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12 *Attorneys for Plaintiff*  
13 JENAM TECH, LLC

14  
15 **UNITED STATES DISTRICT COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**  
17 **OAKLAND DIVISION**

18 JENAM TECH, LLC,  
19 Plaintiff,  
20 vs.  
21 GOOGLE LLC,  
22 Defendant.

Case No. 4:21-cv-07994-JST

**PLAINTIFF'S CONSOLIDATED  
COMPLAINT FOR PATENT  
INFRINGEMENT**  
**(Lead Case)**

1 Plaintiff Jenam Tech, LLC (“Jenam Tech” or “Plaintiff”), files this Complaint against  
2 Google, LLC ( “Google” or “Defendant”) seeking damages and other relief for patent infringement,  
3 and alleges with knowledge to its own acts, and on information and belief as to other matters, as  
4 follows:

5 **PARTIES**

6 1. Plaintiff is a limited liability company organized and existing under the laws of the  
7 State of Texas, having its principal place of business at 211 West Tyler Street, Suite C, Longview,  
8 Texas, 75601.

9 2. Defendant Google is a Delaware corporation with a physical address at 1600  
10 Amphitheatre Pkwy, Mountain View, CA 94043. Google is registered to do business in the State of  
11 California and may be served with process through its registered agent, Corporation Service  
12 Company, 2710 Gateway Oaks Drive, Suite 150N, Sacramento, CA 95833.

13 3. This Court has personal jurisdiction over Google at least because Google regularly  
14 conducts and transacts business, including infringing acts described herein, in this District.

15 4. Defendant conducts business in California, directly or through intermediaries and  
16 offers products or services, including those accused herein of infringement, to customers, and  
17 potential customers located in California, including in the Northern District of California.

18 **JURISDICTION AND VENUE**

19 5. This action arises under the patent laws of the United States, 35 U.S.C. §101, et seq.  
20 This Court has subject matter jurisdiction under 28 U.S.C. §§1331 and 1338(a).

21 6. As to Google, venue is proper in this judicial district pursuant to 28 U.S.C. §1400(b).  
22 Google maintains an established place of business in the state of California and this judicial district.

23 7. Defendant is subject to this Court’s specific and general personal jurisdiction because  
24 Defendant conducts substantial business in this forum, including: (i) making, using, selling,  
25 importing, and/or offering for sale one or more websites or web addresses including, but not limited  
26 to www.google.com, stored and/or hosted on one or more servers owned or under the control of  
27 Google (“Accused Instrumentalities”); (ii) making, using, selling, importing, and/or offering for sale  
28 software for smartphones and tablets as well as other computing devices (e.g., laptops, desktops,

1 Chromebooks, etc.) (“Accused Software”); (iii) making, using, selling, importing, and/or offering  
2 for sale software for smartphones and tablets as well as other computing devices, or offering said  
3 software with such computing devices (e.g., Pixel phones, laptops, desktops, Chromebooks, etc.)  
4 (“Accused Products”); or (iv) regularly doing or soliciting business, engaging in other persistent  
5 courses of conduct, or deriving substantial revenue from goods and services provided to citizens  
6 and residents in California and in this District.

7 **THE PATENTS-IN-SUIT**

8 8. On March 7, 2018, Robert Paul Morris filed United States Patent Application No.  
9 15/915,053 (“the ’053 Application”). The ’053 Application was duly examined and issued as United  
10 States Patent No. 10,069,945 (“the ’945 patent”) (entitled “Methods, Systems, and Computer  
11 Program Products for Sharing Information for Detecting an Idle TCP Connection”), on September 4,  
12 2018.

13 9. Jenam Tech is the owner of the ’945 patent and has the full and exclusive right to  
14 bring actions and recover past, present, and future damages for the Defendant’s infringement of the  
15 ’945 patent.

16 10. The ’945 patent is valid and enforceable. A true and correct copy of the ’945 patent is  
17 attached hereto as Exhibit A.

18 11. On March 7, 2018, Robert Paul Morris filed United States Patent Application No.  
19 15/915,047 (“the ’047 Application”). The ’047 Application was duly examined and issued as United  
20 States Patent No. 10,075,564 (“the ’564 patent”) (entitled “Methods, Systems, and Computer  
21 Program Products for Sharing Information for Detecting an Idle TCP Connection”), on September  
22 11, 2018.

23 12. Jenam Tech is the owner of the ’564 patent and has the full and exclusive right to  
24 bring actions and recover past, present, and future damages for the Defendant’s infringement of the  
25 ’564 patent.

26 13. The ’564 patent is valid and enforceable. A true and correct copy of the ’564 patent is  
27 attached hereto as Exhibit B.

28

1           14.     On March 7, 2018, Robert Paul Morris filed United States patent Application No.  
2 15/915,052 (“the ’052 Application”). The ’052 Application was duly examined and issued as United  
3 States Patent No. 10,075,565 (“the ’565 patent”) (entitled “Methods, Systems, and Computer  
4 Program Products for Sharing Information for Detecting an Idle TCP Connection”), on September  
5 11, 2018.

6           15.     Jenam Tech is the owner of the ’565 patent and has the full and exclusive right to  
7 bring actions and recover past, present, and future damages for the Defendant’s infringement of the  
8 ’565 patent.

9           16.     The ’565 patent is valid and enforceable. A true and correct copy of the ’565 patent is  
10 attached hereto as Exhibit C.

11           17.     On July 19, 2018, Robert Paul Morris filed United States Patent Application No.  
12 16/040,522 (“the ’522 Application”). The ’522 Application was duly examined and issued as United  
13 States Patent No. 10,375,215 (“the ’215 patent”) (entitled “Methods, Systems, and Computer  
14 Program Products for Sharing Information for Detecting an Idle TCP Connection”), on August 6,  
15 2019.

16           18.     Jenam Tech is the owner of the ’215 patent and has the full and exclusive right to  
17 bring actions and recover past, present, and future damages for the Defendant’s infringement of the  
18 ’215 patent.

19           19.     The ’215 patent is valid and enforceable. A true and correct copy of the ’215 patent  
20 is attached hereto as Exhibit D.

21           20.     On July 19, 2018, Robert Paul Morris filed United States Patent Application No.  
22 16/040,517 (“the ’517 Application”). The ’517 Application was duly examined and issued as United  
23 States Patent No. 10,306,026 (“the ’026 patent”) (entitled “Methods, Systems, and Computer  
24 Program Products for Sharing Information for Detecting an Idle TCP Connection”), on May 28,  
25 2019.

26           21.     Jenam Tech is the owner of the ’026 patent and has the full and exclusive right to  
27 bring actions and recover past, present, and future damages for the Defendant’s infringement of the  
28 ’026 patent.

1           22.     The '026 patent is valid and enforceable. A true and correct copy of the '026 patent is  
2 attached hereto as Exhibit E.

3           23.     On September 3, 2017, Robert Paul Morris filed United States Patent Application No.  
4 15/694,802 (“the ‘802 Application”). The ‘802 Application was duly examined and issued as  
5 United States Patent No. 9,923,995 (“the ‘995 Patent”) (entitled “Methods, Systems, and Computer  
6 Program Products for Sharing Information for Detecting an Idle TCP Connection”), on March 20,  
7 2018.

8           24.     Jenam Tech is the owner of the ‘995 Patent and has the full and exclusive right to  
9 bring actions and recover past, present, and future damages for the Defendant’s infringement of the  
10 ‘995 Patent.

11           25.     The ‘995 Patent is valid and enforceable. A true and correct copy of the ‘995 Patent  
12 is attached hereto as Exhibit F.

13           26.     On September 3, 2017, Robert Paul Morris filed United States Patent Application  
14 No. 15/694,803 (“the ‘803 Application”). The ‘803 Application was duly examined and issued as  
15 United States Patent No. 9,923,996 (“the ‘996 Patent”) (entitled “Methods, Systems, and Computer  
16 Program Products for Sharing Information for Detecting an Idle TCP Connection”), on March 20,  
17 2018.

18           27.     Jenam Tech is the owner of the ‘996 Patent and has the full and exclusive right to  
19 bring actions and recover past, present, and future damages for the Defendant’s infringement of the  
20 ‘996 Patent.

21           28.     The ‘996 Patent is valid and enforceable. A true and correct copy of the ‘996 Patent  
22 is attached hereto as Exhibit G.

23           29.     On March 28, 2019, Robert Paul Morris filed United States Patent Application No.  
24 16/368,811 (“the ‘811 Application”). The ‘811 Application was duly examined and issued as  
25 United States Patent No. 10,742,774 (“the ‘774 patent”) (entitled “Methods, Systems, and Computer  
26 Program Products for Sharing Information for Detecting an Idle TCP Connection”), on August 11,  
27 2020.

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1           30. Jenam Tech is the owner of the '774 patent and has the full and exclusive right to  
2 bring actions and recover past, present, and future damages for the Defendant's infringement of the  
3 '774 patent.

4           31. The '774 Patent is valid and enforceable. A true and correct copy of the '774 Patent  
5 is attached hereto as Exhibit O.

6           32. On October 23, 2020, Robert Paul Morris filed United States Patent Application No.  
7 17/079,397 ("the '397 Application"). The '397 Application was duly examined and issued as  
8 United States Patent No. 10,951,742 ("the '742 patent") (entitled "Methods, Systems, and  
9 Computer Program Products for Sharing Information for Detecting at Least One Time Period for a  
10 Connection"), on March 16, 2021.

11           33. Jenam Tech is the owner of the '742 patent and has the full and exclusive right to  
12 bring actions and recover past, present, and future damages for the Defendant's infringement of the  
13 '742 patent.

14           34. The '742 patent is valid and enforceable. A true and correct copy of the '742 patent  
15 is attached hereto as Exhibit Q.

16           35. The '945, '564, '565, '215, '026, '995, '996, '774, '742 patents are collectively  
17 referred to herein as the "patents" or the "patents in suit."

18           36. Jenam Tech has not practiced any claimed invention of the patents in suit.

19           37. Defendant infringes the patents at least through making, using, selling, importing,  
20 and/or offering to sell the Accused Instrumentalities, Accused Software, and Accused Products.

21                           **COUNT I: INFRINGEMENT OF THE '945 PATENT**

22           38. Jenam Tech repeats and re-alleges the allegations of the above paragraphs as if fully  
23 set forth herein.

24           39. The '945 patent includes 144 claims. '945 patent, Ex. A at 24:8-36:65.

25           40. Defendant directly infringes one or more claims of the '945 patent without authority  
26 by making, using (including without limitation testing), selling, importing, and/or offering to sell  
27 products and systems, including by way of example, the Accused Instrumentalities. *See* Claim  
28 Chart for the '945 patent, attached hereto as Exhibit H.

1 41. Defendant has been and is directly infringing, either literally or under the doctrine of  
2 equivalents, at least Claim 104 of the '945 patent by making, using (including without limitation  
3 testing), selling, importing, and/or offering to sell the Accused Instrumentalities. *See* Claim Chart  
4 for the '945 patent, attached hereto as Exhibit H. As demonstrated by the attached claim chart, each  
5 and every element of Claim 104 of the '945 patent is found in the Accused Instrumentalities.

6 42. Defendant has had actual knowledge of the '945 patent at least as early as the date of  
7 service of the original Complaint (Dkt. 1).

8 43. Defendant's acts of infringement have occurred within this District and elsewhere  
9 throughout the United States.

10 **COUNT II: INFRINGEMENT OF THE '564 PATENT**

11 44. Jenam Tech repeats and re-alleges the allegations of the above paragraphs as if fully  
12 set forth herein.

13 45. The '564 patent includes 30 claims. '564 patent, Ex. B at 23:5–27:28.

14 46. Defendant directly infringes one or more claims of the '564 patent without authority  
15 by making, using (including without limitation testing), selling, importing, and/or offering to sell  
16 products and systems, including by way of example, the Accused Instrumentalities. *See* Claim Chart  
17 for the '564 patent, attached hereto as Exhibit I.

18 47. Defendant has been and is directly infringing, either literally or under the doctrine of  
19 equivalents, at least Claim 1 of the '564 patent by making, using (including without limitation  
20 testing), selling, importing, and/or offering to sell the Accused Instrumentalities. *See* Claim Chart  
21 for the '564 patent, attached hereto as Exhibit I. As demonstrated by the attached claim chart, each  
22 and every element of Claim 1 of the '564 patent is found in the Accused Instrumentalities.

23 48. Defendant has had actual knowledge of the '564 patent at least as early as the date  
24 of service of the original Complaint (Dkt. 1).

25 49. Defendant's acts of infringement have occurred within this District and elsewhere  
26 throughout the United States.  
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**COUNT III: INFRINGEMENT OF THE '565 PATENT**

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2 50. Jenam Tech repeats and re-alleges the allegations of the above paragraphs as if fully  
3 set forth herein.

4 51. The '565 patent includes 30 claims. '565 patent, Ex. C at 23:48–28:65.

5 52. Defendant directly infringes one or more claims of the '565 patent without authority  
6 by making, using (including without limitation testing), selling, importing, and/or offering to sell  
7 products and systems, including by way of example, the Accused Instrumentalities. *See* Claim Chart  
8 for the '565 patent, attached hereto as Exhibit J.

9 53. Defendant has been and is directly infringing, either literally or under the doctrine  
10 of equivalents, at least Claim 1 of the '565 patent by making, using (including without limitation  
11 testing), selling, importing, and/or offering to sell the Accused Instrumentalities. *See* Claim Chart  
12 for the '565 patent, attached hereto as Exhibit J. As demonstrated by the attached claim chart, each  
13 and every element of Claim 1 of the '565 patent is found in the Accused Instrumentalities.

14 54. Defendant has had actual knowledge of the '565 patent at least as early as the date  
15 of service of the original Complaint (Dkt. 1).

16 55. Defendant's acts of infringement have occurred within this District and elsewhere  
17 throughout the United States.

**COUNT IV: INFRINGEMENT OF THE '215 PATENT**

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19 56. Jenam Tech repeats and re-alleges the allegations of the above paragraphs as if fully  
20 set forth herein.

21 57. The '215 patent includes 39 claims. '215 patent, Ex. D at 24:15–30:23.

22 58. Defendant directly infringes one or more claims of the '215 patent without authority  
23 by making, using (including without limitation testing), selling, importing, and/or offering to sell  
24 products and systems, including by way of example, the Accused Instrumentalities. *See* Claim  
25 Chart for the '215 patent, attached hereto as Exhibit K.

26 59. Defendant has been and is directly infringing, either literally or under the doctrine  
27 of equivalents, at least Claim 1 of the '215 patent by making, using (including without limitation  
28 testing), selling, importing, and/or offering to sell the Accused Instrumentalities. *See* Claim Chart



1 for the '215 patent, attached hereto as Exhibit K. As demonstrated by the attached claim chart,  
2 each and every element of Claim 1 of the '215 patent is found in the Accused Instrumentalities.

3 60. Defendant has had actual knowledge of the '215 patent at least as early as the date  
4 of service of the original Complaint (Dkt. 1).

5 61. Defendant's acts of infringement have occurred within this District and elsewhere  
6 throughout the United States.

7 **COUNT V: INFRINGEMENT OF THE '026 PATENT**

8 62. Jenam Tech repeats and re-alleges the allegations of the above paragraphs as if fully  
9 set forth herein.

10 63. The '026 patent includes 98 claims. '026 patent, Ex. E at 24:16–34:30.

11 64. Defendant directly infringes one or more claims of the '026 patent without authority  
12 by making, using (including without limitation testing), selling, importing, and/or offering to sell  
13 products and systems, including by way of example, the Accused Instrumentalities and the Accused  
14 Software. *See* Claim Chart for the '026 patent, attached hereto as Exhibit L.

15 65. Defendant has been and is directly infringing, either literally or under the doctrine  
16 of equivalents, at least Claim 1 of the '026 patent by making, using (including without limitation  
17 testing), selling, importing, and/or offering to sell the Accused Instrumentalities and the Accused  
18 Software. *See* Claim Chart for the '026 patent, attached hereto as Exhibit L. As demonstrated by  
19 the attached claim chart, each and every element of Claim 1 of the '026 patent is found in the  
20 Accused Instrumentalities and the Accused Software.

21 66. Defendant has had actual knowledge of the '026 patent at least as early as the date  
22 of service of the original Complaint (Dkt. 1).

23 67. Defendant's acts of infringement have occurred within this District and elsewhere  
24 throughout the United States.

25 **COUNT VI: INFRINGEMENT OF THE '995 PATENT**

26 68. Jenam Tech repeats and re-alleges the allegations of the above paragraphs as if fully  
27 set forth herein.

28 69. The '995 patent includes 30 claims. '995 patent, Ex. F at 23:4-28:16.

1           70. Defendant directly infringes one or more claims of the '995 patent without authority  
2 by making, using (including without limitation testing), selling, importing, and/or offering to sell  
3 products and systems, including by way of example, the Accused Instrumentalities and the Accused  
4 Software. *See* Claim Chart for the '995 patent, attached hereto as Exhibit M.

5           71. Defendant has been and is directly infringing, either literally or under the doctrine  
6 of equivalents, at least Claim 29 of the '995 patent by making, using (including without limitation  
7 testing), selling, importing, and/or offering to sell the Accused Instrumentalities and the Accused  
8 Software. *See* Claim Chart for the '995 patent, attached hereto as Exhibit M. As demonstrated by  
9 the attached claim chart, each and every element of Claim 29 of the '995 patent is found in the  
10 Accused Instrumentalities and the Accused Software.

11           72. Defendant has had actual knowledge of the '995 patent at least as early as April 3,  
12 2019.

13           73. Defendant's acts of infringement have occurred within this District and elsewhere  
14 throughout the United States.

15                           **COUNT VII: INFRINGEMENT OF THE '996 PATENT**

16           74. Jenam Tech repeats and re-alleges the allegations of the above paragraphs as if fully  
17 set forth herein.

18           75. The '996 patent includes 30 claims. '996 patent, Ex. G at 23:27-28:42.

19           76. Defendant directly infringes one or more claims of the '996 patent without authority  
20 by making, using (including without limitation testing), selling, importing, and/or offering to sell  
21 products and systems, including by way of example, the Accused Instrumentalities. *See* Claim  
22 Chart for the '996 patent, attached hereto as Exhibit N.

23           77. Defendant has been and is directly infringing, either literally or under the doctrine  
24 of equivalents, at least Claim 1 of the '996 patent by making, using (including without limitation  
25 testing), selling, importing, and/or offering to sell the Accused Instrumentalities. *See* Claim Chart  
26 for the '996 patent, attached hereto as Exhibit N. As demonstrated by the attached claim chart,  
27 each and every element of Claim 1 of the '996 patent is found in the Accused Instrumentalities.  
28

1 78. Defendant has had actual knowledge of the '996 patent at least as early as April 3,  
2 2019.

3 79. Defendant's acts of infringement have occurred within this District and elsewhere  
4 throughout the United States.

5 **COUNT VIII: INFRINGEMENT OF THE '774 PATENT**

6 80. Jenam Tech repeats and re-alleges the allegations of the above paragraphs as if fully  
7 set forth herein.

8 81. The '774 patent includes 83 claims. '774 patent, Ex. O at 24:22-34:63.

9 82. Defendant directly infringes one or more claims of the '774 patent without authority  
10 by making, using (including without limitation testing), selling, importing, and/or offering to sell  
11 products and systems, including by way of example, the Accused Instrumentalities. *See* Claim  
12 Chart for the '774 patent, attached hereto as Exhibit P.

13 83. Defendant has been and is directly infringing, either literally or under the doctrine  
14 of equivalents, at least Claim 2 of the '774 patent by making, using (including without limitation  
15 testing), selling, importing, and/or offering to sell the Accused Instrumentalities. *See* Claim Chart  
16 for the '774 patent, attached hereto as Exhibit P. As demonstrated by the attached claim chart, each  
17 and every element of Claim 2 of the '774 patent is found in the Accused Instrumentalities.

18 84. Defendant has had actual knowledge of the '774 patent at least as early as August  
19 11, 2020.

20 85. Defendant's acts of infringement have occurred within this District and elsewhere  
21 throughout the United States.

22 **COUNT IX: INFRINGEMENT OF THE '742 PATENT**

23 86. Jenam Tech repeats and re-alleges the allegations of the above paragraphs as if fully  
24 set forth herein.

25 87. The '742 patent includes 176 claims. '742 patent, Ex. Q at 25:4-50:64.

26 88. Defendant directly infringes one or more claims of the '742 patent without authority  
27 by making, using (including without limitation testing), selling, importing, and/or offering to sell  
28

1 products and systems, including by way of example, the Accused Software and Accused Products.  
2 *See* Claim Chart for the '742 patent, attached hereto as Exhibit R.

3 89. Defendant has been and is directly infringing, either literally or under the doctrine  
4 of equivalents, at least claims 1 and 78 of the '742 patent by making, using (including without  
5 limitation testing), selling, importing, and/or offering to sell the Accused Software and Accused  
6 Products. *See* Claim Chart for the '742 patent, attached hereto as Exhibit R. As demonstrated by  
7 the attached claim chart, each and every element of at least claims 1 and 78 of the '742 patent is  
8 found in the Accused Software and Accused Products.

9 90. Upon information and belief, since Google had knowledge of the '742 patent,  
10 Google has induced and continues to induce others to infringe at least claims 1 and 78 of the '742  
11 patent under 35 U.S.C. § 271(b) by, among other things, and with specific intent or willful  
12 blindness, actively aiding and abetting others to infringe, including but not limited to Google's  
13 partners and customers, whose use of the Accused Software and Accused Products constitutes  
14 direct infringement of at least claims 1 and 78 of the '742 patent.

15 91. In particular, Google's actions that aid and abet others such as their partners and  
16 customers to infringe include distributing the Accused Software and Accused Products and  
17 providing materials and/or services related to the Accused Software and Accused Products. On  
18 information and belief, Google has engaged in such actions with specific intent to cause  
19 infringement or with willful blindness to the resulting infringement because Google has had actual  
20 knowledge of the '742 patent and that its acts were inducing infringement of the '742 patent since  
21 Google has had knowledge of the '742 patent.

22 92. On information and belief, since Google had knowledge of the '742 patent, Google's  
23 infringement has been and continues to be willful.

24 93. Defendant has had actual knowledge of the '742 patent at least as early as March 17,  
25 2021.

26 94. Defendant's acts of infringement have occurred within this District and elsewhere  
27 throughout the United States.  
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**RELIEF REQUESTED**

WHEREFORE, Plaintiff respectfully requests that the Court:

A. Declaring that Defendant has infringed the patents in suit;

B. Awarding damages in an amount to be proven at trial, but in no event less than a reasonable royalty for Defendant’s infringement including pre-judgment and post-judgment interest at the maximum rate permitted by law;

C. Ordering an award of reasonable attorneys’ fees and enhanced damages as appropriate against Defendant to Jenam Tech as provided by 35 U.S.C. § 285;

D. Awarding expenses, costs, and disbursements in this action against Defendant, including prejudgment interest; and

E. All other relief necessary or appropriate.

**JURY DEMAND**

Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff hereby demands a trial by jury on all issues so triable.

DATED: January 28, 2022

/s/ Deepali A. Brahmhatt  
Deepali A. Brahmhatt  
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*Attorneys for Plaintiff*  
*JENAM TECH, LLC*

**CERTIFICATE OF SERVICE**

The undersigned certifies that on January 28, 2022, I electronically filed this document with the Clerk of Court via the Court's CM/ECF system which will send notification of such filing to all counsel of record, all of whom have consented to electronic service in this action.

/s/ Deepali A. Brahmhatt  
Deepali A. Brahmhatt

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