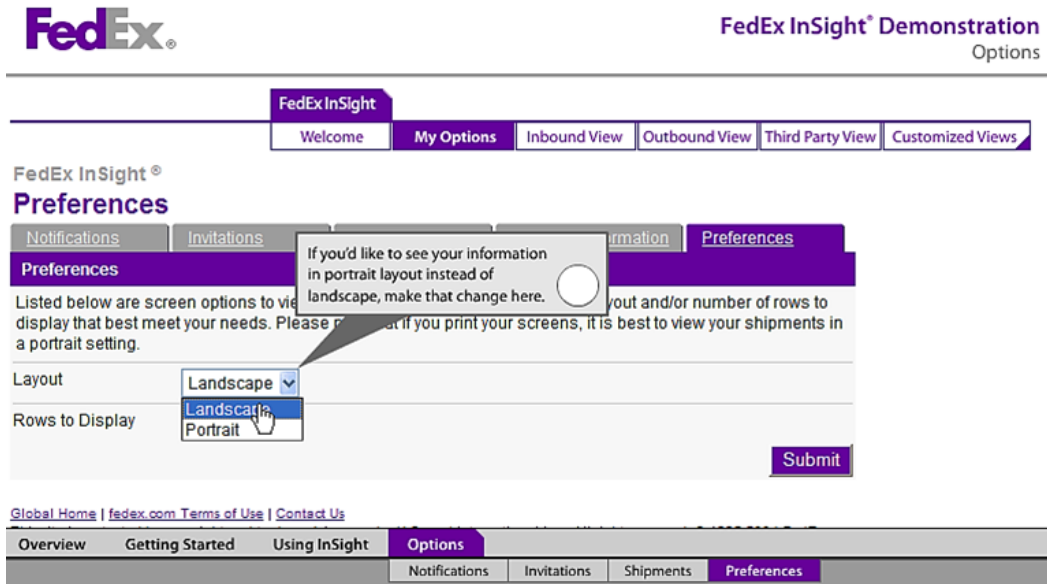


Figure 16. FedEx's InSight software allows users to set preferences according to their needs to get a specific view every time they request for information.



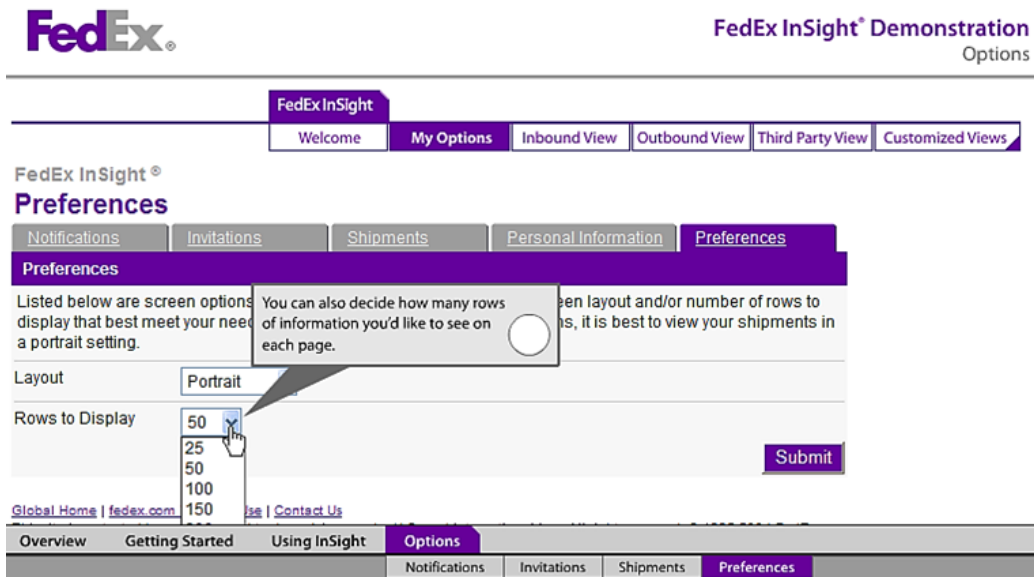


Figure 17. FedEx's InSight software allows users to set preferences according to their needs to get a specific view every time they request for information.

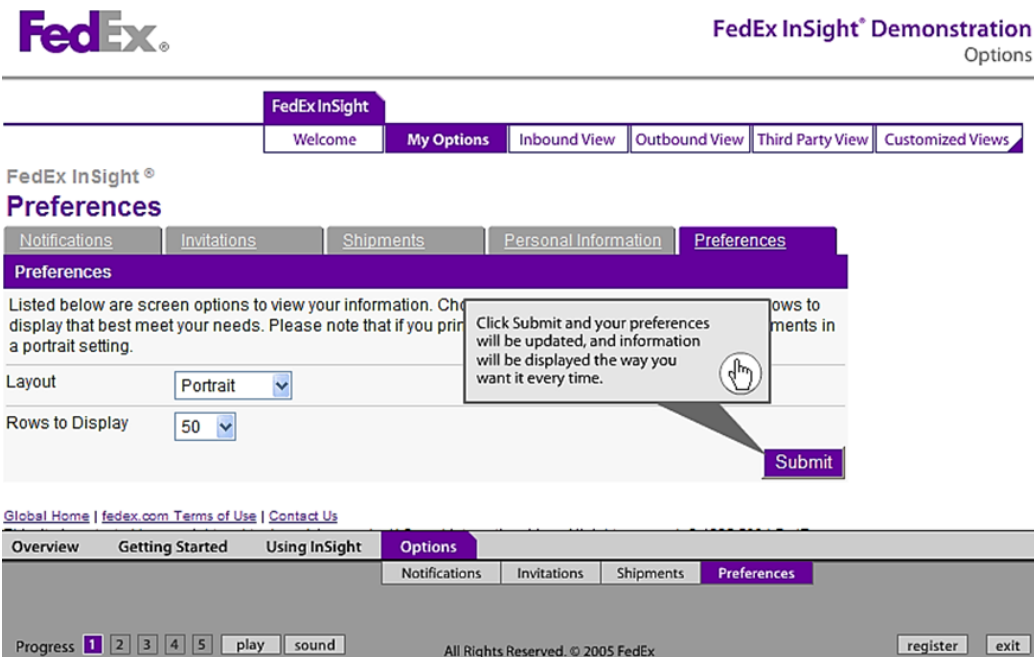


Figure 18. FedEx's InSight software allows users to set preferences according to their needs to get a specific view every time they request for information.



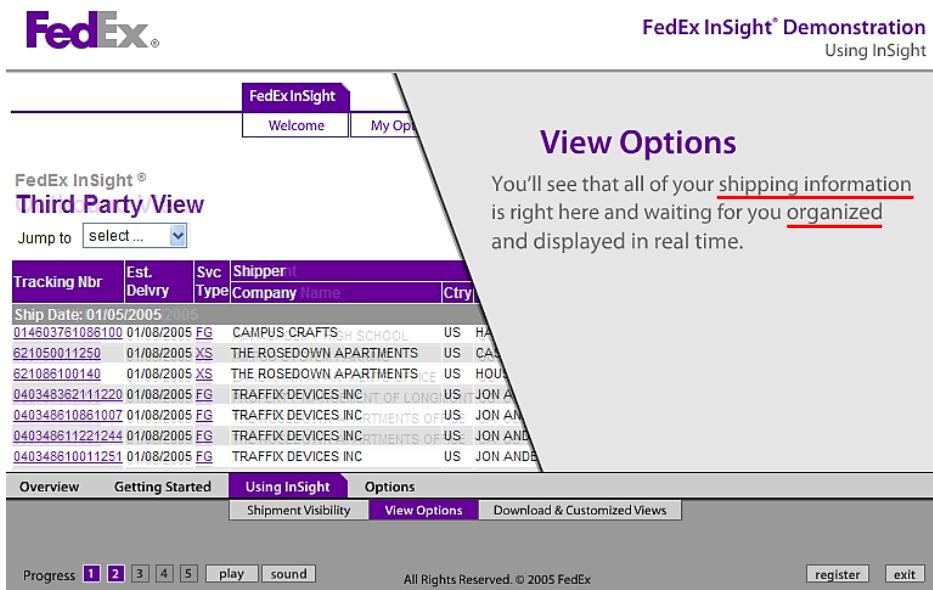


Figure 19. FedEx's InSight software allows users to set preferences according to their needs to get a specific view every time they request for information.

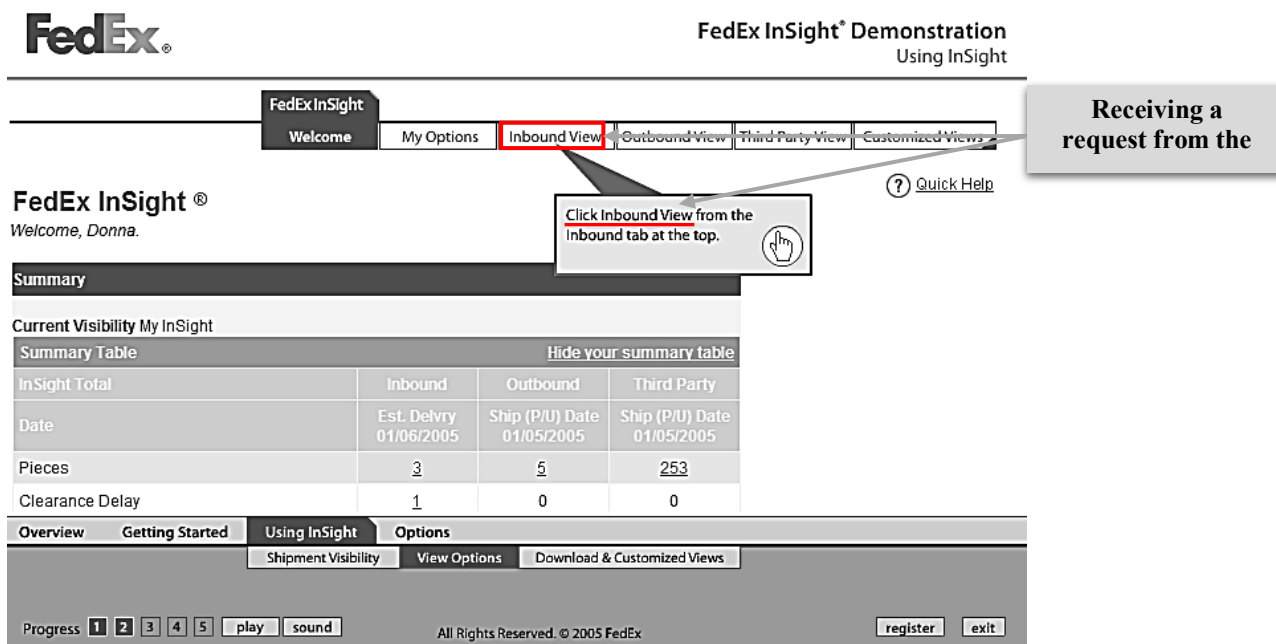


Figure 20. Preferences set by the user are saved each time a page containing shipment records is to be displayed on user's request.

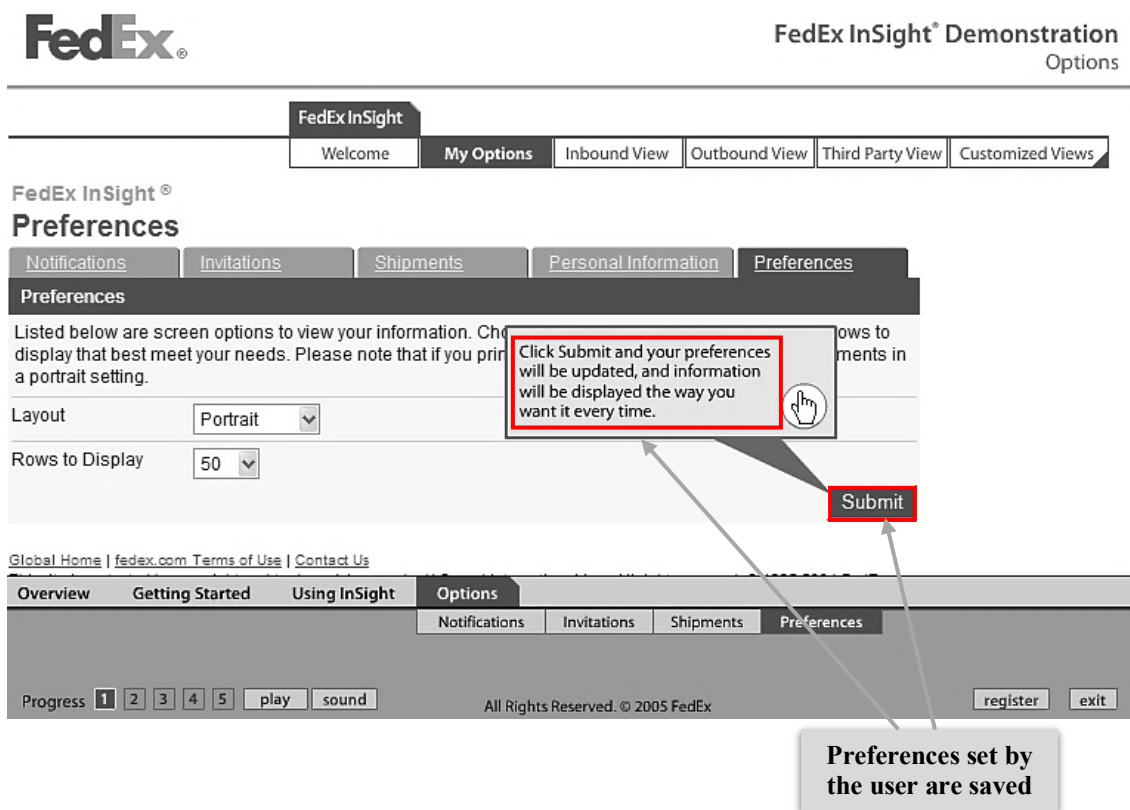


Figure 21. Preferences set by the user are saved each time a page containing shipment records is to be displayed on user's request.

31. FedEx's InSight software performs the step of Claim 13(c): "retrieving the information from a database server." For example, FedEx's InSight software provides shipment information by retrieving it from FedEx's database servers when a user requests for import shipment details by clicking on the 'imports tab.' See Figures 11, 12.

32. FedEx's InSight software performs the step of Claim 13(d): "dynamically formatting the information in accordance with the preference to form custom-formatted information." For example, FedEx's InSight software allows users to dynamically format how the information is presented such as by saving user preferences on how the information is to be displayed. See Figures 15, 21.

33. FedEx's InSight software performs the step of Claim 13(e): "sending the custom-formatted information to the workstation." For example, FedEx's InSight software displays the

saved format of the shipping information based on the user's saved preference settings. *See* Figure 11.

34. **Induced Infringement.** FedEx has also actively induced, and continues to induce, the infringement of at least Claim 13 of the '094 Patent by actively inducing its customers, including merchants and end-users to use FedEx's website in an infringing manner as described above. Upon information and belief, FedEx has specifically intended that its customers use its website that infringe at least Claim 13 of the '094 Patent by, at a minimum, providing access to support for, training and instructions for, its website to its customers to enable them to infringe at least Claim 13 of the '094 Patent, as described above. Even where performance of the steps required to infringe at least Claim 13 of the '094 Patent is accomplished by FedEx and FedEx's customer jointly, FedEx's actions have solely caused all of the steps to be performed.

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

36. Flectere will continue to be injured, and thereby caused irreparable harm, unless and until this Court enters an injunction prohibiting further infringement.

#### **JURY DEMAND**

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

#### **PRAYER FOR RELIEF**

WHEREFORE, Flectere asks this Court to enter judgment against FedEx, granting the following relief:

- A. A declaration that FEDEX has infringed the Patent-in-Suit;
- B. An award of damages to compensate Flectere for FedEx's direct infringement of the Patent-in-Suit;

- C. An order that FedEx and its officers, directors, agents, servants, employees, successors, assigns, and all persons in active concert or participation with them, be preliminarily and permanently enjoined from infringing the Patent-in-Suit under 35 U.S.C. § 283;
- D. An award of damages, including trebling of all damages, sufficient to remedy FedEx's willful infringement of the Patent-in-Suit under 35 U.S.C. § 284;
- E. A declaration that this case is exceptional, and an award to Flectere of reasonable attorneys' fees, expenses and costs under 35 U.S.C. § 285;
- F. An award of prejudgment and post-judgment interest; and
- G. Such other relief as this Court or jury may deem proper and just.

Dated: January 18, 2019

Respectfully submitted,

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