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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

UNILOC 2017 LLC,

Plaintiff,

v.

MICROSOFT CORPORATION,

Defendant.

CASE NO. 8:19-cv-00428

COMPLAINT FOR PATENT INFRINGEMENT

DEMAND FOR JURY TRIAL

Plaintiff Uniloc 2017 LLC ("Uniloc"), by and through the undersigned counsel, hereby brings this action and makes the following allegations of patent infringement relating to U.S. Patent No. 7,167,487 against Defendant Microsoft Corporation ("Microsoft"), and alleges as follows upon actual knowledge with respect to itself and its own acts and upon information and belief as to all other matters:

NATURE OF THE ACTION

1. This is an action for patent infringement. Uniloc alleges that Microsoft infringes U.S. Patent No. 7,167,487 (the "'487 patent), a copy of which is attached hereto as Exhibit A.

2. Uniloc alleges that Microsoft directly and indirectly infringes the '487 patent by making, using, offering for sale, selling and importing devices that implement the 3GPP specification version 6 or later such as the Microsoft Surface Pro. Uniloc further alleges that Microsoft induces and contributes to the infringement of others. Uniloc seeks damages and other relief for Microsoft's infringement of the '487 patent.

THE PARTIES

3. Uniloc 2017 LLC is a Delaware corporation having places of business at 1209 Orange Street, Wilmington, Delaware 19801 and 620 Center Drive, Newport Beach, California 92660.

4. Uniloc holds all substantial rights, title and interest in and to the '487 patent.

5. Upon information and belief, Defendant Microsoft Corporation is a corporation organized and existing under the laws of the State of Washington, with at least the following places of business in this District: 3 Park Plaza, Suite 1600, Irvine, CA 92614; 3333 Bristol Street, Suite 1249, Costa Mesa, CA 92626; 578 The Shops at Mission Viejo, Mission Viejo, CA 92691; 331 Los Cerritos Center, Cerritos, CA

90703; 13031 West Jefferson Blvd., Suite 200, Los Angeles, CA 90094; 2140 Glendale Galleria, JCPenney Court, Glendale, CA 91210; 10250 Santa Monica Blvd., Space #1045, Los Angeles, CA 90067; 6600 Topanga Canyon Blvd, Canoga Park, CA 91303. Microsoft can be served with process by serving its registered agent for service of process in California: Corporation Service Company which Will Do Business in California as CSC - Lawyers Incorporating Service, 2710 Gateway Oaks Dr., Ste. 150, Sacramento, CA 95833.

JURISDICTION AND VENUE

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

7. This Court has both general and specific jurisdiction over Microsoft because Microsoft has committed acts within the Central District of California giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over Microsoft would not offend traditional notions of fair play and substantial justice. Defendant Microsoft, directly and through subsidiaries, intermediaries (including distributors, retailers, franchisees and others), has committed and continues to commit acts of patent infringement in this District, by, among other things, making, using, testing, selling, licensing, importing and/or offering for sale/license products and services that infringe the '487 patent.

8. Venue is proper in this district and division under 28 U.S.C. §§ 1391(b)-(d) and 1400(b) because Microsoft has committed acts of infringement in the Central District of California and has multiple regular and established places of business in the Central District of California.

COUNT I – INFRINGEMENT OF U.S. PATENT NO. 7,167,487

9. The allegations of paragraphs 1-8 of this Complaint are incorporated

by reference as though fully set forth herein.

10. The '487 patent, titled "Network With Logic Channels and Transport Channels," issued on January 23, 2007. A copy of the '487 patent is attached as Exhibit A.

11. Pursuant to 35 U.S.C. § 282, the '487 patent is presumed valid.

12. Invented by Koninklijke Philips Electronics N.V., the '487 patent relates to WCDMA networks and in particular, describes in detail and claims in various ways inventions in computer networks relating to the selection of a transport block format subject to minimum bitrate requirements for prioritized logical channels.

13. On information and belief, Microsoft makes, uses, offers for sale, and sells in the United States and imports into the United States electronic devices that operate in compliance with HSUPA/HSUPA+ standardized in UMTS 3GPP Release 6 and above, such as, the Microsoft Surface Pro with LTE devices, (collectively the "Accused Infringing Devices").

14. On information and belief, the Microsoft Surface Pro with LTE includes a Qualcomm Snapdragon X16 LTE modem, which supports HSUPA functionality.

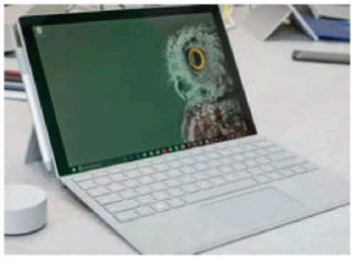
The Surface Pro with LTE Advanced brings cellular wireless connectivity to the convertible tablet/laptop, offering speeds of up to 450Mbps.

"When you want the ultimate in versatility and still want performance to move you forward, we bring the new Surface Pro," said Microsoft's hardware chief Panos Panay, speaking at Microsoft's Future Decoded conference in London.

The LTE version of the Pro uses a Cat 9 modem with support for 20 cellular bands, and is expected to work with a wide variety of 4G networks worldwide, rather than being limited to networks within a specific region.

The new machine has a seven-antenna Qualcomm X16 Gigabit Class LTE modem, which is integrated directly onto the motherboard to optimize its responsiveness when recovering from sleep and hibernation modes.

FIRST LOOK



Surface Pro (2017): Small refinements to a familiar design

Don't call it Surface Pro 5. The latest iteration of the Surface Pro loses the model number, keeps the kickstand, and adds mostly subtle refinements.

Source: https://www.zdnet.com/article/microsofts-new-surface-pro-with-lte-and-450mbps-downloads-out-in-december/

Supported Cellular Technologies

- LTE FDD
- LTE TDD
- LAA
- LTE Broadcast
- WCDMA (DB-DC-HSDPA, DC-HSUPA)
- TD-SCDMA
- CDMA 1x
- EV-DO
- GSM/EDGE

Source: https://www.qualcomm.com/products/snapdragon/modems/4g-lte/x16

15. On information and belief, the Accused Infringing Devices infringe claim 12 in the exemplary manner described below.

16. The Accused Infringing Devices send data to the WCDMA network using logical channels and support channels. The standard provides a mapping of logical channels to transport channels.

5.3.1.1.2 Mapping between logical channels and transport channels

5.3.1.1.2.2 Mapping in Downlink

The mappings as seen from the UE and UTRAN sides are shown in Figure 4 and Figure 5 respectively.

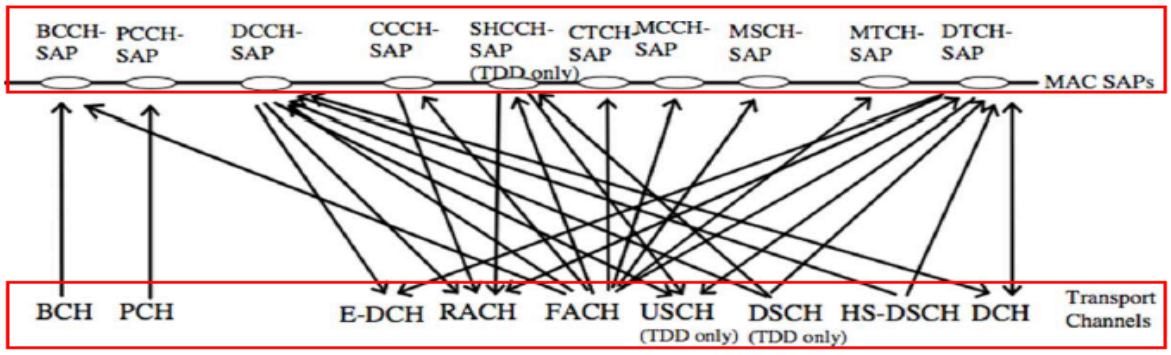


Figure 4: Logical channels mapped onto transport channels, seen from the UE side

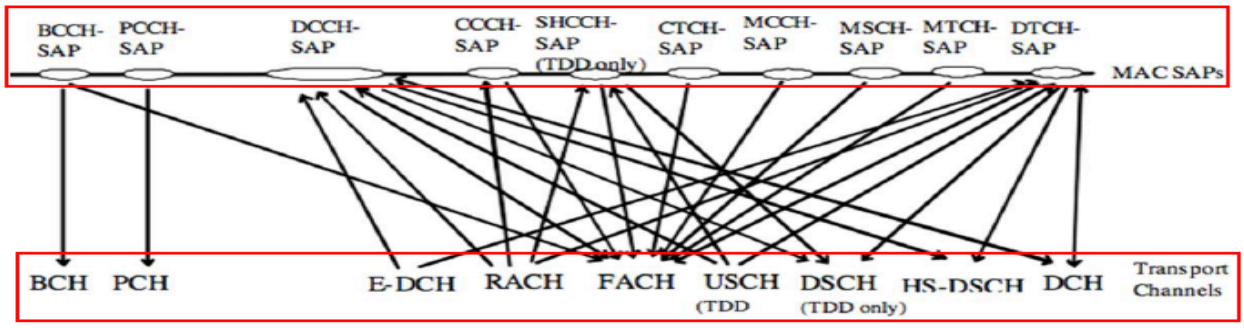


Figure 5: Logical channels mapped onto transport channels, seen from the UTRAN side

Source: 3GPP TS 25.301 V6.6.0 (2008-03) Technical Specification 3rd Generation Partnership Project; Technical Specification Group Radio Access Network; Radio Interface Protocol Architecture, http://www.3gpp.org/ftp/Specs/html-info/25301.htm, Page 16-17.

17. The Accused Infringing Devices are designed for transmitting transport blocks formed from packet units of the logic channels. For example, the Accused Infringing Devices include a medium access control (MAC) layer that receives upper layer protocol data units (PDUs) (i.e., "packet units"), on logical channels and multiplexes the upper layer PDUs into transport blocks. As such the transport blocks are formed from the packet units (PDUs). As shown below, the logical channels come from the upper later into the MAC and are output on the transport channels for transmission.

5.3.1.2 MAC functions

The functions of MAC include:

...

- **Multiplexing/demultiplexing of upper layer PDUs into/from transport blocks delivered to/from the physical layer on common transport channels**. MAC should support service multiplexing for common transport channels, since the physical layer does not support multiplexing of these channels.

- **Multiplexing/demultiplexing of upper layer PDUs into/from transport block sets delivered to/from the physical layer on dedicated transport channels**. The MAC allows service multiplexing for dedicated transport channels. This function can be utilised when several upper layer services (e.g. RLC instances) can be mapped efficiently on the same transport channel. In this case the identification of multiplexing is contained in the MAC protocol control information.

Source: 3GPP TS 25.301 V6.6.0 (2008-03) Technical Specification 3rd Generation Partnership Project; Technical Specification Group Radio Access Network; Radio Interface Protocol Architecture, http://www.3gpp.org/ftp/Specs/html-info/25301.htm, Page 18.

4.2.3 Traffic Related Architecture - UE Side

Figure 4.2.3.1 illustrates the connectivity of MAC entities.

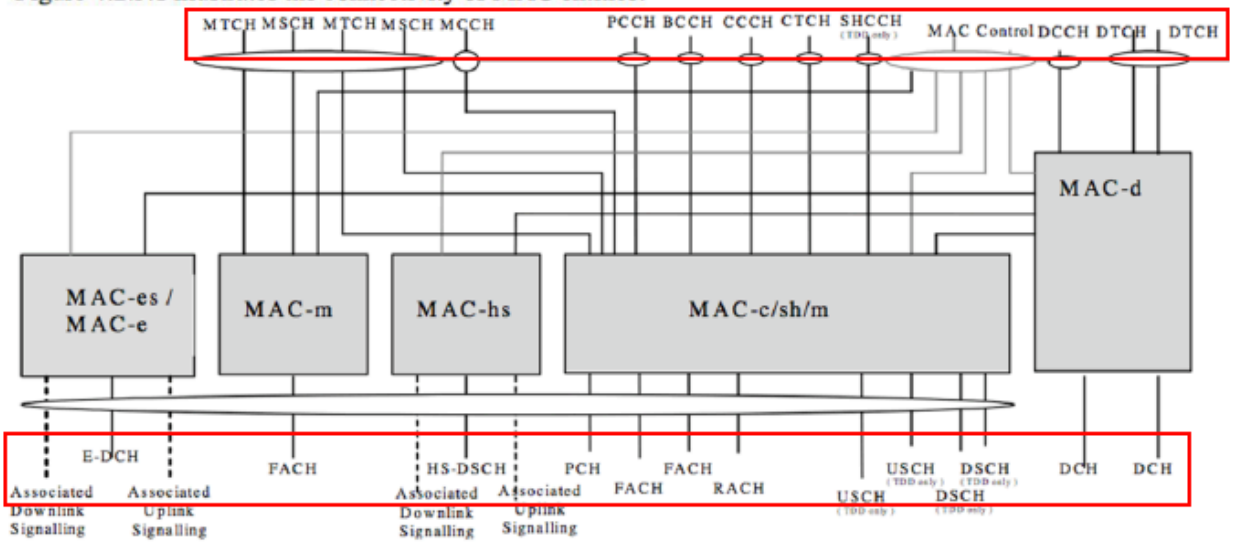


Figure 4.2.3.1: UE side MAC architecture

Source: 3GPP TS 25.321 V6.18.0 (2009-03) Technical Specification 3rd Generation Partnership Project; Technical Specification Group Radio Access Network; Medium Access Control (MAC) protocol specification, http://www.3gpp.org/ftp/Specs/html-info/25321.htm, Page 12.

18. A number of valid transport format combinations is allocated to the transport channels. For example, an Accused Infringing Device is signaled, from the network, which transport format combinations (TFCs) it can use for the transport channels (i.e., "valid transport format combinations"). For the dedicated channel (DCH) transport channel, an Accused Infringing Device is configured to use a transport format combination set (TFCS). For the enhanced DCH (E-DCH) transport channel, an Accused Infringing Device is configured to use a table of enhanced TFCs (E-TFCs). The network configures an Accused Infringing Device to limit the number of TFCs/E-TFCs used (i.e., the "number of valid transport format combinations"), so that a fixed number of bits are sent by the Accused Infringing Device to indicate the selected TFC/E-TFC. For example, 128 E-TFCs are included in each E-TFC table, so that the Accused Infringing Device only uses 7 bits to signal the selected E-TFC. As shown below, the Accused Infringing

Devices are configured to use a table of E-TFCs/E-TFCIs ("valid") for the E-DCH transport channel and are configured to use a set of TFCs, TFCs, ("valid") for the DCH transport channel. The E-DCH uses a 7-bit indicator (128 values) to indicate the selected E-TFC (E-TFCI) for the E-DCH.

11.8.1.4 E-TFC Selection

...

The transmission format and data allocation shall follow the requirements below:

- Only E-TFCs from the configured E-TFCS shall be considered for the transmission;

Source: 3GPP TS 25.321 V6.18.0 (2009-03) Technical Specification 3rd Generation Partnership Project; Technical Specification Group Radio Access Network; Medium Access Control (MAC) protocol specification, http://www.3gpp.org/ftp/Specs/html-info/25321.htm, Page 78-79.

10.3.6.99 E-DPDCH Info

Information Element/Group name	Need	Multi	Type and reference	Semantics description	Version
E-TFCI table index	MP		Integer (0..1)	Indicates which standardised E-TFCI TB size table shall be used	REL-6
E-DCH minimum set E-TFCI	MD		Integer (0..127)	See [15]; Absence means no E-DCH minimum set	REL-6
Reference E-TFCIs	MP	1 to 8		See [29]	REL-6
>Reference E-TFCI	MP		Integer (0..127)		REL-6
>Reference E-TFCI PO	MP		Integer (0..29)	Refer to quantization of the power offset in [28]	REL-6

Source: 3GPP TS 25.331 V6.26.0 (2011-12) Technical Specification 3rd Generation Partnership Project; Technical Specification Group Radio Access Network; Radio Resource Control (RRC); Protocol Specification, http://www.3gpp.org/ftp/Specs/html-info/25331.htm, Page 647.

10.3.5.13 TFCS Explicit Configuration

Information Element/Group name	Need	Multi	IE type and reference	Semantics description
CHOICE *TFCS representation*	MP			
>Complete reconfiguration				
>>TFCS complete reconfiguration information	MP		TFCS Reconfiguration/Addition information 10.3.5.15	
>Addition				
>>TFCS addition information	MP		TFCS Reconfiguration/Addition information 10.3.5.15	
>Removal				
>>TFCS removal information	MP		TFCS Removal Information 10.3.5.16	
>Replace				
>>TFCS removal information	MP		TFCS Removal Information 10.3.5.16	
>>TFCS addition information	MP		TFCS Reconfiguration/Addition information 10.3.5.15	

Source: 3GPP TS 25.331 V6.26.0 (2011-12) Technical Specification 3rd Generation Partnership Project; Technical Specification Group Radio Access Network; Radio Resource Control (RRC); Protocol Specification, http://www.3gpp.org/ftp/Specs/html-info/25331.htm, Page 577.

- *E-TFCI*, the E-DCH transport format combination indicator of 7 bits indicating the transport format being transmitted simultaneously on E-DPDCHs. In essence, the E-TFCI tells the receiver the transport block size coded on the E-DPDCH. From this information the receiver can derive how many E-DPDCHs are transmitted in parallel and what spreading factor is used.

Source: Harri Holma, Antti Toskala (2006), *HSDPA/HSUPA for UMTS High Speed Radio Access for Mobile Communications*, John Wiley & Sons, LTD.

19. The combinations indicate the transport blocks designed for transmission for each transport channel. For example, each TFC (i.e., "combination") of the E-TFCs defines one or more transport blocks designed for transmission over each transport channel. An E-TFC defines a unique transport block size, having associated physical layer parameters, which are applied to one or more transport blocks (i.e., "indicate the transport blocks designed for transmission

for each transport channel"). To illustrate, each E-TFC is uniquely associated with a number of channelization codes and a spreading factor used at the physical layer for that transport block. For the claimed "combinations indicate the transport blocks designed for transmission for each transport channel," the E-TFC defines the formatting or the "design" of the transport block at the physical layer (*i.e.,* "for transmission"). Annex B is one of the E-DCH transport block size tables. The selected E-TFC has a corresponding E-TFCI and transport block size. The selection of the E-TFC sets the format (i.e., "design") for transport blocks sent on the E-DCH transport channel. The E-TFC/E-TFCI defines the physical layer processing of the E-DCH transport blocks.

Annex B (normative):
E-DCH Transport Block Size Tables for FDD

The mapping between the chosen E-TFCI and the corresponding E-DCH transport block size is given in the following tables:

B.1 2ms TTI E-DCH Transport Block Size Table 0

E-TFCI	TB Size (bits)	E-TFCI	TB Size (bits)	E-TFCI	TB Size (bits)	E-TFCI	TB Size (bits)	E-TFCI	TB Size (bits)
0	18	30	342	60	1015	90	3008	120	8913
1	120	31	355	61	1053	91	3119	121	9241
2	124	32	368	62	1091	92	3234	122	9582

...

Source: 3GPP TS 25.321 V6.18.0 (2009-03) Technical Specification 3rd Generation Partnership Project; Technical Specification Group Radio Access Network; Medium Access Control (MAC) protocol specification, http://www.3gpp.org/ftp/Specs/html-info/25321.htm, Page 86.

10.2.3. E-TFC Selection

The E-TFC selection is responsible for selecting the transport format of the E-DCH, thereby determining the data rate to be used for uplink transmission, and to control MAC-e multiplexing. Clearly, the selection needs to take the scheduling

Source: Erik Dahlman, et al (2008), *3G Evolution HSPA and LTE for Mobile Broadband*. Elsevier Ltd.

- *E-TFCI*, the E-DCH transport format combination indicator of 7 bits indicating the transport format being transmitted simultaneously on E-DPDCHs. In essence, the E-TFCI tells the receiver the transport block size coded on the E-DPDCH. From this information the receiver can derive how many E-DPDCHs are transmitted in parallel and what spreading factor is used.

Source: Harri Holma, Antti Toskala (2006), *HSDPA/HSUPA for UMTS High Speed Radio Access for Mobile Communications*, John Wiley & Sons, LTD.

20. A selection algorithm is provided for selecting the transport format combinations and the selection of the transport format combinations is carried out while taking into account a minimum bit rate obtaining for the respective logic channel. For example, uses an E-TFC selection algorithm (i.e., "algorithm provided for selecting…") to selects E-TFCs (i.e., "transport format combinations"). The logical channels have respective QoS criteria, including a Guaranteed bit rate (GBR) (i.e., "minimum bit rate"). The Accused Infringing Device is provided a non-scheduled grant for the logical channel to meet the GBR (i.e., "a minimum bit rate obtaining for the respective logical channel"). The non-scheduled grant for the GBR service is used by the Accused Infrining Device to select the E-TFC (i.e., "the selection of the transport format combinations is carried out while taking into account a minimum bit rate"). As shown below, an Accused Infringing Device uses the non-scheduled grants in the E-TFC selection (i.e., "selection of the transport format combinations") to achieve the guaranteed bit rate for logical channels ("minimum bit rate obtaining for respective logical channel"). The non-scheduled grants are used for the E-TFC selection (i.e., "selection of the transport format combinations"). The guaranteed bitrate is the number of bits delivered within a period of time divided by the duration of the time period ("minimum bit rate"). Additionally, the guaranteed bitrate ("minimum bit rate") is part of the QoS profile for the radio bearer/logical channel.

11.1 General Principle

The QoS of ongoing flows mapped on E-DCH for a UE is maintained by the serving Node B and by the UE. The Node B controls the resources allocated to a UE versus other UEs by means of scheduling as specified in clause 9. The UE controls the QoS of all its logical channels mapped on E-DCH by means of E-TFC selection as specified in subclause 11.2, and by HARQ operation, specified in clause 8.

In addition to these mechanisms, guaranteed bit rate services for MAC-d flows are also supported through non-scheduled transmission. A flow using non-scheduled transmission is defined by the SRNC and provided in the UE and in the Node B. Details on non-scheduled transmission can be found in section 10.

Source: 3GPP TS 25.309 V6.6.0 (2006-03) Technical Specification 3rd Generation Partnership Project; Technical Specification Group Radio Access Network; FDD Enhanced Uplink; Overall description; Stage 2, http://www.3gpp.org/ftp/Specs/html-info/25309.htm, Page 27.

10 Non-scheduled transmissions

When non-scheduled transmission is configured by the SRNC, the UE is allowed to send E-DCH data at any time, up to a configured number of bits, without receiving any scheduling command from the Node B. Thus, signalling overhead and scheduling delay are minimized.

Typical examples of data that may use non-scheduled transmission are the SRBs and GBR services.

Source: 3GPP TS 25.309 V6.6.0 (2006-03) Technical Specification 3rd Generation Partnership Project; Technical Specification Group Radio Access Network; FDD Enhanced Uplink; Overall description; Stage 2, http://www.3gpp.org/ftp/Specs/html-info/25309.htm, Page 26.

The transmission format and data allocation shall follow the requirements below:

- Only E-TFCs from the configured E-TFCS shall be considered for the transmission;
- For all logical channels, if the logical channel belongs to a non-scheduled MAC-d flow, its data shall be considered as available up to the corresponding non-scheduled grant, if the logical channel does not belong to a non-scheduled MAC-d flow, its data shall be considered as available up to the Serving Grant;

...

- if the transmission contains any scheduled data, the size of the selected MAC-e PDU shall not exceed the total of:
  - all non-scheduled grants which are applicable for transmission in this TTI;

Source: 3GPP TS 25.321 V6.18.0 (2009-03) Technical Specification 3rd Generation Partnership Project; Technical Specification Group Radio Access Network; Medium Access Control (MAC) protocol specification, http://www.3gpp.org/ftp/Specs/html-info/25321.htm, Page 79-80.

11.2 TFC and E-TFC selection

Logical channels mapped on the DCHs are always prioritised over those mapped on E-DCH.

The principle of the TFC selection across E-DCH and DCH is the following:

...

- E-TFC restriction is performed with the following characteristics;

...

- Among the supported E-TFCs, the UE selects the smallest E-TFC that maximises the transmission of data according to the non-scheduled grant(s) and the serving grant;

Source: 3GPP TS 25.309 V6.6.0 (2006-03) Technical Specification 3rd Generation Partnership Project; Technical Specification Group Radio Access Network; FDD Enhanced Uplink; Overall description; Stage 2, http://www.3gpp.org/ftp/Specs/html-info/25309.htm, Page 28-29.

Guaranteed bitrate (kbps)

Definition: guaranteed number of bits delivered by UMTS at a SAP within a period of time (provided that there is data to deliver), divided by the duration of the period. The traffic is conformant with the guaranteed bitrate as long as it follows a token bucket algorithm where token rate equals Guaranteed bitrate and bucket size equals Maximum SDU size.

The conformance definition should not be interpreted as a required implementation algorithm. The token bucket algorithm is described in annex B.

UMTS bearer service attributes, e.g. delay and reliability attributes, are guaranteed for traffic up to the Guaranteed bitrate. For the traffic exceeding the Guaranteed bitrate the UMTS bearer service attributes are not guaranteed.

[Purpose: Describes the bitrate the UMTS bearer service shall guarantee to the user or application. Guaranteed bitrate may be used to facilitate admission control based on available resources, and for resource allocation within UMTS.]

Source: 3GPP TS 23.107 V6.4.0 (2006-03) Technical Specification 3rd Generation Partnership Project; Technical Specification Group Services and System Aspects; Quality of Service (QoS) concept and architecture, http://www.3gpp.org/ftp/Specs/html-info/23107.htm, Page 18.

6.4.3.3 UMTS bearer attributes: summary

In table 2, the defined UMTS bearer attributes and their relevancy for each bearer traffic class are summarised. Observe that traffic class is an attribute itself.

Table 2: UMTS bearer attributes defined for each bearer traffic class

Traffic class	Conversational class	Streaming class	Interactive class	Background class
Maximum bitrate	X	X	X	X
Delivery order	X	X	X	X
Maximum SDU size	X	X	X	X
SDU format information	X	X		
SDU error ratio	X	X	X	X
Residual bit error ratio	X	X	X	X
Delivery of erroneous SDUs	X	X	X	X
Transfer delay	X	X		
Guaranteed bit rate	X	X		
Traffic handling priority			X	
Allocation/Retention priority	X	X	X	X
Source statistics descriptor	X	X		
Signalling indication			X	

Source: 3GPP TS 23.107 V6.4.0 (2006-03) Technical Specification 3rd Generation Partnership Project; Technical Specification Group Services and System Aspects; Quality of Service (QoS) concept and architecture, http://www.3gpp.org/ftp/Specs/html-info/23107.htm, Page 22.

21. Microsoft has infringed, and continues to infringe, at least claim 12 of the '487 patent in the United States, by making, using, offering for sale, selling and/or importing the Accused Infringing Devices in violation of 35 U.S.C. § 271(a).

22. Microsoft also has infringed, and continues to infringe, at least claim 12 of the '487 patent by actively inducing others to use, offer for sale, and sell the Accused Infringing Devices. Microsoft's customers who use those devices in accordance with Microsoft's instructions infringe claim 12 of the '487 patent, in violation of 35 U.S.C. § 271(a). Microsoft intentionally instructs its customers to infringe through training videos, demonstrations, brochures, support resources and user guides, such as those located at: www.microsoft.com and https://support.microsoft.com/en-us/help/4036286/surface-set-up-your-surface-3-4g-lte. Microsoft is thereby liable for infringement of the '487 Patent under 35 U.S.C. § 271(b).

23. Microsoft also has infringed, and continues to infringe, at least claim 12 of the '487 patent by offering to commercially distribute, commercially distributing, or importing the Accused Infringing Devices which devices are used in practicing the processes, or using the systems, of the '487 patent, and constitute a material part of the invention. Microsoft knows portions of the Accused Infringing Devices, such as the HSUPA circuitry with the Accused Infringing Devices, to be especially made or especially adapted for use in infringement of the '487 patent, not a staple article, and not a commodity of commerce suitable for substantial noninfringing use. Microsoft is thereby liable for infringement of the '487 patent under 35 U.S.C. § 271(c).

24. Microsoft has been on notice since July 24, 2018 and will have been on notice of the '487 patent since, at the latest, the service of this complaint upon it.

By the time of trial, Microsoft will have known and intended (since receiving such notice) that its continued actions would actively induce and contribute to the infringement of at least claim 12 of the '487 patent.

25. On information and belief, Microsoft may have infringed and continues to infringe the '487 patent through other software and devices utilizing the same or reasonably similar functionality, including other versions of the Accused Infringing Devices.

26. Microsoft's acts of direct and indirect infringement have caused and continue to cause damage to Uniloc and Uniloc is entitled to recover damages sustained as a result of Microsoft's wrongful acts in an amount subject to proof at trial.

PRAYER FOR RELIEF

WHEREFORE, plaintiff Uniloc 2017 LLC respectfully prays that the Court enter judgment in its favor and against Microsoft as follows:

a. A judgment that Microsoft has infringed one or more claims of the '487 Patent literally and/or under the doctrine of equivalents directly and/or indirectly by inducing infringement and/or by contributory infringement;

b. That this Court award Uniloc its damages pursuant to 35 U.S.C. § 284 and any royalties determined to be appropriate;

c. That this be determined to be an exceptional case under 35 U.S.C. § 285 and that Uniloc be awarded enhanced damages up to treble damages for willful infringement as provided by 35 U.S.C. § 284;

d. That this Court award Uniloc prejudgment and post-judgment interest on its damages;

e. That Uniloc be granted its reasonable attorneys' fees in this action;

f. That this Court award Uniloc its costs; and

g. That this Court award Uniloc such other and further relief as the Court deems proper.

DEMAND FOR JURY TRIAL

Uniloc hereby demands trial by jury on all issues so triable pursuant to Fed. R. Civ. P. 38.

Dated: March 5, 2019

FEINBERG DAY ALBERTI LIM & BELLOLI LLP

By: */s/ M. Elizabeth Day*
M. Elizabeth Day

Attorneys for Plaintiff
Uniloc 2017 LLC