IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

GINEGAR LLC, 　　　　　*Plaintiff*, 　　v. SLACK TECHNOLOGIES, INC., 　　　　　*Defendant*.	Case No. 1:21-cv-00494-RM-STV **JURY TRIAL DEMANDED**

FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Ginegar LLC ("Ginegar"), by and through the undersigned counsel, brings this First Amended Complaint against Defendant Slack Technologies, Inc. ("Slack Technologies"), alleging as follows:

I.　　INTRODUCTION

1.　　This is an action by Ginegar against Slack Technologies for infringement of U.S. Patent Numbers 9,367,521 (the "'521 Patent") and 9,760,865 (the "'865 Patent"), collectively referred to as "the Patents-in-Suit."

II.　　THE PARTIES

2.　　Plaintiff Ginegar is a California corporation with its current principal place of business at 2160 Century Park East #707, Los Angeles, California 90067 and mailing address at 777 Brickell Ave #500-96031, Miami, FL 33131. Ginegar is the assignee and owner of the Patents-in-Suit.

3.   Upon information and belief, Defendant Slack Technologies, Inc. is a Delaware corporation with its principal place of business at 500 Howard Street, San Francisco, California 94105.

III.   JURISDICTION AND VENUE

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

5.   This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

6.   This Court has personal jurisdiction over Slack Technologies because Slack Technologies has a place of business in this District and because it continuously and systematically conducts business in this District, including the development, use and sale of the products and/or services at issue in this suit.

7.   Venue is proper in the District of Colorado under 28 U.S.C. §§ 1391(b) and 1400(b) because Slack Technologies has a place of business in this District at 1681 Chestnut Pl., Suite 700, Denver, Colorado 80202 and because a substantial part of the events and omissions giving rise to the claims at issue occurred here.

8.   On information and belief, Slack Technologies operates its second largest office within this district, in Denver.

9.   On information and belief, Slack Technologies has committed acts of infringement in this district by using the accused Slack product.

10.   On information and belief, a substantial number of Slack Technologies' employees who were and are involved in committing acts of infringement live and work in this District.

11.   On information and belief, Slack Technologies' Head of Marketing Operations, Paul Wilson, lives and works in this District.

12.   On information and belief, Slack Technologies, through its employees, has committed acts of infringement in this District by offering for sale the accused Slack product.

13.   On information and belief, Slack Technologies' Head of Sales and Business Development, Jason Mongroo, lives and works in this District.

14.   On information and belief, Slack Technologies, through its employees, has committed acts of infringement in this District by selling the accused Slack product.

IV.   FACTUAL BACKGROUND

The '521 Patent

15.   The '521 Patent, entitled "Content and Context Based Handling of Instant Messages," was issued by the United States Patent and Trademark Office on June 14, 2016. A true and correct copy of the '521 Patent is attached as Exhibit A.

16.   Ginegar is the owner of the entire right, title and interest in and to the '521 Patent.

17.   Instant messaging is a means of communication wherein individuals can communicate with one another using text-based or other forms of communications over a network in substantially real time.

18.   Typically, an instant messaging system consists of two or more client programs and at least one instant message server. The client programs are located on a user's device, which can be a computer, phone, tablet or other device.

19.   The user devices communicate with the instant message server through the internet or over a corporate intranet. The user devices log into the server and may also communicate to the server a private list of individuals that the user is interested in communicating with.

20.   At the time application that would become the '521 Patent was filed, the instant messaging server's primary role was to log users into the instant messaging system and to provide the client program with contact information for the user's friends or contacts. The instant messaging server typically played no further role in the instant message chat session once the client program received the appropriate contact information from the server.

21.   The result was instant message systems with limited functionality. A user could not set preferences regarding his or her instant message sessions. For example, a user could not enable settings that would allow important instant messages to "pop up" when they are received but not allow other messages to "pop up" and disturb the user. This inability to prioritize messages based on sender could result in decreased productivity on the part of the user.

22.   The   inability to set preferences, or handling rules, was a major technological deficiency in the prior art. The result was that prior art instant messaging systems were ill suited for use by businesses.

23.   The '521 Patent teaches a method of processing instant message transactions that addresses the technological deficiencies in the prior art.

24.   An instant message transaction is a series of messages between one or more users during an instant messaging session.

25.   The method taught in the '521 Patent uses a novel instant messaging system. The system utilizes a presence and awareness server, which operates differently than prior art instant message servers.

26.   The presence and awareness server allows users or administrators to establish handling rules.

27.   According to the method of the '521 Patent, an instant message client logs into presence and awareness server, whereupon the instant message client obtains at least one handling rule, which is based on at least one identified content or context, from the presence and awareness server. Each handling rule also consists of at least one corresponding event handling action to be performed within the instant message environment.

28.   When the instant message client receives a message, the handling rule or rules are evaluated. If the identified content or context is satisfied, the corresponding event handling action is performed within the instant message environment.

29.   Event handling actions may include, but are not limited to, showing another user's online status, filtering instant messages, generating notifications, generating messages, or limiting display screen interruptions.

30.   The novel system and method taught in the '521 Patent was not well-understood, routine, or conventional in the industry at the time of the invention.

The '865 Patent

31.   The '865 Patent, entitled "Multi-Modal Transcript Unification in a Collaborative Environment," was issued by the United States Patent and Trademark Office on September 12, 2017. A true and correct copy of the '865 Patent is attached as Exhibit B.

32.   Ginegar is the owner of the entire right, title and interest in and to the '865 Patent.

33.   The inventions disclosed in the '865 Patent relate to systems and methods for a multi-modal instant messaging sessions.

34.   At the time the application that resulted in the '865 Patent was filed, prior art taught the use of instant messaging systems that allowed users to converse with each other in real time via text.

35.   The prior art also taught the use of instant messaging systems that allowed users to converse with each other in real time via audio messages.

36.   However, the prior art instant messaging systems did not allow users to converse with each other using multi-modal communication.   Multi-modal communication is communication where users communicate via different modes of communication, such as text and audio, in a single chat session. Users could not chat with each other by providing a combination text and audio messages in the chat session.

37.   Further, the prior art systems did not automatically log a unified chat transcript that contained multi-modal communication, such as text and audio in one chat session.

38.   This presented serious shortcomings, particularly given the proliferation of instant messaging systems among both businesses and individuals and the need to create unified transcripts of multi-modal instant message conversations.

39.   The system and method disclosed in the '865 Patent solves these technological problems with the prior art.

40.   Specifically, the '865 Patent teaches systems and methods for multi-modal instant messaging where a user converses with another user by providing a combination of text and audio messages in a single chat session.

41.   Further, the systems and methods taught in the '865 patent automatically log a unified chat transcript that contains both audio messages and text messages.

42.   The '865 Patent teaches a system and method that establishes a single instant messaging session that is capable of text chat and voice chat between two conversants in a collaborative environment.

43.   When one conversant receives a voice message and text message respectively, the voice system logs the voice and text messages into a single transcript of conversation that displays the chronological order.

44.   The '865 Patent teaches a system and method for generating a multi-modal conversation transcript that uses a novel multi-modal transcript logic that can be coupled to the collaborative environment through a host server.

45.   Thus, the '865 Patent is particularly useful, compared to the prior art, because it solves a technological shortcoming in the prior art, namely, allowing conversants to use text and voice chat in a single chat session and automatically logging a unified chat transcript that contains multi-modal communications.

46.   The novel system and method taught in the '865 Patent was not well-understood, routine, or conventional in the industry at the time of the invention.

The Slack Communication Platform

47.   Slack Technologies has developed, has sold and continues to sell and offer for sale the Slack communication platform ("Slack").

48.   Slack is a proprietary business communication platform that offers many features, including persistent chart rooms (referred to as "channels") organized by topic, private groups, and direct messaging.

49.   Slack Technologies markets Slack as a unified business communications platform that allows users to "make calls, share files, and even connect with other apps."

50.   Slack Technologies claims that "[o]ver 750,000 companies use Slack."

CLAIM I
(INFRINGEMENT OF THE '521 PATENT)

51.   Ginegar repeats and realleges the allegations of paragraphs 1-24 as if fully set forth herein.

52.   The '521 Patent is valid and enforceable.

53.   Slack Technologies has infringed and continues to infringe, both directly and indirectly, at claims 1 and 2 of the '521 Patent, either literally or under the doctrine of equivalents.

54.   Claim 1 of the '521 Patent recites:

A method of processing instant message transactions comprising:

[1] logging a first instant message client into an instant message server;

[2] obtaining from the instant message server, at least one handling rule that is evaluated in an instant messaging environment in response to receipt of a message, each handling rule defining a condition based upon at least one of identified content or identified context, and a corresponding event handling action to be performed within the instant message environment;

[3] identifying an instant message conversation within the instant message environment between a user and a correspondent;

[4] evaluating each handling rule;

[5] performing the corresponding event handling action of an associated handling rule if it is determined that the condition of that handling rule is satisfied; and

[6] conveying to the user participating in the instant message conversation, an indication that the corresponding event handling action was performed.

55.   Slack directly infringes claim 1 of the '521 Patent as follows.

56.   Regarding the preamble of claim 1, to the extent the preamble is determined to be limiting, use of Slack meets this limitation.   Slack processes received messages in instant messaging sessions and notifies the recipient if the content of a message complies to a condition set by the user.

See, e.g., Exhibit C (https://slack.com/help/articles/201355156-Guide-to-desktop-notifications, last accessed on February 10, 2021).

57.   Slack also preforms the first listed step of claim 1.   The Slack desktop or smartphone software connects to a messenger server in order to function.

See, e.g., Exhibit D, (Presentation by Keith Adams, Chief Architect at slack. Available at:

https://www.infoq.com/presentations/slack-infrastructure/, last accessed on February 10, 2021).

58.   Slack also preforms the second listed step of claim 1. Handling rules are stored on a message server and are obtained by downloading to the user device.

An overview of the Slack architecture on AWS

See, e.g., Exhibit E (https://aws.amazon.com/solutions/case-studies/slack/, last accessed on February 10, 2021).
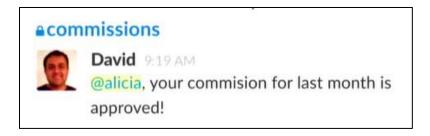
See, e.g., Exhibit F (https://slack.com/help/articles/360002034727-Getting-started-for-guests, last accessed on February 10, 2021).

59.   The handling rules are stored and synced by the Slack server. The content of received messages are evaluated against these rules.

See, e.g., Exhibit C (https://slack.com/help/articles/201355156-Guide-to-desktop-notifications, last accessed on February 10, 2021).

60.   Slack uses each handling rule to define a condition based on at least one of identified content or context. For example, the Slack software will highlight content in response to a username or specific keywords.

See, e.g., https://www.youtube.com/watch?v=cfkX8oTalDg, last accessed on February 10, 2021.

61.   Slack performs a corresponding event handling action within the instant message environment, for example, highlighting a username.

62.   Slack also performs the third listed step of claim 1. Slack identifies an instant message conversation within the instant message environment between a user and a correspondent.

See, e.g., Exhibit G (https://slack.com/team-chat, last accessed on February 10, 2021).

63.   Slack also performs the Fourth listed step of Claim 1. Slack evaluates each handling rule by checking the content of the message. For example, the Slack software checks the message for user mentions.

See, e.g., Exhibit H (https://slack.com/help/articles/205240127-Use-mentions-in-Slack, last accessed on February 10, 2021).

64.   Slack also performs the fifth listed step of Claim 1.   Slack performs the corresponding event handling action of an associated handling rule if it is determined that the condition of that handling rule is satisfied, for example highlighting key words if they are present in a message.

See, e.g., https://www.youtube.com/watch?v=cfkX8oTalDg, last accessed on February 10, 2021.

65.   Finally, Slack also performs the sixth listed step of Claim 1. Slack conveys to the user, who is participating in the instant message conversation, an indication that the corresponding event handling action was performed, for example notifying the user with a pop-up notification.

See, e.g., https://www.youtube.com/watch?v=cfkX8oTalDg, last accessed on February 10, 2021.

66.   Claim 2 of the '521 Patent recites:

The method according to claim 1, wherein at least one handling rule is autonomically generated based upon a dynamic evaluation of at least one of a user or a community of instant message users.

67.   Slack directly infringes claim 2 of the '521 Patent as follows.

68.   At least one handling rule is autonomically generated based on a dynamic evaluation of at least one of a user or a community of instant message users.   When a user first joins a Slack workspace, the Slack system autonomically generates a set of handling rules based on a dynamic evaluation of at least one of a user or a community of instant message users.

When you first join a workspace, Slack will notify you of messages that are for you. By default, here's when you'll receive notifications:

- You receive a direct message (DM)
- Someone @mentions you or notifies a channel that you're in
- Someone uses one of your keywords
- Someone replies to a thread that you're following
- You receive a reminder from Slackbot

See, e.g., Exhibit C (https://slack.com/help/articles/201355156-Guide-to-desktop-notifications, last accessed on February 10, 2021).

69.   In violation of 35 U.S.C. § 271(a), Slack Technologies has directly infringed the '521 Patent, either literally or under the doctrine of equivalents, by making, using, selling, and/or offering to sell in the United States, and/or importing into the United States, without license or authority, Slack.

70.   In violation of 35 U.S.C. § 371(b), Slack Technologies has also indirectly infringed the '521 Patent by actively inducing infringement of the'521 Patent by users of Slack, knowing

that their use of Slack would and has directly infringed, either literally or under the doctrine of equivalents, the '521 Patent and specifically intending that its users infringe the '521 Patent.

71.   In violation of 35 U.S.C. § 371(c), Slack has also indirectly infringed the ''521 Patent by offering to sell or license and/or selling or licensing with the United States its Slack product for use in practicing one or more of the methods claimed in the '521 Patent, which constitutes a material part of the invention claimed by the '521 Patent and is not a staple article or commodity of commerce suitable for substantial non-infringing use, for use in practicing one or more of the methods claimed in the '521 Patent, knowing that use of Slack by users would directly infringe, either literally or under the doctrine of equivalents, the '521 Patent.

72.   Upon information and belief, Slack Technologies has had notice of the '521 Patent at least as of the date of service of the original Complaint in this lawsuit.

73.   As a result of Slack Technologies' infringement of the '521 Patent, Ginegar has suffered and continues to suffer substantial injury and is entitled to recover all damages caused by Slack Technologies' infringement to the fullest extent permitted by the Patent Act, together with prejudgment interest and costs for Slack Technologies' wrongful conduct.

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CLAIM II
(INFRINGEMENT OF THE '865 PATENT)

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74.   Ginegar repeats and realleges the allegations of paragraphs 1-44 as if fully set forth herein.

75.   The '865 Patent is valid and enforceable.

76.   Slack has infringed and continues to infringe, both directly and indirectly, at least claims 1, 8 and 10 of the '865 Patent, either literally or under the doctrine of equivalents.

77.   Claim 1 of the '865 Patent recites:

A method for generating a unified chat transcript for a multi-modal conversation in an instant messaging session, the method comprising:
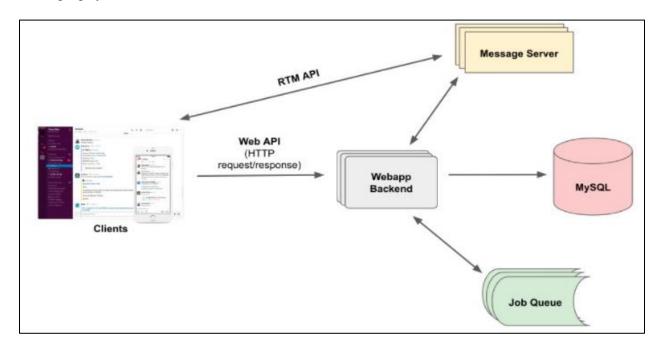
[1] establishing a single instant messaging session between two conversants;

[2] receiving text messages as part of a conversation between the two conversants, through the single instant messaging session;

[3] embedding in the instant messaging session a voice message received from one of the two conversants;

[4] classifying each one of the embedded voice message and the received text messages by type, the type of message being one of a voice message and a text message;

[5] determining if the one of the voice and text messages is classified as a voice message; and

[6] logging the classified voice and text messages in a single transcript of conversation between the two conversants occurring in the single instant messaging session in response to determining that the one of the received voice and text messages is classified as a voice message.

78.   Slack directly infringes claim 1 of the '865 Patent as follows.

79.   Regarding the preamble of claim 1, to the extent the preamble is determined to be limiting, use of Slack meets this limitation. Slack generates a unified chat transcript for a multi-modal conversation in an instant messaging session.

On any subscription, workspace owners and admins can export data (messages and file links) from public channels.
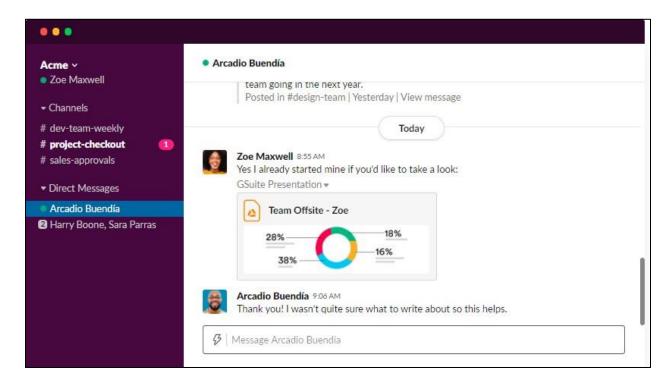
Org owners can request to export data from all channels and conversations in their org, or from all conversations that a single user is part of. If their request is approved, org owners can use the steps below to export data from public channels, private channels and direct messages, or from a single user's conversations.

See, e.g., Exhibit I (https://slack.com/help/articles/201658943-Export-your-workspace-data#enterprise-grid-plan-1, last accessed on February 10, 2021).

80.   Slack also performs the first listed step of Claim 1. Slack establishes a single instant messaging system between two conversants.
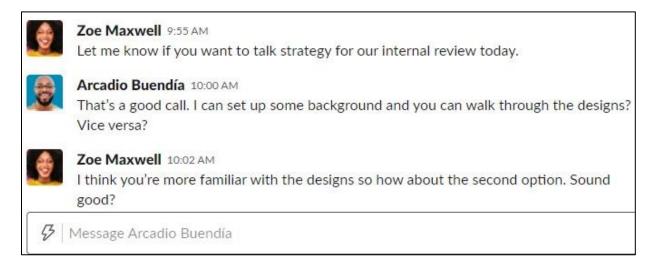

See, e.g., Exhibit J (https://slack.engineering/how-slack-built-shared-channels/, last accessed on February 10, 2021).
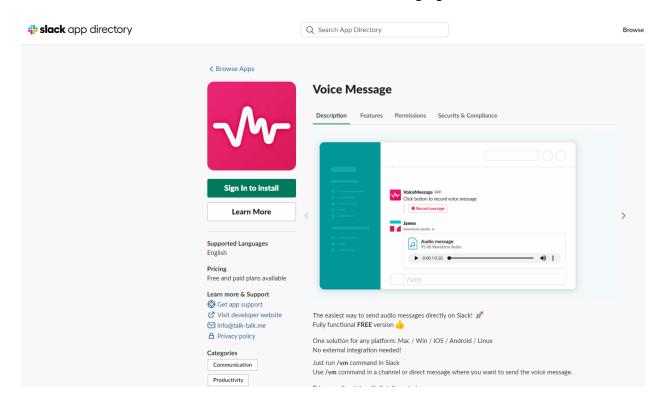
See, e.g., Exhibit K (https://slack.com/, last accessed on February 10, 2021).

81.   Slack also performs the second listed step of claim 1. Slack receives text messages

as part of a conversation between two conversants through a single instant messaging session.

See, e.g., Exhibit K (https://slack.com/, last accessed on February 10, 2021).

82.   Slack also performs the third listed step of Claim 1. Slack embeds voice messages

received from one of the two conversants in the instant messaging session.

See, e.g., Exhibit L (https://slack.com/apps/AE79QUZF0-voice-message, last accessed on February 10, 2021).

83.   Slack also performs the fourth listed step of Claim 1.   Slack classifies each embedded voice message and text messages by type and displays a play icon indicating the duration of audio in the voice message.
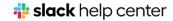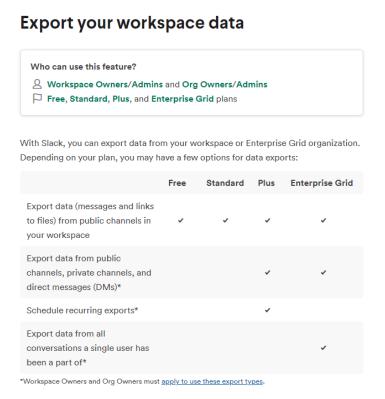

See, e.g., Exhibit L (https://slack.com/apps/AE79QUZF0-voice-message, last accessed on February 10, 2021).

84.   Slack also performs the fifth listed step of Claim 1.   Slack determines if one of the voice and text messages is classified as a voice message.   Slack indicates the type of file and the duration of the voice message, which classifies the voice message on the basis of its type.

See, e.g., Exhibit L (https://slack.com/apps/AE79QUZF0-voice-message, last accessed on February 10, 2021).

85.   Finally, Slack also performs the sixth listed step of Claim 1.   Slack logs classified voice and text messages in a single transcript of a conversation between the two conversants occurring the single instant messaging session in response to determining that one of the received

voice and text messages is classified as a voice message. The transcript indicates which messages
are text messages and which are voice messages.

See,   e.g.,   Exhibit   I   (https://slack.com/help/articles/201658943-Export-your-workspace-
data#enterprise-grid-plan-1, last accessed on February 10, 2021).

86.   Claim 8 of the '865 Patent recites:

A collaborative computing data processing system comprising:

[1] a processor;

[2] an instant messenger configured to maintain a multi-modal instant messaging
session between first and second conversants; and

[3] multi-modal transcript unification logic, executing on the processor and
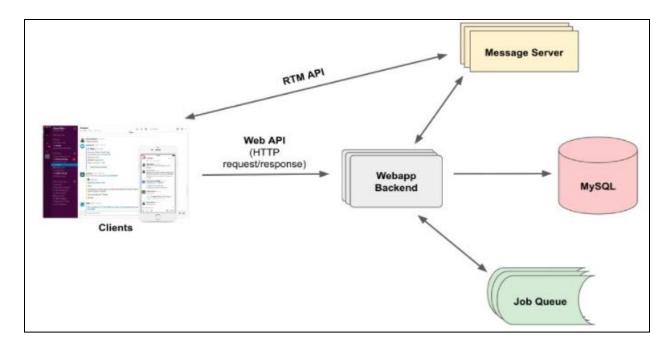configured to

[3A] establish a single instant messaging session between two conversants,

receive text messages as part of a conversation between the two conversants, through the single instant messaging session,
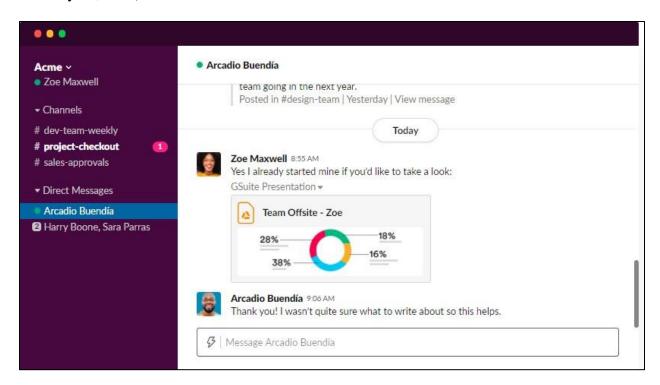
[3B] embed in the instant messaging session a voice message received from one of the two conversants,

[3C] classify each one of the embedded voice message and the received text messages by type, the type of message being one of a voice message and a text message,

[3D] determine if the one of the voice and text messages is classified as a voice message, and

[3E] log the classified voice and text messages in a single transcript of conversation between the two conversants occurring in the single instant messaging session in response to determining that the one of the voice and text messages is classified as a voice message.

87. Slack directly infringes claim 8 of the '865 Patent as follows.

88. Regarding the preamble of claim 8, to the extent the preamble is determined to be limiting, Slack meets this limitation. On information and belief, Slack is a collaborative computing data processing system.

89. Regarding the first element of claim 8, on information and belief, the Slack system contains a processor.

90. Regarding the second element of claim 8, on information and belief, the Slack system contains an instant messenger configured to maintain a multi-modal instant messaging session between first and second conversants.

91. Regarding the third element of claim 8, on information and belief, the Slack system contains multi-modal logic, executed on the processor, and configured to perform the steps claimed in claim 8.

92. On information and belief, the multi-modal transcript unification logic establishes a single instant messaging system between two conversants.
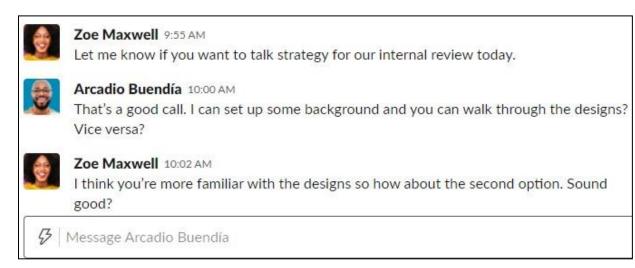
See, e.g., Exhibit J (https://slack.engineering/how-slack-built-shared-channels/, last accessed on February 10, 2021).

See, e.g., Exhibit K (https://slack.com/, last accessed on February 10, 2021).

93.   On information and belief, the multi-modal transcript unification logic receives text messages as part of a conversation between two conversants, through the single instant messaging session.
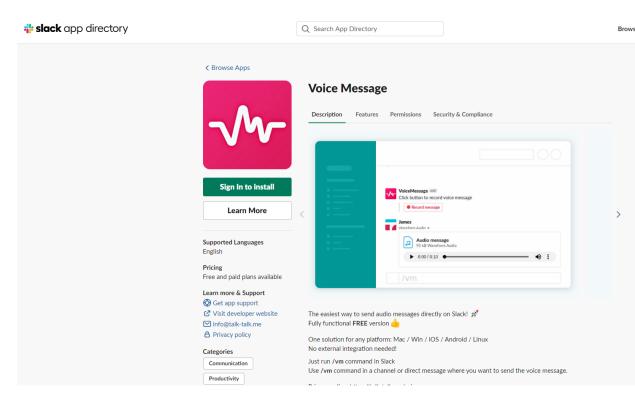

See, e.g., Exhibit K (https://slack.com/, last accessed on February 10, 2021).

94.   On information and belief, the multi-modal transcript unification logic embeds in the instant messaging session a voice message received from one of the two conversants.

See, e.g., Exhibit L (https://slack.com/apps/AE79QUZF0-voice-message, last accessed on February 10, 2021).

95.   On information and belief, the multi-modal transcript unification logic classifies each one of the embedded voice message and the received text messages by type.

See, e.g., Exhibit L (https://slack.com/apps/AE79QUZF0-voice-message, last accessed on February 10, 2021).

96.   On information and belief, the multi-modal transcript unification logic determines if the one of the voice and text messages classified as a voice message.
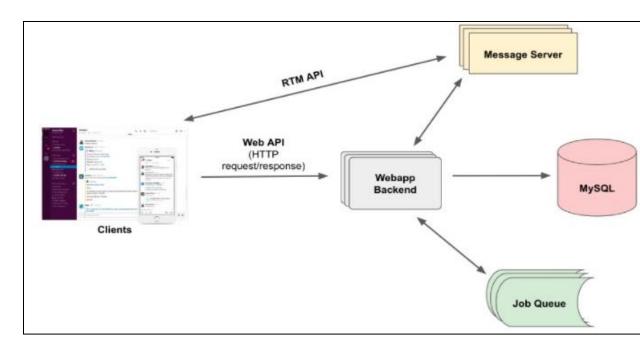
See, e.g., Exhibit L (https://slack.com/apps/AE79QUZF0-voice-message, last accessed on February 10, 2021).

97.   On information and belief, the multi-modal transcript unification logic logs the classified voice and text messages in a single transcript of conversation between the two conversants occurring in the single instant messaging session in response to determining that the one of the voice and text messages is classified as a voice message.
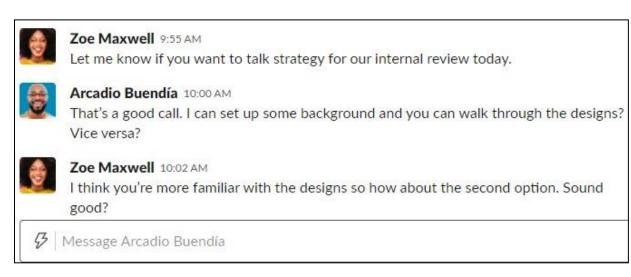
98.   Claim 10 of the '865 Patent recites:

A computer program product comprising a computer usable storage medium that is not a transitory signal per se, having computer usable program code stored thereon for generating a unified transcript for a multi-modal conversation, the computer usable program code, when executed on a computer hardware device, causing the computer hardware device to perform the operations of:

[1] establishing a single instant messaging session between two conversants;

[2] receiving text messages as part of a conversation between the two conversants, through the single instant messaging session;

[3] embedding in the instant messaging session a voice message received from one of the two conversants;

[4] classifying each one of the embedded voice message and the received text messages by type, the type of message being one of a voice message and a text message;

[5] determining if the one of the voice and text messages is classified as a voice message; and,

[6] logging the classified voice and text messages in a single transcript of conversation between the two conversants occurring in the single instant messaging session in response to determining that the one of the received voice and text messages is classified as a voice message.

99.   Slack directly infringes claim 10 of the '865 Patent as follows.

100.   Regarding the preamble of claim 8, to the extent the preamble is determined to be limiting, on information and belief, the Slack system is a computer program product comprising a computer usable storage medium that is not a transitory signal pers se, having a computer usable program code stored thereon for generating a unified transcript for a muti-modal conversation. The computer usable program code, when executed, causes the computer device to perform the operations claimed in claim 10.

101.   Regarding the first element of claim 10, on information and belief the Slack system establishes a single instant messing session between two conversants.

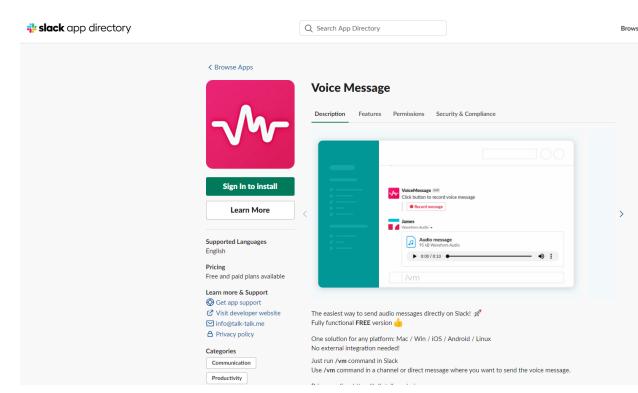*See, e.g.*, Exhibit J (https://slack.engineering/how-slack-built-shared-channels/, last accessed on February 10, 2021).

102. Regarding the second element of claim 10, on information and belief the Slack system receives text messages as part of a conversation between two conversants, through the single instant messaging session.

See, e.g., Exhibit K (https://slack.com/, last accessed on February 10, 2021).

103.   Regarding the third element of claim 10, the Slack system embeds in the instant messaging system a voice message received from one of the two conversants.

See, e.g., Exhibit L (https://slack.com/apps/AE79QUZF0-voice-message, last accessed on February 10, 2021).

104.   Regarding the fourth element of claim 10, the Slack system classifies each of the embedded voice message and the received text messages by type, the type of message being one of a voice message and a text message.

See, e.g., Exhibit L (https://slack.com/apps/AE79QUZF0-voice-message, last accessed on February 10, 2021).

105.   Regarding the fifth element of claim 10, on information and belief, the Slack system determines if the one of the voice and text messages is classified as a voice message.

106.   Regarding the sixth element of claim 10, on information and belief, the Slack system logs the classified voice and text messages in a single transcript of conversation between the two conversants occurring in the single instant messaging session in response to determining that the one of the received voice and text messages is classified as a voice message.

107.   In violation of 35 U.S.C. § 271(a), Slack Technologies has directly infringed the '865 Patent, either literally or under the doctrine of equivalents, by making, using, selling, and/or offering to sell in the United States, and/or importing into the United States, without license or authority, Slack.

108.   In violation of 35 U.S.C. § 371(b), Slack Technologies has also indirectly infringed the '865 Patent by actively inducing infringement of the'865 Patent by users of the Slack, knowing that their use of Slack would and has directly infringed, either literally or under the doctrine of equivalents, the '865 Patent and specifically intending that its users infringe the '865 Patent.

109.   In violation of 35 U.S.C. § 371(c), Slack has also indirectly infringed the '865 Patent by offering to sell or license and/or selling or licensing with the United States its Slack product for use in practicing one or more of the methods claimed in the '865 Patent, which constitutes a material part of the invention claimed by the '865 Patent and is not a staple article or commodity of commerce suitable for substantial non-infringing use, for use in practicing one or more of the methods claimed in the '865 Patent, knowing that use of Slack by users would directly infringe, either literally or under the doctrine of equivalents, the '865 Patent.

110.   On information and belief, Slack Technologies has had at notice of the '865 Patent at least as of the date of service of this Complaint.

111.   As a result of Slack Technologies' infringement of the '865 Patent, Ginegar has suffered and continues to suffer substantial injury and is entitled to recover all damages caused by Slack Technologies' infringement to the fullest extent permitted by the Patent Act, together with prejudgment interest and costs for Slack Technologies' wrongful conduct.

PRAYER FOR RELIEF

WHEREFORE, Ginegar respectfully requests that this Court enter judgment in its favor and grant the following relief against Slack Technologies:

A. That the Court enter judgment for Ginegar on all causes of actions asserted in this Complaint;

B. That the Court enter judgment in favor of Ginegar and against Slack Technologies for monetary damages to compensate it for Slack Technologies' infringement of the Patents-in-Suit pursuant to 35 U.S.C.§ 284, including costs and prejudgment interest as allowed by law;

C. That the Court enter judgment in favor of Ginegar and against Slack Technologies for accounting and/or supplemental damages for all damages occurring after any discovery cutoff and through the Court's entry of final judgment;

D. That the Court enter judgment that this case is exceptional under 35 U.S.C. § 285 and enter an award to Ginegar of its costs and attorneys' fees; and

E. That the Court award Ginegar all further relief as the Court deems just and proper.

JURY DEMAND

Pursuant to Federal Rule of Civil Procedure 38, Ginegar respectfully demands a jury trial on all issues and claims so triable.

Dated: May 20, 2021

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<u>CERTIFICATE OF SERVICE</u>

A true and correct copy of the foregoing instrument was served or delivered

electronically via U.S. District Court [LIVE] – Document Filing System, to all counsel of record,

and served via electronic mail on the clients of all moving attorneys on this 20th day of May

2021.

/s/ Jon B. Hyland