

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

LONESTAR BIOMETRICS LLC.,	)	
	)	Case No. 2:22-cv-00241-JRG-RSP
Plaintiff,	)	
	)	<b><u>JURY TRIAL DEMANDED</u></b>
v.	)	
	)	
TCL TECHNOLOGY GROUP CORP., TCL	)	
ELECTRONICS HOLDINGS LIMITED,	)	
TCL COMMUNICATION TECHNOLOGY	)	
HOLDINGS LIMITED, TCL	)	
COMMUNICATION LIMITED, TCT	)	
MOBILE INTERNATIONAL LIMITED,	)	
HUIZHOU TCL MOBILE	)	
COMMUNICATION COMPANY	)	
LIMITED, and TCL MOBILE	)	
COMMUNICATION (HK) COMPANY	)	
LIMITED,	)	
	)	
Defendants.	)	

**FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Lonestar Biometrics LLC. (“LB” or “Plaintiff”) for its First Amended Complaint against Defendants TCL Technology Group Corp. (“TCL Technology”), TCL Electronics Holdings Limited (“TCL Electronics”), TCL Communication Technology Holdings Limited (“TCL Communication”), TCL Communication Limited (“TCLC”), TCT Mobile International Limited (“TCT”), Huizhou TCL Mobile Communication Company Limited (“Huizhou TCL Mobile”), and TCL Mobile Communication (HK) Company Limited (“TCL Mobile (HK)”) (collectively “TCL” or “Defendants”) for patent infringement alleges as follows:

**THE PARTIES**

1. LB is a limited liability company organized and existing under the laws of the State of Texas, with its principal place of business located at 104 E. Houston Street, Marshall, TX 75670.

2. Upon information and belief, Defendant TCL Technology is a corporation organized and existing under the laws of China, with its principal place of business located at TCL Keji Daxia, No.17, Huifeng 3rd Road, Zhongkai High-Tech Zone Huizhou, Guangdong, 516000 China. Defendant TCL Technology is a leading manufacturer and seller of smartphones and tablets in the world and in the United States. Upon information and belief, Defendant TCL Technology owns the trademark “TCL” which is marked on the Accused Products.<sup>1</sup> Upon information and belief, Defendant TCL Technology does business in Texas and in the Eastern District of Texas, directly or through intermediaries.

3. Upon information and belief, Defendant TCL Electronics Holdings Limited is a corporation organized and existing under the laws of the Cayman Islands, with its principal place of business located at 7th Floor, Building 22E, 22 Science Park East Avenue, Hong Kong Science Park, Shatin, New Territories, Hong Kong, and may be served pursuant to the provisions of the Hague Convention. Upon information and belief, TCL Electronics is an indirect wholly-owned subsidiary of TCL Technology. TCL Electronics is involved in the manufacture and sale of TVs, smartphones, smart connective devices and services, smart commercial display and smart home products and provision of Internet platform operating services.<sup>2</sup> Upon information and belief, TCL Electronics does business in Texas and in the Eastern District of Texas, directly or through intermediaries.

4. Upon information and belief, Defendant TCL Communication Technology Holdings Limited is a corporation organized and existing under the laws of the People’s Republic

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<sup>1</sup> See [https://www.tcl.com/usca/content/dam/tcl/product/mobile/tcl-10-5g-uw/downloads/VZW%20TCL-T790S%20UM\\_20201020\\_FINAL.pdf](https://www.tcl.com/usca/content/dam/tcl/product/mobile/tcl-10-5g-uw/downloads/VZW%20TCL-T790S%20UM_20201020_FINAL.pdf).

<sup>2</sup> TCL Electronics Holdings Limited Annual Report 2020, at 141, <https://doc.irasia.com/listco/hk/tclelectronics/annual/2020/ar2020.pdf>.

of China, with its principal place of business located at TCL Communication Technology Building, Block F4, TCL International E City, Zhong Shan Yuan Road, Nanshan District, Shenzhen, Guangdong, 518052, China, and may be served pursuant to the provisions of the Hague Convention. Upon information and belief, TCL Communication is a wholly-owned subsidiary of TCL Electronics,<sup>3</sup> which is an indirectly wholly-owned subsidiary of TCL Technology. Together with its subsidiaries, TCL Communication manufactures and sells smartphones. Upon information and belief, TCL Communication does business in Texas and in the Eastern District of Texas, directly or through intermediaries.

5. Upon information and belief, Defendant TCL Communication Limited is a corporation organized and existing under the laws of the People's Republic of China, having an address of 7/F, Block F4, TCL International E. City Zhong Shan Yuan Road, Nanshan District, Shenzhen, China, and may be served pursuant to the provisions of the Hague Convention. TCLC is involved in the manufacture and sale of smartphones. Upon information and belief, TCLC does business in Texas and in the Eastern District of Texas, directly or through intermediaries.

6. Upon information and belief, Defendant TCT Mobile International Limited is a corporation organized and existing under the laws of the Hong Kong Special Administrative Region of the People's Republic of China, with a principal place of business located at 5/F, Building 22E, Hong Kong Science Park, 22 Science Park East Avenue, Sha Tin, Hong Kong, China., and may be served pursuant to the provisions of the Hague Convention. TCT is a leading manufacturer and seller of smartphones and tablets in the world and in the United States. Upon information and belief, TCL Communication is a wholly-owned subsidiary of TCL Electronics.<sup>4</sup>

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<sup>3</sup> *Id.* at 145.

<sup>4</sup> *Id.*

Upon information and belief, TCT does business in Texas and in the Eastern District of Texas, directly or through intermediaries.

7. Upon information and belief, Defendant Huizhou TCL Mobile Communication Company Limited is a corporation organized and existing under the laws of the People's Republic of China, with a principal place of business located at No. 3, Donghe South Road, Dongxin Area, Dongjiang Hi-tech Industrial Park, Zhongkai Hi-tech Zone, Huizhou City, Guangdong, China and may be served pursuant to the provisions of the Hague Convention. Upon information and belief, Huizhou TCL Mobile is a wholly-owned subsidiary of TCL Electronics and is involved in the manufacture and sale of smartphones. Upon information and belief, Huizhou TCL Mobile does business in Texas and in the Eastern District of Texas, directly or through intermediaries.

8. Upon information and belief, Defendant TCL Mobile Communication (HK) Company Limited is a corporation organized and existing under the laws of the Hong Kong Special Administrative Region of the People's Republic of China with a principal place of business located at 5/F, Building 22E, Hong Kong Science Park, 22 Science Park East Avenue, Sha Tin, Hong Kong, China, and may be served pursuant to the provisions of the Hague Convention. Upon information and belief, TCL Mobile (HK) is an indirect wholly-owned subsidiary of TCL Electronics<sup>5</sup> involved in the manufacture and sale of smartphones. Upon information and belief, TCL Mobile (HK) does business in Texas and in the Eastern District of Texas, directly or through intermediaries.

9. Upon information and belief, the Defendants are part of an interrelated group of companies, which together comprise one of the world's largest manufacturers of televisions and smartphones and one of the leading sellers of televisions and smartphones in the United States,

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<sup>5</sup> *Id.*

including the TCL and Alcatel brands. TCL, which refers to the company and its subsidiaries as the “Group,” describes itself as one of the “world’s leading consumer electronics company” and states that the Group is “mainly involved in the manufacture and sale of television (‘TV’) sets, smart mobile, smart connective devices and services, smart commercial display and smart home products and provision of Internet platform operating services.”<sup>6</sup>

10. Defendants have authorized sellers and sales representatives that offer and sell products pertinent to the Original Complaint and this Amended Complaint through the State of Texas, including in this Judicial District, and to consumers throughout this Judicial District, such as: Best Buy, 422 West TX-281 Loop, Suite 100, Longview, Texas 75605; Walmart Longview Supercenter, 515 East Loop 281, Longview, Texas 75605 ; T-Mobile, 900 East End Boulevard North, Suite 100, Marshall, Texas 75670; Verizon authorized retailers, including Victra, 1006 East End Boulevard North , Marshall, Texas 75670.

### **JURISDICTION**

11. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 1, *et seq.* This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

12. This Court has personal jurisdiction over Defendants. Defendants regularly conduct business and have committed acts of patent infringement and/or have induced acts of patent infringement by others in this Judicial District and/or have contributed to patent infringement by others in this Judicial District, the State of Texas, and elsewhere in the United States.

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<sup>6</sup> *Id.* at 5, 141.

13. Venue is proper in this Judicial District pursuant to 28 U.S.C. § 1391 because, among other things, TCL is not a resident of the United States, and thus may be sued in any judicial district pursuant to 28 U.S.C. § 1391(c)(3). Venue is further proper in this Judicial District pursuant to 28 U.S.C. §§ 1400(b) and 1391(b) and (c) because each Defendant is subject to personal jurisdiction in this Judicial District and has committed acts of patent infringement in this Judicial District. Each Defendant, through its own acts and/or through the acts of each other Defendant, makes, uses, sells, offers to sell, and/or imports infringing products within this Judicial District, regularly does and solicits business in this Judicial District, and has the requisite minimum contacts with the Judicial District, such that this venue is a fair and reasonable one. Further, upon information and belief, the Defendants have admitted or not contested proper venue in this Judicial District in other patent infringement actions.

14. Defendants are subject to this Court's jurisdiction pursuant to due process and/or the Texas Long Arm Statute due at least to its substantial business in this State and Judicial District, including (a) at least part of its past infringing activities, (b) regularly doing business or soliciting business in Texas, and/or (c) engaging in persistent conduct and/or deriving substantial revenue from goods and services provided to customers in Texas.

15. Defendants have had actual notice of the Patents-in-Suite (defined below) at least as of June 28, 2022, the filing date of the Original Complaint in this Action.

#### **PATENTS-IN-SUIT**

16. On January 5, 2016, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,232,088 (the "'088 Patent") entitled "Scanning in a Defined Region on a Display Screen". A true and correct copy of the '088 Patent is available at: <http://pdfpiw.uspto.gov/.piw?Docid=9232088>.

17. On January 16, 2016, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,241,082 (the “’082 Patent”) entitled “Method and Apparatus for Scanning Through a Display Screen”. A true and correct copy of the ’082 Patent is available at: <http://pdfpiw.uspto.gov/.piw?Docid=9241082>.

18. On January 31, 2017, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 9,560,293 (the “’293 Patent”) entitled “Method and Apparatus for Image Capture Through a Display Screen”. A true and correct copy of the ’082 Patent is available at: <http://pdfpiw.uspto.gov/.piw?Docid=9560293>.

19. LB is the sole and exclusive owner of all right, title, and interest in the ’088 Patent, the ’082 Patent, and the ’293 Patent (collectively, the “Patents-in-Suit”), and holds the exclusive right to take all actions necessary to enforce its rights to the Patents-in-Suit, including the filing of this patent infringement lawsuit. LB also has the right to recover all damages for past, present, and future infringement of the Patents-in-Suit and to seek injunctive relief as appropriate under the law.

20. LB has at all times complied with the marking provisions of 35 U.S.C. § 287 with respect to the Patents-in-Suit. Upon information and belief, prior assignees and licensees have also complied with the marking provisions of 35 U.S.C. § 287.

### **FACTUAL ALLEGATIONS**

21. The Patents-in-Suit generally relate to methods and apparatuses for scanning and/or capturing images through a display screen.

22. The Patents-in-Suit generally relate to technology involving scanning and image capturing through a display screen in mobile and handheld devices. The technology described in the Patents-in-Suit was developed by Darwin Hu. For example, the technology is implemented by

infringing mobile and handheld devices with optical fingerprint scanners embedded underneath the display screens. TCL has infringed and is continuing to infringe the Patents-in-Suit by making, using, selling, offering to sell, and/or importing, and by actively inducing others to make, use, sell, offer to sell, and/or importing, products including but not limited to mobile and/or handheld devices with optical fingerprint scanners embedded beneath the display screen, such as the TCL 20 Pro, among other products.

**COUNT I**  
**(Infringement of the '088 Patent)**

23. Paragraphs 1 through 22 are incorporated by reference as if fully set forth herein.

24. LB has not licensed or otherwise authorized Defendants to make, use, offer for sale, sell, or import any products that embody the inventions of the '088 Patent.

25. Defendants have and continue to directly infringe the '088 Patent, either literally or under the doctrine of equivalents, without authority and in violation of 35 U.S.C. § 271, by making, using, offering to sell, selling, and/or importing into the United States products that satisfy each and every limitation of one or more claims of the '088 Patent. Such products include mobile and/or handheld devices with optical fingerprint scanners embedded beneath the display screen, such as the TCL 20 Pro, among other products.

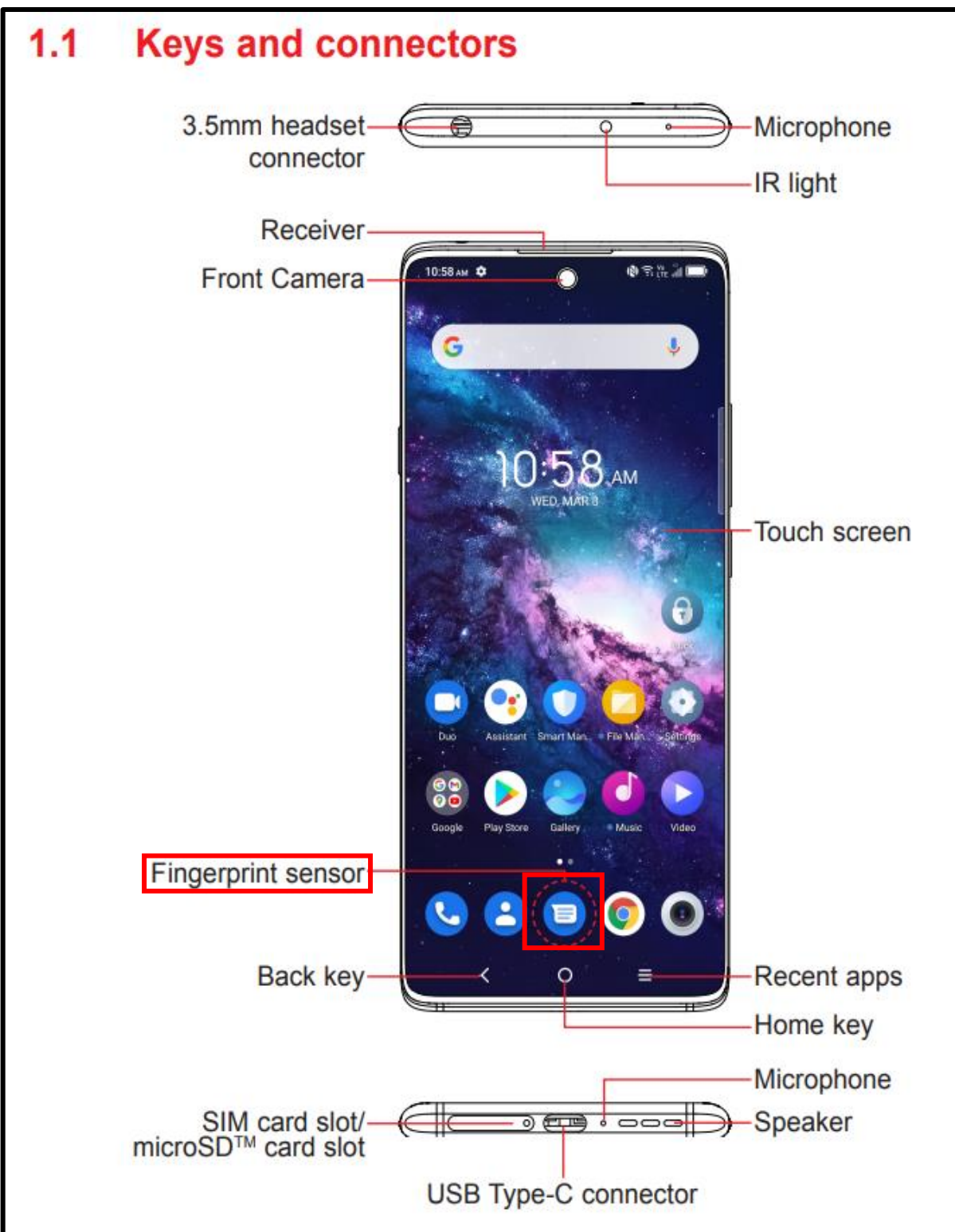
26. For example, Defendants have and continue to directly infringe at least claim 1 of the '088 Patent by making, using, offering to sell, selling, and/or importing into the United States products that include mobile phones with an optical fingerprint scanner embedded beneath the display screen, such as the TCL 20 Pro:

<b>FEATURES</b>	Sensors	<u>Fingerprint (under display, optical)</u> , accelerometer, gyro, proximity, compass
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<sup>7</sup> [https://www.gsmarena.com/tcl\\_20\\_pro\\_5g-10855.php](https://www.gsmarena.com/tcl_20_pro_5g-10855.php).



27. The TCL 20 Pro is a computing device which comprises a display device having a viewing area for displaying content, the display device caused to display a scanning region for a user to place a scanning object onto the display device in accordance with the scanning region, wherein the scanning region is defined visibly to the user and smaller than the viewing area in size, a portion of the scanning object falling into the scanning region is scanned by an array of sensors embedded in the display device:



<sup>8</sup> TCL 20 Pro User Manual at p. 4, available at: <https://mobile-support.tcl.com/global/en/service-support-mobile/tcl20-pro5g.html>.

28. For example, the TCL 20 Pro also contains and a circuit module, coupled to sensors, reading out sensing signals from the sensors to produce and image of the portion of the scanning object, wherein the image captures details on the portion of the scanning object.

29. Defendants have and continue to indirectly infringe one or more claims of the '088 Patent by knowingly and intentionally inducing others, including TCL customers and end-users, to directly infringe, either literally or under the doctrine of equivalents, by making, using, offering to sell, selling and/or importing into the United States products that include infringing technology, such as mobile and/or handheld devices with optical fingerprint scanners embedded beneath the display screen.

30. Defendants, with knowledge that these products, or the use thereof, infringes the '088 Patent at least as of the date of the Original Complaint, knowingly and intentionally induced, and continue to knowingly and intentionally induce, direct infringement of the '088 Patent by providing these products to end users for use in an infringing manner. Alternatively, on information and belief, Defendants have adopted a policy of not reviewing the patents of others, including specifically those related to Defendants' specific industry, thereby remaining willfully blind to the Patent-in-Suit at least as early as the issuance of the Patents-in-Suit.

31. Defendants have induced infringement by others, including end users, with the intent to cause infringing acts by others or, in the alternative, with the belief that there was a high probability that others, including end users, infringe the '088 Patent, but while remaining willfully blind to the infringement. Defendants have and continue to induce infringement by its customers and end-users by supplying them with instructions on how to operate the infringing technology in an infringing manner, while also making publicly available information on the infringing technology via Defendants' website, product literature and packaging, and other publications.

32. LB has suffered damages as a result of Defendants' direct and indirect infringement of the '088 Patent in an amount to be proven at trial.

33. LB has suffered, and will continue to suffer, irreparable harm as a result of Defendants' infringement of the '088 Patent, for which there is no adequate remedy at law, unless Defendants' infringement is enjoined by this Court.

**COUNT II**  
**(Infringement of the '082 Patent)**

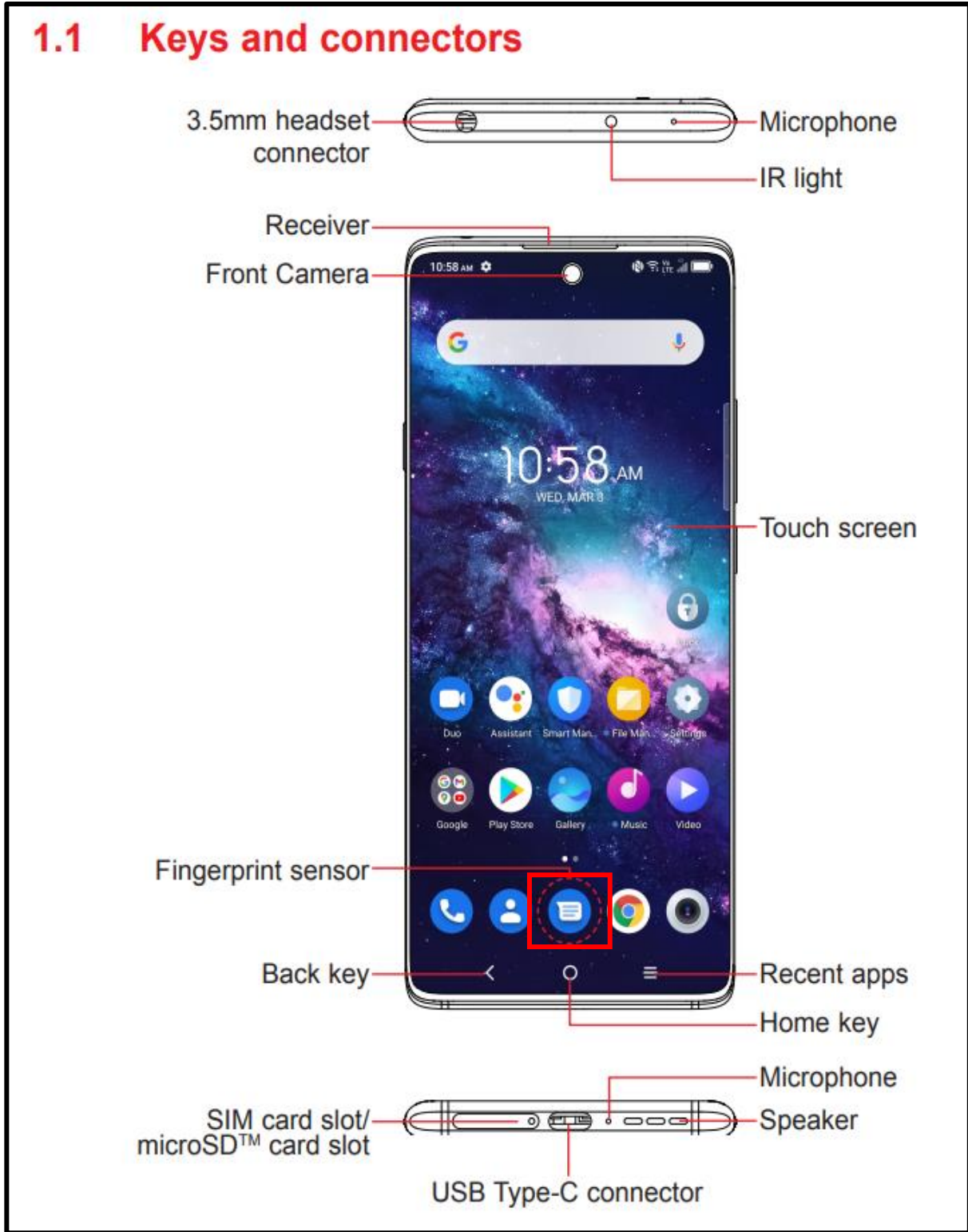
34. Paragraphs 1 through 22 are incorporated by reference as if fully set forth herein.

35. LB has not licensed or otherwise authorized Defendants to make, use, offer for sale, sell, or import any products that embody the inventions of the '082 Patent.

36. Defendants have and continue to directly infringe the '082 Patent, either literally or under the doctrine of equivalents, without authority and in violation of 35 U.S.C. § 271, by making, using, offering to sell, selling, and/or importing into the United States products that satisfy each and every limitation of one or more claims of the '082 Patent. Such products include mobile and/or handheld devices with optical fingerprint scanners embedded beneath the display screen, including, but not limited to, the TCL 20 Pro, among other products.

37. For example, Defendants have and continue to directly infringe at least claim 20 of the '082 Patent by making, using, offering to sell, selling, and/or importing into the United States products that include mobile phones with an optical fingerprint scanner embedded beneath the display screen, such as the TCL 20 Pro, among other products.

38. The TCL 20 Pro is a display device which comprises a display unit driven to display thereon at least a scanning region:



<sup>9</sup> TCL 20 Pro User Manual at p. 4, available at: <https://mobile-support.tcl.com/global/en/service-support-mobile/tcl20-pro5g.html>.

39. The TCL 20 Pro further comprises a sensing module integrated with the display unit:

<b>FEATURES</b>	Sensors	<u>Fingerprint (under display, optical)</u> , accelerometer, gyro, proximity, compass
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40. The TCL 20 Pro further comprises at least a light source to illuminate a portion of an object being placed in the scanning region and against the display unit, wherein the display unit is driven to have a moment of see-through, and at least a source is turned on to cause the sensing module to generate an image of the portion of the object:

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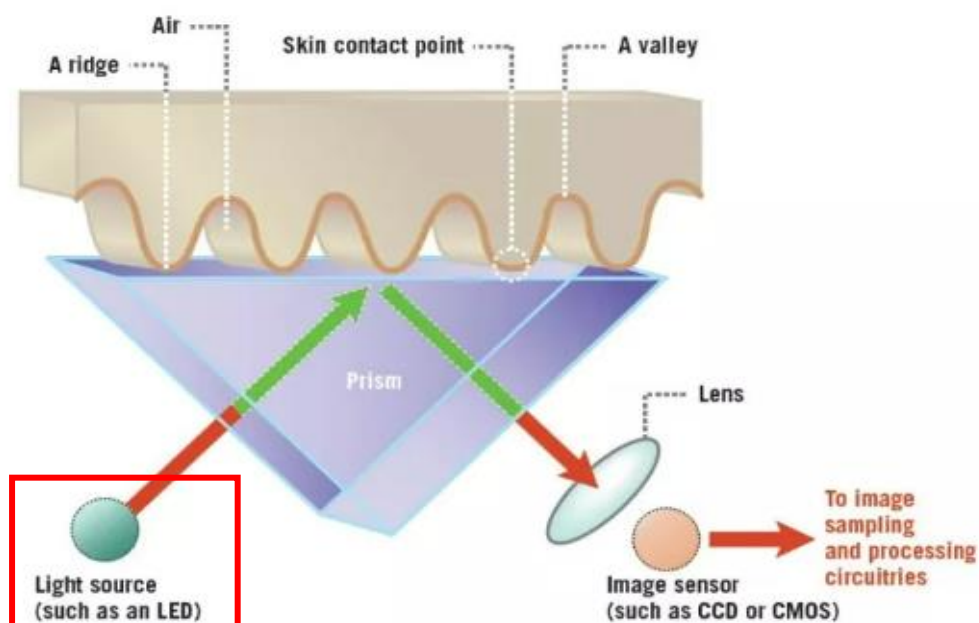
<sup>10</sup> [https://www.gsmarena.com/tcl\\_20\\_pro\\_5g-10855.php](https://www.gsmarena.com/tcl_20_pro_5g-10855.php).

## Optical scanners

Optical fingerprint scanners are the oldest method of capturing and comparing fingerprints. As the name suggests, this technique relies on capturing an optical image — essentially a photograph. It then uses algorithms to detect unique patterns on the surface, such as ridges or marks, by analyzing the lightest and darkest areas of the image.

Just like smartphone cameras, these sensors have a finite resolution. The higher the resolution, the finer details the sensor can discern about your finger, increasing the level of security. However, these sensors capture much higher contrast images than a regular camera. Optical scanners typically have a very high number of diodes per inch to capture these details up close. Of course, it's very dark when your finger is placed over the scanner. The scanners, therefore, incorporate arrays of LEDs or even your phone's display as a flash to light up the picture come scan time.

### An optical sensor.



41. Defendants have and continue to indirectly infringe one or more claims of the '082 Patent by knowingly and intentionally inducing others, including TCL customers and end-users, to directly infringe, either literally or under the doctrine of equivalents, by making, using, offering to sell, selling and/or importing into the United States products that include infringing technology, such as mobile and/or handheld devices with optical fingerprint scanners embedded beneath the

<sup>11</sup> <https://www.androidauthority.com/how-fingerprint-scanners-work-670934/>.

display screen.

42. Defendants, with knowledge that these products, or the use thereof, infringes the '082 Patent at least as of the date of the Original Complaint, knowingly and intentionally induced, and continue to knowingly and intentionally induce, direct infringement of the '082 Patent by providing these products to end users for use in an infringing manner. Alternatively, on information and belief, Defendants have adopted a policy of not reviewing the patents of others, including specifically those related to Defendants' specific industry, thereby remaining willfully blind to the Patent-in-Suit at least as early as the issuance of the Patents-in-Suit.

43. Defendants have induced infringement by others, including end users, with the intent to cause infringing acts by others or, in the alternative, with the belief that there was a high probability that others, including end users, infringe the '082 Patent, but while remaining willfully blind to the infringement. Defendants have and continue to induce infringement by its customers and end-users by supplying them with instructions on how to operate the infringing technology in an infringing manner, while also making publicly available information on the infringing technology via Defendants' website, product literature and packaging, and other publications.

44. LB has suffered damages as a result of Defendants' direct and indirect infringement of the '082 Patent in an amount to be proven at trial.

45. LB has suffered, and will continue to suffer, irreparable harm as a result of Defendants' infringement of the '082 Patent, for which there is no adequate remedy at law, unless Defendants' infringement is enjoined by this Court.

**COUNT III**  
**(Infringement of the '293 Patent)**

46. Paragraphs 1 through 22 are incorporated by reference as if fully set forth herein.

47. LB has not licensed or otherwise authorized Defendants to make, use, offer for sale,



sell, or import any products that embody the inventions of the '293 Patent.

48. Defendants have and continue to directly infringe the '293 Patent, either literally or under the doctrine of equivalents, without authority and in violation of 35 U.S.C. § 271, by making, using, offering to sell, selling, and/or importing into the United States products that satisfy each and every limitation of one or more claims of the '293 Patent. Such products include mobile and/or handheld devices with optical fingerprint scanners embedded beneath the display screen, including, but not limited to, the TCL 20 Pro, among other products.

49. For example, Defendants have and continue to directly infringe at least claim 1 of the '293 Patent by making, using, offering to sell, selling, and/or importing into the United States products that include mobile phones with an optical fingerprint scanner embedded beneath the display screen, such as the TCL 20 Pro, among other products.

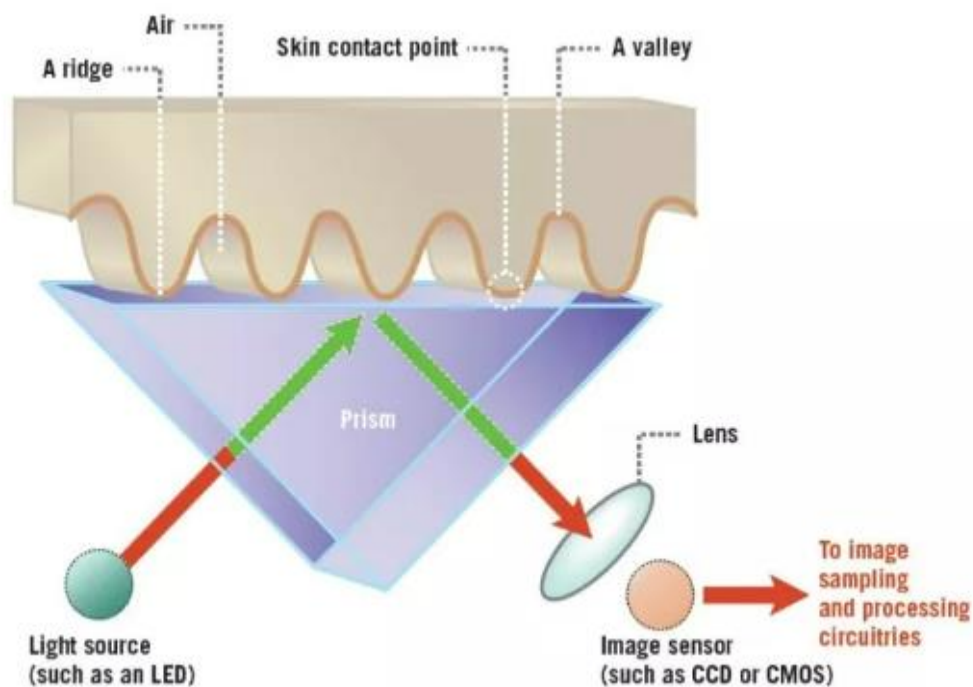
50. The TCL 20 Pro is a display device which comprises a display unit. The TCL 20 Pro further comprises an image sensing module including an optical assembly and an image sensor, wherein the optical assembly includes a first light guide with the first and second ends, the second end shaped in parabolic curvature and acting as an edge-type micro-optical light guide reflector, and the image sensor is disposed at a center of the first end:

## Optical scanners

Optical fingerprint scanners are the oldest method of capturing and comparing fingerprints. As the name suggests, this technique relies on capturing an optical image — essentially a photograph. It then uses algorithms to detect unique patterns on the surface, such as ridges or marks, by analyzing the lightest and darkest areas of the image.

Just like smartphone cameras, these sensors have a finite resolution. The higher the resolution, the finer details the sensor can discern about your finger, increasing the level of security. However, these sensors capture much higher contrast images than a regular camera. Optical scanners typically have a very high number of diodes per inch to capture these details up close. Of course, it's very dark when your finger is placed over the scanner. The scanners, therefore, incorporate arrays of LEDs or even your phone's display as a flash to light up the picture come scan time.

### An optical sensor.



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51. The TCL 20 Pro is a display device wherein the display unit is driven to have a moment of see-through so that an object placed against the display unit is imaged by the image sensor via the first light guide that collects and focuses the reflected light onto the image sensor.

<sup>12</sup> <https://www.androidauthority.com/how-fingerprint-scanners-work-670934/>.

52. Defendants have and continue to indirectly infringe one or more claims of the '293 Patent by knowingly and intentionally inducing others, including TCL customers and end-users, to directly infringe, either literally or under the doctrine of equivalents, by making, using, offering to sell, selling and/or importing into the United States products that include infringing technology, such as mobile and/or handheld devices with optical fingerprint scanners embedded beneath the display screen.

53. Defendants, with knowledge that these products, or the use thereof, infringes the '293 Patent at least as of the date of the Original Complaint, knowingly and intentionally induced, and continue to knowingly and intentionally induce, direct infringement of the '293 Patent by providing these products to end users for use in an infringing manner. Alternatively, on information and belief, Defendants have adopted a policy of not reviewing the patents of others, including specifically those related to Defendants' specific industry, thereby remaining willfully blind to the Patent-in-Suit at least as early as the issuance of the Patents-in-Suit.

54. Defendants have induced infringement by others, including end users, with the intent to cause infringing acts by others or, in the alternative, with the belief that there was a high probability that others, including end users, infringe the '293 Patent, but while remaining willfully blind to the infringement. Defendants have and continue to induce infringement by its customers and end-users by supplying them with instructions on how to operate the infringing technology in an infringing manner, while also making publicly available information on the infringing technology via Defendants' website, product literature and packaging, and other publications.

55. LB has suffered damages as a result of Defendants' direct and indirect infringement of the '293 Patent in an amount to be proven at trial.

56. LB has suffered, and will continue to suffer, irreparable harm as a result of

Defendants' infringement of the '293 Patent, for which there is no adequate remedy at law, unless Defendants' infringement is enjoined by this Court.

**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a jury for all issues so triable.

**PRAYER FOR RELIEF**

WHEREFORE, LB prays for relief against Defendants as follows:

- a. Entry of judgment declaring that Defendants have directly and/or indirectly infringed one or more claims of each of the Patents-in-Suit;
- b. An order pursuant to 35 U.S.C. § 283 permanently enjoining Defendants, their officers, agents, servants, employees, attorneys, and those persons in active concert or participation with them, from further acts of infringement of one or more of the Patents-in-Suit;
- c. An order awarding damages sufficient to compensate LB for Defendants' infringement of the Patents-in-Suit, but in no event less than a reasonable royalty, together with interest and costs;
- d. Entry of judgment declaring that this case is exceptional and awarding LB its costs and reasonable attorney fees under 35 U.S.C. § 285; and
- e. Such other and further relief as the Court deems just and proper.

Dated: January 30, 2024

Respectfully submitted,

/s/ John Andrew Rubino  
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***ATTORNEYS FOR PLAINTIFF,  
LONESTAR BIOMETRICS LLC***