IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

MONUMENT PEAK VENTURES, LLC,	§	
Plaintiff,	§	
	§	**CIV. A. NO.**
v.	§	
	§	
SAMSARA INC.,	§	**JURY TRIAL**
Defendant.	§	
	§	

COMPLAINT AND JURY DEMAND

Monument Peak Ventures, LLC seeks redress for damages caused by Samsara's unauthorized adoption and use of the subject matter claimed in U.S. Patent Nos. 7,233,684, 8,024,311, and 8,836,784. MPV states the following in support of its Complaint for patent infringement against Samsara:

THE PARTIES

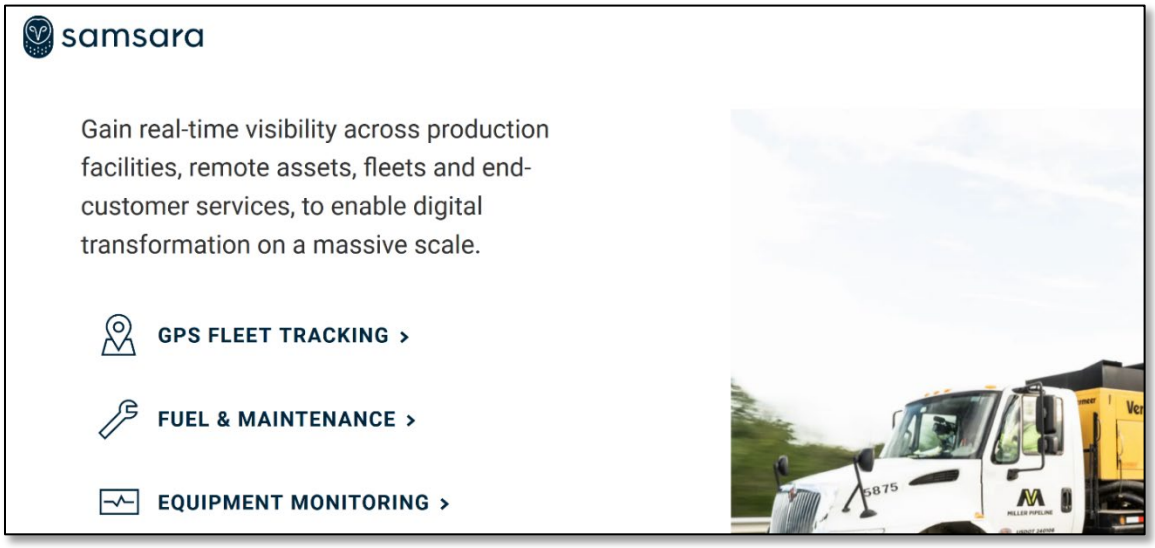
1. Plaintiff, Monument Peak Ventures, LLC, is a Texas Limited Liability Company with its principal place of business in Allen, Texas.

2. Samsara Inc. (formerly Samsara Networks Inc.) was incorporated in Delaware in 2015 as Samsara Networks Inc. and changed its name to Samsara Inc. in February 2021. Samsara is located at 1170 Peachtree Street, 9th Floor, Atlanta, Georgia 303091.

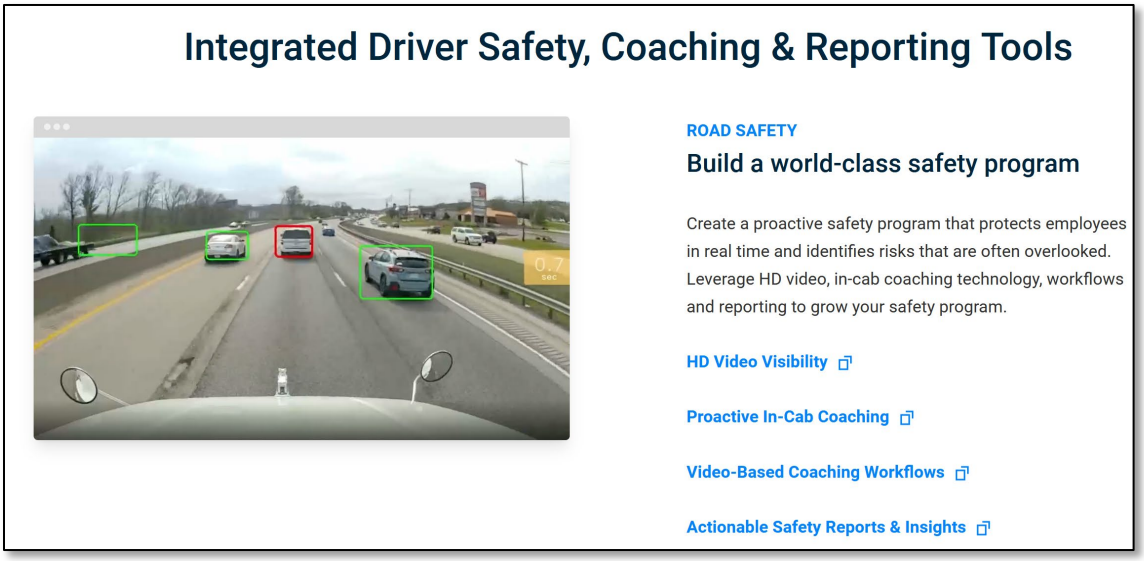
3. Samsara can be served with process through its registered agent, CT

Corporation System, 289 S. Culver Street, Lawrenceville, Georgia 30046-4805.

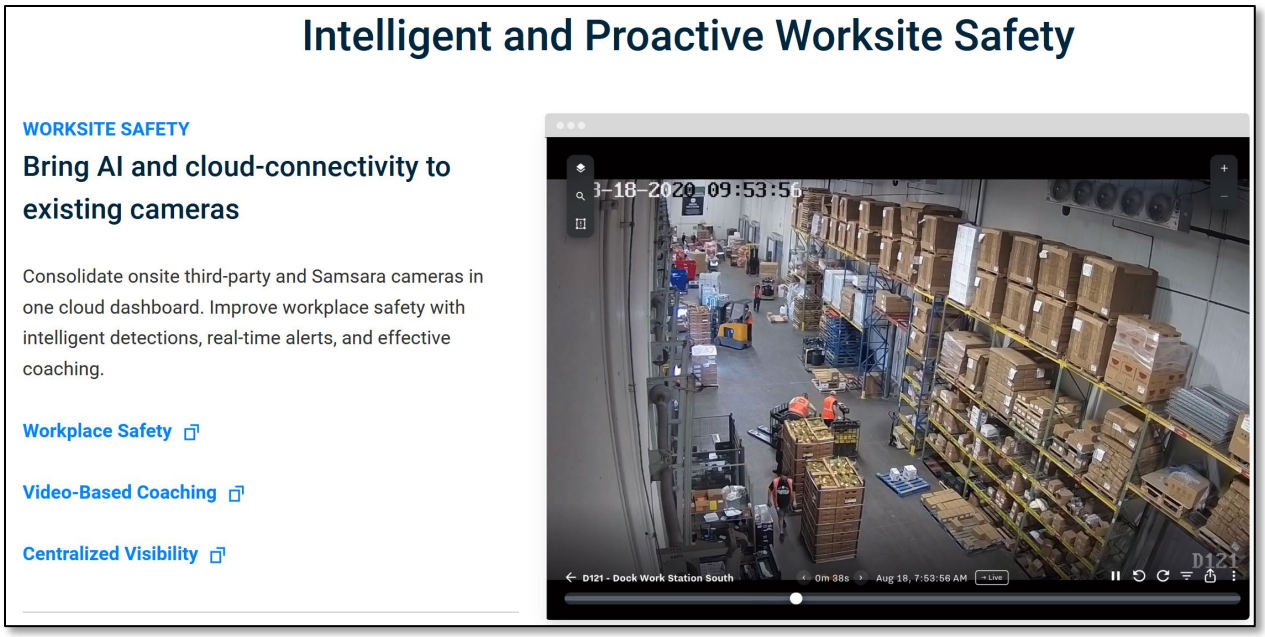
4. Samsara provides through its integrated Connected Operations Cloud real-time access to video imagery and image analytics for remote monitoring.



5. Samsara's Connected Operations Cloud features include Video-Based Safety, Vehicle Telematics, Apps and Driver Workflows, Equipment Monitoring, and Site Visibility.



6. Using the inventions claimed in the MPV asserted patents, Samsara integrates AI-powered analytics and cloud-based processing, storage, and access to capture and analyze imagery at customer sites and identify important content for review and action.



7. Samsara markets, offers for sale, and sells the infringing products throughout the United States including within this district.

JURISDICTION AND VENUE

8. MPV brings this action for patent infringement under the patent laws of the United States, namely 35 U.S.C. §§ 271, 281, and 284-285, among others. This Court has subject-matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

9. Venue is proper in this judicial district pursuant to 28 U.S.C. §

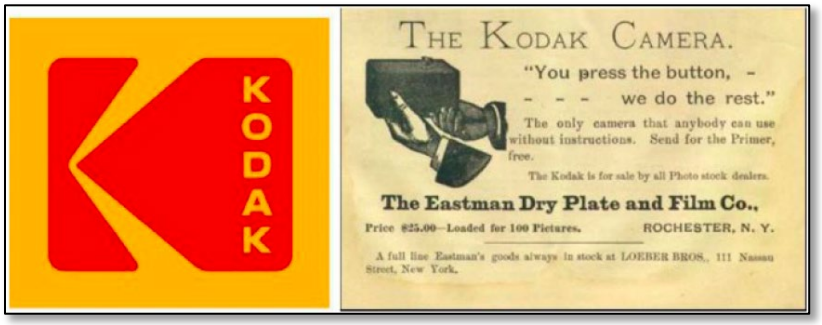
1400(b) because Samsara maintains an established place of business in this district, does business in this district, has committed acts of infringement in this district, and has purposely sought and transacted business in this district involving the infringing Samsara Connected Operations Cloud system.

MONUMENT PEAK VENTURES

10. MPV owns a portfolio of patents invented by the Eastman Kodak Company. Since acquiring the Kodak portfolio, MPV has promoted adoption of technologies claimed in Kodak portfolio and has entered into license agreements with over thirty companies.

11. The Asserted Patents claim inventions born from the ingenuity of the Eastman Kodak Company ("Kodak"), an iconic American imaging technology company that dates back to the late 1800s.

12. The first model of a Kodak camera was released in 1888.



13. In 1935 Kodak introduced "Kodachrome," a color reversal stock for movie and slide film.

14. In 1963 Kodak introduced the Instamatic camera, an easy-to-load point-and-shoot camera.

15. By 1976 Kodak was responsible for 90% of the photographic film and 85% of the cameras sold in the United States.

16. At the peak of its domination of the camera industry, Kodak invented the first self-contained digital camera in 1975.

17. By 1986 Kodak had created the first megapixel sensor that was

capable of recording 1,400,000 pixels.

18. While innovating in the digital imaging space Kodak developed an immense patent portfolio and extensively licensed its technology in the space.

19. In 2010, Kodak received $838,000,000 in patent licensing revenue.

20. As part of a reorganization of its business, Kodak sold many of its patents to some of the biggest names in technology including Google, Facebook, Amazon, Microsoft, Samsung, Adobe Systems, HTC and others for $525,000,000.

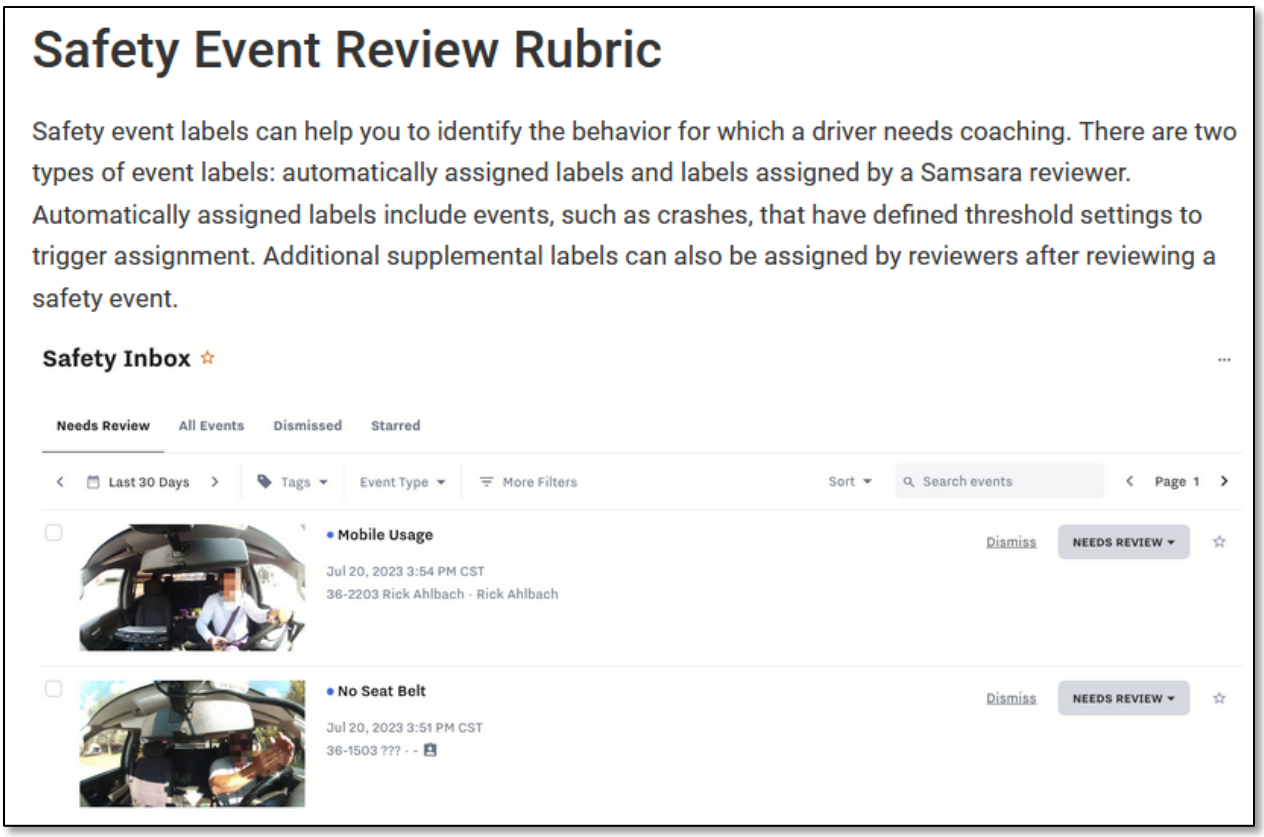
SAMSARA'S INFRINGING CONNECTED OPERATIONS CLOUD

21. Samsara markets its Connected Operations Cloud as an extensive AI-powered Data Platform that brings real-time visibility, analytics, and insights to its customers' physical operations.

22. Samsara applications on the Samsara Data Platform operationalize analytics to provide video-based driver safety workflows and data, equipment monitoring, and site visibility.

23. Samsara's Cloud-Based Visibility solution provides viewing, analysis, and archiving of video captured by connected IoT cameras.

24. Samsara uses artificial intelligence to detect safety events in real-time and detect risky behaviors including distracted driving, tailgating, and unsafe driving habits.



25. Samsara published the screenshot above demonstrating safety events detected, analyzed, and archived by Samsara for safety event review.

26. Samsara makes, sells, offers for sale, and uses the infringing Samsara products in this district and throughout the United States.

COUNT 1:
INFRINGEMENT OF U.S. PATENT NO. 7,233,684

27. MPV realleges and incorporates by reference the allegations set forth above as if restated verbatim here.

28. MPV is the owner, by assignment, of U.S. Patent No. 7,233,684, titled "Imaging Method and System Using Affective Information."

29. As the owner of the ’684 Patent, MPV holds all substantial rights in and under the ’684 Patent, including the right to grant licenses, exclude others, and to enforce, sue, and recover damages for past and future infringement.

30. The United States Patent and Trademark Office issued the ’684 Patent on June 19, 2007, after a full examination that concluded in allowance of subject matter found to be in compliance with Title 35 of the United States Code.

31. Samsara has and continues to directly infringe at least claim 1 of the ’684 Patent by using (including its own testing), making, selling, offering for sale, licensing, and/or importing the Samsara Connected Operations Cloud system without authorization or license as exemplified below.

32. The Samsara accused products satisfy each and every element of at least claim 1 of the ’684 Patent either literally or under the doctrine of equivalents when used as intended and instructed by Samsara.

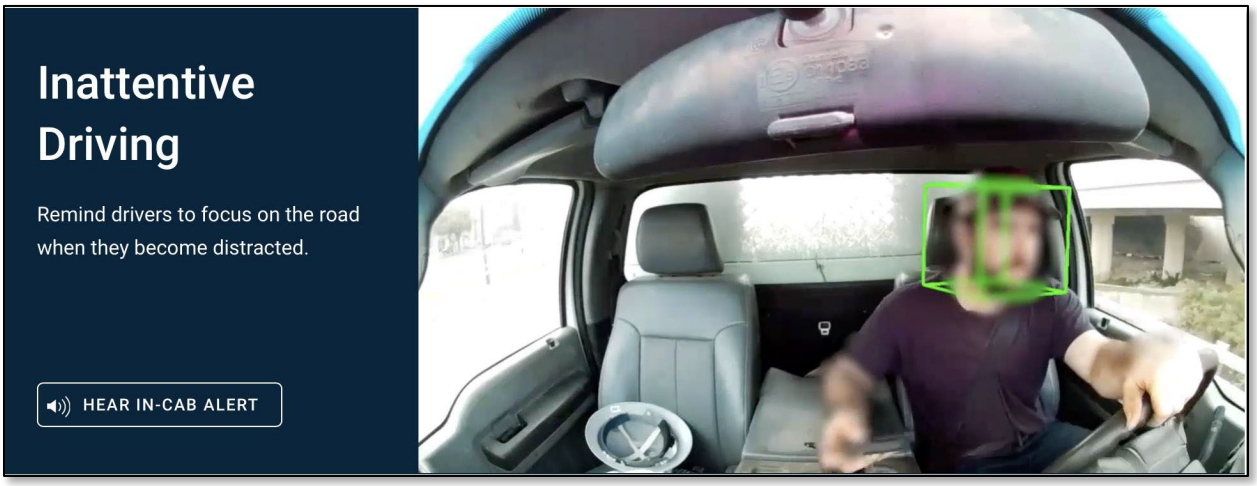
33. Claim 1 recites an embodiment of the claimed subject matter:

> 1. An imaging method comprising the steps of
>
> capturing an image of a scene;
>
> collecting affective information at capture; and
>
> associating the affective information with the scene image,
>
> wherein the step of collecting affective information
>
> comprises monitoring the physiology of a user and, wherein

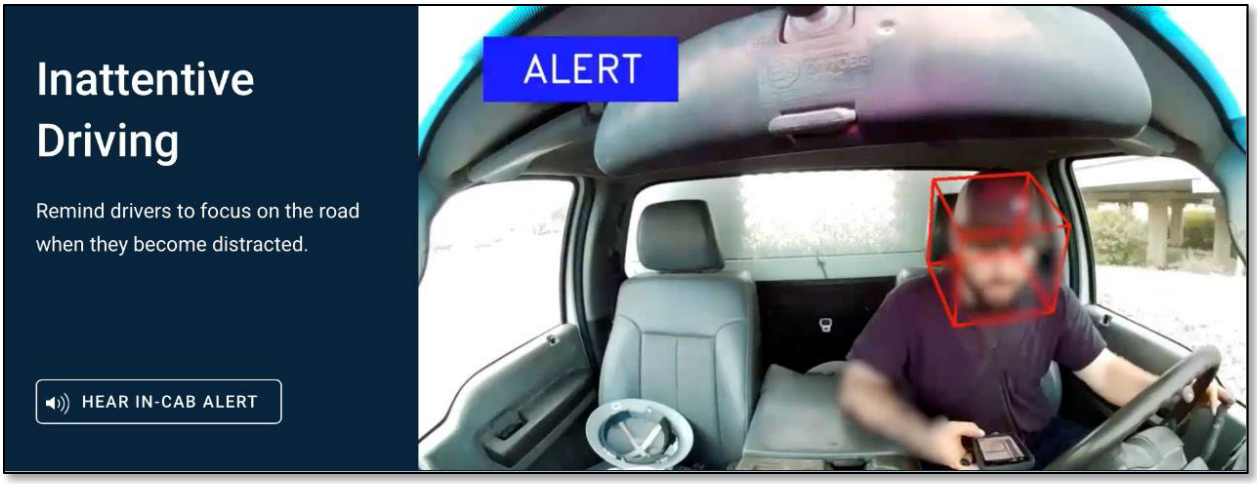
the step of collecting affective information comprises the steps of interpreting the collected physiological information to determine the relative degree of importance of the scene image.

34. The Samsara system utilized AI-powered cameras to capture in-vehicle images of a driver and his environment.

35. The ’684 Infringing Instrumentalities include a cabin camera that captures images of the driver (an “image of a scene”).



36. The Samsara system collects affective information at capture (e.g., driver head position and activity) and monitors the physiology of a user.



37. Samsara describes exemplary functionality of its system on its website, https://www.samsara.com/products/safety/dash-cam.

> To align the detection of distracted driving events with the NHTSA definition, the Samsara Dual-Facing AI Dash Cam (model CM32) provides an inward-facing camera, computer vision, and AI to analyze the head position of a driver in real-time.
>
> To get started with Distracted Driving Detection, reference the following workflows to enable and configure event detection:

38. Samsara associates the affective information with the scene image (e.g., driver head activity with the images of the driver) and monitors attentiveness of a driver (i.e., the physiology of a user).

39. The Samsara system interprets the collected information to determine whether an alert for distracted driving is necessary. Such alerts include speed threshold or severity and indicate a relative degree of importance of a scene image.

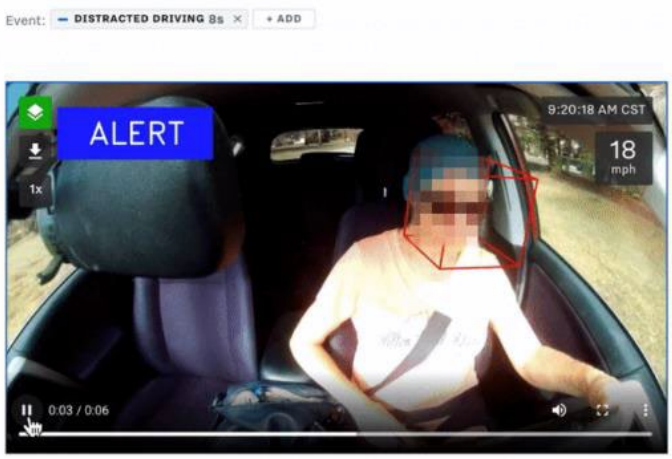
Inattentive Driving Triggers

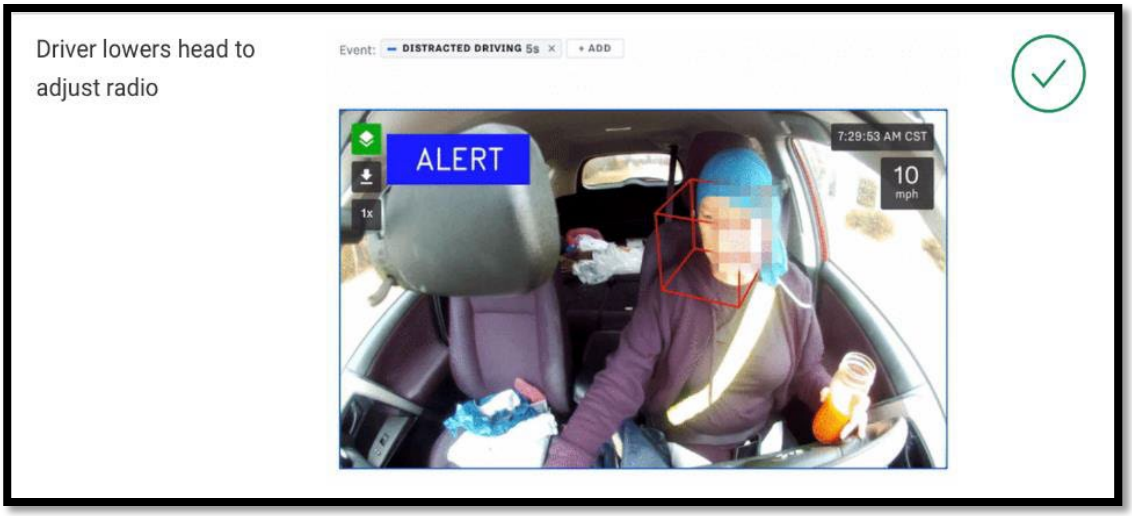
The camera must be mounted and installed correctly and the driver face and torso must be clearly visible by the CM for Samsara AI to accurately detect distracted driving. See Best Practices for more guidance to ensure accurate detection. An Inattentive Driving event triggers when:

- Driving speed is above 25mph (by default).
- The driver's head is outside of the normal range, off and on, for a sustained period of time.

The following examples provide different scenarios where Samsara expects to detect inattentive driving and also scenarios where Samsara does *not* expect to detect inattentive driving:

40. Samsara generates alerts for important events such as phone usage while driving or inattention as exemplified below.

Scenario	Example	Triggers Detection
Driver lowers head to look at phone		✓



41. Samsara provided configuration settings for inattentive driving, for example, that use speed and relative degree of importance information to provide configured alerts.

3. Configure the Distracted Driving Detection settings for `Inattentive Driving`:

- **In-cab audio alerts**: By default, in-cab audio alerts are `OFF`. Choose `ON` to play in-cab audio alerts when Samsara detects distracted driving after the vehicle speed exceeds the **Speed Threshold**. In-cab alerts will continue to play in cab, regardless of meeting the event maximum.
- **Speed Threshold**: The minimum speed that the vehicle must be driving before an event is detected, an in-cab audio alert plays, and a safety event is uploaded to the Safety Inbox (**0 mph**, **10 mph**, **25 mph** (default), or **35 mph**). Increase the speed threshold to reduce the volume of events and decrease the speed threshold to increase the volume of events. For example, if you set the Speed Threshold to 0 mph, the dash cam will detect events at all vehicle speeds, including events detected while the vehicle is parked.
- **Severity**: Corresponds to the allowable distracted time before a safety event is uploaded to the Safety Inbox. The higher the severity, the longer the amount of time a driver can be distracted before a safety event is generated. The distraction period ends when the driver returns to a normal state. Choose from the following severity levels:
  - **Low**: 7 seconds (2 beeps)
  - **Medium** (default): 9 seconds (2 beeps plus voice coaching)
  - **High**: 13 seconds (2 beeps plus voice coaching)

42. Consistent with Samsara's published descriptions and instructions, normal operation of the Samsara system as shown in the materials published by Samsara performs each and every step and satisfies each and every element recited in each asserted claim of the '684 Patent including claim 1 either literally or under the doctrine of equivalents.

43. Samsara has notice of the '684 Patent at least by service of this Complaint and is aware of customers and end users using the Samsara system as intended to practice at least claim 1.

44. Samsara actively encourages and directs customers and end users to use the Samsara system in a manner that infringes the '684 Patent.

45. Samsara provides technical assistance and publishes instructional information directing third parties to make and use the Samsara system in a manner that infringes the '684 Patent.

46. Samsara has and continues to advertise and promote infringing features of its system and encourage third party customers and end users to operate the Samsara system in a manner that infringes the '684 Patent.

47. Encouraged and instructed by Samsara, third-party customers and end users operate the Samsara system as instructed and intended, in a manner that infringes the '684 Patent claims.

48. At least as of the filing of this Complaint and thereafter, Samsara has

the requisite knowledge and has acted to encourage and instruct customers and end users how to use the Samsara system in a manner that infringes one or more claims of the '684 Patent.

49. MPV has been damaged by Samsara's infringing acts and is entitled to recover the damages sustained in an amount subject to proof at trial, which, by law, can be no less than a reasonable royalty, together with interest and costs as fixed by this Court, pursuant to 35 U.S.C. § 284.

COUNT 2:
INFRINGEMENT OF U.S. PATENT NO. 8,024,311

50. MPV realleges and incorporates by reference the allegations set forth above as if restated verbatim here.

51. MPV is the owner, by assignment, of U.S. Patent No. 8,024,311, titled "Identifying Media Assets From Contextual Information."

52. As the owner of the '311 Patent, MPV holds all substantial rights in and under the '311 Patent, including the right to grant licenses, exclude others, and to enforce, sue, and recover damages for past and future infringement.

53. The United States Patent and Trademark Office issued the '311 Patent on November 9, 2020, after a full examination that concluded in allowance of subject matter found to be in compliance with Title 35 of the United States Code.

54. Samsara had directly infringed at least claim 1 of the '311 Patent by

using (including its own testing), making, selling, offering for sale, licensing, and/or importing the Samsara Sites App and related monitoring and cloud-based platform without authorization or license as exemplified below.

55. The Samsara system practices the '311 Patent, satisfying each and every element of each asserted claim either literally or under the doctrine of equivalents.

56. Claim 1 recites an embodiment of the claimed subject matter:

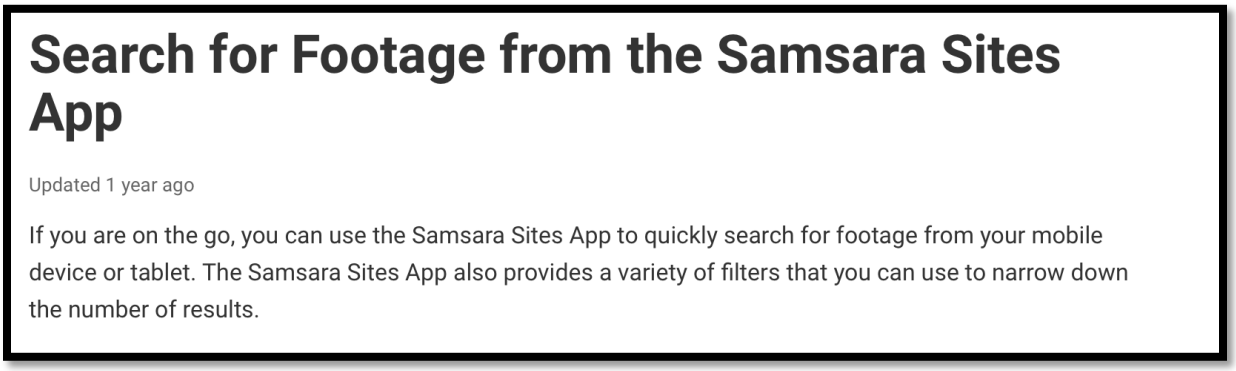
> 1. A method implemented at least in part by a data processing system, the method for identifying media assets that are potentially relevant to contextual information, and the method comprising the steps of:
>
> receiving, by the data processing system, the contextual information,
>
> wherein the received contextual information comprises a first set of contextual information and a second set of contextual information, the second set being received after the first set;
>
> identifying a chosen event based at least upon an analysis of the contextual information;
>
> identifying a set of media assets based at least upon an analysis of the identified event, wherein the step of identifying the set of media assets comprises:
>
> identifying a superset of media assets associated with the

chosen event based at least upon an analysis of the first set of contextual information at a time when the second set of contextual information has not yet been received, the superset of media assets comprising more media assets than the set of media assets; and

identifying the set of media assets from the superset of media assets based at least upon an analysis of the second set of contextual information;

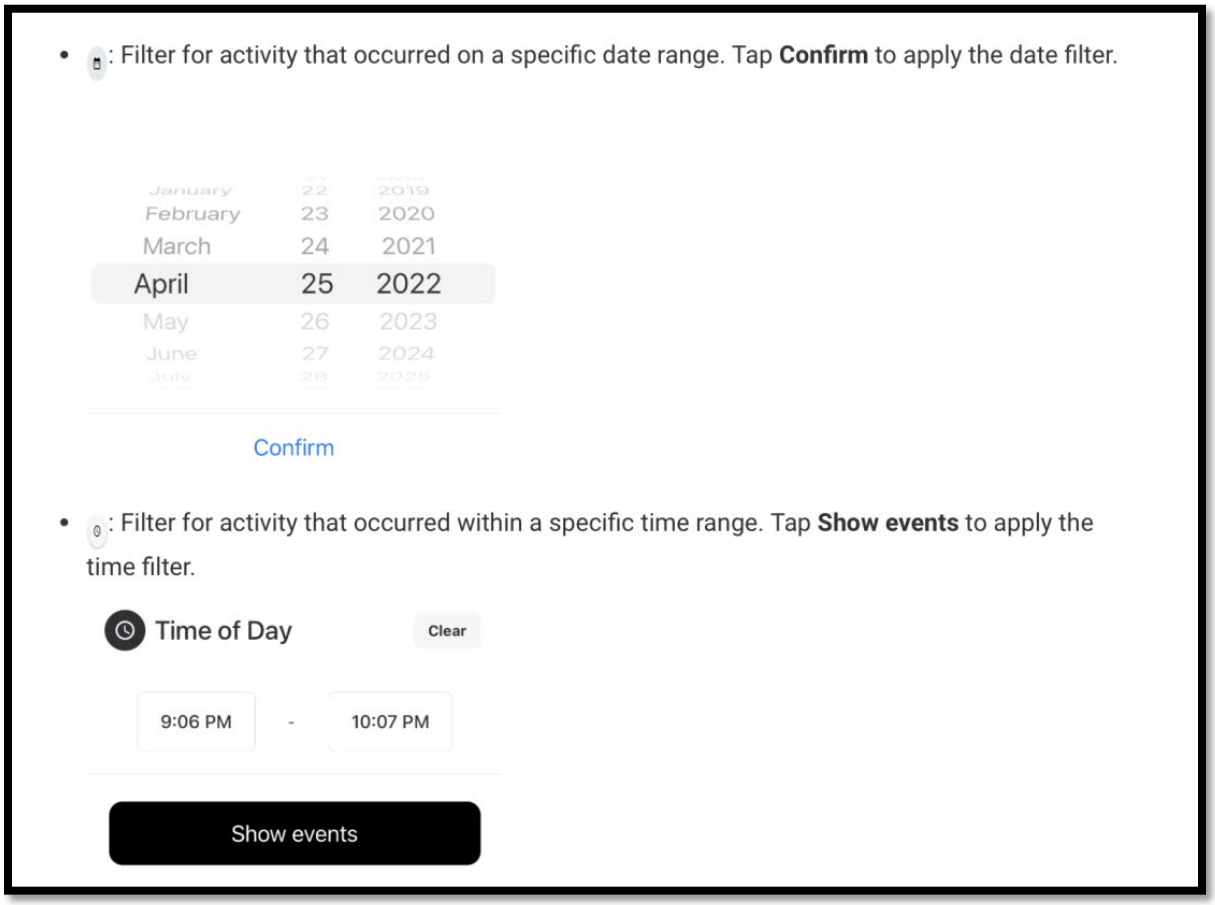
associating, in a processor-accessible memory system, at least some of the contextual information with the chosen event, or at least one asset in the set of media assets, or both the chosen event and at least one asset in the set of media assets.

57. Samsara's Sites App identifies media assets that are relevant to received contextual information.

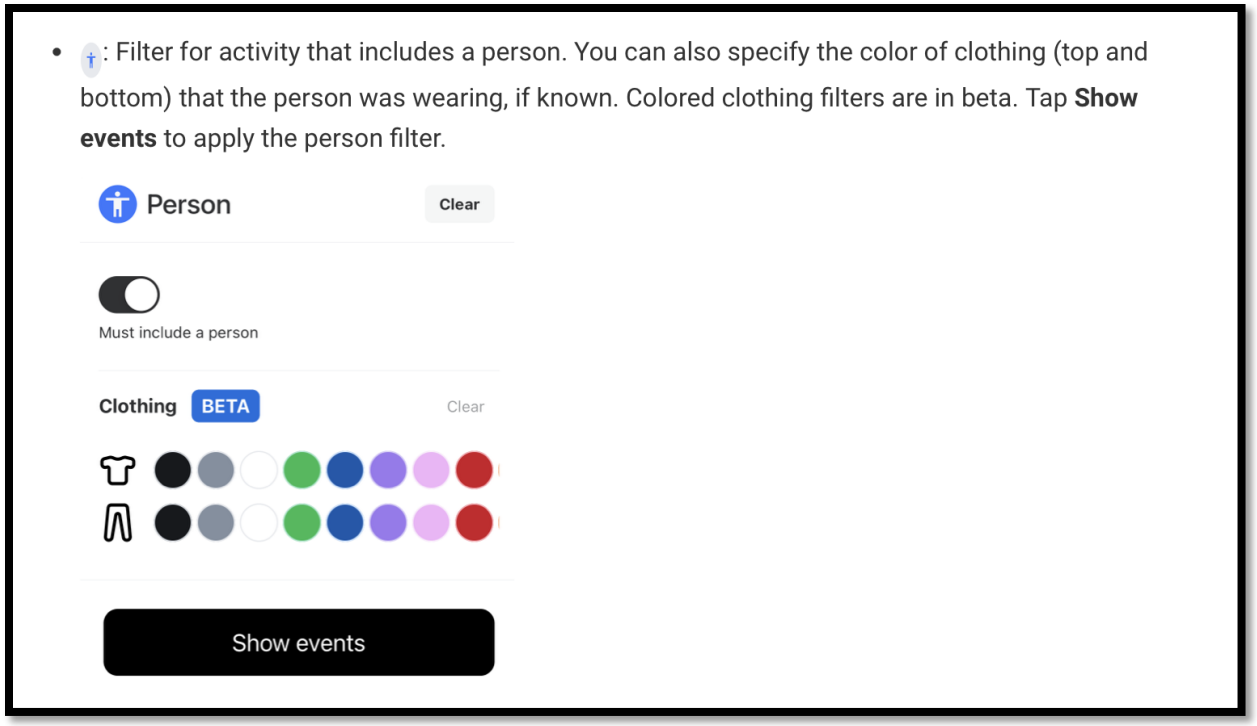


58. Samsara's Sites App (a "data processing system") receives event

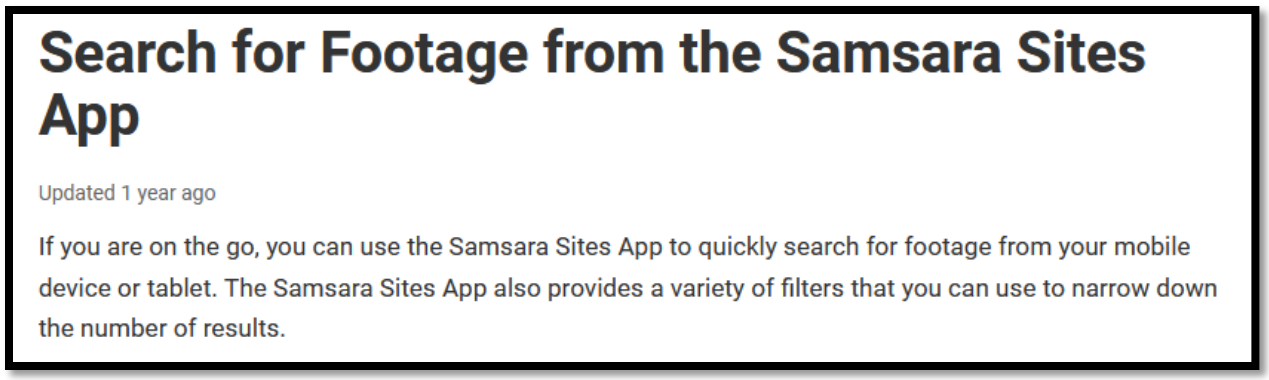
filters ("contextual information") that comprise date and time ranges (a "first set of contextual information") as exemplified in Samsara's publication shown below:



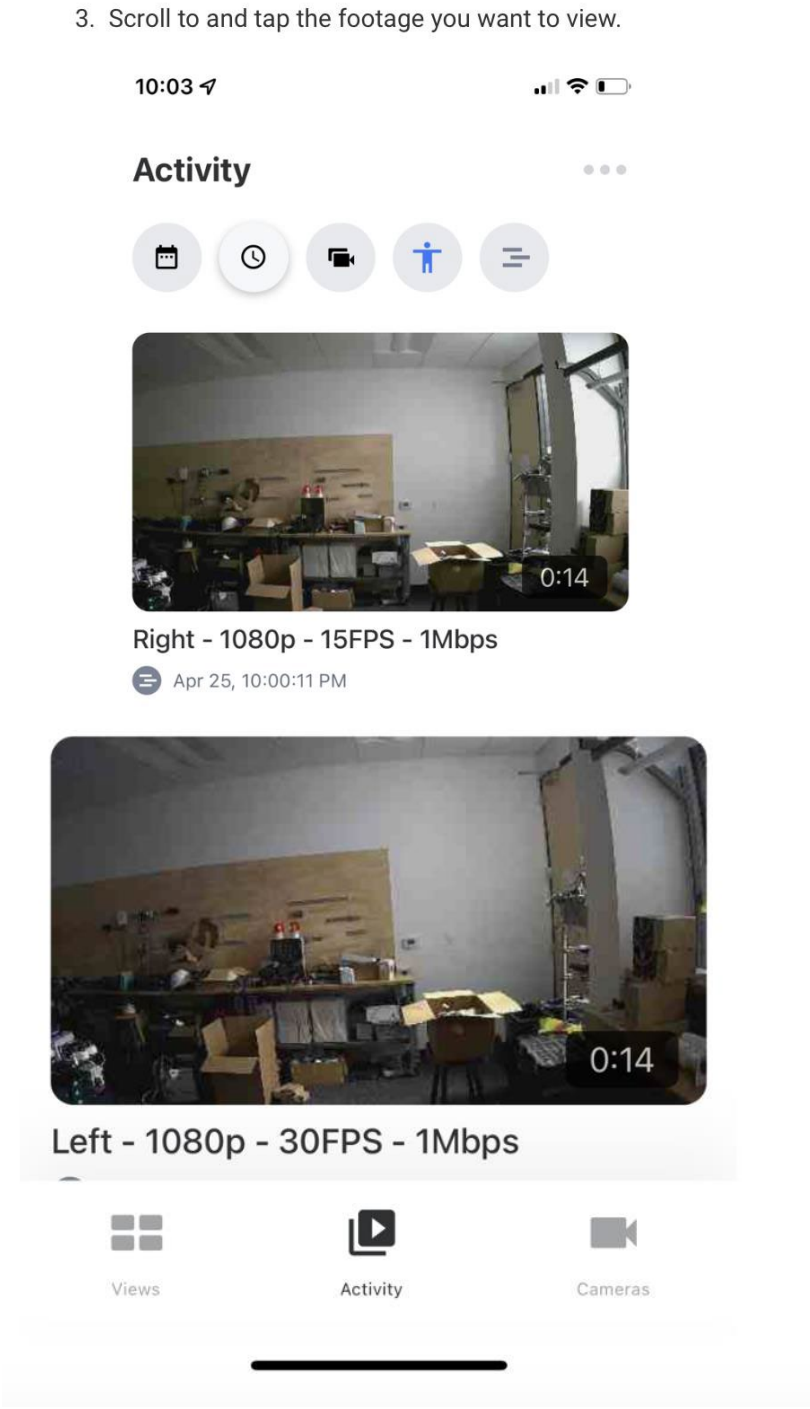
59. Samsara's Sites App receives event filters to specify whether a person is in the frame and the color of clothing worn ("a second set of contextual information . . . received after the first set") as shown below:



60. Samsara identifies an event satisfying filter criteria (a "chosen event") based upon an analysis of the search filters.

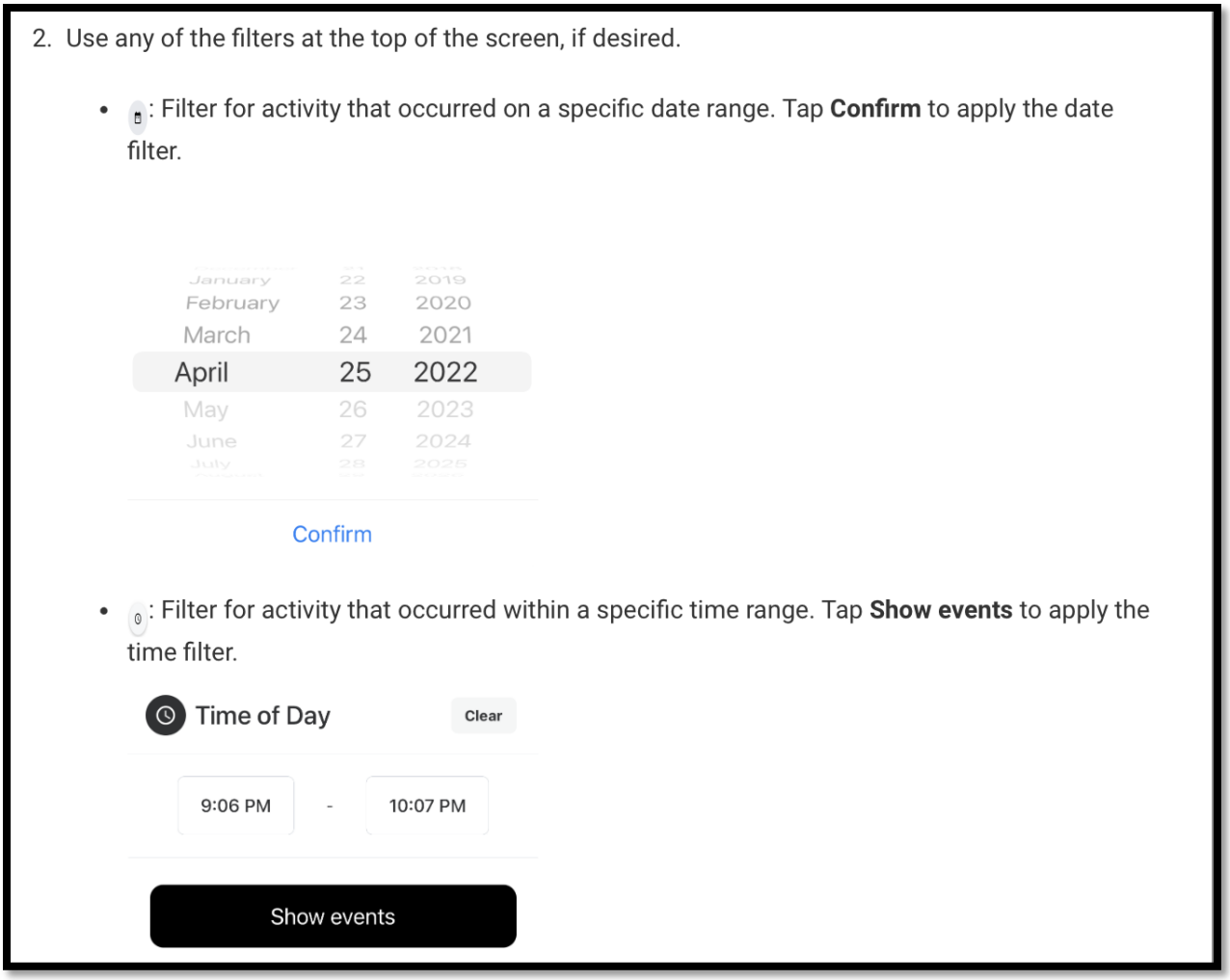


61. Samsara publishes instructional information detailing how the Sites App practices the ’311 Patent on its website at https://kb.samsara.com/hc/en-us/articles/5876220669709-Search-for-Footage-from-the-Samsara-Sites-App.



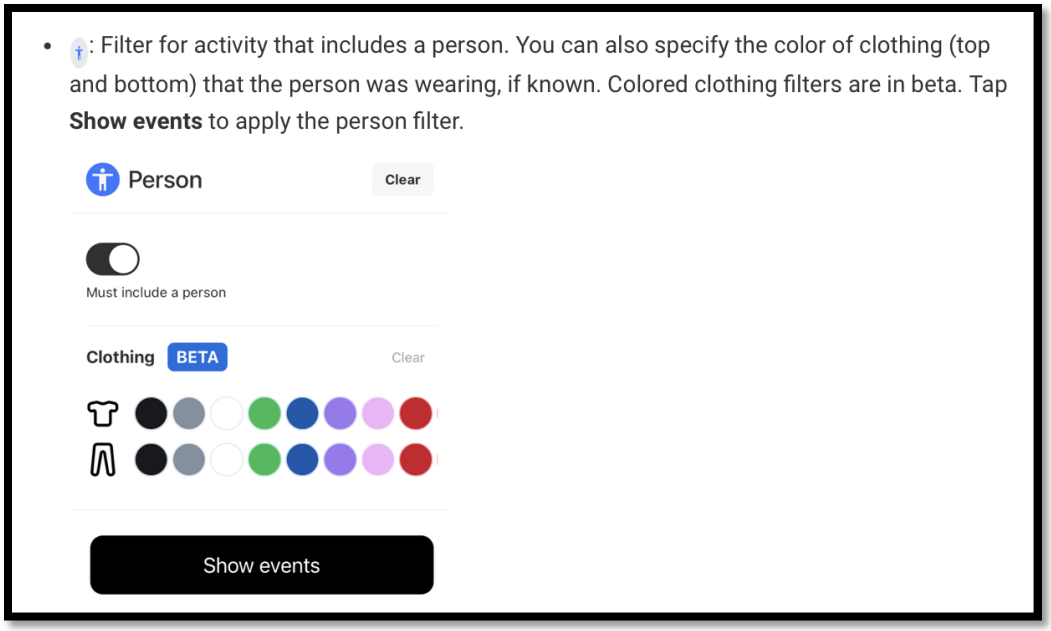
62. Samsara identifies and provides users with a set of recordings ("media assets") based upon the identified event as shown above.

63. Samsara identifies a superset of recordings based upon the date and time ranges at a time when the second set of event filters has not yet been received.

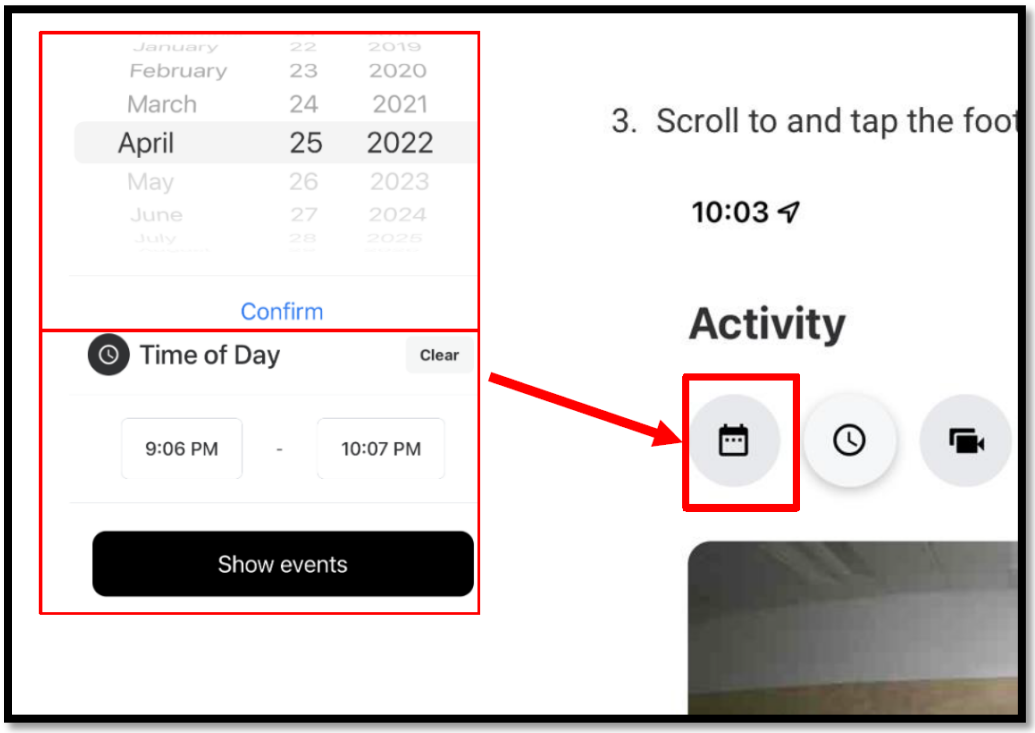


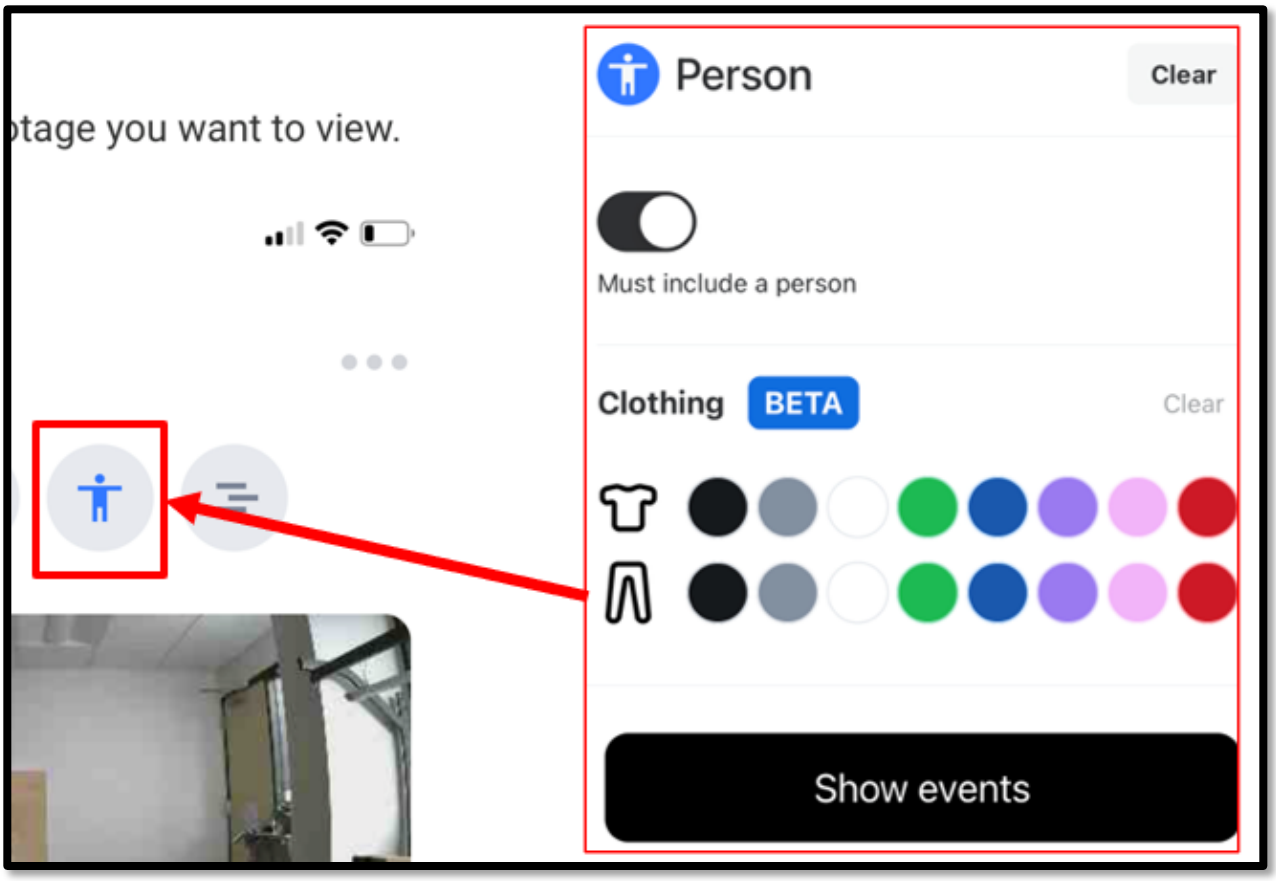
64. The screenshot above published by Samsara shows the "Show events" button where the superset of recordings is accessed before any other filters have been added.

65. Samsara identifies a set of records based upon an additional event filter such as footage featuring a person in the frame or the color of clothing worn.



66. Samsara's Sites App associates contextual information with at least one assets in the set of media assets.





67. Samsara video search provides the ability to search for content filtered by time of day, detection of a person in frame, and clothing worn.

68. Media assets (video clips) that meet the specified filters illuminate associated filter tags on the Activity Page and are displayed, associating filter information and recordings.

69. Consistent with Samsara's published descriptions and instructions, normal operation of the Samsara system as shown in the materials published by Samsara performs each and every step and satisfies each and every element recited in each asserted claim of the '311 Patent including claim 1 either literally or under

the doctrine of equivalents.

70. Samsara has notice of the ’311 Patent at least by service of this Complaint and is aware of customers and end users using the Samsara system as intended to practice at least claim 1.

71. Samsara actively encourages and directs customers and end users to use the Samsara system in a manner that infringes the ’311 Patent.

72. Samsara provides technical assistance and publishes instructional information directing third parties to make and use the Samsara system in a manner that infringes the ’311 Patent.

73. Samsara has and continues to advertise and promote infringing features of its system and encourage third party customers and end users to operate the Samsara system in a manner that infringes the ’311 Patent.

74. Encouraged and instructed by Samsara, third-party customers and end users operate the Samsara system as instructed and intended, in a manner that infringes the ’311 Patent claims.

75. At least as of the filing of this Complaint and thereafter, Samsara has the requisite knowledge and has acted to encourage and instruct customers and end users how to use the Samsara system in a mannter that infringes one or more claims of the ’311 Patent.

76. MPV has been damaged by Samsara’s infringing acts and is entitled

to recover the damages sustained in an amount subject to proof at trial, which, by law, can be no less than a reasonable royalty, together with interest and costs as fixed by this Court, pursuant to 35 U.S.C. § 284.

COUNT 3:
INFRINGEMENT OF U.S. PATENT NO. 8,836,784

77. MPV realleges and incorporates by reference the allegations set forth above as if restated verbatim here.

78. MPV is the owner, by assignment, of U.S. Patent No. 8,836,784, titled "Automotive Imaging System for Recording Exception Events."

79. As the owner of the '784 Patent, MPV holds all substantial rights in and under the '784 Patent, including the right to grant licenses, exclude others, and to enforce, sue, and recover damages for past and future infringement.

80. The United States Patent and Trademark Office issued the '784 Patent on September 16, 2014, after a full examination that concluded in allowance of subject matter found to be in compliance with Title 35 of the United States Code.

81. Samsara has and continues to directly infringe at least claim 25 of the '784 Patent by using (including its own testing), making, selling, offering for sale, licensing, and/or importing the Samsara Connected Operations Cloud system without authorization or license as exemplified below.

82. The Samsara system and use of the system as performed, intended and

instructed by Samsara satisfies each and every element of each asserted claim of the ’784 Patent either literally or under the doctrine of equivalents.

83. Claim 25 recites an embodiment of the claimed subject matter:

> 25. A method comprising:
>
> performing, by a processing system, a first function to monitor operation of a motor vehicle via an image capture device, wherein the image capture device comprises a digital camera configured to capture a video sequence of digital images;
>
> periodically using, by the processing system, the digital camera in a second function different from the first function to capture digital images at a first capture frequency;
>
> storing, by the processing system, the periodically captured digital images in the image memory system for a specified period of time;
>
> receiving, at the processing system, an input indicating a detection of an exception event from an exception event detection mechanism, wherein the exception event detection mechanism is configured to process inputs received from a plurality of sensing devices;

determining, by the processing system, a type of the exception event based on data captured by the image capture device in the second function;

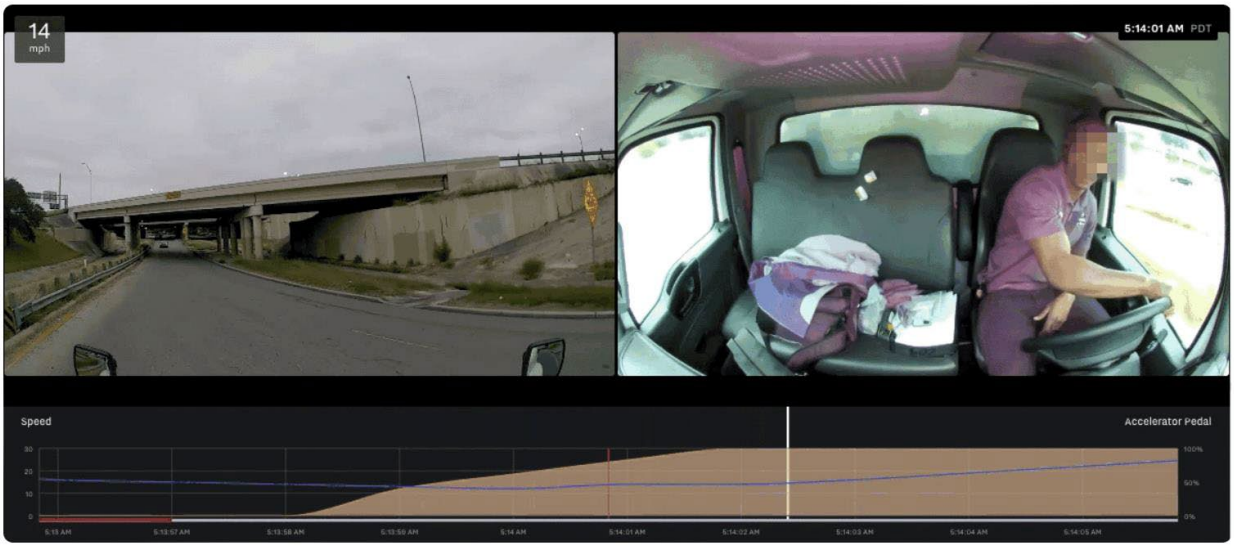
storing, by the processing system, metadata with the captured digital images, wherein the metadata comprises the determined type of the exception event; and providing, by the processing system, a response to the exception event.

84. In normal operation as intended and directed by Samsara, the Samsara system, including Samsara's AI-optimized processor (a processing system) uses AI-powered Dash Cams (image capture devices) to monitor a vehicle's speed through a stop sign (a first function to monitor operation of a motor vehicle) wherein Samsara's Dash Cams comprise a digital camera configured to capture a video sequence of digital images as exemplieifed below in Samsara's publication

demonstrating Rolling Stop Detection.

The Samsara CM3x series Dash Cams can determine when a driver does not stop completely for a posted stop sign. **Rolling Stop Detection** proactively analyzes stop signs and driver behavior to surface safety events to the Safety Inbox.

Rolling Stop Detection triggers when a posted stop sign is detected and the driver speed remains above 10mph. When the dash cam identifies a safety event, the Vehicle Gateway (VG) uploads a ten second video to the Safety Inbox; however, the event does not impact the driver safety score.



High Definition Video, Outward and Inward

The CM32 captures smooth, high-definition video of the road and driver simultaneously, enabling operators to clearly see events of interest. With high-end resolution, 30 frame per second capture, and in-cab Infrared LED for unlit nighttime video, the CM32 provides exceptional performance in a scalable camera system.

85. Samsara uses the Dash Cam to detect an unsafe following distance (a second function) and capture digital images at a first capture frequency of 30 frames per second.

The Samsara AI Dash Cams (models CM31 and CM32) can detect unsafe following distance, often referred to as tailgating. Following Distance AI Event Detection helps you improve driver safety by sending optional in-cab alerts to encourage drivers to increase following distance. Dash cams use a combination of distance estimation and current speed data to detect unsafe following behavior in real-time.

Fleet-Wide Visibility from the Samsara Cloud

Paired with the VG-series vehicle gateway, the CM32 automatically uploads video clips and still images to the Samsara Cloud, providing zero-touch, centralized visibility into footage from an entire fleet. The CM32's cellular capabilities eliminate the need for manually retrieving memory cards from vehicles or downloading footage from a DVR. Operators can instantly access recent and historical captures from any web browser, and can easily dismiss or flag events for follow-up.

High Definition Video Optimized for Fleets

The CM31 captures clear, smooth, high-definition video footage enabling operators to clearly see events of interest. With high-end 1080p resolution, 30 frame per second capture, a wide-angle 121° lens, and low-light performance optimized for night driving, the CM31 provides exceptional performance in a scalable camera system.

86. Samsara stores the images in the image memory system for a specified period of time.

Configure your data retention preference for dash cam image and video data:

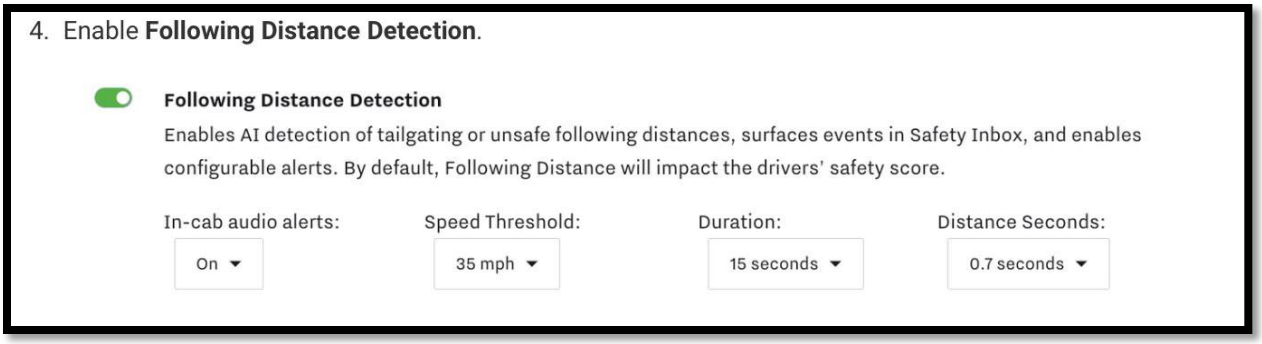
- Keep dash cam image and video data for at least as long as I'm a customer (default for non-EU)
- Keep dash cam image and video data for 28 days
- Keep dash cam image and video data for 1 month (30 days)
- Keep dash cam image and video data for 1.5 months (45 days)
- Keep dash cam image and video data for 6 months (184 days) (default in the EU)
- Keep dash cam image and video data for 4 years (1461 days)

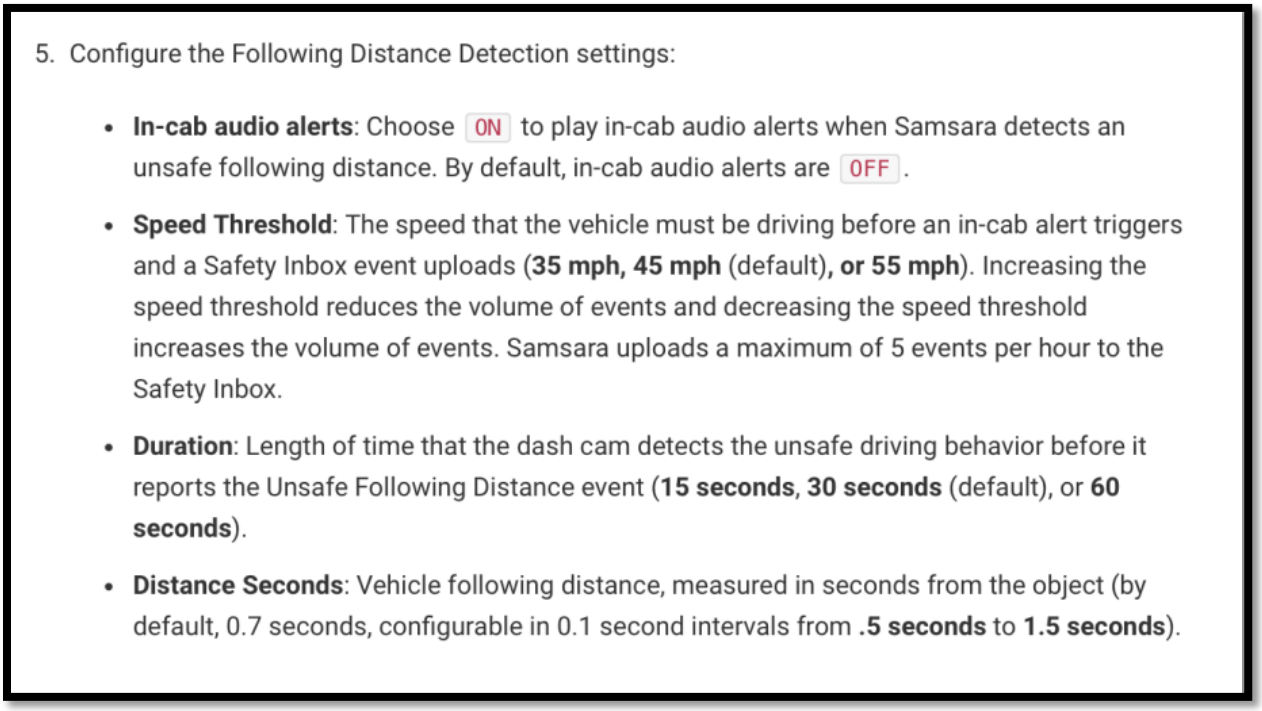
87. The Samsara system receives a vehicle following distance (an "input") indicating the vehicle is at a following distance of 1 second or less (a detection of an exception event) from the vehicle gateway (e.g., VG54-NA) (an exception event detection mechanism) that is configured to process inputs received from a plurality of sensing devices (e.g., the vehicle speedometer and accelerometer).

The Samsara AI Dash Cams (models CM31 and CM32) can detect unsafe following distance, often referred to as tailgating. Following Distance AI Event Detection helps you improve driver safety by sending optional in-cab alerts to encourage drivers to increase following distance. Dash cams use a combination of distance estimation and current speed data to detect unsafe following behavior in real-time.

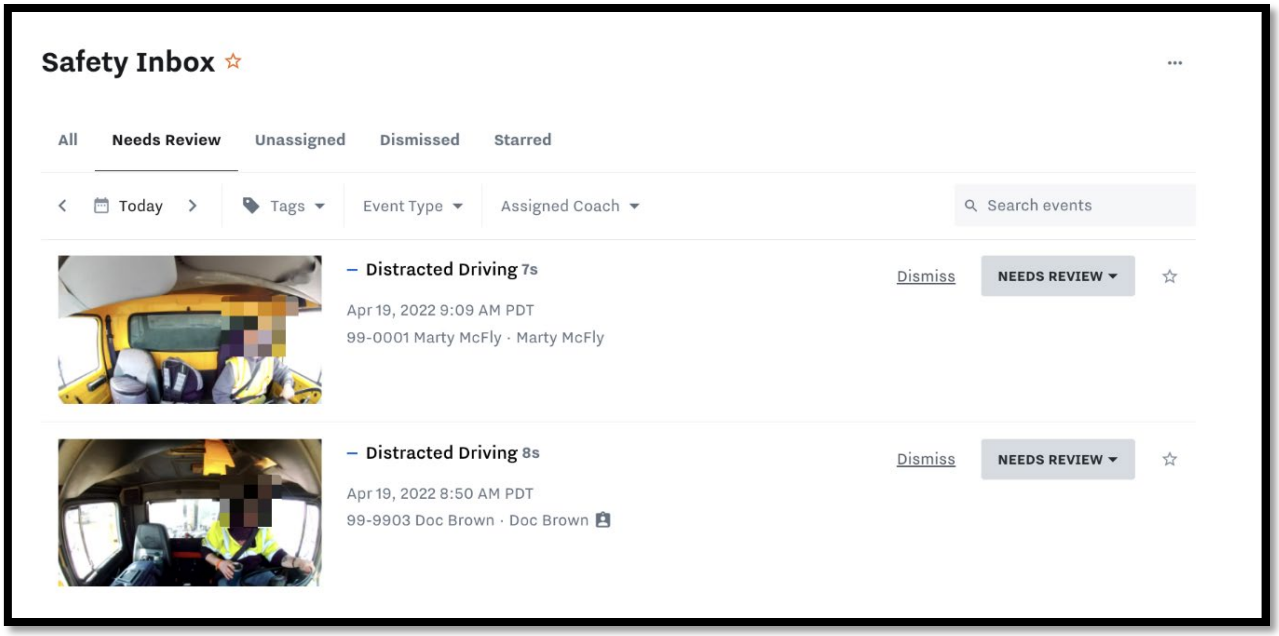
The VG54-NA Vehicle Gateway is an advanced sensor platform for fleets, providing operators with real-time location and analytics, sensor data, accessory compatibility, WiFi hotspot connectivity, and ELD-ready hours of service logging.

88. The Samsara system determines if the vehicle exceeds an unsafe following distance duration (types of exception events) based upon the data captured by the Dash Cam.



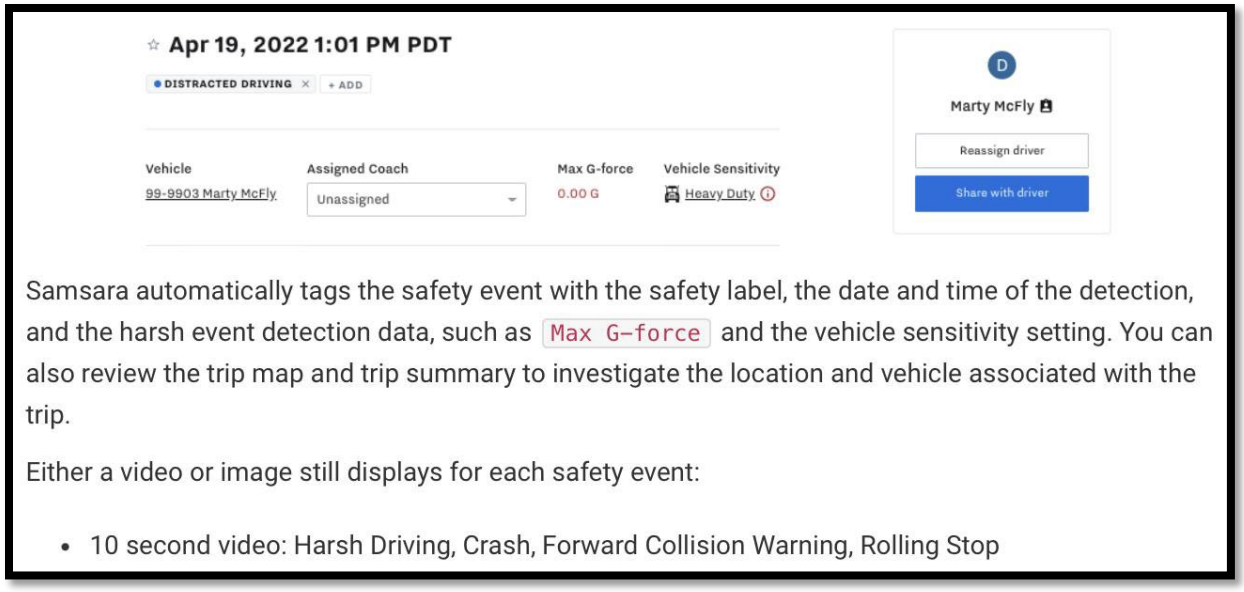


89. The Samsara system stores the video clips with metadata tags (e.g., vehicle speed, following distance, and duration) to the Safety inbox in order to notify the driver of unsafe activity.

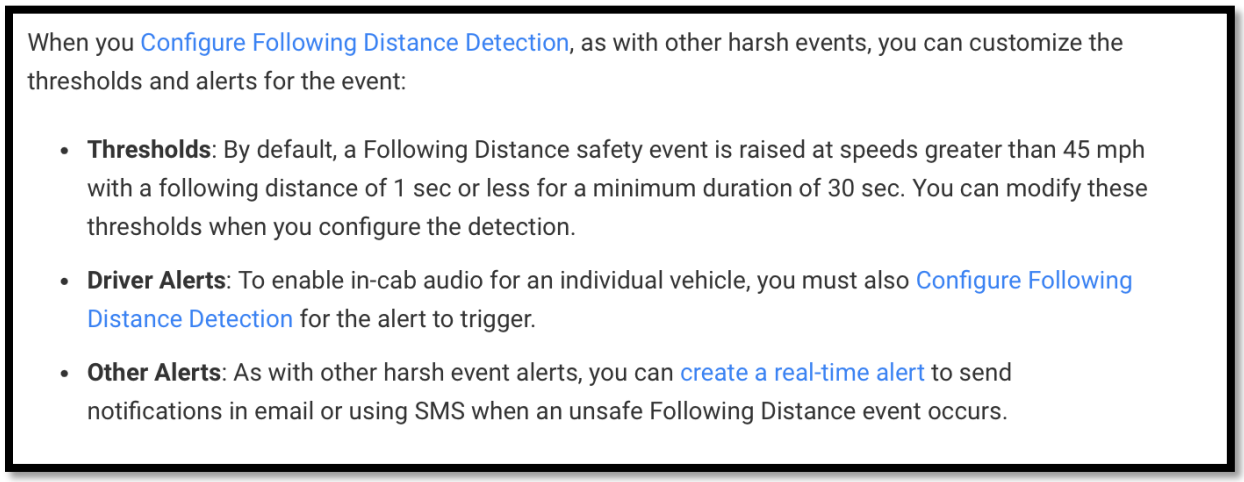


When you review safety events from the Safety Inbox, in addition to automatically detected behaviors, you can manually add event labels to highlight behaviors to surface in the Safety Score and Safety Overview. Unless otherwise noted, you can manually add a label to a behavior; however, `Manual Only` events only surface in the Safety Overview and Safety Score if you manually add the event label. The following table summarizes the category and color-coded severity for each behavior label:

Category	Label and Severity Color
Crash	Crash
Collision Risk	Following Distance Following of 2-4s (Manual Only) Following of 0-2s (Manual Only) Late Response (Manual Only) Defensive Driving (Manual Only) Near Collision (Manual Only) Forward Collision Warning



90. The Samsara system provides a safety alert (a response to the exception event).



91. Consistent with Samsara's published descriptions and instructions, normal operation of the '784 Infringing Instrumentalities performs each and every step and satisfies each and every element recited in each asserted claim of the '784 Patent including claim 25 either literally or under the doctrine of equivalents.

92. Samsara has notice of the ’784 Patent at least by service of this Complaint and is aware of customers and end users using the Samsara system as intended to practice at least claim 25.

93. Samsara actively encourages and directs customers and end users to use the Samsara system in a manner that infringes the ’784 Patent.

94. Samsara provides technical assistance and publishes instructional information directing third parties to make and use the Samsara system in a manner that infringes the ’784 Patent.

95. Samsara has and continues to advertise and promote infringing features of its system and encourage third party customers and end users to operate the Samsara system in manner that infringes the ’784 Patent.

96. Encouraged and instructed by Samsara, third-party customers and end users operate the Samsara system as instructed and intended, in a manner that infringes the ’784 Patent claims.

97. At least as of the filing of this Complaint and thereafter, Samsara has the requisite knowledge and has acted to encourage and instruct customers and end users how to use the Samsara system in a manner that infringes one or more claims of the ’784 Patent.

98. MPV has been damaged by Samsara’s infringing acts and is entitled to recover the damages sustained in an amount subject to proof at trial, which, by

law, can be no less than a reasonable royalty, together with interest and costs as fixed by this Court, pursuant to 35 U.S.C. § 284.

NOTICE

99. MPV does not currently distribute, sell, offer for sale, or make products embodying the Asserted Patents.

100. MPV has complied with all notice requirements of 35 U.S.C. § 287.

NOTICE OF REQUIREMENT OF LITIGATION HOLD

101. Samsara is hereby notified it is legally obligated to locate, preserve, and maintain all records, notes, drawings, documents, data, communications, materials, electronic recordings, audio/video/photographic recordings, and digital files, including edited and unedited or "raw" source material, and other information and tangible things that Samsara knows, or reasonably should know, may be relevant to actual or potential claims, counterclaims, defenses, and/or damages by any party or potential party in this lawsuit, whether created or residing in hard copy form or in the form of electronically stored information (hereafter collectively referred to as "Potential Evidence").

102. As used above, the phrase "electronically stored information" includes without limitation: computer files (and file fragments), e-mail (both sent and received, whether internally or externally), information concerning e-mail (including but not limited to logs of e-mail history and usage, header information,

and deleted but recoverable e-mails), text files (including drafts, revisions, and active or deleted word processing documents), instant messages, audio recordings and files, video footage and files, audio files, photographic footage and files, spreadsheets, databases, calendars, telephone logs, contact manager information, internet usage files, and all other information created, received, or maintained on any and all electronic and/or digital forms, sources and media, including, without limitation, any and all hard disks, removable media, peripheral computer or electronic storage devices, laptop computers, mobile phones, personal data assistant devices, Blackberry devices, iPhones, video cameras and still cameras, and any and all other locations where electronic data is stored. These sources may also include any personal electronic, digital, and storage devices of any and all of Samsara's agents, resellers, or employees if Samsara electronically stored information resides there.

103. Samsara is hereby further notified and forewarned that any alteration, destruction, negligent loss, or unavailability, by act or omission, of any Potential Evidence may result in damages or a legal presumption by the Court and/or jury that the Potential Evidence is not favorable to Samsara's claims and/or defenses. To avoid such a result, Samsara's preservation duties include, but are not limited to, the requirement that Samsara immediately notify its agents and employees to halt and/or supervise the functions of Samsara's electronic systems and refrain

from deleting Potential Evidence, either manually or through a policy of periodic deletion.

JURY DEMAND

MPV hereby demands a trial by jury on all claims, issues and damages so triable.

PRAYER FOR RELIEF

MPV prays for the following relief:

a. That Samsara be summoned to appear and answer;

b. That the Court enter an order declaring that Samsara has infringed each of the asserted patents.

c. That the Court grant MPV judgment against Samsara for all actual, consequential, special, punitive, increased, and/or statutory damages, including, if necessary, an accounting of all damages; pre- and post-judgment interest as allowed by law; and reasonable attorneys' fees, costs, and expenses incurred in this action;

d. That Samsara be found to have willfully infringed the Asserted Patents; and

e. That MPV be granted such other and further relief as the Court may deem just and proper under the circumstances.

Dated: December 11, 2023 Respectfully submitted,

KENT & RISLEY, LLC

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