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

PARALLEL NETWORKS LICENSING, LLC,
 	
               Plaintiff,
 	
    v.
 	
ARROW ELECTRONICS, INC.,
 	
               Defendant.
	Civil Action No. 4:21-cv-714
	
	JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Parallel Networks Licensing, LLC ("Parallel Networks" or "Plaintiff"), for its

Complaint against Defendant Arrow Electronics, Inc. (hereinafter, "Arrow" or "Defendant"),

alleges the following:

NATURE OF THE ACTION

1.   This is an action for patent infringement arising under the Patent Laws of the

United States, 35 U.S.C. § 1 *et seq*.

THE PARTIES

2.   Plaintiff Parallel Networks is a limited liability company organized under the laws

of the State of Texas with a place of business at 17440 N. Dallas Parkway, Suite 230, Dallas,

Texas 75287.

3.   Upon information and belief, Arrow Electronics, Inc. is a corporation organized

and existing under the laws of New York, with a place of business at 9201 E. Dry Creek Rd.,

Centennial, Colorado 80112. Upon information and belief, Arrow offers and sells products and

services throughout the United States, including in and from this judicial district, and introduces

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products and services that perform infringing processes into the stream of commerce knowing that they would be sold in this judicial district and elsewhere in the United States.

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 under 28 U.S.C. §§ 1331 and 1338(a).

6.   Venue is proper in this judicial district under 28 U.S.C. § 1400(b).

7.   This Court has personal jurisdiction over the Defendant under the laws of the State of Texas, due at least to the presence of Defendant's offices within this District and its substantial business in Texas and in this judicial district, directly or through intermediaries, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct and/or deriving substantial revenue from goods and services provided to individuals in the State of Texas. Further, venue is proper in this district because Defendant regularly conducts business through its Texas office at 1820 Preston Park Blvd., Suite 2800 Plano, Texas 75093-3685.

BACKGROUND

The Invention

8.   Keith A. Lowery is the lead inventor of the U.S. Patent No. 5,894,554 ("the '554 Patent") and related U.S. Patent No. 6,415,335 ("the '335 patent") (collectively, "the Asserted Patents"), which share a common specification. Both patents resulted from the pioneering research of Mr. Lowery in the area of server load-balancing and how websites could more efficiently and quickly process very large volumes of website visitor requests for web pages. Mr. Lowery's research resulted in the development of a method and apparatus for "creating and managing custom Web sites."
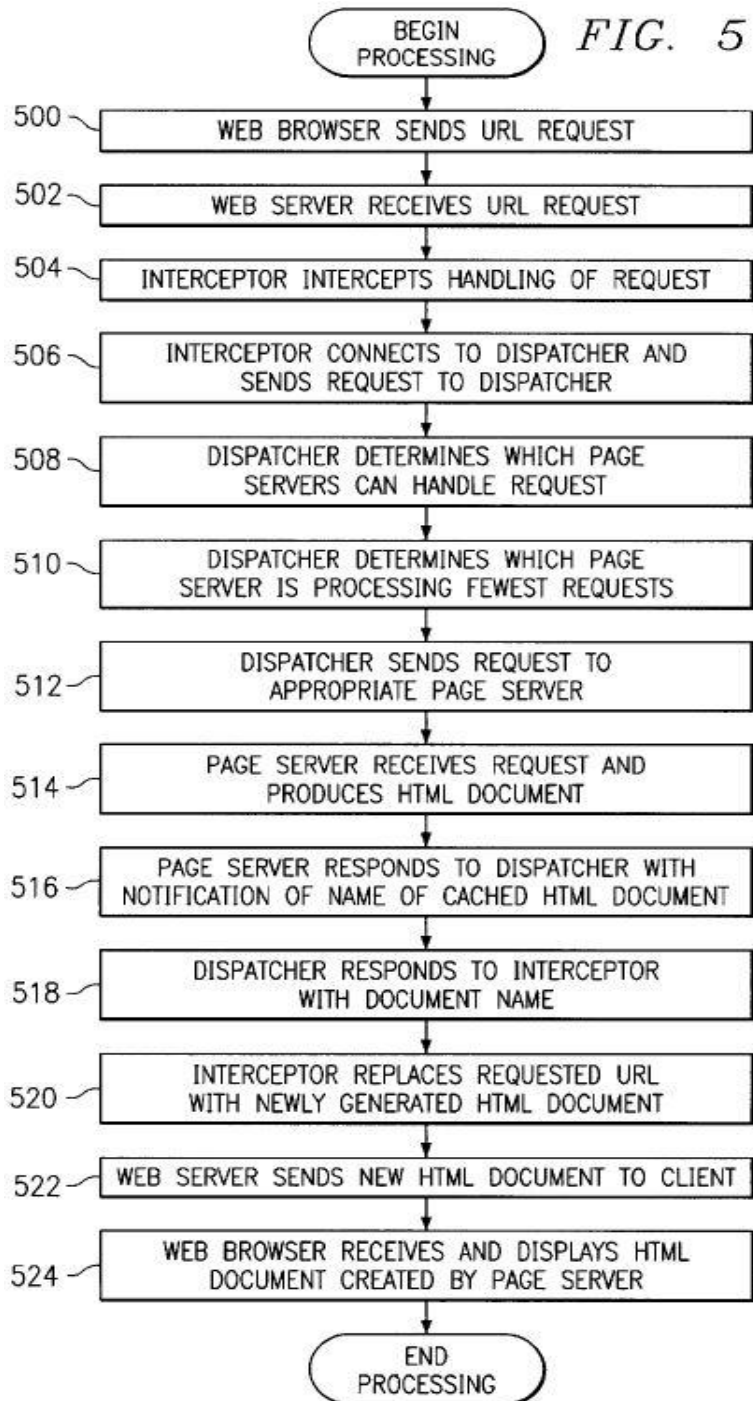
9.   For example, Mr. Lowery developed a computer-implemented method for managing a dynamic Web page generation request to a HTTP-compliant device, the computer-implemented method comprising the steps of routing the request from the HTTP-compliant device to a page server, the page server receiving the request and releasing the HTTP-compliant device to process other requests, processing the request, processing the request, the processing being performed by the page server concurrently with the HTTP-compliant device, as the HTTP-compliant device processes the other requests, and dynamically generating a Web page in response to the request, the Web page, including data dynamically retrieved from one or more data sources.

10.   Figure 4 (FIG. 4) of both the Asserted Patents, set forth below, is a block diagram of a client-server system which illustrates the methods claimed in the two patents.
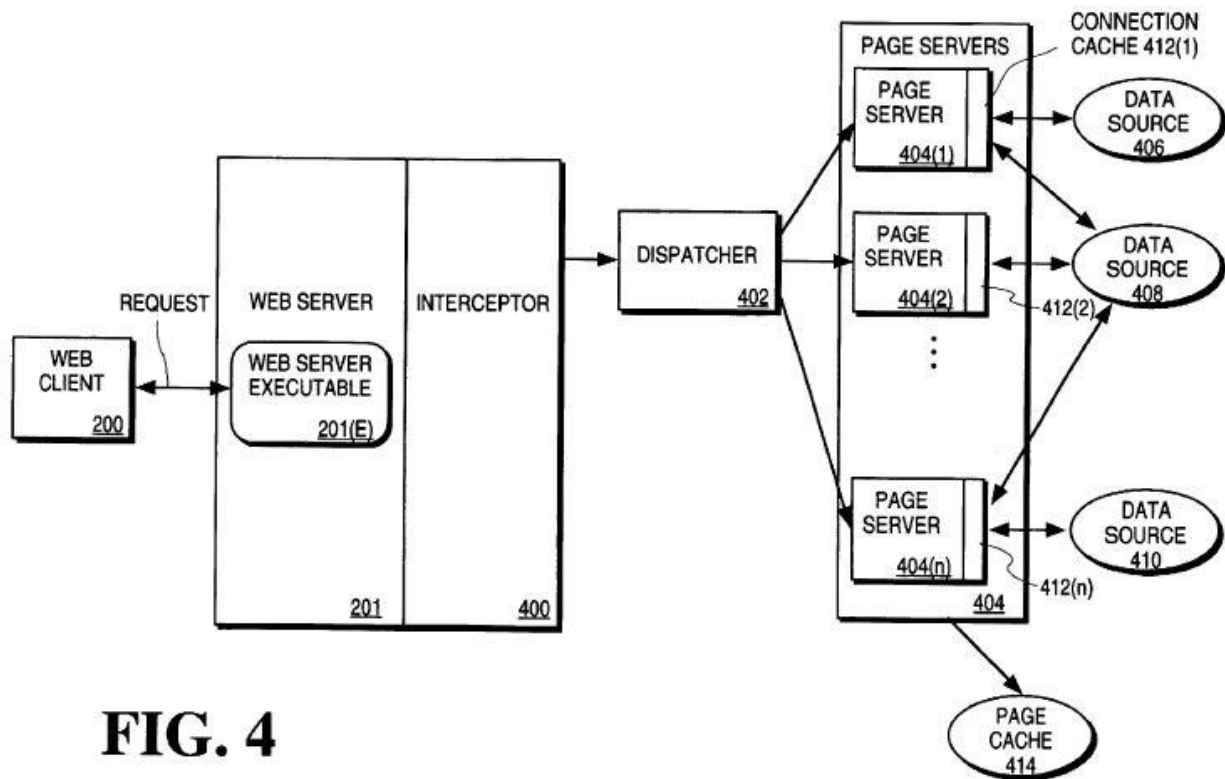
FIG. 4

11. Figure 5 (FIG. 5) of the Asserted Patents set forth below, is a flow chart which illustrates the operation of a client-server system constructed to perform the methods claimed in the Patents.

FIG. 5

BEGIN PROCESSING

500 — WEB BROWSER SENDS URL REQUEST

502 — WEB SERVER RECEIVES URL REQUEST

504 — INTERCEPTOR INTERCEPTS HANDLING OF REQUEST

506 — INTERCEPTOR CONNECTS TO DISPATCHER AND SENDS REQUEST TO DISPATCHER

508 — DISPATCHER DETERMINES WHICH PAGE SERVERS CAN HANDLE REQUEST

510 — DISPATCHER DETERMINES WHICH PAGE SERVER IS PROCESSING FEWEST REQUESTS

512 — DISPATCHER SENDS REQUEST TO APPROPRIATE PAGE SERVER

514 — PAGE SERVER RECEIVES REQUEST AND PRODUCES HTML DOCUMENT

516 — PAGE SERVER RESPONDS TO DISPATCHER WITH NOTIFICATION OF NAME OF CACHED HTML DOCUMENT

518 — DISPATCHER RESPONDS TO INTERCEPTOR WITH DOCUMENT NAME

520 — INTERCEPTOR REPLACES REQUESTED URL WITH NEWLY GENERATED HTML DOCUMENT

522 — WEB SERVER SENDS NEW HTML DOCUMENT TO CLIENT

524 — WEB BROWSER RECEIVES AND DISPLAYS HTML DOCUMENT CREATED BY PAGE SERVER

END PROCESSING

Advantage Over the Prior Art

12.   The patented inventions disclosed in the Asserted Patents, provide many
advantages over the prior art, and in particular improved the operations of web sites facing high-
traffic conditions. *See* '554 Patent at col. 4, ll. 38–53, '335 Patent at col. 4, ll. 38–53; *see also,
generally*, '554 Patent at col 6, ll. 49-52, '355 Patent at col. 6. ll. 49-52. One advantage of the
patented invention is that it optimizes the performance of data sources by caching Web pages
that are reputedly accessed, allowing subsequent requests to use the cached Web page rather than
re-accessing the data source, radically improving the performance of the data source. *See* '554
Patent at col. 6, ll. 55—col. 7, ll. 7, '335 Patent at col. 6, ll. 55—col. 7, ll. 8.

13.   Another advantage of the patented invention is that it allows Web site
administrators to utilize multiple levels of security to manage the Web site, depending on the
embodiment. *See* '554 Patent at col. 7, ll. 11—44, '335 Patent at col. 7 ll. 10—43. For example,
by making use of the Web age caching ability described above an administrator can enable
additional security for those sites that want to publish non-interactive content from internal
information systems, but do not want real-time Internet accessibility to those internal information
systems. *Id.* In this instance the Page server can act as a "replication and staging agent," and
create Web pages in batches rather than in real-time, and then stored for access at a later time,
even if the Page sever and dispatcher are not present or responsive later. *Id.* It is also possible in
another embodiment for a Page server to take such action that it can essentially deploy a Web
site via the copying of a single file, reducing other security risks. *See, id.* at col. 7, ll. 32—44,
col. 7 ll. 31—43.

14.   Another advantage of the patented invention is the scalability created by the dynamic nature of the load balancing, as accomplished by the Dispatcher and as modified by the Web site administrator. *See* '554 Patent at col. 8, ll. 10—51, '335 Patent at col. 8 ll. 10—51.

15.   Because of these significant advantages that can be achieved through the use of the patented invention, Parallel Networks believes that the management of dynamic web page generation requests as taught in the '554 and '335 Patents is widely implemented. Indeed, the patented inventions can be used for a variety of environments where large volumes of dynamic web page requests must be optimized including, for example, server farms and cloud computing architectures.

<u>**Post-Issuance Re-Examination and Litigation History of the Asserted Patents**</u>

16.   The Asserted Patents were subject to three ex-parte reexamination requests which took more than five years to complete. In July 2012, the United States Patent & Trademark Office (USPTO) issued certificates of correction which corrected erroneous claims in the *ex parte* reexamination certificates that had been issued by the USPTO for both of the Asserted Patents. All of the original claims in the '554 patent were canceled and new claims 12–49 were added. Similarly, all of the original claims in the '335 patent were canceled and new claims 30–85 were added.

17.   The Asserted Patents were previously litigated in this District, as well as the United States District Court for the District of Delaware. *See Parallel Networks Licensing LLC v. International Business Machines Corporation*, 1-13-cv-02072 (DED) (filed Dec. 20, 2013); *Parallel Networks Licensing LLC v. Microsoft Corporation*, 1-13-cv-02073 (DED) (filed Dec. 20, 2013); *Parallel Networks LLC v. Orbitz Worldwide Inc.*, 2-10-cv-00059 (TXED) (filed Feb. 23, 2010); *Parallel Networks LLC vs Saks Inc.*, 2-09-cv-00367 (TXED) (filed Nov. 19,

2009); *Quinstreet Inc. v. Parallel Networks, LLC*, 2-09-cv-00345 (TXED) (filed Nov. 04, 2009);

Parallel Networks, LLC v. Microsoft Corporation, 2-09-cv-00172 (TXED) (filed May. 29,

2009); *Parallel Networks, LLC v. Priceline.Com, Inc et al.*, 2-08-cv-00045 (TXED) (filed

Feb. 05, 2008); *Parallel Networks, LLC v. Netflix, Inc. et al.*, 2-07-cv-00562 (TXED) (filed Dec.

28, 2007); *epicRealm Licensing, LLC v. The Macerich Company*, 5-07-cv-00181 (TXED) (filed

Dec. 03, 2007); *epicRealm Licensing, LP. v. Various, Inc.*, 2-07-cv-00030 (TXED) (filed Jan. 25,

2007); *epicRealm Licensing, LP. v. Various, Inc.*, 5-07-cv-00135 (TXED) (filed Jan. 25, 2007);

Quinstreet Inc. v. Parallel Networks, LLC, 1-06-cv-00495 (DED) (filed Aug. 08, 2006); *Oracle

Corporation et al v. Parallel Networks LLC*, 1-06-cv-00414 (DED) (filed Jun. 30, 2006);

epicRealm Licensing, LLC v. Franklin Covey Co. et al., 5-07-cv-00126 (TXED) (filed Aug. 05,

2005); *epicRealm Licensing, LLC v. Autoflex Leasing, Inc. et al.*, 2-05-cv-00163 (TXED) (filed

May. 02, 2005); *epicRealm Licensing, LLC v. Autoflex Leasing, Inc. et al.*, 5-07-cv-00125

(TXED) (filed May. 02, 2005); *epicRealm, Licensing, LLC v. Speedera Networks, Inc.*, 2-05-cv-

00150 (TXED) (filed Apr. 15, 2005) (collectively "Prior District Court Litigation").

18.   The Asserted Patents have also been adjudicated in several appeals to the

Federal Circuit Court of Appeals.   *See Oracle Corp. v. Parallel Networks, LLC*, 375 F. App'x

36 (Fed. Cir. 2010); *Parallel Networks Licensing v. Microsoft Corp.*, No. 2018-1120, 2019 U.S.

App. LEXIS 19442, at *9 (Fed. Cir. June 28, 2019); *Parallel Networks Licensing, LLC v. IBM*,

Civil Action No. 13-2072 (KAJ), 2017 U.S. Dist. LEXIS 28461, at *16-17 (D. Del. Feb. 22,

2017) (collectively, the "Federal Circuit Appeals")

19.   In December 2014, Microsoft filed *Inter Partes* Review (IPR) petitions before the

Patent Trial and Appeals Board (PTAB) of the USPTO challenging the claims of the Asserted

Patents under 35 U.S.C. §§ 102 and 103; *See Microsoft Corporation v. Parallel Networks*

Licensing, LLC, IPR2015-00483 (PTAB); ('554 Patent, filed Dec. 23, 2014); *Microsoft*

Corporation v. Parallel Networks Licensing, LLC, IPR2015-00484 (PTAB) ('554 Patent, filed

Dec. 23, 2014); *Microsoft Corporation v. Parallel Networks Licensing, LLC*, IPR2015-00485

(PTAB) ('335 Patent, filed Dec. 23, 2014); *Microsoft Corporation v. Parallel Networks*

Licensing, LLC, IPR2015-00486 (PTAB) ('335 Patent, filed Dec. 23, 2014).

20.   As to the '554 patent, the PTAB instituted reviews of claims 12–19, 32, 34, 46

and 48 in IPR2015-00483 (IPR-483) and claims 12, 20–31, 33, 35–45, 47 and 49 in IPR2015-

00484. The PTAB consolidated those reviews into IPR-483, which involves claims 12–49 of the

'554 patent. As to the '335 patent, the PTAB instituted reviews of claims 30–40, 43–53, and 56–

85 in IPR2015-00485 (IPR-485) and claims 32, 33, 35–42, 45, 46, 48–55, 65, 69, 80, and 84 in

IPR2015-00486. The PTAB consolidated those reviews in IPR-485, which involved claims 30–

85 of the '335 patent. In August 2015, IBM filed IPR petitions substantially similar to the

Microsoft petitions. *See*, *International Business Machines Corp. v. Parallel Networks Licensing*,

LLC, IPR2015-01729 (PTAB) ('554 Patent, filed Aug. 14, 2015); *International Business*

Machines Corp. v. Parallel Networks Licensing, LLC, IPR2015-01731 (PTAB) ('554 Patent,

filed Aug. 14, 2015); *International Business Machines Corp. v. Parallel Networks Licensing,*

LLC, IPR2015-01732 (PTAB) ('335 Patent, filed Aug. 14, 2015); *International Business*

Machines Corp. v. Parallel Networks Licensing, LLC, IPR2015-01734 (PTAB) ('335 Patent,

filed Aug. 14, 2015). The PTAB instituted reviews on the IBM petitions and joined IBM as a

petitioner to IPR-483 and IPR-485 (the Microsoft and IBM IPR petitions are hereinafter

collectively, the "PTAB Proceedings").

21.   In its August 2016 Final Written Decision for IPR483, the PTAB concluded that

Microsoft and IBM (hereafter collectively "Petitioners") failed to demonstrate the unpatentability

of claims 12–49 of the '554 patent over the cited prior art. *Microsoft Corp. v. Parallel Networks Licensing, LLC*, IPR2015-00483, 2016 WL 8944632, at *11 (PTAB, Aug. 11, 2016) (IPR-483 Final Decision). The PTAB reached the same conclusion in IPR-485 for claims 30–85 of the '335 patent. *Microsoft Corp. v. Parallel Networks Licensing, LLC*, IPR2015-00485, 2016 WL 8999702, at *10 (P.T.A.B. Aug. 11, 2016) (IPR-485 Final Decision).

22.   Microsoft appealed the PTAB's Final Written Decisions to the Federal Circuit, which issued its ruling on December 1, 2017 affirming the PTAB's claim construction and rejecting certain anticipation arguments while vacating and remanding with respect to certain other invalidity arguments. *Microsoft Corp. v. Parallel Networks Licensing*, LLC, 715 F. App'x 1013, 1015 (Fed. Cir. 2017).

23.   The Prior District Court Litigation, PTAB Proceedings, and Federal Circuit Appeals, inform the scope and construction of the claims of the Asserted Patents.

COUNT I – DEFENDANT'S INFRINGEMENT OF
U.S. PATENT NO. 5,894,554

24.   The allegations set forth in the foregoing paragraphs are incorporated into this First Count.

25.   On April 13, 1999, the '554 Patent was duly and legally issued by the United States Patent and Trademark Office under the title "System for managing dynamic web page generation requests by intercepting request at Web server and routing to page server thereby releasing web server to process other requests[.]" A true and correct copy of the '554 Patent is attached as Exhibit A.

26.   Parallel Networks is the assignee and owner of the right, title and interest in and to the '554 Patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

27.   Upon information and belief, Defendant has directly infringed one or more claims of the '554 Patent by using, and/or providing and causing to be used products, specifically one or more servers that may load-balance among other servers, which by way of example, includes Defendant's use of A10's A10 Lightning ADC, and/or Thunder ADC products, or the use of a web server in conjunction with the same (the "Accused Instrumentalities").

28.   Upon information and belief, Defendant has directly infringed at least claim 12 of the '554 patent by its use of A10 Lightning ADC (Application Delivery Controller) and Thunder ADC line (which both can managed, for example, using the A10 Harmony controller, or by use of a web server in conjunction with the same.

29.   Upon information and belief, the Accused Instrumentalities perform a computer-implemented method for managing a dynamic Web page generation request to a Web server. A10 Lightning ADC, and/or Thunder ADC products feature the ability to serve as a server that load-balances among other servers. The below deployment examples from A10's website show load balancing amongst application servers.

Source: https://www.a10networks.com/wp-content/uploads/A10-DS-15100-EN.pdf
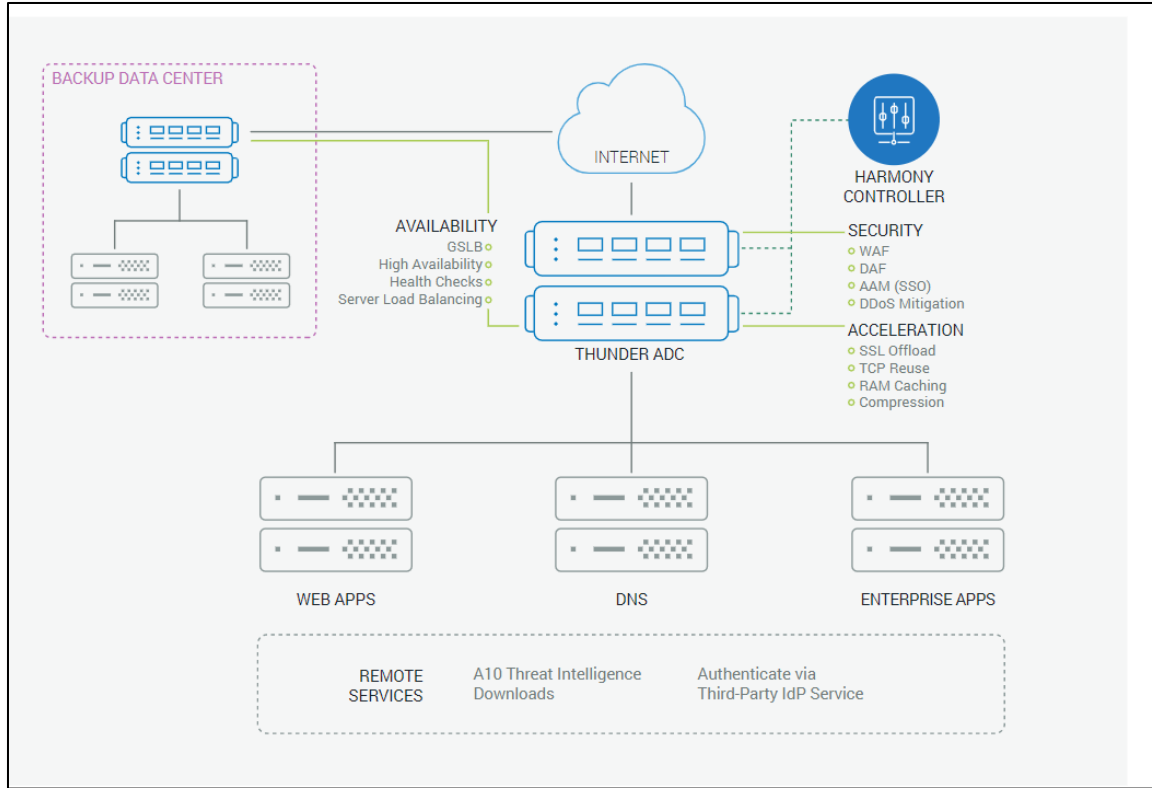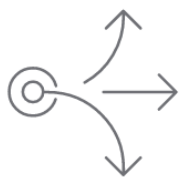
ADVANCED
SERVER LOAD BALANCING

Thunder ADC is a full-proxy, load-balancing and content-switching solution. With aFleX® scripting, deep packet inspection, comprehensive load-balancing algorithms and persistence support, Thunder ADC enables application layer visibility to optimally route inbound requests.

Customizable server health checks ensure only fully functional servers are used to service client needs. The server best able to respond is selected and total servers required can be substantially reduced for lower TCO.
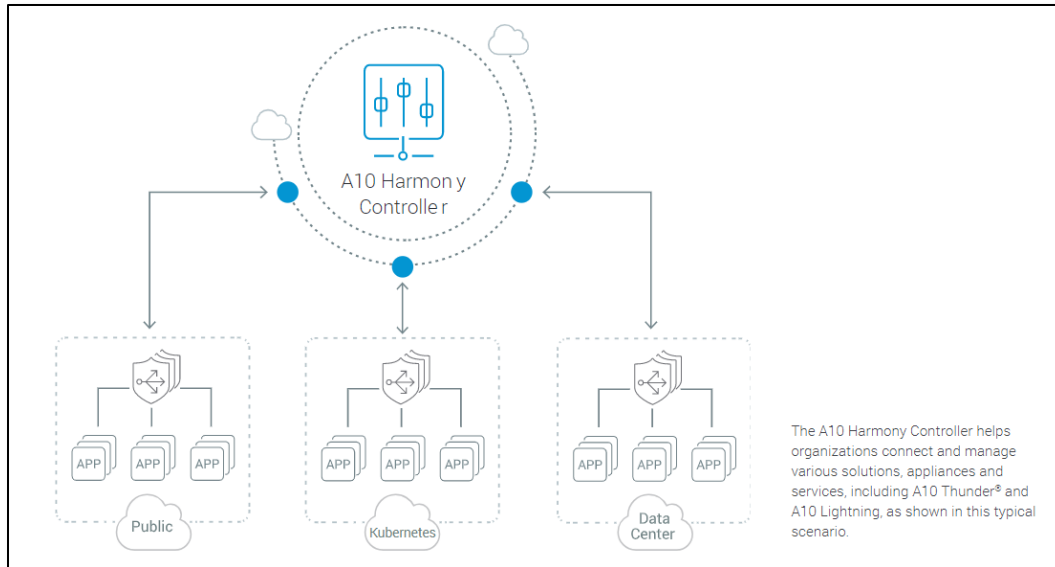
Source: https://www.a10networks.com/wp-content/uploads/A10-DS-15100-EN.pdf

GLOBAL
SERVER LOAD BALANCING (GSLB)

Extend load balancing on a global basis. Thunder ADCs, distributed worldwide, continuously update each other on their respective individual nodes for optimal site selection and status to ensure disaster recovery.

Geographic and network proximity policy metrics optimize multi-site deployments. DNS Proxy or DNS Server methods further improve implementation flexibility and deployment simplicity.
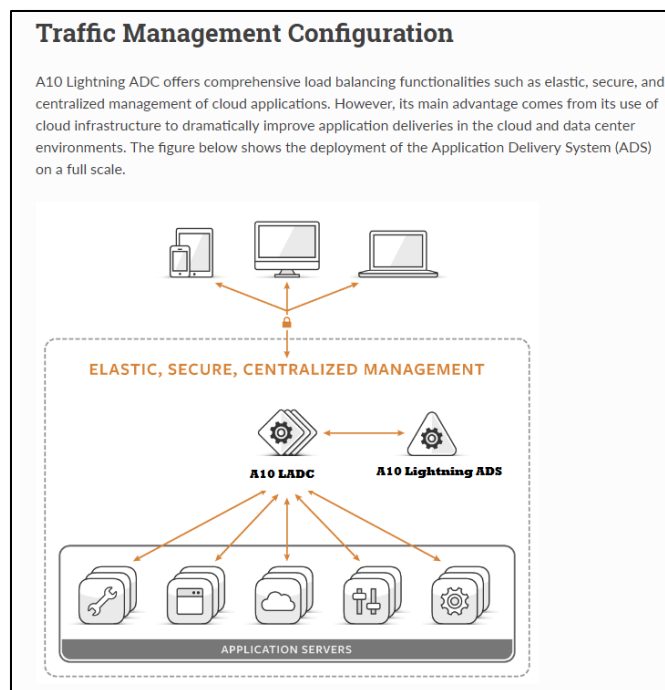
Source: https://www.a10networks.com/wp-content/uploads/A10-DS-15100-EN.pdf

The A10 Harmony Controller helps organizations connect and manage various solutions, appliances and services, including A10 Thunder® and A10 Lightning, as shown in this typical scenario.

Source: https://a10networks.optrics.com/downloads/datasheets/A10-Lightning-Application-Delivery-Service.pdf

- **Layer 4-7 advanced load-balancing with auto-scaling.** Extend traditional load-balancing with content-switching and session persistence. Advanced server health checks ensure requests are only forwarded to active servers that are able to respond.

Source: https://a10networks.optrics.com/downloads/datasheets/A10-Lightning-Application-Delivery-Service.pdf

Traffic Management Configuration

A10 Lightning ADC offers comprehensive load balancing functionalities such as elastic, secure, and centralized management of cloud applications. However, its main advantage comes from its use of cloud infrastructure to dramatically improve application deliveries in the cloud and data center environments. The figure below shows the deployment of the Application Delivery System (ADS) on a full scale.

Source: http://docs.hc.a10networks.com/2.2.4/ads-traffic-mgmt.html

30.   Upon information and belief, the Accused Instrumentalities route requests from a Web server to a selected page server, said selected page server receiving said request and releasing said Web server to process other requests, wherein said routing step further includes the steps of intercepting said request at said Web server, routing said request from said Web server to a dispatcher, and dispatching, by said dispatcher, said request to said selected page server. This element is met, in one non-limiting example, by A10 Lightning ADC, and/or Thunder ADC products' use of the least-connected load-balancing method.

31.   In using this method, as demonstrated in the diagram below, the Accused Instrumentalities rout a request from a Web server, and selects a page server to release the Web server from that request to process it.

In A10 Lightning ADC, you can select any of these load balancing methods:

- Least Connections
- Round Robin
- IP Hash
- IP Port Hashing
- Least Connections

When a load balancer is configured to use the least connection method, it selects the service with the least number of active connections to ensure that the load of the active requests is balanced on the services. This method is the default load balancing method because it provides the best performance.

This method is used when you do not want to overload a busy server and distribute the load to other servers which are relatively less loaded.

Source http://docs.hc.a10networks.com/2.2.4/ads-traffic-mgmt.html

32.   All requests dispatched from the Accused Instrumentalities are concurrently received and processed by one of the page server machines as chosen, in this example, by the

method of determining which has the least active connections. The web server resources, including, but not limited to, memory, and a CPU associated with the particular task, duty or obligations in processing this request are thereby freed.

33.   Upon information and belief, the Accused Instrumentalities process requests, wherein such processing is performed by a selected page server while the Web server concurrently processes other requests. This element is met A10 Lightning ADC, and/or Thunder ADC products, as in using methods of load-balancing like the least-connected method, the routing of a new request necessarily depends on the number of current active transactions at the page server level.

34.   Upon information and belief, the Accused Instrumentality, in response to a request, a selected page server retrieves data from one or more sources and aids in the generations of dynamic web pages. Much of A10's documentation describes dynamically retrieved content as being retrieved from databases, but also from on-board caches when such data has already been recently accessed.

35.   Upon information and belief, the Accused Instrumentalities utilize a form of dispatching such that it includes examining a request to make a selection of which page server should process said request from among a plurality of page servers that can each generate said Web page requested by said request, selecting one of said plurality of page servers to dynamically generate said Web page, wherein such selection is based on examining dynamic information regarding a load associated with each of the plurality of page servers and sending said request to said selected page server based on this examination.

36.   This dispatching element is satisfied by the use A10 Lightning ADC, and/or Thunder ADC products, as they examine requests to make selections of page servers—each of

which is capable of generating the Web page—based on information regarding the load

associated with each page server. For example, A10 Lightning ADC dispatches a request to an

appropriate page server based on examining the dynamic information regarding the load

associated with each of the page servers—one non-limiting example of such information being

which page server has the least amount of active connections:

Source http://docs.hc.a10networks.com/2.2.4/ads-traffic-mgmt.html

37.   Parallel Networks has been harmed by Defendant's infringing activities.

COUNT 2 – DEFENDANT'S INFRINGEMENT OF
U.S. PATENT NO. 6,415,335

38.   The allegations set forth in the foregoing paragraphs are incorporated into this

Second Count.

39.   On July 2, 2002, the '335 Patent was duly and legally issued by the United States

Patent and Trademark Office under the title "System and method of managing dynamic web

page generation requests[.]" A true and correct copy of the '335 Patent is attached as Exhibit B.

40.   Parallel Networks is the assignee and owner of the right, title and interest in and to the '335 Patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

41.   Upon information and belief, each Defendant has directly infringed one or more claims of the '335 Patent by using, and/or providing and causing to be used products, specifically one or more servers that may load-balance among other servers, which by way of example, includes Defendant's use of A10 Lightning ADC, and/or Thunder ADC products, or the use of a web server in conjunction with the same (the "Accused Instrumentalities").

42.   Upon information and belief, Defendant has directly infringed at least claim 43 of the '335 patent by its use of A10 Lightning ADC, and/or Thunder ADC products, or by use of a web server in conjunction with the same.

43.   Upon information and belief, the Accused Instrumentalities transfers requests from a HTTP-compliant device to a selected page server, said selected page server being selected from among a plurality of page servers, and receiving said request and releasing said HTTP-compliant device to process other requests, wherein said transferring step further includes the steps of intercepting said request at said HTTP-compliant device, selecting said page server from among a plurality of page servers that can each process the request based on dynamic information maintained for each of said plurality of page servers, and then transferring said request from said HTTP-compliant device to the selected page server. This element is met, in one non-limiting example, by A10 Lightning ADC, and/or Thunder ADC products' use of the least-connected load-balancing method.

44.   In using this method, as demonstrated in the diagram below, the Accused Instrumentalities transfers a request from a HTTP-compliant device, and selects a page server to release the HTTP-compliant device from that request to process it.

Source: https://www.a10networks.com/wp-content/uploads/A10-DS-15100-EN.pdf
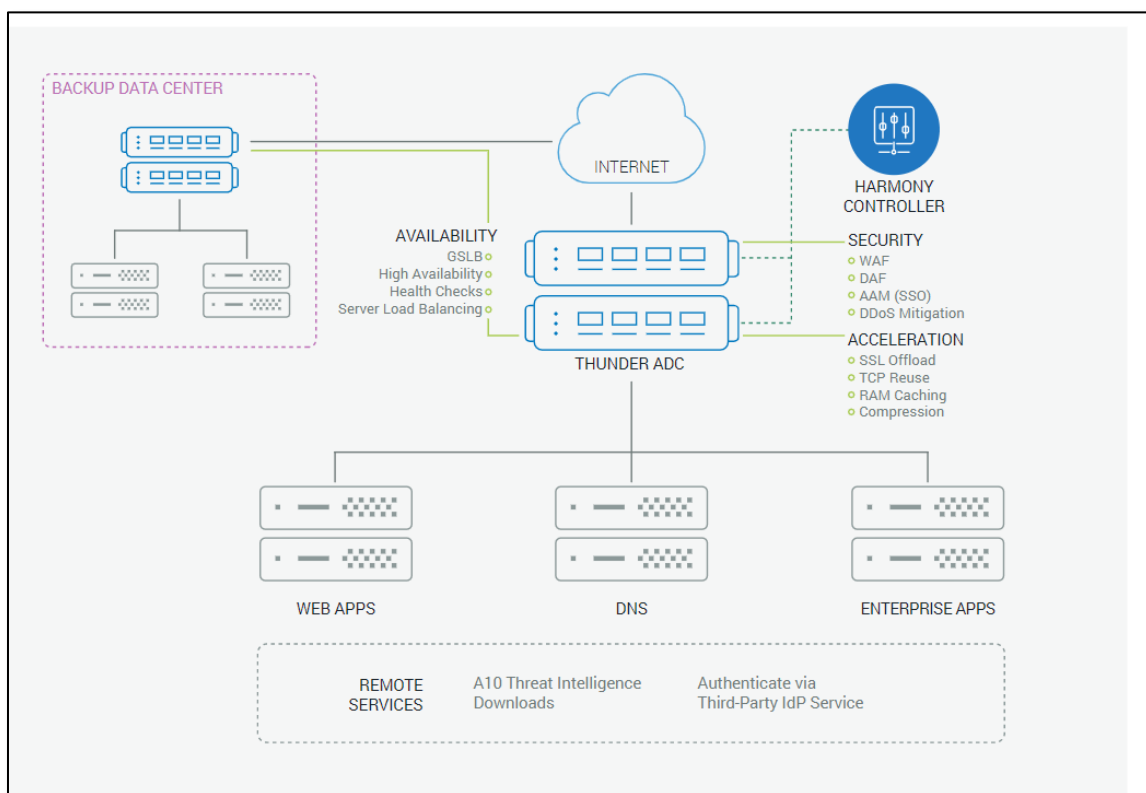
45.   All requests transferred from the Accused Instrumentalities are concurrently received and processed by one of the page server machines as chosen, in this example, by the method of determining which has the least active connections. The HTTP-compliant device resources, including, but not limited to, memory, and a CPU associated with the particular task, duty or obligations in processing this request are thereby freed.

46.   Upon information and belief, the Accused Instrumentalities process requests, wherein such processing is performed by a selected page server while the HTTP-compliant

device concurrently processes other requests. This element is met by A10 Lightning ADC, and/or Thunder ADC products, as in using methods of load-balancing like the least-connected method, the routing of a new request necessarily depends on the number of current active transactions at the page server level.

47.   Upon information and belief, the Accused Instrumentality, in response to a request, a selected page server retrieves data from one or more sources and aids in the generations of dynamic web pages. Much of A10's documentation describes dynamically retrieved content as being retrieved from databases, but also from on-board caches when such data has already been recently accessed.

48.   Parallel Networks has been harmed by Defendant's infringing activities.

JURY DEMAND

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Parallel Networks demands a trial by jury on all issues triable as such.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Parallel Networks demands judgment for itself and against Defendant as follows:

A.   An adjudication that Defendant has infringed the '554 and '335 Patents;

B.   An award of damages to be paid by Defendant adequate to compensate Parallel Networks, LLC for Defendant's past infringement of the '554 and '335 Patents, 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 Plaintiff's reasonable attorneys' fees; and

D.   An award to Parallel Networks of such further relief at law or in equity as the

Court deems just and proper.

Dated: September 13, 2021   DEVLIN LAW FIRM LLC

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