UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

TERRESTRIAL COMMS LLC, Plaintiff v. **ACCO BRANDS USA LLC, AND ACCO BRANDS CORPORATION,** Defendants	**Case No. 6:20-cv-00097** **JURY TRIAL DEMANDED**

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Terrestrial Comms LLC ("Plaintiff" or "Terrestrial") hereby asserts the following claims for patent infringement against Defendant ACCO Brands USA LLC and ACCO Brands Corporation ("Defendants" or "ACCO"), and alleges, on information and belief, as follows:

THE PARTIES

1. Terrestrial is a limited liability company organized and existing under the laws of the Texas with its principal place of business at 17330 Preston Road, Suite 200D, Dallas, Texas 75252.

2. On information and belief, Defendant ACCO Brands USA LLC is a Delaware corporation with its headquarters at 4 Corporate Drive, Lake Zurich, Illinois 60047.

3. On information and belief, Defendant ACCO Brands Corporation is a Delaware corporation with its headquarters at 120 Ricefield Lane, Hauppauge, New York 11788.

JURISDICTION AND VENUE

4. This action arises under the patent laws of the United States, 35 U.S.C. § 1, *et seq*. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

5. Defendant has committed acts of infringement in this judicial district.

6. On information and belief, the Court has personal jurisdiction over Defendant because Defendant has committed, and continues to commit, acts of infringement in the state of Texas, has conducted business in the state of Texas, and/or has engaged in continuous and systematic activities in the state of Texas.

7. On information and belief, Defendant's instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in the Western District of Texas.

8. On information and belief, Defendant maintains a regular and established place of business in this Judicial District as evidenced by a recent job posting for a Marketing Manager in Austin, Texas.

Category Marketing Manager

POSTED ON 11/7/2019 CLOSED ON 1/22/2020

ACCO Brands Austin, TX Full Time

Job Posting for **Category Marketing Manager** at **ACCO Brands**

Achieve. Create. Collaborate. Organize.

Essential brands. Innovative products. Smart investment. Winning team. This is what you will find at ACCO Brands. We are passionate about building a culture that is committed to the success of our employees. If you are looking for an organization that offers rewarding opportunities and is dedicated to team orientation, learning and development, and flourishes with success, we invite you to be a part of building our company for the future.

Are you looking for a workplace that is highly collaborative and transparent? Are you hoping to work with teams that are positive, dedicated and passionate about their work? If your answers are yes, then **Kensington**, which operates as the technology division of ACCO Brands (NYSE:ACCO), is a right place for you to work and grow your career!

We are looking for **Category Marketing Manager -Data Protection** to work in our Austin, TX office.

As a Category Marketing Manager, you are responsible for developing the global marketing strategy to drive market share growth and leadership in physical hardware security and data protection categories for the Kensington brand. You are going to develop strategy and tactics to market and drive market share growth in physical hardware security and data protection categories (includes physical and digital locks, biometrics, shredders, privacy filters) in supported countries around the globe.

9. Venue is proper in the Western District of Texas pursuant to 28 U.S.C. § 1400(b).

ACUSED PRODUCTS

10. Upon information and belief, Defendant makes, uses, imports, sells, and/or offers for sale the Kensington Pro Fit Wireless Keyboard and Mouse, (collectively the "Accused Products").

11. Upon information and belief, Defendant ACCO encourages and supports the use of the Accused Products through its online support, advertising, and licensing relationships with resellers.

THE PATENTS-IN_SUIT

12. On August 29, 2006, United States Patent No. 7,098,850 (the "'850 patent"), entitled "Grounded Antenna for a Wireless Communication Device and Method," was duly and lawfully issued by the U.S. Patent and Trademark Office.

13. Terrestrial is the assignee and owner of the right, title and interest in and to the '850 patent, including the right to assert all causes of action arising under said patents and the right to any remedies for infringement of them.

14. On March 20, 2007, United States Patent No. 7,193,563 (the "'563 patent"), entitled "Grounded Antenna for a Wireless Communication Device and Method," was duly and lawfully issued by the U.S. Patent and Trademark Office.

15. Terrestrial is the assignee and owner of the right, title and interest in and to the '563 patent, including the right to assert all causes of action arising under said patents and the right to any remedies for infringement of them.

16. On August 12, 2008, United States Patent No. 7,411,552 (the "'552 patent"), entitled "Grounded Antenna for a Wireless Communication Device and Method," was duly and lawfully issued by the U.S. Patent and Trademark Office.

17. Terrestrial is the assignee and owner of the right, title and interest in and to the '552 patent, including the right to assert all causes of action arising under said patents and the right to any remedies for infringement of them.

18. On December 6, 2005, United States Patent No. 6,973,133 (the "'133 patent"), entitled "Integrated Radio Frequency Interface," was duly and lawfully issued by the U.S. Patent and Trademark Office.

19. Terrestrial is the assignee and owner of the right, title and interest in and to the '133 patent, including the right to assert all causes of action arising under said patents and the right to any remedies for infringement of them.

20. On February 11, 2003, United States Patent No. 6,519,290 (the "'290 patent"), entitled "Integrated Radio Frequency Interface," was duly and lawfully issued by the U.S. Patent and Trademark Office.

21. Terrestrial is the assignee and owner of the right, title and interest in and to the '290 patent, including the right to assert all causes of action arising under said patents and the right to any remedies for infringement of them.

COUNT I – INFRINGEMENT OF U.S. PATENT NO. 7,098,850

22. Terrestrial repeats and realleges the allegations of paragraphs 1 through 21 as if fully set forth herein.

23. Claim 1 of the '850 Patent recites:

> 1. A wireless communication device, comprising:
>
> a substrate;
>
> a wireless communication chip positioned on said substrate;
>
> a ground plane positioned on said substrate;

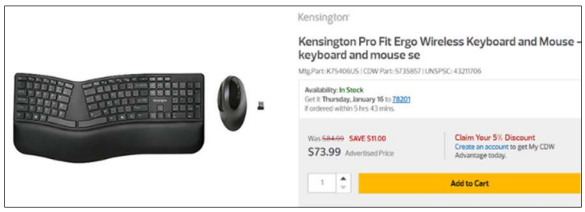
a first antenna operating at a first operating frequency and electrically coupled to said wireless communication chip by a coupling element, said first antenna also electrically coupled to said ground plane; and said coupling element being arranged to act as a second antenna at a second operating frequency.

24. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendant has infringed and continues to infringe the '850 Patent by making, using, importing, offering for sale, and/or selling the Accused Products.

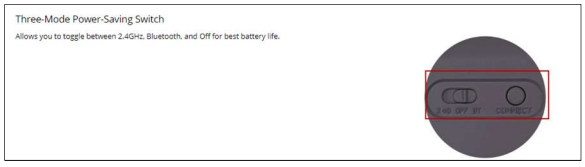
25. As exemplified below, the Accused Products are a wireless communication device.

A wireless communication device, comprising:

The Accused Instrument communicates via Wireless USB Radio and Bluetooth.



https://www.cdw.com/product/kensington-pro-fit-ergo-wireless-keyboard-and-mouse-keyboard-and-mouse-se/5735857



https://www.cdw.com/product/kensington-pro-fit-ergo-wireless-keyboard-and-mouse-keyboard-and-mouse-se/5735857

a substrate; a wireless communication chip positioned on said substrate;

a ground plane positioned on said substrate;

The chipset within the Accused Instrument comprises a substrate, a wireless communication chip positioned on said substrate, and a ground plane positioned on one

side of that substrate:

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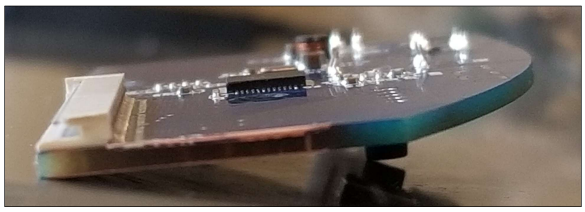
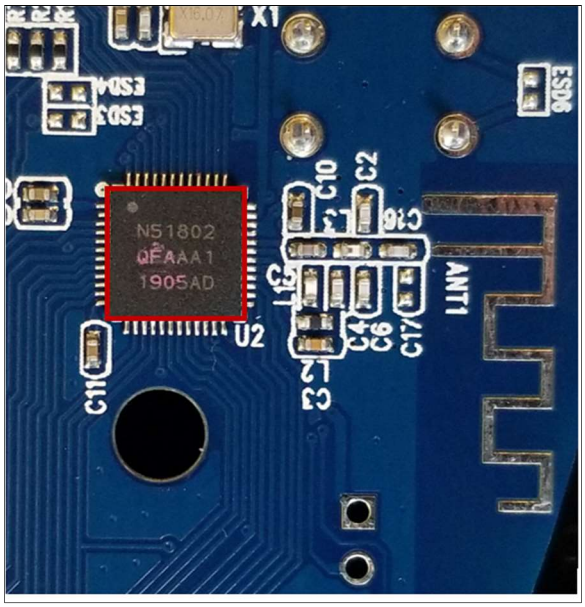
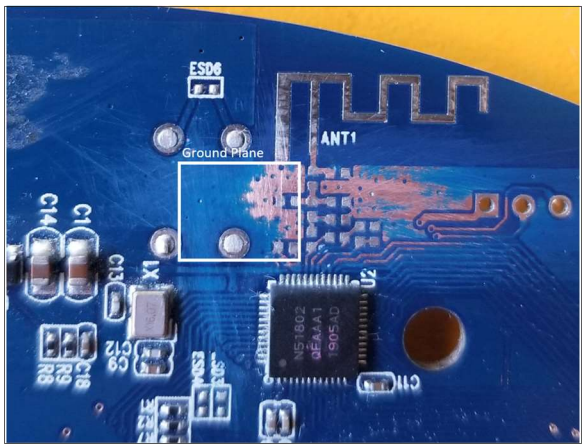


The Accused Instrument utilizes a Nordic Semi Conductor nRF51802 chip, which is a wireless communication RF/Bluetooth Chip.



https://www.nordicsemi.com/Products/Low-power-short-range-wireless/nRF51802

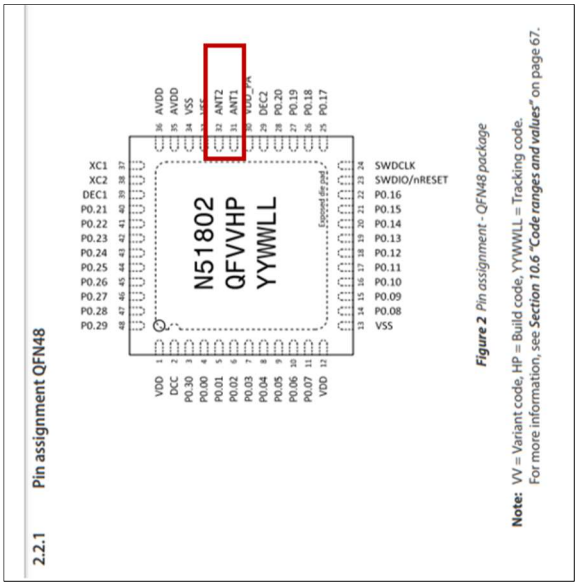


Both the Ground Plane and RF Chip are position on the substrate

a first antenna operating at a first operating frequency and electrically coupled to said wireless communication chip by a coupling element, said first antenna also electrically coupled to said ground plane; and

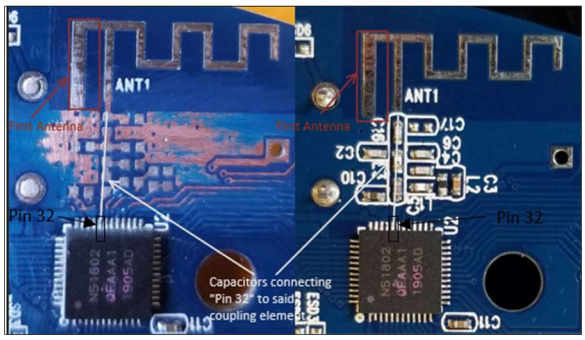
The Accused Instrument utilizes an antenna that is electrically coupled to the wireless communication chip and electrically shorted at one end to said ground plane:

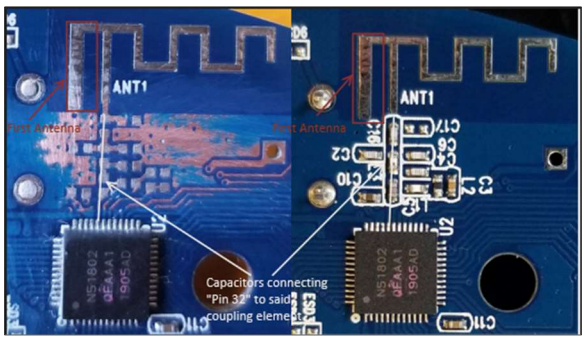
The First Antenna is operates at a first frequency:

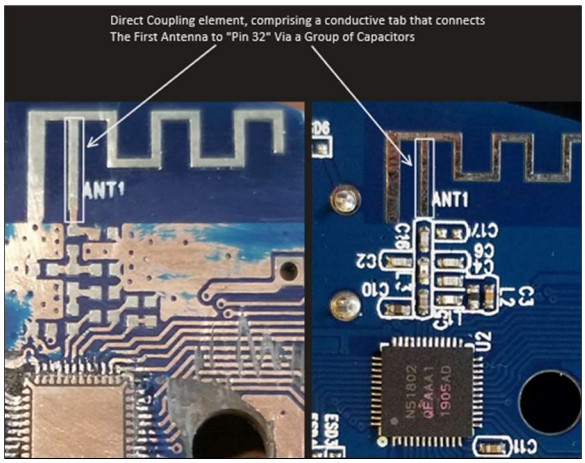


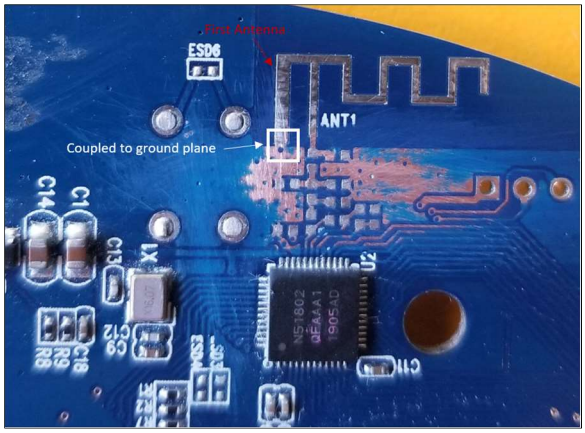
31	ANT1	RF	Differential antenna connection (TX and RX).
32	ANT2	RF	Differential antenna connection (TX and RX).

https://infocenter.nordicsemi.com/pdf/nRF51802_PS_v1.2.pdf?cp=5_5_0_0



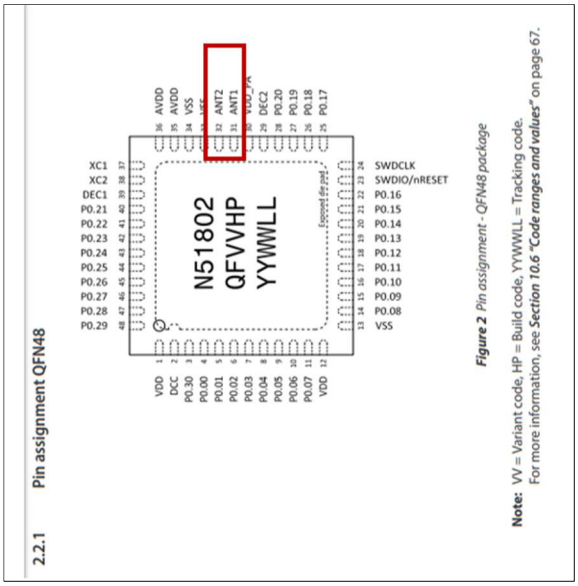






said coupling element being arranged to act as a second antenna at a second operating frequency.

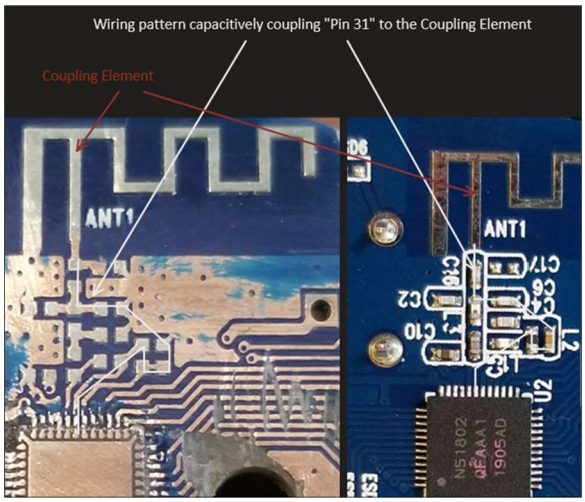
The wireless communication chip is designed to support two antennas:



31	ANT1	RF	Differential antenna connection (TX and RX).
32	ANT2	RF	Differential antenna connection (TX and RX).

https://infocenter.nordicsemi.com/pdf/nRF51802_PS_v1.2.pdf?cp=5_5_0_0

The coupling element is capactively coupled to the Pin 31 – a pin designated for a second differential antenna connection.



Thus, according to the functionality of the chip, the wiring pattern of the coupling element with said chip the coupling element is arranged to operate at a second frequency.

26. Terrestrial is entitled to recover from Defendant the damages sustained by Terrestrial as a result of Defendant's infringement of the ’850 Patent in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT II – INFRINGEMENT OF U.S. PATENT NO. 7,193,563

27. Terrestrial repeats and realleges the allegations of paragraphs 1 through 21 as if fully set forth herein.

28. Claim 1 of the ’563 Patent recites:

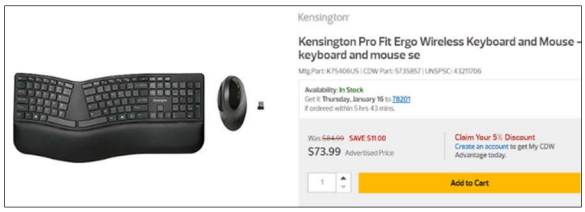
> 1. A wireless communication device, comprising:
>
> a substrate;
>
> a wireless communication chip positioned on said substrate;
>
> a ground plane positioned on said substrate; and
>
> an antenna electrically coupled to said wireless communication chip and electrically shorted at one end to said ground plane.

29. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendant has infringed and continues to infringe the ’563 Patent by making, using, importing, offering for sale, and/or selling the Accused Products.

30. As exemplified below, the Accused Products are a wireless communication device.

A wireless communication device, comprising:

The Accused Instrument communicates via Wireless USB Radio and Bluetooth.



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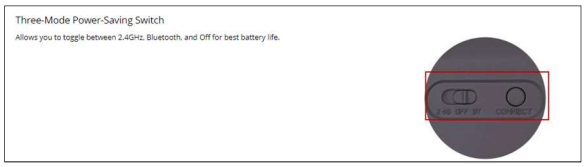

https://www.cdw.com/product/kensington-pro-fit-ergo-wireless-keyboard-and-mouse-keyboard-and-mouse-se/5735857

a substrate;

a wireless communication chip positioned on said substrate;

a ground plane positioned on said substrate; and

The chipset within the Accused Instrument comprises a substrate, a wireless communication chip positioned on said substrate, and a ground plane positioned on one side of that substrate:

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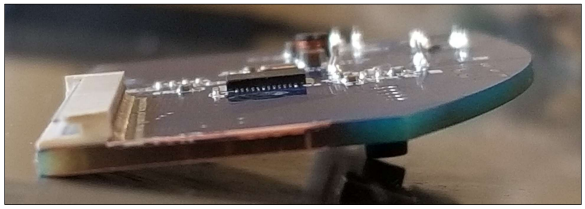
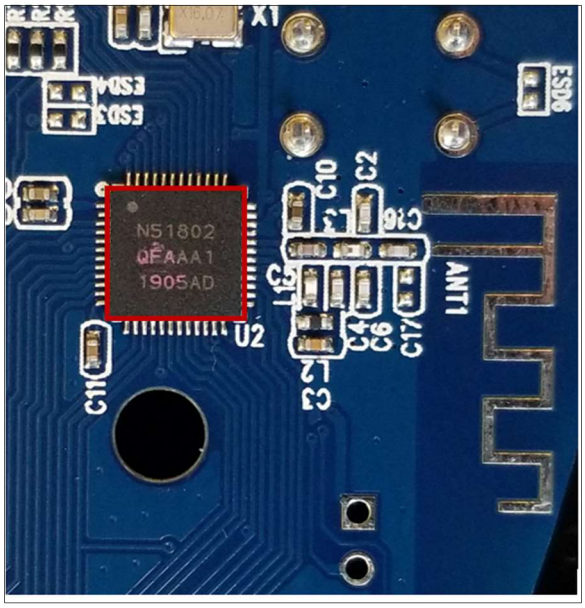
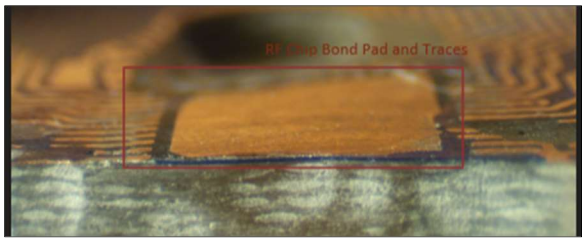


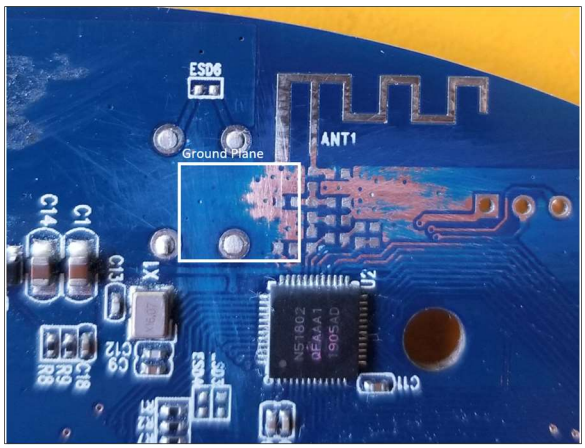
The Accused Instrument utilizes a Nordic Semi Conductor nRF51802 chip, which

is a wireless communication RF/Bluetooth Chip.

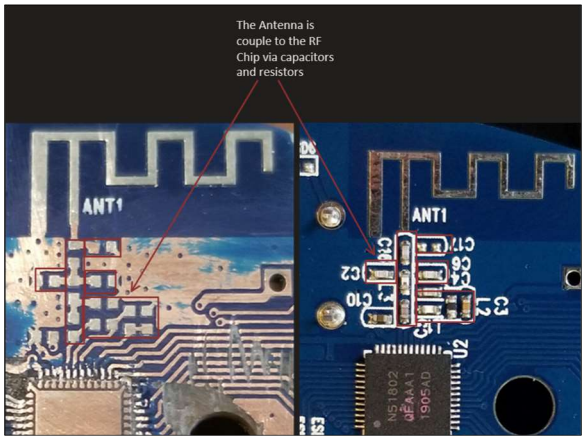


https://www.nordicsemi.com/Products/Low-power-short-range-wireless/nRF51802



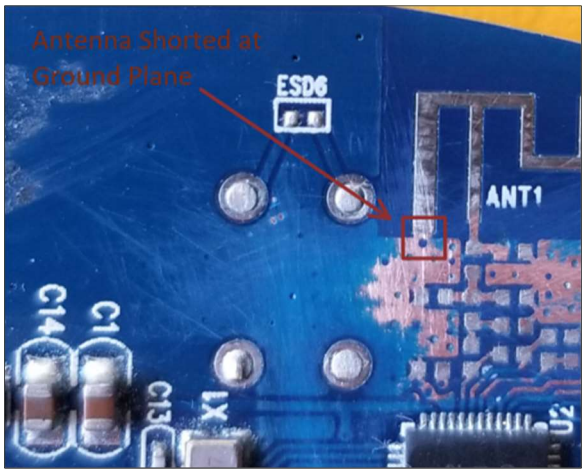


The Accused Instrument utilizes an antenna that is electrically coupled to the wireless communication chip and electrically shorted at one end to said ground plane:



Both the Ground Plane and RF Chip are positioned on the substrate.

an antenna electrically coupled to said wireless communication chip and electrically shorted at one end to said ground plane.



31. Terrestrial is entitled to recover from Defendant the damages sustained by Terrestrial as a result of Defendant's infringement of the '563 Patent in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT III – INFRINGEMENT OF U.S. PATENT NO. 7,411,552

32. Terrestrial repeats and realleges the allegations of paragraphs 1 through 21 as if fully set forth herein.

33. Claim 1 of the '552 Patent recites:

1. A wireless communication device, comprising:

a substrate;

a ground plane positioned on one side of the substrate;

a wireless communication chip electrically connected to said ground plane and proximate thereto;

an antenna having a first end and a second end, said first end electrically connected to said ground plane; and

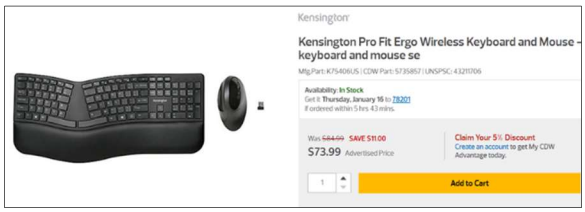
said second end comprising an open circuit.

34. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendant has infringed and continues to infringe the '552 Patent by making, using, importing, offering for sale, and/or selling the Accused Products.

35. As exemplified below, the Accused Products are a wireless communication device that communicates via Bluetooth and Wi-Fi.

A wireless communication device, comprising:

The Accused Instrument communicates via iWreless USB radio and Bluetooth.



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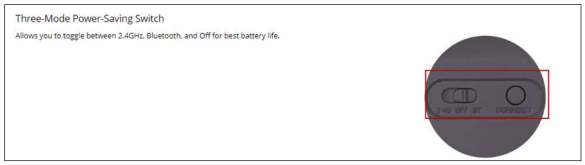

https://www.cdw.com/product/kensington-pro-fit-ergo-wireless-keyboard-and-mouse-keyboard-and-mouse-se/5735857

a substrate; a ground plane positioned on one side of the substrate;

The chipset within the Accused Instrument comprises of a substrate and a ground plane positioned on one side of that substrate:

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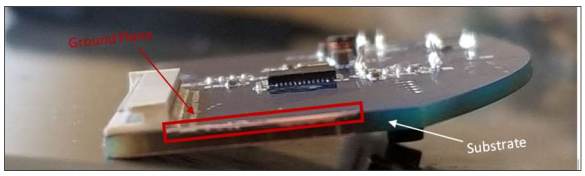
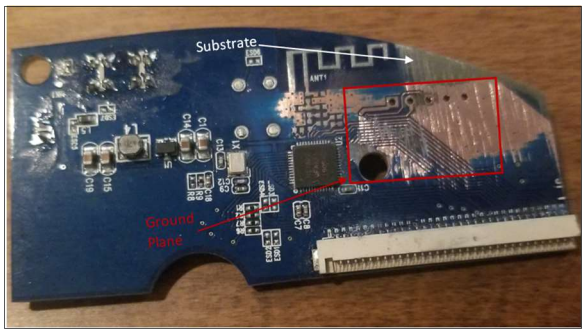
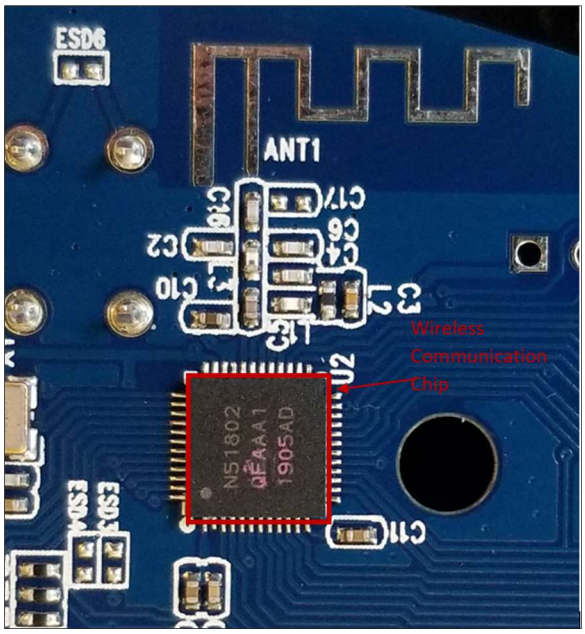


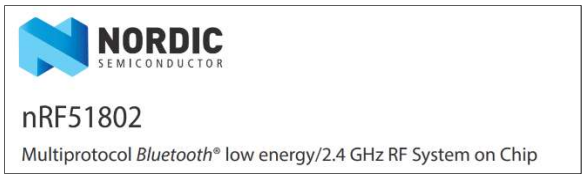


a wireless communication chip electrically connected to said ground plane and proximate thereto;

The Accused Instrument includes a wireless communication chip (Nordic Semi Conductor nRF51802).



https://www.nordicsemi.com/Products/Low-power-short-range-wireless/nRF51802



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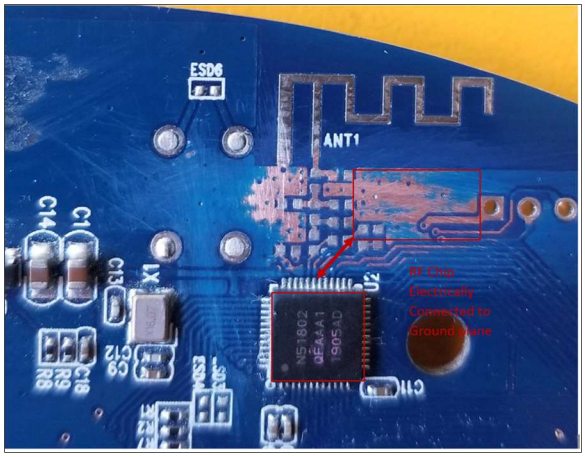
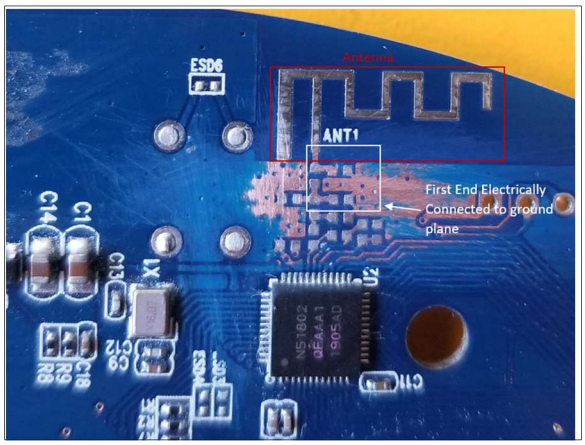
The wireless communicaiton chip is electrically connected to the groud plane and proximate thereto.

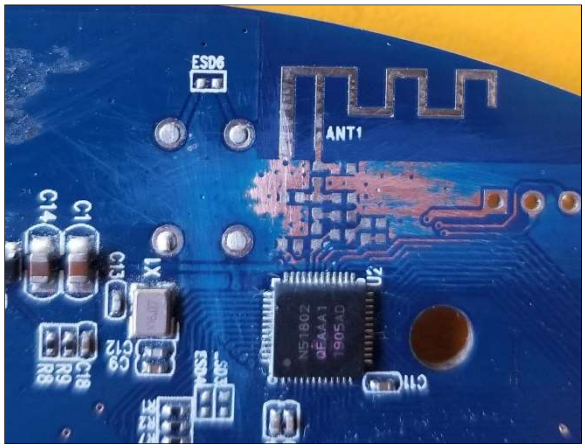


an antenna having a first end and a second end, said first end electrically connected to said ground plane; and

The Accussed Instrument comprises an antenna having two ends, one electrically connected to said ground plane and another comprising an open circuit:



said second end comprising an open circuit.



36. Terrestrial is entitled to recover from Defendant the damages sustained by Terrestrial as a result of Defendant's infringement of the ’552 Patent in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT IV – INFRINGEMENT OF U.S. PATENT NO. 6,973,133

37. Terrestrial repeats and realleges the allegations of paragraphs 1 through 21 as if fully set forth herein.

38. Claim 1 of the '133 Patent recites:

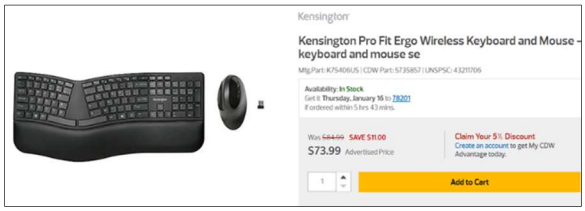
> 1. An apparatus comprising:
>
> a circuit configured to (i) communicate one or more Universal Serial Bus (USB) data signals via a wireless radio signal comprising a single frequency hopping sequence configured to support one or more USB devices and (ii) enumerate said one or more USB devices.

39. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendant has infringed and continues to infringe the '133 Patent by making, using, importing, offering for sale, and/or selling the Accused Products.

40. As exemplified below, the Accused Products are an apparatus comprising a circuit configured to communicate USB data signals over a wireless frequency.

An apparatus comprising:

The Accused Instrumentality is an apparatus comprising a circuit configured to communicate USB data signals over a wireless frequency to one or more USB devices (e.g. keyboard and mouse) and to enumerate the USB devices.

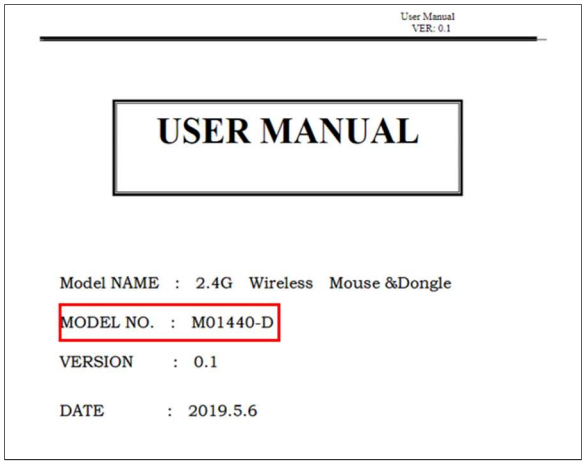


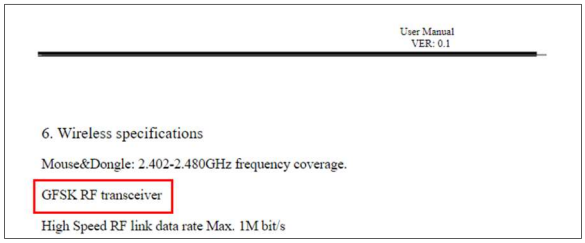
https://www.cdw.com/product/kensington-pro-fit-ergo-wireless-keyboard-and-mouse-keyboard-and-mouse-se/5735857

a circuit configured to (i) communicate one or more Universal Serial Bus (USB) data signals via a wireless radio signal comprising a single frequency hopping sequence configured to support one or more USB devices and

The Accused Products include a circuit configured to communicated one or more USB data signals to support one more USB devices.

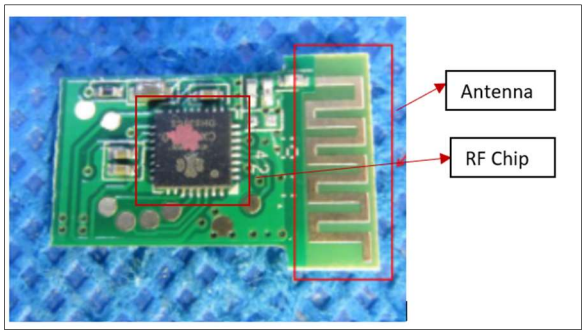
The Accused Products include a USB Transceiver unit.





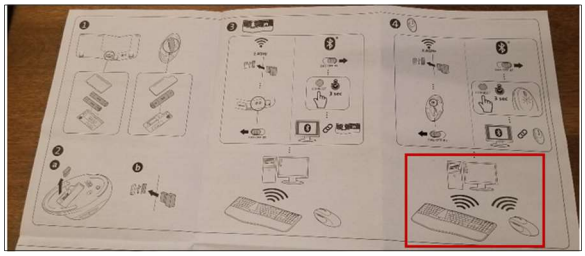
https://fccid.io/GV3-M01440D/Users-Manual/User-Manual-4329605

The circuit is a device configured to communicate via wireless radio frequency.



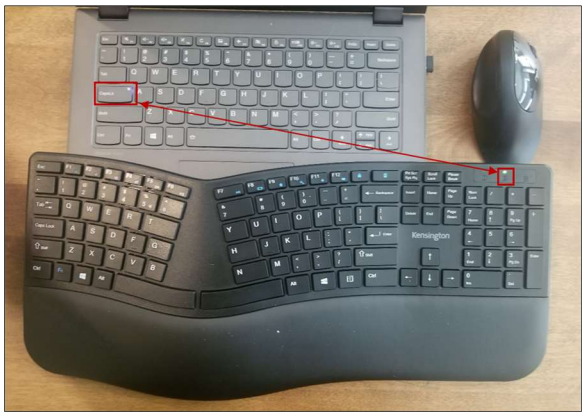
https://fccid.io/GV3-M01440D/Internal-Photos/Internal-photos-4329600

The circuit is operable to communicate with one or more USB devices.



The host device (e.g. computer) communicates data through the circuit (e.g. USB dongle) to a USB device (e.g. keyboard) via wireless radio signal.

As an example of this communication, when a user presses the "Caps Lock" key on a computer which hosts the circuit, the "Caps Lock" indicator on the wirelessly connected keyboard lights up.



The circuit operates on a frequency hopping sequence (e.g. Gaussian frequency-shift keying).

Anbotek 安博检测 Anbotek Testing

Report No.: SZAWW190510012-01 FCC ID: GV3-M01440D Page1 of 40

FCC TEST REPORT

Client Name	:	ACCO Brands, Inc.
Address	:	1500 Fashion Island Blvd., 3rd Floor, San Mateo, CA94404, United States
Product Name	:	Wireless dongle
Date	:	Jun. 17, 2019

1.2. Description of Device (EUT)

Product Name	:	Wireless dongle	
Model No.	:	M01440-D	
Trade Mark	:	Kensington	
Test Power Supply	:	DC 5V by USB Port	
Test Sample No.	:	1-2-1(Normal Sample), 1-2-2(Engineering Sample)	
Product Description	:	Operation Frequency:	2403~2480MHz
		Number of Channel:	16 Channels
		Modulation Type:	GFSK
		Antenna Type:	PCB Antenna
		Antenna Gain(Peak):	-4.35 dBi

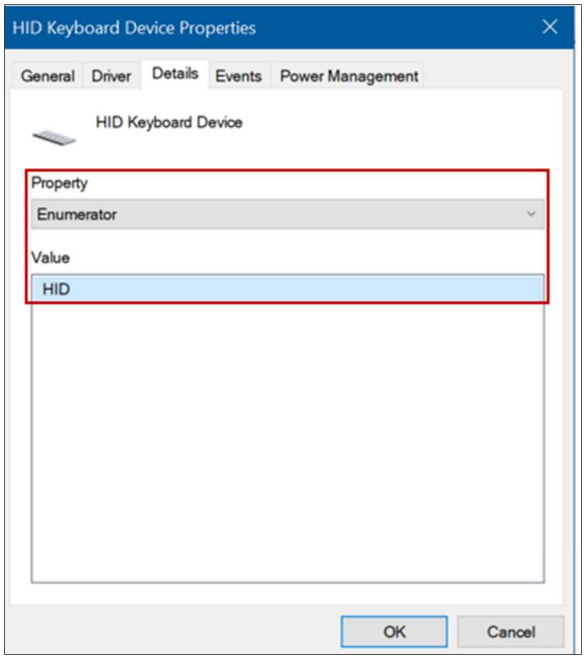
https://fccid.io/GV3-M01440D/Test-Report/RF-Test-Report-4329603

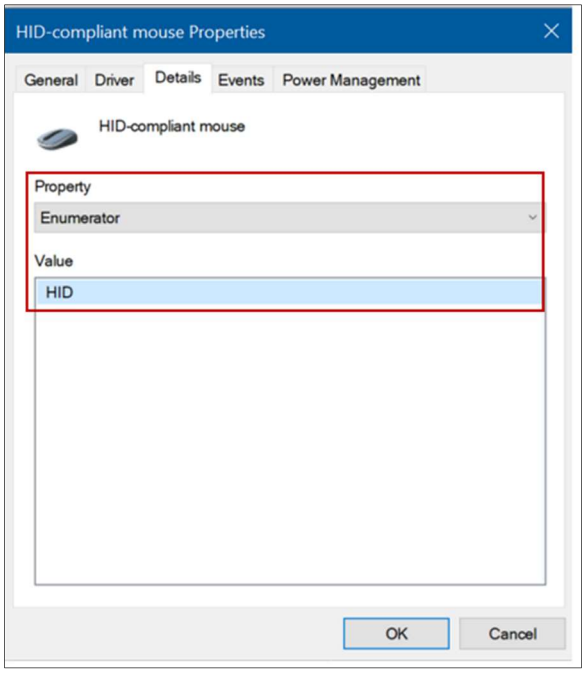
The circuit operates between 2403 and 2480 MHz.

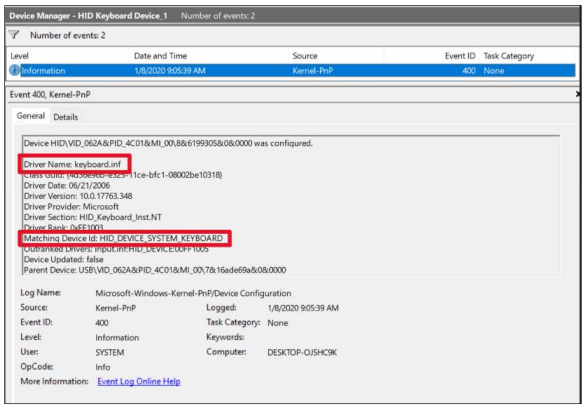
The frequency hopping sequence supports one or more USB devices (e.g. mouse and keyboard).

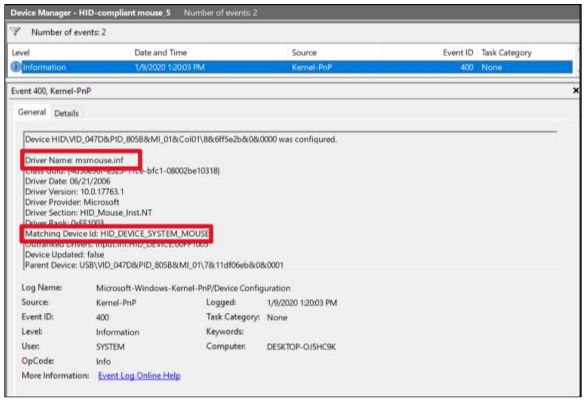
(ii) enumerate said one or more USB devices.

The Accused Instrumentality is operable to enumerate the USB devices.









"A hardware ID is a vendor-defined string that Windows uses to match a device to an INF file."

https://docs.microsoft.com/en-us/windows-hardware/drivers/install/hardware-ids

41. Terrestrial is entitled to recover from Defendant the damages sustained by Terrestrial as a result of Defendant's infringement of the '133 Patent in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT V – INFRINGEMENT OF U.S. PATENT NO. 6,519,290

42. Terrestrial repeats and realleges the allegations of paragraphs 1 through 21 as if fully set forth herein.

43. Claim 1 of the '290 Patent recites:

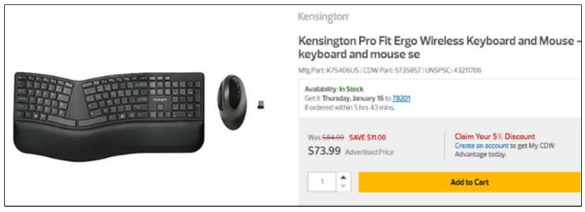
> 1. An apparatus comprising:
>
> a circuit configured to generate a wireless radio signal in response to one or more first Universal Serial Bus (USB) data signals,
>
> wherein said wireless radio signal comprises a single frequency hopping sequence configured to support one or more USB peripheral wireless network devices, and
>
> said circuit is configured to (i) generate said one or more first USB data signals in response to said wireless radio signal and
>
> (ii) enumerate said one or more USB devices.

44. Without license or authorization and in violation of 35 U.S.C. § 271(a), Defendant has infringed and continues to infringe the '290 Patent by making, using, importing, offering for sale, and/or selling the Accused Products.

45. As exemplified below, the Accused Products are a circuit configured to communicate USB data signals over a wireless frequency.

An apparatus comprising:

The Accused Instrumentality is an apparatus comprising a circuit configured to communicate USB data signals over a wireless frequency to one or more USB devices (e.g. keyboard and mouse) and to enumerate the USB devices.



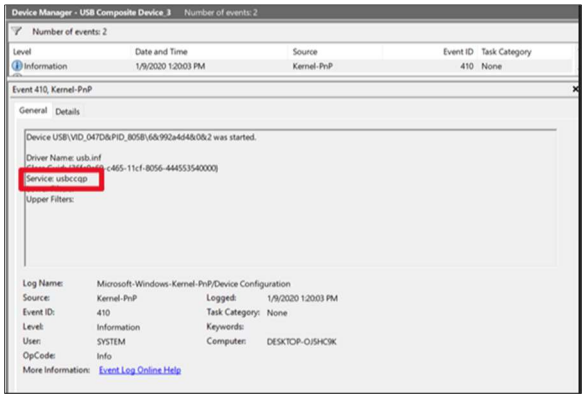
https://www.cdw.com/product/kensington-pro-fit-ergo-wireless-keyboard-and-mouse-keyboard-and-mouse-se/5735857

a circuit configured to generate a wireless radio signal in response to one or more first Universal Serial Bus (USB) data signals,

The Accused Products include a circuit configured to generate a wireless radio signal in response to one or more first Universal Serial Bus (USB) data signals.

The first data signal below is communicated between the host device and the USB interface.

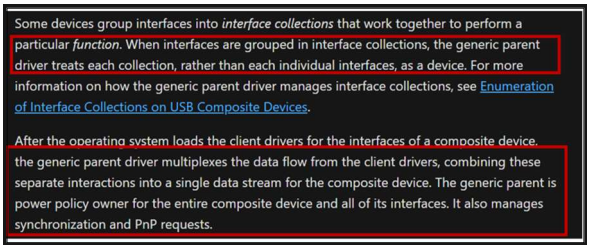
To set up the USB interface, the client drivers (provided by the host) communicate with the receiver to establish the protocol as described below:



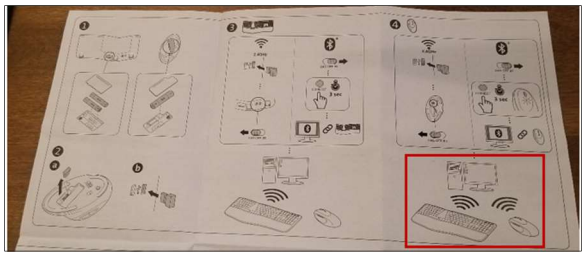
The service shown above is the USB generic parent driver.

https://docs.microsoft.com/en-us/windows-hardware/drivers/usbcon/usb-common-class-

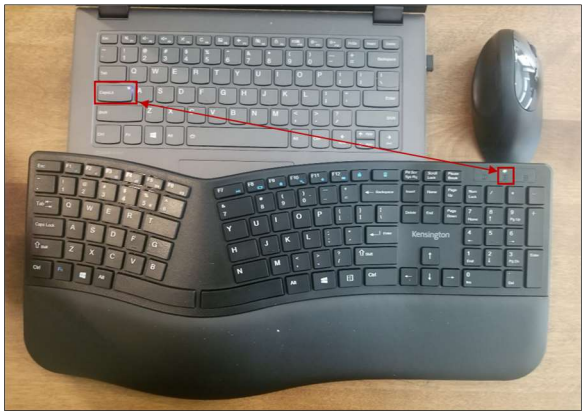
generic-parent-driver



In response to said first data transaction the device is then registered to the computer and begins transmitting a wireless frequency device to connect to peripheral devices (a mouse and keyboard).



Then once the peripheral device is turned on, the USB Transceiver registers and communicates with said device.



wherein said wireless radio signal comprises a single frequency hopping sequence configured to support one or more USB peripheral wireless network devices, and

The radio signal generated comprises a frequency hopping sequence to support one or more peripheral devices.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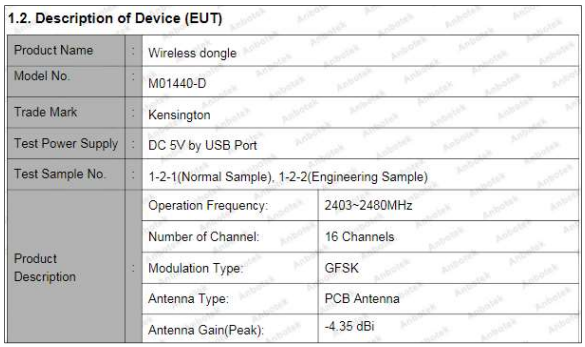
Report No.: SZAWW190510012-01 FCC ID: GV3-M01440D Page1 of 40

FCC TEST REPORT

Client Name	:	ACCO Brands, Inc.
Address	:	1500 Fashion Island Blvd., 3rd Floor, San Mateo, CA94404, United States
Product Name	:	Wireless dongle
Date	:	Jun. 17, 2019

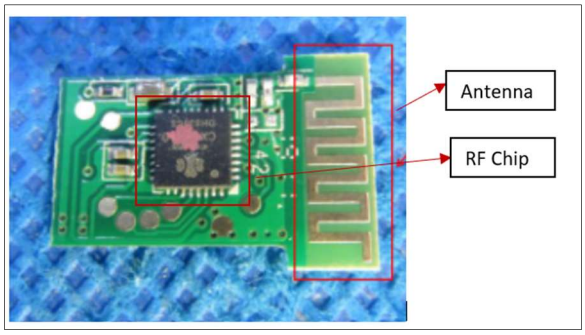


1.2. Description of Device (EUT)

Product Name	:	Wireless dongle	
Model No.	:	M01440-D	
Trade Mark	:	Kensington	
Test Power Supply	:	DC 5V by USB Port	
Test Sample No.	:	1-2-1(Normal Sample), 1-2-2(Engineering Sample)	
Product Description	:	Operation Frequency:	2403~2480MHz
		Number of Channel:	16 Channels
		Modulation Type:	GFSK
		Antenna Type:	PCB Antenna
		Antenna Gain(Peak):	-4.35 dBi

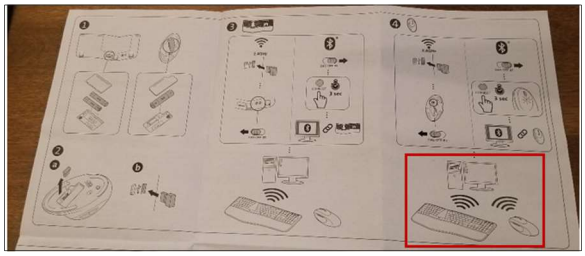
https://fccid.io/GV3-M01440D/Test-Report/RF-Test-Report-4329603

The circuit is a device configured to communicate via wireless radio frequency.



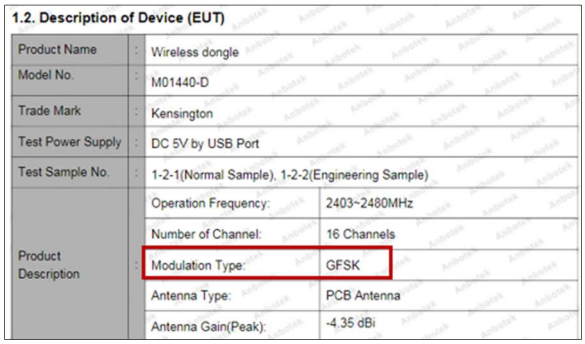
https://fccid.io/GV3-M01440D/Internal-Photos/Internal-photos-4329600

The circuit is operable to communicate with one or more USB devices.



https://www.logitech.com/assets/45924/wireless-combo-mk270-quick-start-guide.pdf

The circuit operates on a frequency hopping sequence (e.g. Gaussian frequency-shift keying).



1.2. Description of Device (EUT)

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		Antenna Gain(Peak):	-4.35 dBi

https://fccid.io/GV3-M01440D/Test-Report/RF-Test-Report-4329603

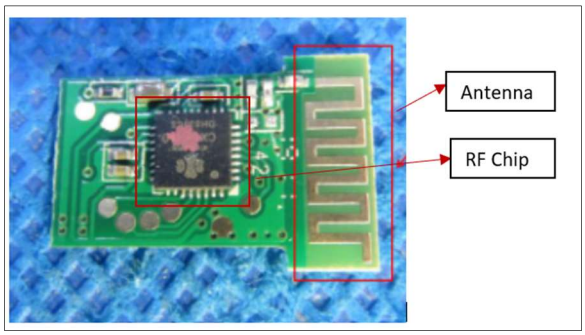
The circuit operates between 2403 and 2480 MHz.

The frequency hopping sequence supports one or more USB peripheral devices (e.g. mouse and keyboard).

said circuit is configured to (i) generate said one or more first USB data signals in response to said wireless radio signal and

The device generates a USB data signal in response to said wireless radio signal.

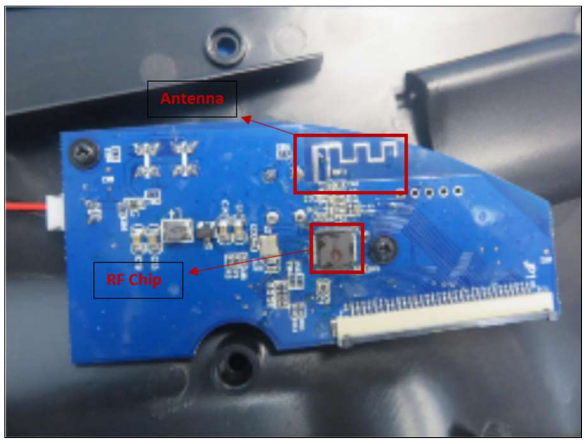
The circuit is a device configured to communicate via wireless radio frequency (e.g. 2.4 GHz wireless radio).



https://fccid.io/GV3-M01440D/Internal-Photos/Internal-photos-4329600

The circuit is operable to communicate with one or more USB devices (e.g. Mouse and Keyboard).

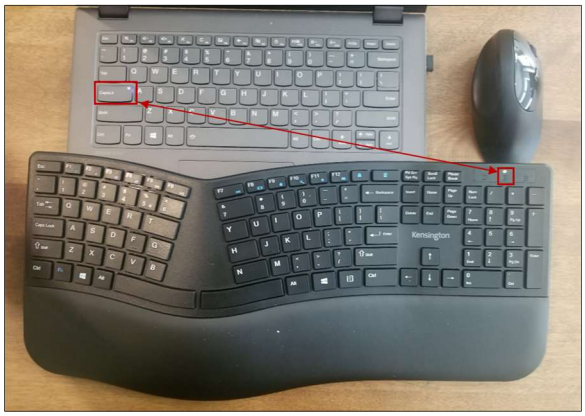
The transmitter in the wireless keyboard sends a data signal via a radio frequency to the USB device which receives the radio signals and converts that data into a USB data signal which is then communicated to the host device.



https://fccid.io/GV3-M01440K/Internal-Photos/Internal-photos-4329536

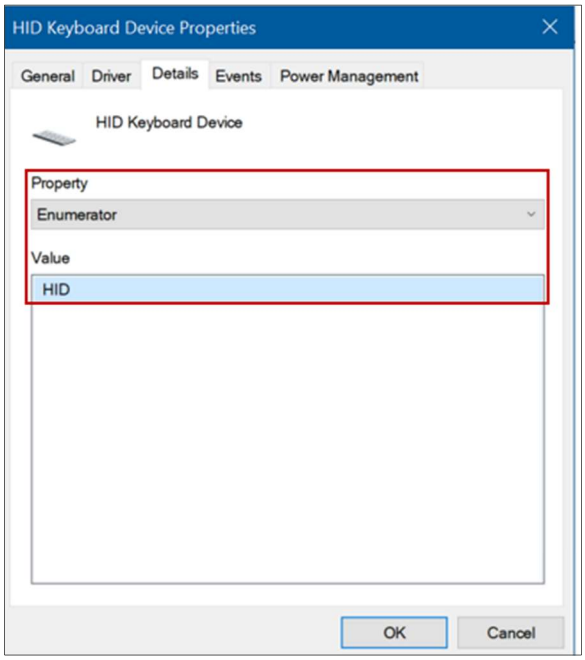
When the caps lock light when pressed on the wireless keyboard turns on the caps

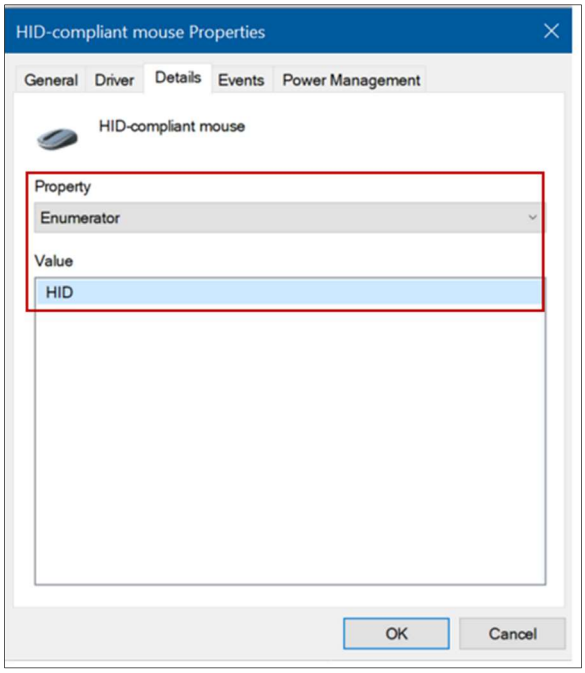
lock light on the host computers keyboard.

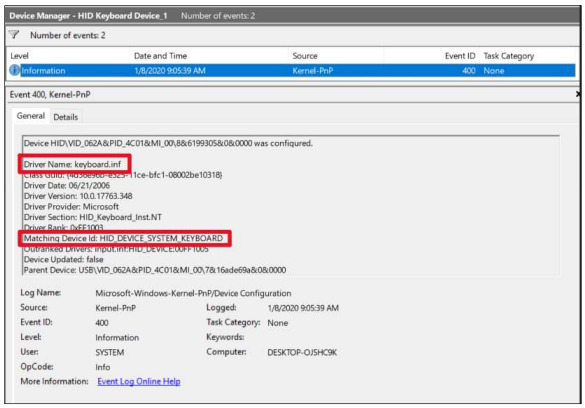


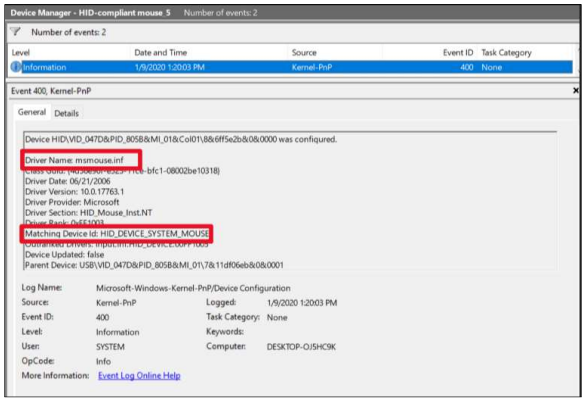
(ii) enumerate said one or more USB devices.

The Accused Instrumentality is operable to enumerate the USB devices.









"A hardware ID is a vendor-defined string that Windows uses to match a device to an INF file."

https://docs.microsoft.com/en-us/windows-hardware/drivers/install/hardware-ids

46. Terrestrial is entitled to recover from Defendant the damages sustained by Terrestrial as a result of Defendant's infringement of the '290 Patent in an amount subject to proof at trial, which, by law, cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

PRAYER FOR RELIEF

WHEREFORE, Terrestrial requests that this Court enter judgment against Defendant as follows:

A. An adjudication that Defendant has infringed the '850 Patent, the '563 Patent, the '552 Patent, the '133 Patent, and the '290 Patent;

B. An award of damages to be paid by Defendant adequate to compensate Terrestrial for Defendant's past infringement of the '850 Patent, the '563 Patent, the '552 Patent, the '133 Patent, and the '290 Patent, and any continuing or future infringement through the date such judgment is entered, including interest, costs, expenses and an accounting of all infringing acts including, but not limited to, those acts not presented at trial;

C. A declaration that this case is exceptional under 35 U.S.C. § 285, and an award of Terrestrial's reasonable attorneys' fees; and

D. An award to Terrestrial of such further relief at law or in equity as the Court deems just and proper.

JURY DEMAND

Plaintiff demands trial by jury, Under Fed. R. Civ. P. 38.

Dated: February 10, 2020

Respectfully Submitted

/s/ Raymond W. Mort, III

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Texas State Bar No. 00791308
raymort@austinlaw.com

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ATTORNEYS FOR PLAINTIFF