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16 *Attorneys for Plaintiff Brius Technologies, Inc.*

17 UNITED STATES DISTRICT COURT
18 CENTRAL DISTRICT OF CALIFORNIA
19

20 BRIUS TECHNOLOGIES, INC.,

21 Plaintiff,

22 v.

23 SWIFT HEALTH SYSTEMS INC.
24 d/b/a/ INBRACE and UNIVERSITY
OF SOUTHERN CALIFORNIA,

25 Defendants.
26
27
28

Case No. 8:22-cv-01770

**COMPLAINT FOR
DECLARATORY JUDGMENT OF
NONINFRINGEMENT**

DEMAND FOR JURY TRIAL

1 Plaintiff Brius Technologies, Inc. ("Plaintiff" or "Brius"), by and through its
2 attorneys, alleges for its Complaint against Defendant Swift Health Systems Inc.
3 d/b/a/ InBrace "InBrace") and the University of Southern California ("USC")
4 (collectively, "Defendants") as follows:

5 **NATURE OF THE ACTION**

6 1. Brius brings this action for a declaratory judgment of noninfringement
7 of the U.S. Patent No. 11,129,696 ("the '696 patent"), arising under 28 U.S.C. §§
8 1331, 1338(a), 2201, and 2202. A true and correct copy of the '696 patent is attached
9 hereto as Exhibit 1. Brius seeks this relief because InBrace purports to possess
10 certain rights under the '696 patent by virtue of a license from USC and has wrongly
11 alleged that Brius infringes the '696 patent. Brius denies that it has infringed, or
12 infringes, any properly construed claim of the '696 patent. In addition to directly
13 accusing Brius of infringement, on information and belief, InBrace has represented
14 to others, including orthodontists and customers, that Brius is infringing InBrace's
15 patent rights. Brius, thus, brings this action to remove the cloud of uncertainty that
16 InBrace's allegations have imposed on Brius' business.

17 2. The face of the '696 patent identifies USC as the owner by assignment
18 of the '696 patent. On information and belief, InBrace has a contractual relationship
19 with USC and/or serves as USC's agent for purposes of commercializing and
20 enforcing the '696 patent.

21 **THE PARTIES**

22 3. Brius is a corporation organized and existing under the laws of the State
23 of Delaware, with its principal place of business at 2611 Westgrove Drive, Suite 109,
24 Carrollton, Texas, 75006. Brius is a leading provider of innovative orthodontic
25 technology, including its Independent Mover[®] technology, which provides teeth
26 straightening solutions that are efficient and aesthetic.

27 4. On information and belief, InBrace is a corporation organized and
28 existing under the laws of the State of Delaware, with its principal place of business

1 at 111 Academy Drive, Suite 150, Irvine, California 92617. InBrace purports to have
2 certain rights under the '696 patent by virtue of a license from USC. On information
3 and belief, InBrace has a contractual relationship with USC and/or serves as USC's
4 agent for purposes of commercializing and enforcing the '696 patent.

5 5. On information and belief, USC is a corporation organized and existing
6 under the laws of the State of California, with its principal place of business at 3551
7 Trousdale Parkway, ADM 352, Los Angeles, California 90089. USC is listed as the
8 owner by assignment of the '696 patent. (Ex. 1 at cover.)

9 6. On information and belief, InBrace and USC together possess all
10 substantial rights under the '696 patents. Joinder of these parties is appropriate under
11 Rules 19 and/or 20 of the Federal Rules of Civil Procedure.

12 **JURISDICTION AND VENUE**

13 7. This Court has subject matter jurisdiction over this action under the
14 Declaratory Judgment Act, 28 U.S.C. §§ 2201-2202, and further under 28 U.S.C.
15 §§ 1331 and 1338(a) because this action involves claims arising under the patent laws
16 of the United States, 35 U.S.C. §§ 1 *et seq.*

17 8. This Court has general personal jurisdiction over InBrace at least
18 because (1) InBrace maintains a principal place of business in Irvine, California
19 within this District, and (2) InBrace has had continuous and systematic business
20 contacts with the State of California and this District. On information and belief,
21 InBrace has been registered to do business in the State of California since 2014 and
22 employs over 150 individuals at its Irvine, California location. This Court also has
23 specific personal jurisdiction over InBrace because InBrace has engaged in
24 enforcement activities relating to the '696 patent in and from California and this
25 District, including for example through communications from its CEO.

26 9. This Court has general personal jurisdiction over USC at least because
27 (1) USC is incorporated in California, (2) USC has its principal place of business in
28 Los Angeles, California within this District, and (3) USC has had continuous and

1 systematic business contacts with the State of California and this District. On
2 information and belief, USC employs over 28,000 faculty, staff, and student workers,
3 a large portion of whom are employed in the State of California and within this
4 District, and further enrolls over 49,000 undergraduate, graduate, and professional
5 students in the State of California and within this District. (See
6 [https://about.usc.edu/facts/.](https://about.usc.edu/facts/))

7 10. Venue in this District is proper under 28 USC §§ 1391(b) and (c) at least
8 because a substantial part of the events or omissions giving rise to Brius' claims
9 occurred in this District and because each of Defendants is subject to personal
10 jurisdiction in this District such that they reside in this District.

11 11. An actual, immediate, and justiciable controversy exists between Brius
12 and Defendants regarding the noninfringement of the '696 patent. InBrace purports
13 to possess certain rights under the '696 patent by virtue of a license from USC and
14 has asserted that Brius infringes this patent. Brius denies that it infringes, or has
15 infringed, any properly construed claim of the '696 patent.

16 12. The controversy is immediate and substantial as reflected by the parties'
17 escalating communications regarding alleged infringement by Brius. Within months
18 after the '696 patent issued, InBrace communicated to Brius personnel that it believed
19 Brius was infringing certain InBrace patents, though InBrace did not specifically
20 identify which patents it believed to be infringed.

21 13. On or about May 4, 2022, InBrace's CEO emailed Brius' then-CEO and
22 vice president of sales, stating InBrace's belief that Brius' "product designs that have
23 appeared on various social channels . . . are covered by several InBrace patents,"
24 though he did not specify which patents those were. The email further attached a
25 presentation including a slide that purported to compare InBrace's product with
26 several examples of Brius' products incorporating Independent Mover[®] technology.
27 A true and correct copy of the slide is attached hereto as Exhibit 2. Consistent with
28 the email, the slide stated: "On social media and at clinical presentations, Brius team-

1 members have been showing product iterations that we believe are covered by
2 Several [sic] InBrace patents.”

3 14. On or about August 19, 2022, InBrace’s CEO again emailed Brius’ then-
4 CEO and vice president of sales, and attached another presentation referencing
5 alleged infringement by Brius. A true and correct copy of the presentation is attached
6 hereto as Exhibit 3. In the presentation, InBrace again pointed to several examples
7 of Brius’ products incorporating Independent Mover[®] technology and specifically
8 identified the ’696 patent. Given the context of the parties’ earlier communications,
9 it was apparent from the presentation that InBrace was accusing Brius of infringing
10 the ’696 patent.

11 15. In August 2022, Brius appointed an interim CEO. On or about
12 September 26, 2022, Brius’ interim CEO had a telephone conference with InBrace’s
13 CEO to discuss InBrace’s infringement allegations and the August 19, 2022
14 presentation. During the telephone conference, InBrace’s CEO confirmed that it was
15 InBrace’s position that Brius was infringing the referenced ’696 patent and
16 potentially other unidentified patents. Underscoring the immediacy of the matter,
17 InBrace’s CEO indicated that enforcement would be inevitable.

18 16. On information and belief, InBrace has represented, and continues to
19 represent, to customers that Brius is infringing the ’696 patent.

20 **FACTUAL BACKGROUND**

21 **Brius’ Independent Mover[®] Technology**

22 17. A common objective in orthodontics is to correct teeth misalignment
23 (malocclusion) by using devices referred to as “braces” to reposition teeth to a more
24 functional or aesthetically pleasing location. Typically, braces employ an archwire—
25 a thin, flexible wire—placed along a patient’s dental arch and secured to brackets
26 that are fixed to the front of the patient’s teeth. Archwires for orthodontic
27 applications are available as precut arch-shaped wires or spools of wire that can be
28 further shaped. The shape and stiffness of the archwire as well as the archwire-

1 bracket interaction, in turn, govern the forces applied to the teeth and thus the
2 direction and degree of tooth movement.

3 18. To exert a desired force on a patient's teeth, an orthodontist will
4 manually incorporate bends in the archwire when initially placing and securing it to
5 the patient's teeth. The movement of any one tooth, however, can cause unintentional
6 movement of other nearby teeth. Through regular appointments, the orthodontist will
7 visually assess the progress of the treatment and make manual adjustments to the
8 archwire, or replace or reposition the brackets. The adjustment process can be time
9 consuming and tedious for the patient, and often results in patient discomfort for
10 several days following an appointment.

11 19. Eschewing archwires altogether, Brius developed an innovative
12 orthodontic treatment system that uses "Independent Movers[®]" positioned on the
13 back (lingual) side of the teeth to efficiently and effectively treat all ranges of
14 malocclusions. This technology allows an orthodontist to manipulate a 3D virtual
15 model of the patient's teeth to develop a treatment plan that is then used to create a
16 custom-designed set of Independent Movers[®].

17 20. Unlike archwires, Brius' Independent Movers[®] are formed from sheets
18 of nickel titanium (NiTi) alloy and include structures of varying shapes and cross-
19 sections, such as arms, bends, ribbons, and bars—all designed and pre-programmed
20 to move each tooth independently to its final, desired location. An example of Brius'
21 Independent Movers[®] is shown below:



(<https://brius.com/orthodontists/>.)

21. Brius' Independent Mover[®] technology advantageously minimizes the unwanted movement of teeth, providing for a more efficient treatment that reduces the number of office visits, patient discomfort, and overall treatment time.

22. Underscoring the innovative nature of the Independent Mover[®] technology, Brius has applied for and obtained numerous patents covering aspects of this technology, including U.S. Patent Nos. 10,383,707, 10,905,527, 10,993,785, and 10,980,614.

The '696 Patent

23. The '696 patent is entitled "Orthodontic appliance with snap fitted, non-sliding archwire" and "relates to orthodontic appliances, including archwires and associated orthodontic brackets." (Ex. 1 at title, 1:22-23.)

24. The '696 patent issued from U.S. Patent Application No. 16/292,126, filed on March 4, 2019 ("'126 application") and purports to claim priority to U.S. Patent Application No. 15/249,198, U.S. Patent Application No. 14/067,690, and U.S. Provisional Patent Application No. 61/720,263 (collectively "priority applications"). (Ex. 1 at cover.)

25. Independent claim 1 of the '696 patent recites:

1. A custom archform configured to follow a dental arch segment, the custom archform comprising:

a plurality of bracket connectors, each bracket connector of the plurality of bracket connectors corresponding to an individual tooth of the dental arch segment such that the plurality of bracket connectors respectively correspond to each and every tooth of the dental arch segment,

a plurality of interproximal segments, each interproximal segment of the plurality of interproximal segments corresponding to each and every interdental space of the dental arch segment, wherein each interproximal segment of the plurality of interproximal segments is interspersed between a pair of bracket connectors of the plurality of bracket connectors,

wherein the archform defines a longitudinal axis and wherein each interproximal segment comprises a first point on the longitudinal axis, a second point on the longitudinal axis, and an interproximal loop between the first point and the second point, the interproximal loop comprising a first portion configured to extend in a gingival direction away from the first point and a second portion configured to extend in an occlusal direction to the second point thereby defining a gap along the longitudinal axis between the first and second points that provides an unobstructed opening configured to face in the occlusal direction to within the interproximal loop, without extending on an occlusal side of the longitudinal axis; and

wherein the archform comprises a custom memorized shape that is configured to move teeth of the dental arch segment from an initial configuration to a digitally pre-determined expected alignment obtained using image data of the patient's teeth by forces imparted by the archform on respective orthodontic brackets after the plurality of bracket connectors are locked to respective orthodontic brackets disposed on teeth of the dental arch segment.

26. Independent claim 19 of the '696 patent recites:

19. A custom archform configured to fit within a human mouth and follow a dental arch segment, the custom archform comprising:

a plurality of bracket connectors, each bracket connector of the plurality of bracket connectors corresponding to an individual tooth of the dental arch segment such that the plurality of bracket connectors correspond to each and every tooth of the dental arch segment that is to be manipulated by the custom archform,

a plurality of interproximal segments, each interproximal segment of the plurality of interproximal segments corresponding to each and every interdental space between teeth of the dental arch segment, wherein each interproximal segment of the plurality of interproximal segments comprises an interproximal loop,

wherein an interproximal segment of the plurality of interproximal segments is interspersed between each adjacent pair of bracket connectors of the plurality of bracket connectors,

wherein the archform defines a longitudinal axis and wherein the interproximal loop comprises a first point on the longitudinal axis, a second point on the longitudinal axis, and a curve extending away from the longitudinal axis in a gingival direction between the first point and the second point, without extending on an occlusal side of the longitudinal axis, to define

1 a gap along the longitudinal axis that is open in an
2 occlusal direction to facilitate flossing,

3 wherein the archform comprises a customized shape a
4 digitally pre-determined expected alignment of the
5 teeth, obtained using image data of the patient's teeth
6 an expected alignment of the teeth, the customized
7 shape configured to move teeth of the dental arch
8 segment from an initial configuration towards the
9 expected alignment by forces imparted by the
archform on orthodontic brackets disposed on teeth of
the dental segment; and

wherein when the plurality of bracket connectors are
locked in respective orthodontic brackets, at least a
portion of the archform is configured to deflect,
thereby transferring forces to the teeth of the dental
archform and causing orthodontic tooth movement.

10 27. As set forth in independent claims 1 and 19, all of the claims of the '696
11 patent require an "archform."

12 28. A true and correct copy of the '126 application (that issued as the '696
13 patent) as filed is attached as Exhibit 4.

14 29. The term "archform" did not appear in the '126 application as filed. (*See*
15 *generally* Ex. 4.)

16 30. The term "archform" did not appear in any of the '696 patent's priority
17 applications as filed.

18 31. During the prosecution of the '126 application, the applicants submitted
19 a preliminary amendment dated July 31, 2020. A true and correct copy of the July
20 31, 2020 preliminary amendment is attached as Exhibit 5.

21 32. It was in the July 31, 2020 preliminary amendment that the applicants
22 first proposed any claims including the term "archform" during the prosecution of
23 the '126 patent.

24 33. In the July 31, 2020 preliminary amendment, the applicants canceled all
25 of the then-pending claims that recited the term "archwire" and added new claims
26 that recited the term "archform." (*Compare* Ex. 4 at 31-36 (claims reciting
27 "archwire"), *with* Ex. 5 at 2-5 (newly added claims reciting "archform").)

1 34. In the July 31, 2020 preliminary amendment, the applicants represented
2 that “no new matter ha[d] been added” but did not identify any support in the
3 specification of the ’126 application for the term “archform.” (Ex. 5 at 6.)

4 35. During the prosecution of the ’126 application, the applicants submitted
5 another preliminary amendment dated October 13, 2020. A true and correct copy of
6 the October 13, 2020 preliminary amendment is attached as Exhibit 6.

7 36. In the October 13, 2020 preliminary amendment, the applicants again
8 canceled the then-pending claims and added new claims reciting the term
9 “archform.” (Ex. 6.)

10 37. In the October 13, 2020 preliminary amendment, the applicants again
11 represented that “no new matter ha[d] been added” but did not identify any support
12 in the specification of the ’126 application for the term “archform.” (Ex. 6 at 6.)

13 38. During the prosecution of the ’126 application, the Examiner issued a
14 notice of allowability dated August 23, 2021 containing an Examiner’s amendment
15 to the specification. A true and correct copy of the notice of allowability containing
16 the Examiner’s amendment is attached as Exhibit 7.

17 39. The Examiner noted that authorization for the amendment was provided
18 by the applicants’ prosecution counsel and amended paragraph [0043] of the ’126
19 application as follows:

20 **IN THE SPECIFICATION:**

21 AT [0043] of the originally filed specification, LINE 4,
22 after “interproximal loops by the archwire legs 103.”
23 INSERT –The archform 101 may define a longitudinal
24 axis. The interproximal segments of the archform 101 may
25 include a first point on the longitudinal axis, a second point
26 on the longitudinal axis, and an interproximal loop 105
27 between the first and second points. The interproximal
28 loop 105 can include a first portion configured to extend in
a gingival direction away from the first point and a second
portion configured to extend in an occlusal direction to the
second point. The interproximal loop 105 can define a gap
along the longitudinal axis between the first and second
points that provides an unobstructed opening configured to
face in the occlusal direction, the unobstructed opening
providing access into the interproximal loop 105. The
archform 101 can include an interproximal loop 105

1 extending away from the longitudinal axis in a gingival
 2 direction between the first and second points, without
 3 extending on an occlusal side of the longitudinal axis, to
 define a gap along the longitudinal axis that is open in an
 occlusal direction to facilitate flossing.–

4 (Ex. 7 at 3-4.)

5 40. The amendment to paragraph [0043] of the '126 application is reflected
 6 in the issued '696 patent on column 7, lines 10-28, hereinafter referred to as the
 7 “archform” passage:

8 The archform 101 may define a longitudinal axis. The
 9 interproximal segments of the archform 101 may include a
 first point on the longitudinal axis, a second point on the
 longitudinal axis, and an interproximal loop 105 between
 10 the first and second points. The interproximal loop 105 can
 include a first portion configured to extend in a gingival
 11 direction away from the first point and a second portion
 configured to extend in an occlusal direction to the second
 12 point. The interproximal loop 105 can define a gap along
 the longitudinal axis between the first and second points
 13 that provides an unobstructed opening configured to face
 in the occlusal direction, the unobstructed opening
 14 providing access into the interproximal loop 105. The
 archform 101 can include an interproximal loop 105
 15 extending away from the longitudinal axis in a gingival
 direction between the first and second points, without
 16 extending on an occlusal side of the longitudinal axis, to
 define a gap along the longitudinal axis that is open in an
 17 occlusal direction to facilitate flossing.

18 (Ex. 1 at 7:10-28.)

19 41. The “archform” passage did not appear in the '126 application as filed.
 20 (*See generally* Ex. 4.)

21 42. The “archform” passage did not appear in any of the '696 patent's
 22 priority applications as filed.

23 43. The “archform” passage refers to an “archform 101” three times. (Ex.
 24 1 at 7:10-28.)

25 44. The three references to an “archform 101” in the “archform” passage
 26 are the only instances (outside of the claims) in which the term “archform” appears
 27 in the specification of the issued '696 patent.

1 45. Although the “archform” passage refers to an “archform 101,” the
 2 specification of the ’696 patent in the preceding paragraph and elsewhere refers to an
 3 “archwire 101”:

4 To engage the **archwire 101** into an orthodontic bracket on
 5 a misaligned tooth, temporary deflections of the **archwire**
 6 **101** may take place. The archwire can be made of any
 material, such as a shape memory alloy, beta-titanium, or
 stainless steels.

7 (Ex. 1 at 7:1-5 (emphasis added); *see also id.* at 6:40, 6:46-48, 6:59, 6:62, 6:64-66,
 8 7:55, 7:57, 8:11, 8:59, 11:23 (referencing “archwire 101”).)

9 46. The specification of the ’696 patent uses the terms “archform” and
 10 “archwire” interchangeably.

11 47. All of the embodiments described in the ’696 patent incorporate an
 12 archwire or a bracket for accommodating an archwire.

13 48. Figures 1A-1B the ’696 patent reflect an embodiment of an archwire.
 14 (Ex. 1 at 4:41.)

15 49. Figures 2A-2B the ’696 patent reflect an embodiment of an archwire.
 16 (Ex. 1 at 4:46.)

17 50. Figures 3A-11 of the ’696 patent each reflect an embodiment that
 18 includes an archwire and/or an orthodontic bracket for accommodating an archwire.

19 51. Figures 3A-3H of the ’696 patent reflect an embodiment of an
 20 orthodontic bracket into which “an archwire may be snap fitted.” (Ex. 1 at 4:51-52.)

21 52. Figures 4A-4E of the ’696 patent reflect an embodiment of an
 22 orthodontic bracket into which “an archwire may be snap fitted.” (Ex. 1 at 5:3-5.)

23 53. Figures 5A-5E of the ’696 patent reflect an embodiment of an
 24 orthodontic bracket into which “an archwire may be snap fitted.” (Ex. 1 at 5:18-20.)

25 54. Figures 6A-6F of the ’696 patent reflect an embodiment of an
 26 orthodontic bracket into which “an archwire may be snap fitted.” (Ex. 1 at 5:33-35.)

27 55. Figures 7A-7F of the ’696 patent reflect an embodiment of an
 28 orthodontic bracket into which “an archwire may be snap fitted.” (Ex. 1 at 5:50-52.)

1 56. Figures 8A-8E of the '696 patent reflect an embodiment of an
2 orthodontic bracket into which "an archwire may be snap fitted." (Ex. 1 at 5:66-6:1.)

3 57. Figures 9A-9B of the '696 patent reflect an embodiment of an
4 orthodontic bracket and "archwire." (Ex. 1 at 6:14-19.)

5 58. Figures 10A-10C of the '696 patent reflect an embodiment of an
6 orthodontic bracket and archwire." (Ex. 1 at 6:20-26.)

7 59. Figure 11 of the '696 patent reflects an embodiment of an orthodontic
8 bracket and "archwire." (Ex. 1 at 6:27-28.)

9 60. The specification of the '696 patent does not describe an "archform" as
10 anything other than an archwire.

11 61. The specification of the '696 patent does not support an "archform" as
12 encompassing anything other than an archwire.

13 62. A person of ordinary skill in the art at the time of the alleged invention
14 of the '696 patent would have understood the term "archform" as used in the '696
15 patent claims to refer to an archwire.

16 **CLAIM FOR RELIEF**

17 **(Declaratory Judgment of Noninfringement of the '696 Patent)**

18 63. Brius repeats and realleges each and every allegation contained in the
19 preceding paragraphs as if fully set forth herein.

20 64. An actual and justiciable controversy exists between Brius and
21 Defendants concerning the noninfringement of the '696 patent.

22 65. InBrace purports to possess certain rights under the '696 patent by virtue
23 of a license from USC.

24 66. InBrace has alleged, and continues to allege, that Brius' orthodontic
25 appliances incorporating Independent Mover[®] technology infringe the '696 patent.

26 67. Brius denies that it has infringed, or infringes, any properly construed
27 claim of the '696 patent.

28

1 Dated: September 27, 2022

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