

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND DIVISION**

IOT INNOVATIONS LLC,

Plaintiff,

v.

SAVANT TECHNOLOGIES LLC d/b/a GE
LIGHTING,

Defendant.

Case No. _____

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff IoT Innovations LLC (“IoT Innovations” or “Plaintiff”) files this Complaint against Savant Technologies LLC doing business as GE Lighting (“Savant” or “Defendant”) alleging, based on its own knowledge as to itself and its own actions, and based on information and belief as to all other matters, as follows:

NATURE OF THE ACTION

1. This is a patent infringement action to stop Savant’s infringement of the following United States Patents (collectively, the “Asserted Patents”) issued by the United States Patent and Trademark Office (“USPTO”):

U.S. Patent No.	Title	Available At
7,209,876	System And Method For Automated Answering Of Natural Language Questions And Queries	https://ppubs.uspto.gov/dirsearch-public/print/downloadPdf/7209876
7,379,975	Electric Device, Computer Program, System And Method Of Setting Up User Applications	https://ppubs.uspto.gov/dirsearch-public/print/downloadPdf/7379975

U.S. Patent No.	Title	Available At
7,408,872	Modulation Of Signals For Transmission In Packets Via An Air Interface	https://ppubs.uspto.gov/dirsearch-public/print/downloadPdf/7408872
7,751,533	Dynamic Message Templates And Messaging Macros	https://ppubs.uspto.gov/dirsearch-public/print/downloadPdf/7751533

2. IoT Innovations seeks injunctive relief and monetary damages.

PARTIES

3. IoT Innovations is a limited liability company formed under the laws of Texas with a registered office address located in Austin, Texas.

4. Savant is a limited liability company organized under the laws of the State of Delaware and has its principal place of business located at 1975 Noble Road, Nela Park, Cleveland, Ohio, 44112.

5. Savant may be served through its agent, Cogency Global Inc., located at 3958-D Brown Park Drive, Hilliard, Ohio 43026.

JURISDICTION AND VENUE

6. IoT Innovations repeats and re-alleges the allegations in the Paragraphs above as though fully set forth in their entirety.

7. This is an action for infringement of a United States patent arising under 35 U.S.C. §§ 271, 281, and 284–85, among others. This Court has subject matter jurisdiction of the action under 28 U.S.C. § 1331 and § 1338(a).

8. Venue is proper against Savant in this District pursuant to 28 U.S.C. § 1400(b) and 1391(c) because it has maintained established and regular places of business in this District and has committed acts of patent infringement in the District. *See In re: Cray Inc.*, 871 F.3d 1355, 1362-1363 (Fed. Cir. 2017).

9. Savant is subject to this Court's specific and general personal jurisdiction under due process because of Savant's substantial business in this judicial District, including: (i) at least a portion of the infringements alleged herein; and (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct, or deriving substantial revenue from goods and services provided to individuals in this state and in this District.

10. Specifically, Savant intends to do and does business in, has committed acts of infringement in, and continues to commit acts of infringement in this District directly, through intermediaries, by contributing to and through inducement of third parties, and offers its products or services, including those accused of infringement here, to customers and potential customers located in this state, including in this District.

11. Savant maintains regular and established places of business in this District, including at 1975 Noble Rd., Cleveland, Ohio 44112.

12. Savant offers products and services and conducts business in this District as described below.

13. Savant ships and causes to be shipped into the District infringing products and materials instructing its customers to perform infringing activities to its employees, exclusive and non-exclusive contractors, agents, and affiliates for installation, operation, and service at locations within this District.

14. Savant commits acts of infringement from this District, including, but not limited to, using, installing, testing of the Accused Products, selling and offering to sell the Accused Products, and inducement of third parties to use the Accused Products in an infringing manner.

15. Through at least its website, www.gelighting.com, Savant instructs its customers on how to install and use the Accused Products.

THE ACCUSED PRODUCTS

16. IoT Innovations repeats and re-alleges the allegations in the Paragraphs above as though fully set forth in their entirety.

17. Based upon public information, Savant owns, operates, advertises, and/or controls the website and domain www.gelighting.com, through which it advertises, sells, offers to sell, provides and/or educates customers about its products and services.

18. Savant makes, uses, sells, offers for sale, imports, provides, supplies, and/or distributes its control platform and systems, including but not limited to the following products and services that infringe one or more claims of the Asserted Patents:

- (1) GE Kitchen Hub,
- (2) GE Smart Switch,
- (3) GE Smart Toggle Switch,
- (4) GE Smart Outlet,
- (5) GE Smart Fan Control,
- (6) GE Smart Motion Switch,
- (7) GE In-Wall Toggle,
- (8) GE 240V 40A Outdoor Module 12726;
- (9) GE Appliance Module 45653,
- (10) GE Relay Switch,
- (11) GE In-Wall Duplex Receptacle,
- (12) C-Reach Smart Bridge,
- (13) Cync or C by GE Bluetooth Smart Lights,
- (14) Cync Lights,
- (15) Cync Bulbs,

- (16)Cync Switches,
 - (17)Cync Downlights,
 - (18)Cync Motion Sensors,
 - (19)Cync Wire Free Remotes,
 - (20)Cync Smart Thermostats and Sensors,
 - (21)Cync Cameras,
 - (22)Cync Light Strips,
 - (23)Cync Plugs,
 - (24)Cync App,
 - (25)GE Lighting Website;
 - (26)GE Lighting Support Website;
 - (27)other substantially similar products and services offered in the past or the future, all of the prior models, iterations, releases, versions, generations, and prototypes of the foregoing, and any associated hardware, software, applications, and functionality associated with those products and solutions
- (collectively, the “Accused Products”).

19. Savant also instructs its customers, agents, employees, and affiliates regarding how to use the Accused Products.

20. For these reasons and the additional reasons detailed below, the Accused Products practice at least one claim of each of the Asserted Patents.

COUNT I: INFRINGEMENT OF U.S. PATENT NO. 7,209,876

21. IoT Innovations repeats and re-alleges the allegations in the Paragraphs above as though fully set forth in their entirety.

22. The USPTO duly issued U.S. Patent No. 7,209,876 (hereinafter, the “’876 patent”) on

April 24, 2007 after full and fair examination of Application No. 10/293,743 which was filed on November 13, 2002.

23. IoT Innovations owns all substantial rights, interest, and title in and to the '876 patent, including the sole and exclusive right to prosecute this action and enforce it against infringers and to collect damages for all relevant times.

24. IoT Innovations or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of one or more claims of the '876 patent.

25. The claims of the '876 patent are not directed to an abstract idea and are not limited to well-understood, routine, or conventional activity. Rather, the claimed inventions include inventive components and functionalities that improve tools for searching electronic information repositories and retrieving relevant results using queries and results built from natural language.

26. The written description of the '876 patent describes in technical detail each limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from and improved upon what may have been considered conventional or generic in the art at the time of the invention.

27. Savant has directly infringed and continues to directly infringe one or more claims of the '876 patent by making, using, selling, offering to sell, importing, and/or internal and external testing of the Accused Products.

28. Savant has directly infringed and continues to directly infringe, either literally or under the doctrine of equivalents, at least claim 13 of the '876 patent, as exemplified in the claim chart attached hereto as **Exhibit A**.

29. More specifically, and as just one example of infringement, Savant, using the Accused Products, including but not limited to the GE Lighting Website/GE Lighting Support Website, performs a method for producing answers to a question or query, executable in a computer system, comprising the steps of: (a) receiving a search question or query comprising data indicative of a subject to be searched; (b) initiating a key words and/or phrases search of an information repository for data containing terms present in said search question or query, and receiving a first data set comprising data from said information repository containing terms present in said search question or query; (c) retrieving answer phrases from said first data set having a syntactic form matching an expected answer to said search question or query; and (d) providing output in the form of one or more of said answer phrases. *See Exhibit A.*

30. Savant had knowledge of the '876 patent at least as of the date when it was notified of the filing of this action.

31. Savant has also indirectly infringed one or more claims of the '876 patent by inducing others to directly infringe said claims. Savant has induced end-users, including, but not limited to, Savant's employees, partners, contractors, or customers, to directly infringe, either literally or under the doctrine of equivalents, the '876 patent by providing or requiring use of the Accused Products. Savant took active steps, directly or through contractual relationships with others, with the specific intent to cause them to use the Accused Products in a manner that infringes one or more claims of the '876 patent, including, for example, claim 13. Such steps by Savant included, among other things, advising or directing personnel, contractors, or end-users to use the Accused Products in an infringing manner; advertising and promoting the use of the Accused Products in an infringing manner; distributing instructions that guide users to use the Accused Products in an infringing manner; and/or instructional and technical support on its website. Savant is performing

these steps, which constitute induced infringement with the knowledge of the '876 patent and with the knowledge that the induced acts constitute infringement. Savant is aware that the normal and customary use of the Accused Products by others would infringe the '876 patent. Savant's inducement is ongoing. *See Exhibit A.*

32. Savant has also indirectly infringed by contributing to the infringement of the '876 patent. Savant has contributed to the direct infringement of the '876 patent by its customers, personnel, and contractors. The Accused Products have special features that are specially designed to be used in an infringing way and that have no substantial uses other than ones that infringe one or more claims of the '876 patent, including, for example, claim 13. The special features constitute a material part of the invention of one or more of the claims of the '876 patent and are not staple articles of commerce suitable for substantial non-infringing use. Savant's contributory infringement is ongoing. *See Exhibit A.*

33. Furthermore, on information and belief, Savant has a policy or practice of not reviewing the patents of others, including instructing its employees to not review the patents of others, and thus have been willfully blind of IoT Innovations' patent rights.

34. Savant's actions are at least objectively reckless as to the risk of infringing a valid patent and this objective risk was either known or should have been known by Savant.

35. Savant's infringement of the '876 patent has been willful, intentional, deliberate, or in conscious disregard of IoT Innovations' patent rights under the patent.

36. IoT Innovations has been damaged as a result of the infringing conduct by Savant alleged above. Thus, Savant is liable to IoT Innovations in an amount that compensates it for such infringements, which by law cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

37. IoT Innovations has suffered irreparable harm, through its loss of market share and goodwill, for which there is no adequate remedy at law. IoT Innovations has and will continue to suffer this harm by virtue of Savant's infringement of the '876 patent. Savant's actions have interfered with and will interfere with IoT Innovations' ability to license technology. The balance of hardships favors IoT Innovations' ability to commercialize its own ideas and technology. The public interest in allowing IoT Innovations to enforce its right to exclude outweighs other public interests, which supports injunctive relief in this case.

COUNT II: INFRINGEMENT OF U.S. PATENT NO. 7,379,975

38. IoT Innovations repeats and re-alleges the allegations in the Paragraphs above as though fully set forth in their entirety.

39. The USPTO duly issued U.S. Patent No. 7,379,975 (hereinafter, the "'975 patent") on May 27, 2008 after full and fair examination of Application No. 10/825,929 which was filed on April 16, 2004.

40. IoT Innovations owns all substantial rights, interest, and title in and to the '975 patent, including the sole and exclusive right to prosecute this action and enforce it against infringers and to collect damages for all relevant times.

41. IoT Innovations or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of one or more claims of the '975 patent.

42. The claims of the '975 patent are not directed to an abstract idea and are not limited to well-understood, routine, or conventional activity. Rather, the claimed inventions include inventive components and functionalities that improve and simplify the application set up of user applications which share application data.

43. The written description of the '975 patent describes in technical detail each limitation

of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from and improved upon what may have been considered conventional or generic in the art at the time of the invention.

44. Savant has directly infringed and continues to directly infringe one or more claims of the '975 patent by making, using, selling, offering to sell, importing, and/or internal and external testing of the Accused Products.

45. Savant has directly infringed and continues to directly infringe, either literally or under the doctrine of equivalents, at least claim 19 of the '975 patent, as exemplified in the claim chart attached hereto as **Exhibit B**.

46. More specifically, and as just one example of infringement, the Accused Products, including but not limited to the GE Lighting Smart Home (Cync App), comprise a computer program embodied on a computer readable storage medium, for executing a computer process in an electric device, the computer process including steps, the steps including: inputting instructions to execute at least one command from the other electric device over the proximity interface, the at least one command being associated with the second user application, the second user application using application data shared between the electric device and another electric device, at least a portion of the application data being communicated between the first electric device and the second electric device by using a wireless interface; and executing the at least one command on the basis of the instructions, wherein the at least one command is used to replace a series of actions of the user. *See* **Exhibit B**.

47. Savant had knowledge of the '975 patent at least as of the date when it was notified of the filing of this action.

48. Savant has also indirectly infringed one or more claims of the '975 patent by inducing others to directly infringe said claims. Savant has induced end-users, including, but not limited to, Savant's employees, partners, contractors, or customers, to directly infringe, either literally or under the doctrine of equivalents, the '975 patent by providing or requiring use of the Accused Products. Savant took active steps, directly or through contractual relationships with others, with the specific intent to cause them to use the Accused Products in a manner that infringes one or more claims of the '975 patent, including, for example, claim 19. Such steps by Savant included, among other things, advising or directing personnel, contractors, or end-users to use the Accused Products in an infringing manner; advertising and promoting the use of the Accused Products in an infringing manner; distributing instructions that guide users to use the Accused Products in an infringing manner; and/or instructional and technical support on its website. Savant is performing these steps, which constitute induced infringement with the knowledge of the '975 patent and with the knowledge that the induced acts constitute infringement. Savant is aware that the normal and customary use of the Accused Products by others would infringe the '975 patent. Savant's inducement is ongoing. *See Exhibit B.*

49. Savant has also indirectly infringed by contributing to the infringement of the '975 patent. Savant has contributed to the direct infringement of the '975 patent by its customers, personnel, and contractors. The Accused Products have special features that are specially designed to be used in an infringing way and that have no substantial uses other than ones that infringe one or more claims of the '975 patent, including, for example, claim 19. The special features constitute a material part of the invention of one or more of the claims of the '975 patent and are not staple articles of commerce suitable for substantial non-infringing use. Savant's contributory infringement is ongoing. *See Exhibit B.*

50. Furthermore, on information and belief, Savant has a policy or practice of not reviewing the patents of others, including instructing its employees to not review the patents of others, and thus have been willfully blind of IoT Innovations' patent rights.

51. Savant's actions are at least objectively reckless as to the risk of infringing a valid patent and this objective risk was either known or should have been known by Savant.

52. Savant's infringement of the '975 patent has been willful, intentional, deliberate, or in conscious disregard of IoT Innovations' patent rights under the patent.

53. IoT Innovations has been damaged as a result of the infringing conduct by Savant alleged above. Thus, Savant is liable to IoT Innovations in an amount that compensates it for such infringements, which by law cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

54. IoT Innovations has suffered irreparable harm, through its loss of market share and goodwill, for which there is no adequate remedy at law. IoT Innovations has and will continue to suffer this harm by virtue of Savant's infringement of the '975 patent. Savant's actions have interfered with and will interfere with IoT Innovations' ability to license technology. The balance of hardships favors IoT Innovations' ability to commercialize its own ideas and technology. The public interest in allowing IoT Innovations to enforce its right to exclude outweighs other public interests, which supports injunctive relief in this case.

COUNT III: INFRINGEMENT OF U.S. PATENT NO. 7,408,872

55. IoT Innovations repeats and re-alleges the allegations in the Paragraphs above as though fully set forth in their entirety.

56. The USPTO duly issued U.S. Patent No. 7,408,872 (hereinafter, the "'872 patent") on August 5, 2008, after full and fair examination of Application No. 10/483,367, which was filed on July 9, 2001.

57. IoT Innovations owns all substantial rights, interest, and title in and to the '872 patent, including the sole and exclusive right to prosecute this action and enforce the '872 patent against infringers and to collect damages for all relevant times.

58. IoT Innovations or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of one or more claims of the '872 patent.

59. The claims of the '872 patent are not directed to an abstract idea and are not limited to well-understood, routine, or conventional activity. Rather, the claimed inventions include inventive components that improve upon the function and operation of signal modulation.

60. The written description of the '872 patent describes in technical detail each limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from and improved upon what may have been considered conventional or generic in the art at the time of the invention.

61. Savant has directly infringed and continues to directly infringe one or more claims of the '872 patent by making, using, selling, offering to sell, importing, and/or internal and external testing of the Accused Products.

62. Savant has directly infringed and continues to directly infringe, either literally or under the doctrine of equivalents, at least claim 1 of the '872 patent, as exemplified in the claim chart attached hereto as **Exhibit C**.

63. More specifically, and as just one example of infringement, Savant, using the Accused Products, including but not limited to the Cync App, performs a method for modulating signals, wherein signals are to be transmitted by a device in packets via an air interface, the method

comprising: receiving a first plurality of bits and a second plurality of bits, creating a pair of bits by adding a set bit to a first bit of said first plurality of bits, wherein one of said set bit and said first bit of said first plurality of bits has a fixed value, and mapping one of a first set of values to said pair of bits according to a selected modulation scheme and mapping a second set of values to said second plurality of bits according to said selected modulation scheme. *See Exhibit C.*

64. IoT Innovations has been damaged as a result of the infringing conduct by Savant alleged above. Thus, Savant is liable to IoT Innovations in an amount that compensates it for such infringements, which by law cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

COUNT IV: INFRINGEMENT OF U.S. PATENT NO. 7,751,533

65. IoT Innovations repeats and re-alleges the allegations in the Paragraphs above as though fully set forth in their entirety.

66. The USPTO duly issued U.S. Patent No. 7,751,533 (hereinafter, the “’533 patent”) on July 6, 2010, after full and fair examination of Application No. 11/120,169, which was filed on May 2, 2005.

67. IoT Innovations owns all substantial rights, interest, and title in and to the ’533 patent, including the sole and exclusive right to prosecute this action and enforce the ’533 patent against infringers and to collect damages for all relevant times.

68. IoT Innovations or its predecessors-in-interest have satisfied all statutory obligations required to collect pre-filing damages for the full period allowed by law for infringement of one or more claims of the ’533 patent.

69. The claims of the ’533 patent are not directed to an abstract idea and are not limited to well-understood, routine, or conventional activity. Rather, the claimed inventions include inventive components that improve upon the function and operation of electronic messaging, and

more specifically to dynamic message templates and messaging macros that facilitate the creation electronic messages.

70. The written description of the '533 patent describes in technical detail each limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how the non-conventional and non-generic combination of claim limitations is patently distinct from and improved upon what may have been considered conventional or generic in the art at the time of the invention.

71. Savant has directly infringed and continues to directly infringe one or more claims of the '533 patent by making, using, selling, offering to sell, importing, and/or internal and external testing of the Accused Products.

72. Savant has directly infringed and continues to directly infringe, either literally or under the doctrine of equivalents, at least claim 1 of the '533 patent, as exemplified in the claim chart attached hereto as **Exhibit D**.

73. More specifically, and as just one example of infringement, Savant, using the Cync App, performs a method comprising: executing an application at a device, wherein context data including context data items is associated with the executing application; selecting a messaging technology to send a message from the device; selecting a template for the message, wherein the template comprises a dynamic field; selecting a context data item from the context data associated with the executing application; and automatically inserting the selected context data item in the dynamic field to facilitate the creation of a message. *See* **Exhibit D**.

74. Savant had knowledge of the '533 patent at least as of the date when it was notified of the filing of this action.

75. Savant has also indirectly infringed and continues to indirectly infringe one or more

claims of the '533 patent by inducing others to directly infringe said claims. Savant has induced end-users, including, but not limited to, Savant's employees, partners, contractors, or customers, to directly infringe, either literally or under the doctrine of equivalents, the '533 patent by providing or requiring use of the Accused Products. Savant took active steps, directly or through contractual relationships with others, with the specific intent to cause them to use the Accused Products in a manner that infringes one or more claims of the '533 patent, including, for example, claim 1. Such steps by Savant included, among other things, advising or directing personnel, contractors, or end-users to use the Accused Products in an infringing manner; advertising and promoting the use of the Accused Products in an infringing manner; distributing instructions that guide users to use the Accused Products in an infringing manner; and/or instructional and technical support on its website. Savant is performing these steps, which constitute induced infringement with the knowledge of the '533 patent and with the knowledge that the induced acts constitute infringement. Savant is aware that the normal and customary use of the Accused Products by others would infringe the '533 patent. Savant's inducement is ongoing. *See Exhibit D.*

76. Savant has also indirectly infringed by contributing to the infringement of the '533 patent. Savant has contributed to the direct infringement of the '533 patent by its customers, personnel, and contractors. The Accused Products have special features that are specially designed to be used in an infringing way and that have no substantial uses other than ones that infringe one or more claims of the '533 patent, including, for example, claim 1. The special features constitute a material part of the invention of one or more of the claims of the '533 patent and are not staple articles of commerce suitable for substantial non-infringing use. Savant's contributory infringement is ongoing. *See Exhibit D.*

77. Furthermore, on information and belief, Savant has a policy or practice of not

reviewing the patents of others, including instructing its employees to not review the patents of others, and thus have been willfully blind of IoT Innovations' patent rights.

78. Savant's actions are at least objectively reckless as to the risk of infringing a valid patent and this objective risk was either known or should have been known by Savant.

79. Savant's infringement of the '533 patent has been willful, intentional, deliberate, or in conscious disregard of IoT Innovations' patent rights under the '533 patent.

80. IoT Innovations has been damaged as a result of the infringing conduct by Savant alleged above. Thus, Savant is liable to IoT Innovations in an amount that compensates it for such infringements, which by law cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

81. IoT Innovations has suffered irreparable harm, through its loss of market share and goodwill, for which there is no adequate remedy at law. IoT Innovations has and will continue to suffer this harm by virtue of Savant's infringement of the '533 patent. Savant's actions have interfered with and will interfere with IoT Innovations' ability to license technology. The balance of hardships favors IoT Innovations' ability to commercialize its own ideas and technology. The public interest in allowing IoT Innovations to enforce its right to exclude outweighs other public interests, which supports injunctive relief in this case.

JURY DEMAND

82. IoT Innovations hereby requests a trial by jury on all issues so triable by right.

PRAYER FOR RELIEF

83. IoT Innovations requests that the Court find in its favor and against GE, and that the Court grant IoT Innovations the following relief:

- a. Judgment that one or more claims of each of the Asserted Patents has been infringed, either literally or under the doctrine of equivalents, by Savant or others acting in

concert therewith;

- b. A permanent injunction enjoining Savant and its officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in concert therewith from infringement of the '876, '975, and '533 patents; or, in the alternative, an award of a reasonable ongoing royalty for future infringement of said patents by such entities;
- c. Judgment that Savant accounts for and pays to IoT Innovations all damages to and costs incurred by IoT Innovations because of Savant's infringing activities and other conduct complained of herein;
- d. Judgment that Savant's infringements be found willful as to the '876, '975, and '533 patents, and that the Court award treble damages for the period of such willful infringement pursuant to 35 U.S.C. § 284;
- e. Pre-judgment and post-judgment interest on the damages caused by Savant's infringing activities and other conduct complained of herein;
- f. That this Court declare this an exceptional case and award IoT Innovations its reasonable attorneys' fees and costs in accordance with 35 U.S.C. § 285; and
- g. All other and further relief as the Court may deem just and proper under the circumstances.

Dated: August 16, 2024

Respectfully submitted,

/s/ Gregory H. Collins

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* *Pro hac vice* application forthcoming