

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

IOT INNOVATIONS LLC,

Plaintiff,

v.

SNAP ONE, LLC,

Defendant.

Civil Action No. 2:24-cv-00704

**JURY TRIAL DEMANDED**

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff IoT Innovations LLC (“IoT Innovations” or “Plaintiff”) files this Complaint against Snap One, LLC (“Snap One” 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 Snap One’s infringement of the following United States Patents (the “Asserted Patents”) issued by the United States Patent and Trademark Office (“USPTO”), copies of which are available, respectively, at the links below:

	<b>U.S. Patent No.</b>	<b>Title</b>	<b>Available At</b>
A.	7,165,224	Image Browsing And Downloading In Mobile Networks	USPTO.GOV, <a href="https://patentcenter.uspto.gov/applications/10262969">https://patentcenter.uspto.gov/applications/10262969</a> , <a href="https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/7165224">https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/7165224</a> .
B.	7,280,830	Automatic Registration Services Provided Through A Home Relationship Established Between A Device And A Local Area Network	USPTO.GOV, <a href="https://patentcenter.uspto.gov/applications/10859735">https://patentcenter.uspto.gov/applications/10859735</a> , <a href="https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/7280830">https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/7280830</a> .
C.	7,379,464	Personal Digital Gateway	USPTO.GOV, <a href="https://patentcenter.uspto.gov/applications/10306504">https://patentcenter.uspto.gov/applications/10306504</a> , <a href="https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/7379464">https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/7379464</a> .

	U.S. Patent No.	Title	Available At
D.	8,085,796	Establishing A Home Relationship Between A Wireless Device And A Server In A Wireless Network	USPTO.GOV, <a href="https://patentcenter.uspto.gov/applications/12126137">https://patentcenter.uspto.gov/applications/12126137</a> , <a href="https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/8085796">https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/8085796</a>
E.	8,401,571	Mobile Electronic System	USPTO.GOV, <a href="https://patentcenter.uspto.gov/applications/10534012">https://patentcenter.uspto.gov/applications/10534012</a> . <a href="https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/8401571">https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/8401571</a>
F.	8,972,576	Establishing A Home Relationship Between A Wireless Device And A Server In A Wireless Network	USPTO.GOV, <a href="https://patentcenter.uspto.gov/applications/10833381">https://patentcenter.uspto.gov/applications/10833381</a> . <a href="https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/8972576">https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/8972576</a>
G.	RE44742	Dynamic Message Templates And Messaging Macros	USPTO.GOV, <a href="https://patentcenter.uspto.gov/applications/13542351">https://patentcenter.uspto.gov/applications/13542351</a> , <a href="https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/RE44742">https://image-ppubs.uspto.gov/dirsearch-public/print/downloadPdf/RE44742</a>

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 (Travis County).

4. Based upon public information, Snap One is a limited liability company formed under the laws of North Carolina since June 12, 2000.

5. Based upon public information, Snap One has its principal office at 1800 Continental Blvd., Suite 200, Charlotte, North Carolina, 28273.

6. Based upon public information, Snap One may be served through its registered agent, Corporation Service Company, located at 2626 Glenwood Avenue, Suite 550, Raleigh, North Carolina, 27608.

7. Based upon public information, Snap One is registered to do business in the State of

Texas.

8. Based upon public information, Snap One may be served through its registered agent, Corporation Service Company d/b/a CSC-Lawyers Inco, located at 211 East 7th Street, Suite 620, Austin, Texas 78701.

9. Based upon public information, Snap One offers control and security platform and systems under the brand name Control4 Smart Home.<sup>1</sup>

### **JURISDICTION AND VENUE**

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

11. This is an action for infringement of United States patents 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).

12. Venue is proper against Defendant 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).

13. For example, Defendant maintains regular and established places of business at 2720 Country Club Rd., Suite E, Allen, Texas, 75002; 2624 Bill Owens Pkwy, Longview, Texas, 75604; 111 North Central Expressway, Suite 110, Allen, Texas, 75013; 5933 Preston Road, #100, Frisco, Texas, 75034; 5600 Nebraska Furniture Mart Drive, The Colony, Texas, 75056; 1406 Halsey Way, Suite 146, Carrollton, Texas, 75007; 5711 South Broadway, Tyler, Texas 75703; and 3419 Cross

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<sup>1</sup> See <https://www.control4.com/> (last visited August 28, 2024)

Timbers, Suite 101A, Flower Mound, Texas, 75028. *See, e.g.*,<sup>2</sup>.

14. Defendant uses these certified showrooms and certified dealers, along with certified installation and service technicians that reside in this District and work from the identified locations and other locations in this District, to originate sales and service Control4 customers.<sup>3</sup>

15. Defendant enters into various agreements with its certified showrooms, certified dealers, and certified installation and service technicians to originate customers for, install, service, and maintain the accused products and services described below.

16. Defendant has the right to direct and control the certified showrooms, certified dealers, and certified installation and service technicians.

17. Defendant has manifested consent that the certified showrooms, certified dealers, and certified installation and service technicians act on behalf of Defendant.

18. The certified showrooms, certified dealers, and certified installation and service technicians have consented to act on behalf of Defendant to sell, offer for sale, install, service, and maintain the Accused Products.

19. Defendant is subject to this Court's specific and general personal jurisdiction under due process and/or the Texas Long Arm Statute due at least to Defendant'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 Texas and in this District.

20. Specifically, Defendant intends to do and does business in, has committed acts of

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<sup>2</sup> <https://www.control4.com/local/all/> and <https://www.eventbrite.com/e/c4-yourself-event-control4-showroom-visits-tickets-920980546607?aff=oddtcreator> (Last visited August 28, 2024)

<sup>3</sup> *See, e.g.*, <https://www.control4.com/o/go-with-a-pro/> and [https://www.control4.com/dealer\\_locator](https://www.control4.com/dealer_locator) (Last visited August 28, 2024)

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 Texas, including in this District.

21. Defendant owns, operates, advertises, and/or controls the website and domain control4.com, through which it advertises, sells, offers to sell, provides and/or educates customers in this District about their products and services.

22. Defendant's website specifically targets residents of this District.<sup>4</sup>

23. Defendant's business specifically depends on employees, exclusive and non-exclusive contractors, agents, and/or affiliates, *etc.*, being physically present at places in the District, and Defendant affirmatively acted to make permanent operations within this District to service its customers. *See In re: Cray Inc.*, 871 F.3d 1355, 1365–66 (Fed. Cir. 2017) (citing *In re: Cordis Corp.*, 769 F.2d 733, 736 (Fed. Cir. 1985)). Defendant employs and contracts with those employees, exclusive and non-exclusive contractors, agents, and/or affiliates, *etc.*, with the specific requirement that those individuals and entities maintain a presence in the District to service customers within the District. At least through these employees, Defendant does its business in this District through a permanent and continuous presence. *See In re: Cordis Corp.*, 769 F.2d at 737.

24. Defendant ships and causes to be shipped into the District infringing products as well as 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

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<sup>4</sup> *See, e.g.*, <https://www.control4.com/dealer/stereoandvideocenterllc2-75703/tyler-tx/> (Last visited August 28, 2024).

locations within the District.

25. Defendant commits acts of infringement from this District, including, but not limited to, use of the Accused Products and inducement of third parties to use the Accused Instrumentalities.

### **THE ACCUSED PRODUCTS**

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

27. Defendant uses, causes to be used, sells, offers for sale, provides, supplies, or distributes its control and security platform and systems under the brand name Control4 Smart Home, including but not limited to, Touchscreen Controls and Controller Devices, Cameras, Video Doorbells, Controllers, Essential Lightning, Hubs and Automation Controllers, Touch Screens, Control4 App, Wireless Keypads, Dimmers, Switches, Outlets, Amplifiers and Receivers, Remotes, Thermostat, Fan Speed Controller, Locks, Video Doorbells, Cameras, Sensors, Centralized Lighting Panels, Wired Keypads Centralized Lighting Modules, Networking Routers, Networking Switches, Triad Speakers, Control4 app(s), Control4 OS 3 software, and associated server hardware and software (the “Accused Products”).

28. Defendant also instructs its customers, agents, employees, and affiliates regarding how to use the Accused Products for home control and security.

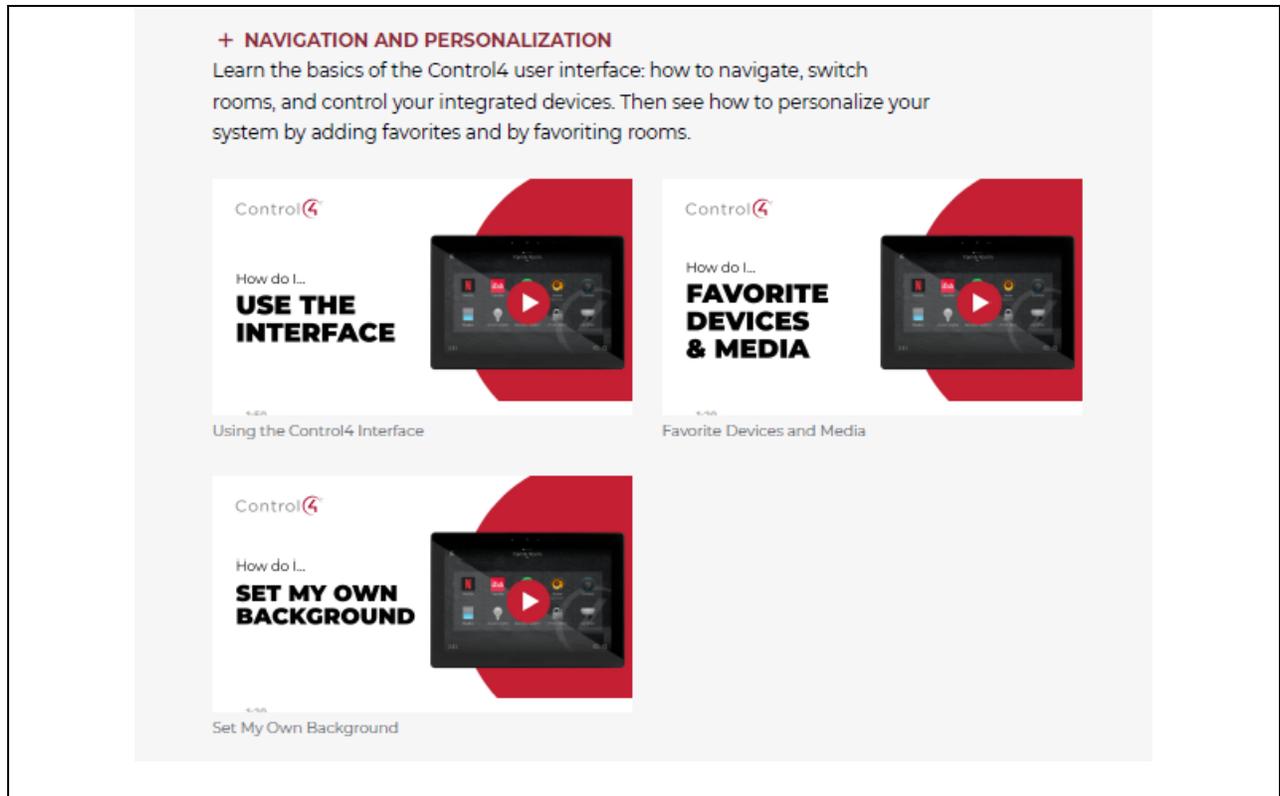


Figure 1: Excerpt from Control4 webpage

Source: <https://www.control4.com/os3/getting-the-most-out-of-os3> (Last visited August 28, 2024)

29. 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. 7,165,224

30. Plaintiff repeats and re-alleges the allegations in the Paragraphs above as though fully set forth in their entirety.

31. The USPTO duly issued U.S. Patent No. 7,165,224 (hereinafter, the "'224 patent") on January 16, 2007, after full and fair examination of Application No. 10/262,969, which was filed on October 3, 2002. *See* '224 patent at p. 1.

32. IoT Innovations owns all substantial rights, interest, and title in and to the '224 patent, including the sole and exclusive right to prosecute this action and enforce the '224 patent against infringers and to collect damages for all relevant times.

33. The claims of the '224 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 image management in a mobile network.

34. The written description of the '224 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.

35. Defendant has directly infringed the claims of the '224 patent by using, providing, supplying, or distributing the Accused Products. As just one example, Defendant has directly infringed and continues to infringe, either literally or under the doctrine of equivalents, claim 1 of the '224 patent, as detailed in the Evidence of Use attached as Exhibit AA. As shown in Exhibit AA, Defendant, through the use and provision of the Accused Products, performs a method of viewing an image on a mobile device, the method comprising the steps of storing in the mobile device a miniaturized version of an image being stored in the mobile device; transferring the image to an external storage device; deleting the image from the mobile device; detecting selection of the miniaturized version of the image; in response to detecting selection of the miniaturized version of the image, sending via a wireless communication network a first message requesting transfer of the image to the mobile device; and receiving a second message via the wireless communication network transferring the image to the mobile device.

36. Since at least the time of receiving the original complaint in this action, Defendant has also indirectly infringed the '224 patent by inducing others to directly infringe the '224 patent.

Defendant has induced end-users, including, but not limited to, Defendant's employees, partners, or contractors, to directly infringe, either literally or under the doctrine of equivalents, the '224 patent by providing or requiring use of the Accused Products. Defendant 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 '224 patent, including, for example, claim 1 of the '224 patent. Such steps by Defendant 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; or distributing instructions that guide users to use the Accused Products in an infringing manner. Defendant is performing these steps, which constitute induced infringement with the knowledge of the '224 patent and with the knowledge that the induced acts constitute infringement. Defendant is aware that the normal and customary use of the Accused Products by others would infringe the '224 patent. Defendant's inducement is ongoing.

37. Defendant has also indirectly infringed by contributing to the infringement of the '224 patent. Defendant has contributed to the direct infringement of the '224 patent by its personnel, contractors, and customers. 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 '224 patent, including, for example, claim 1 of the '224 patent. The special features constitute a material part of the invention of one or more of the claims of the '224 patent and are not staple articles of commerce suitable for substantial non-infringing use. Defendant's contributory infringement is ongoing.

38. Defendant had knowledge of the '224 patent at least as of the date when it was notified of the filing of this action.

39. Furthermore, on information and belief, Defendant 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.

40. Defendant'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 Defendant.

41. Defendant's direct infringement of one or more claims of the '224 patent is, has been, and continues to be willful, intentional, deliberate, or in conscious disregard of IoT Innovations' rights under the patent.

42. 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 '224 patent.

43. IoT Innovations has been damaged as a result of the infringing conduct by Defendant alleged above. Thus, Defendant 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.

44. 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 Defendant's infringement of the '224 patent. Defendant's actions have interfered with and will interfere with Plaintiff's 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. 7,280,830**

45. Plaintiff repeats and re-alleges the allegations in the Paragraphs above as though fully set forth in their entirety.

46. The USPTO duly issued U.S. Patent No. 7,280,830 (hereinafter, the “’830 patent”) on October 9, 2007 after full and fair examination of Application No. 10/859,735 which was filed on June 2, 2004. *See* ’830 patent at p. 1.

47. IoT Innovations owns all substantial rights, interest, and title in and to the ’830 patent, including the sole and exclusive right to prosecute this action and enforce the ’830 patent against infringers and to collect damages for all relevant times.

48. The claims of the ’830 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 automatic registration of a new device through the establishment of a home relationship with a network server.

49. The written description of the ’830 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.

50. Defendant has directly infringed the claims of the ’830 patent by using, providing, supplying, or distributing the Accused Products. As just one example, Defendant has directly infringed and continues to infringe, either literally or under the doctrine of equivalents, claim 1 of the ’830 patent, as detailed in the Evidence of Use attached as Exhibit BB. As shown in Exhibit BB, Defendant, using the Accused Products and their associated hardware and software and

functionalities, performs a method for automatic registration of a new wireless device with a registration server, comprising: establishing a home relationship between the new wireless device and a network server, such that no additional configuration is required by a user of the new device to communicate over a network once the relationship is established, wherein establishing a home relationship includes, determining at the network server, that the wireless device is an owned device, wherein the owned device is previously known to the network server; automatically obtaining registration information for the new device; establishing a connection between a registration server and the network server; and sending the registration information from the network server to the registration server.

51. Since at least the time of receiving the original complaint in this action, Defendant has also indirectly infringed the '830 patent by inducing others to directly infringe the '830 patent. Defendant has induced end-users, including, but not limited to, Defendant's employees, partners, or contractors, to directly infringe, either literally or under the doctrine of equivalents, the '830 patent by providing or requiring use of the Accused Products. Defendant 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 '830 patent, including, for example, claim 1 of the '830 patent. Such steps by Defendant 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; or distributing instructions that guide users to use the Accused Products in an infringing manner. Defendant is performing these steps, which constitute induced infringement with the knowledge of the '830 patent and with the knowledge that the induced acts constitute infringement. Defendant is aware that the normal and customary use of the Accused Products by others would

infringe the '830 patent. Defendant's inducement is ongoing.

52. Since at least the time of receiving the original complaint in this action, Defendant has also indirectly infringed by contributing to the infringement of the '830 patent. Defendant has contributed to the direct infringement of the '830 patent by their personnel, contractors, and customers. 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 '830 patent, including, for example, claim 1 of the '830 patent. The special features constitute a material part of the invention of one or more of the claims of the '830 patent and are not staple articles of commerce suitable for substantial non-infringing use. Defendant's contributory infringement is ongoing.

53. Defendant had knowledge of the '830 patent at least as of the date when they were notified of the filing of the original complaint in this action.

54. Furthermore, on information and belief, Defendant 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.

55. Defendant'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 Defendant.

56. Defendant's direct infringement of one or more claims of the '830 patent is, has been, and continues to be willful, intentional, deliberate, or in conscious disregard of IoT Innovations' rights under the patent.

57. 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 '830 patent.

58. IoT Innovations has been damaged as a result of the infringing conduct by Defendant alleged above. Thus, Defendant 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.

59. 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 Defendant's infringement of the '830 patent. Defendant'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. 7,379,464**

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

61. The USPTO duly issued U.S. Patent No. 7,379,464 (hereinafter, the "'464 patent") on May 27, 2008, after full and fair examination of Application No. 10/306,504 which was filed on November 27, 2002. *See* '464 patent at p. 1.

62. IoT Innovations owns all substantial rights, interest, and title in and to the '464 patent, including the sole and exclusive right to prosecute this action and enforce it against infringers and to collect damages for all relevant times.

63. The claims of the '464 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, operation, and security of communications

devices by sharing of personalized information by providing communications infrastructures to support and capitalize on the different communications devices of the user to provide up-to-date personalized information through a digital gateway.

64. The written description of the '464 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.

65. Defendant has directly infringed the claims of the '464 patent by using, providing, supplying, or distributing the Accused Products. As just one example, Defendant has directly infringed and continues to infringe, either literally or under the doctrine of equivalents, claim 1 of the '464 patent, as detailed in the Evidence of Use attached as Exhibit GG. As shown in Exhibit GG Defendant, using the Accused Products and their associated hardware and software and functionalities, performs a method, comprising selecting a user's communications device from a plurality of communications devices to communicate data between a personal digital gateway and the selected communications device, the data associated with a common user of the personal digital gateway and of the selected communications device; storing profiles for each of the user's communications devices; retrieving a profile associated with the selected communications device; interpreting the data according to a rule-based engine to categorize the data as at least one of (1) data associated with an access agent, (2) data associated with a configuration agent, (3) data associated with a security agent, and (4) data associated with a management agent; processing the data according to an edge side assembler; and communicating the data and the profile to the selected communications device.

66. Since at least the time of receiving the original complaint in this action, Defendant has also indirectly infringed and continues to indirectly infringe one or more claims of the '464 patent by inducing others to directly infringe said claims. Defendant has induced end-users, including, but not limited to, Defendant's employees, partners, or contractors, to directly infringe, either literally or under the doctrine of equivalents, the '464 patent by providing or requiring use of the Accused Products. Defendant has taken 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 '464 patent, including, for example, claim 1. Such steps by Defendant 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; or distributing instructions that guide users to use the Accused Products in an infringing manner. Defendant is performing these steps, which constitute induced infringement with the knowledge of the '464 patent and with the knowledge that the induced acts constitute infringement. Defendant is aware that the normal and customary use of the Accused Products by others would infringe the '464 patent. Defendant's inducement is ongoing. Since at least the time of receiving the original complaint in this action, Defendant has also indirectly infringed and continues to indirectly infringe by contributing to the infringement of the '464 patent. Defendant has contributed to the direct infringement of the '464 patent by its personnel, contractors, and customers. 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 '464 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 '464 patent and are not staple articles of commerce suitable for substantial non-infringing use.

Defendant's contributory infringement is ongoing. Defendant had knowledge of the '464 patent at least as of the date when they were notified of the filing of the original complaint in this action.

67. Furthermore, on information and belief, Defendant 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.

68. Defendant'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 Defendant.

69. 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 '464 patent.

70. IoT Innovations has been damaged as a result of the infringing conduct by Defendant alleged above. Thus, Defendant 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.

71. 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 Defendant's infringement of the '464 patent. Defendant'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 IV: INFRINGEMENT OF U.S. PATENT NO. 8,085,796**

72. Plaintiff repeats and re-alleges the allegations in the Paragraphs above as though fully

set forth in their entirety.

73. The USPTO duly issued U.S. Patent No. 8,085,796 (hereinafter, the “’796 patent”) on December 27, 2011 after full and fair examination of Application No. 12/126,137 which was filed on May 23, 2008. *See* ’796 patent at p. 1.

74. IoT Innovations owns all substantial rights, interest, and title in and to the ’796 patent, including the sole and exclusive right to prosecute this action and enforce said patent against infringers and to collect damages for all relevant times.

75. 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 ’796 patent.

76. The written description of the ’796 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.

77. The claims of the ’796 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, operation, and security of communications devices by sharing of personalized information by providing communications infrastructures to support and capitalize on the different communications devices of the user to provide up-to-date personalized information through a digital gateway.

78. Defendant has directly infringed the claims of the ’796 patent by using, providing, supplying, or distributing the Accused Products.

79. As just one example, Defendant has directly infringed and continues to infringe, either literally or under the doctrine of equivalents, claim 1 of the '796 patent, as detailed in the Evidence of Use attached as Exhibit FF. As shown in Exhibit FF Defendant, using the Accused Products and their associated hardware and software and functionalities, performs a method for selecting a selected communications device from a plurality of communications devices associated with a user, receiving data for communication between a personal digital gateway and the selected communications device, storing profiles for each of the plurality of communications devices, retrieving a profile associated with the selected communications device, interpreting the data for communication according to a rule-based engine, processing the data for communication according to an edge side assembler, and sending the data for communication and the profile from the personal digital gateway to the selected communications device.

80. IoT Innovations has been damaged as a result of the infringing conduct by Defendant alleged above. Thus, Defendant 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 Defendant's infringement of the '796 patent. Defendant'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.

82. Defendant had knowledge of the '796 patent at least as of the date when it was notified

of the filing of this action.

83. Upon information and belief, Defendant has also indirectly infringed one or more claims of the '796 patent by inducing others to directly infringe said claims.

84. Defendant has induced end-users, including, but not limited to, Defendant's customers, employees, partners, or contractors, to directly infringe, either literally or under the doctrine of equivalents, the '796 patent by providing or requiring use of the Accused Products.

85. Defendant 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 '796 patent, including, for example, claim 1 of the '796 patent.

86. Such steps by Defendant 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 providing ongoing instructional and technical support to customers on how to use the Accused Products in an infringing manner.

87. Defendant is performing these steps, which constitute induced infringement with the knowledge of the '796 patent and with the knowledge that the induced acts constitute infringement. Defendant is aware that the normal and customary use of the Accused Products by others would infringe the '796 patent.

88. Defendant's inducement is ongoing.

89. Upon information and belief, Defendant has also indirectly infringed by contributing to the infringement of the '796 patent.

90. Defendant has contributed to the direct infringement of the '796 patent by their

personnel, contractors, and customers.

91. 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 '796 patent, including, for example, claim 1 of the '796 patent. The special features constitute a material part of the invention of one or more of the claims of the '796 patent and are not staple articles of commerce suitable for substantial non-infringing use. In fact, as shown in Exhibit FF, the primary purpose of the Accused Products is to act and operate in a way that infringes the '796 patent.

92. Defendant's contributory infringement is ongoing.

93. Furthermore, on information and belief, Defendant 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.

94. Defendant'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 Defendant.

95. Defendant's direct infringement of one or more claims of the '796 patent is, has been, and continues to be willful, intentional, deliberate, or in conscious disregard of IoT Innovations' rights under the patent.

96.

#### **COUNT V: INFRINGEMENT OF U.S. PATENT NO. 8,401,571**

97. Plaintiff repeats and re-alleges the allegations in the Paragraphs above as though fully set forth in their entirety.

98. The USPTO duly issued U.S. Patent No. 8,401,571 (hereinafter, the "'571 patent") on March 19, 2013 after full and fair examination of Application No. 10/534,012, which was filed on

May 5, 2005, which claims priority to a PCT application, filed November 5, 2002. *See* '571 patent at 1. A Certificate of Correction was issued on March 11, 2014. *See id.* at 11.

99. IoT Innovations owns all substantial rights, interest, and title in and to the '571 patent, including the sole and exclusive right to prosecute this action and enforce said patent against infringers and to collect damages for all relevant times.

100. 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 '571 patent.

101. The written description of the '571 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.

102. The claims of the '571 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 operation of previous devices and systems by using a posture of an apparatus to select a mode of presentation.

103. Defendant has directly infringed the claims of the '571 patent by using, providing, supplying, or distributing the Accused Products.

104. As just one example, Defendant has directly infringed and continues to infringe, either literally or under the doctrine of equivalents, claim 1 of the '571 patent, as detailed in the Evidence of Use attached as Exhibit CC. As shown in Exhibit CC Defendant, using the Accused Products and their associated hardware and software and functionalities, sells, offers for sale, imports,

and/or uses the Accused Products, which comprise an apparatus with at least one processing component configured to process data indicative of the current posture of said apparatus for enabling a posture related presentation of information to a user *via* an output component, said processing including selecting one of at least two different modes of presentation depending on said current posture of said apparatus.

105. IoT Innovations has been damaged as a result of the infringing conduct by Defendant alleged above. Thus, Defendant 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.

106. 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 Defendant's infringement of the '571 patent. Defendant'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.

107. Defendant had knowledge of the '571 patent at least as of the date when it was notified of the filing of this action.

108. Upon information and belief, Defendant has also indirectly infringed one or more claims of the '571 patent by inducing others to directly infringe said claims.

109. Defendant has induced end-users, including, but not limited to, Defendant's employees, partners, or contractors, to directly infringe, either literally or under the doctrine of equivalents, the '571 patent by providing or requiring use of the Accused Products.

110. Defendant 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 '571 patent, including, for example, claim 1 of the '571 patent.

111. Such steps by Defendant 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; or distributing instructions that guide users to use the Accused Products in an infringing manner; and/or providing ongoing instructional and technical support to customers on its website, app, or written documentation on how to use the Accused Products in an infringing manner.

112. Defendant is performing these steps, which constitute induced infringement with the knowledge of the '571 patent and with the knowledge that the induced acts constitute infringement. Defendant is aware that the normal and customary use of the Accused Products by others would infringe the '571 patent.

113. Defendant's inducement is ongoing.

114. Upon information and belief, Defendant has also indirectly infringed by contributing to the infringement of the '571 patent.

115. Defendant has contributed to the direct infringement of the '571 patent by their personnel, contractors, and customers.

116. 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 '571 patent, including, for example, claim 1 of the '571 patent. The special features constitute a material part of the invention of one or more of the claims of the '571 patent and are not staple articles of commerce suitable for substantial non-infringing use. In fact, as shown in

Exhibit CC, the primary purpose of the Accused Products is to act and operate in a way that infringes the '571 patent.

117. Defendant's contributory infringement is ongoing. Furthermore, on information and belief, Defendant 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.

118. Defendant'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 Defendant.

119. Defendant's direct infringement of one or more claims of the '571 patent is, has been, and continues to be willful, intentional, deliberate, or in conscious disregard of IoT Innovations' rights under the patent.

#### **COUNT VI: INFRINGEMENT OF U.S. PATENT NO. 8,972,576**

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

121. The USPTO duly issued U.S. Patent No. 8,972,576 (hereinafter, the "'576 patent") on March 3, 2015 after full and fair examination of Application No. 10/833,381 which was filed on April 28, 2004. *See* '576 patent at p. 1.

122. IoT Innovations owns all substantial rights, interest, and title in and to the '576 patent, including the sole and exclusive right to prosecute this action and enforce said patent against infringers and to collect damages for all relevant times.

123. 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 '576 patent.

124. The written description of the '576 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.

125. The claims of the '576 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 upon the function, operation, and security communications devices and networks by employing an improved network protocol that enables the establishment of a known, persistent relationship between a mobile wireless device and a wireless network that allows the device to communicate over the network absent further configuration once the relationship has been established.

126. Defendant has directly infringed the claims of the '576 patent by using, providing, supplying, or distributing the Accused Products.

127. As just one example, Defendant has directly infringed and continues to infringe, either literally or under the doctrine of equivalents, claim 17 of the '576 patent, as detailed in the Evidence of Use attached as Exhibit DD. As shown in Exhibit DD, the Accused Products and their associated hardware and software and functionalities include a network configuration comprising a mobile device; and a wireless home network to communicate with the mobile device, the home network comprising at least one server coupled to at least one access point through a network interface, wherein the server: (a) detects the presence of the mobile device; (b) in response to determining that the mobile device is unrecognized, automatically notifies a network administrator and requests authorization from the network administrator to establish a relationship

between the network and the mobile device; (c) in response to receiving the authorization from the network administrator to establish the relationship, requests authorization from a mobile device to establish the relationship; and (d) establishes the relationship between the mobile device and the network in response to receiving the authorization from the mobile device, such that no additional configuration is required by the mobile device to communicate over the network once the relationship has been established.

128. IoT Innovations has been damaged as a result of the infringing conduct by Defendant alleged above. Thus, Defendant 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.

129. 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 Defendant's infringement of the '576 patent. Defendant'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.

130. Defendant had knowledge of the '576 patent at least as of the date when it was notified of the filing of this action.

131. Defendant has also indirectly infringed one or more claims of the '576 patent by inducing others to directly infringe said claims.

132. Defendant has induced end-users, including, but not limited to, Defendant's customers, employees, partners, or contractors, to directly infringe, either literally or under the

doctrine of equivalents, the '576 patent by providing or requiring use of the Accused Products.

133. Defendant 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 '576 patent, including, for example, claim 17.

134. Such steps by Defendant 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 providing ongoing instructional and technical support to customers on how to use the Accused Products in an infringing manner.

135. Defendant is performing these steps, which constitute induced infringement with the knowledge of the '576 patent and with the knowledge that the induced acts constitute infringement.

136. Defendant is aware that the normal and customary use of the Accused Products by others would infringe the '576 patent.

137. Defendant's inducement is ongoing.

138. Defendant has also indirectly infringed by contributing to the infringement of the '576 patent.

139. Defendant has contributed to the direct infringement of the '576 patent by their personnel, contractors, and customers.

140. 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 '576 patent, including, for example, claim 17. The special features constitute a material part of the invention of one or more of the claims of the '576 patent and are not staple articles of

commerce suitable for substantial non-infringing use. In fact, as shown in Exhibit DD, the primary purpose of the Accused Products is to act and operate in a way that infringes the '576 patent.

141. Defendant's contributory infringement is ongoing.

142. Furthermore, on information and belief, Defendant 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.

143. Defendant'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 Defendant.

144. Defendant's direct infringement of one or more claims of the '576 patent is, has been, and continues to be willful, intentional, deliberate, or in conscious disregard of IoT Innovations' rights under the patent.

#### **COUNT VII: INFRINGEMENT OF U.S. PATENT NO. RE44,742**

145. Plaintiff repeats and re-alleges the allegations in the Paragraphs above as though fully set forth in their entirety.

146. The USPTO duly issued U.S. Patent No. RE44,742 (hereinafter, the "'742 patent'") on February 4, 2014 after full and fair examination of Application No. 13/542,351 which was filed on July 5, 2012. *See* '742 patent at 1. The '724 patent is a reissue of U.S. Patent No. 7,751,533. *See id.* at 12.

147. IoT Innovations owns all substantial rights, interest, and title in and to the '742 patent, including the sole and exclusive right to prosecute this action and enforce said patent against infringers and to collect damages for all relevant times.

148. 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 '742 patent.

149. The written description of the '742 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.

150. The claims of the '742 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 preexisting template-based messaging systems.

151. Defendant has directly infringed the claims of the '742 patent by using, providing, supplying, or distributing the Accused Products.

152. As just one example, Defendant has directly infringed and continues to infringe, either literally or under the doctrine of equivalents, claim 22 of the '742 patent, as detailed in the Evidence of Use attached as Exhibit EE. As shown in Exhibit EE Defendant, using the Accused Products and their associated hardware and software and functionalities, performs a method comprising determining, by a processing device, a message to be generated from a message template; automatically populating, by the processing device, a dynamic field of the message template with message context data in response to the determination; and sending, by the processing device, the message having the message context data in the dynamic field of the message template to a remote device.

153. IoT Innovations has been damaged as a result of the infringing conduct by Defendant alleged above. Thus, Defendant 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.

154. 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 Defendant's infringement of the '742 patent. Defendant'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.

155. Defendant had knowledge of the '742 patent at least as of the date when it was notified of the filing of this action.

156. Upon information and belief, Defendant has also indirectly infringed one or more claims of the '742 patent by inducing others to directly infringe said claims.

157. Defendant has induced end-users, including, but not limited to, Defendant's employees, partners, or contractors, to directly infringe, either literally or under the doctrine of equivalents, the '742 patent by providing or requiring use of the Accused Products.

158. Defendant 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 '742 patent, including, for example, claim 22 of the '742 patent.

159. Such steps by Defendant 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; or distributing instructions that guide users to use the Accused Products in an infringing manner; and/or providing

ongoing instructional and technical support to customers on how to use the Accused Products in an infringing manner.

160. Defendant is performing these steps, which constitute induced infringement with the knowledge of the '742 patent and with the knowledge that the induced acts constitute infringement.

161. Defendant is aware that the normal and customary use of the Accused Products by others would infringe the '742 patent.

162. Defendant's inducement is ongoing.

163. Upon information and belief, Defendant has also indirectly infringed by contributing to the infringement of the '742 patent.

164. Defendant has contributed to the direct infringement of the '742 patent by their personnel, contractors, and customers.

165. 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 '742 patent, including, for example, claim 22 of the '742 patent. The special features constitute a material part of the invention of one or more of the claims of the '742 patent and are not staple articles of commerce suitable for substantial non-infringing use. In fact, as shown in Exhibit EE, the primary purpose of the Accused Products is to act and operate in a way that infringes the '742 patent.

166. Defendant's contributory infringement is ongoing.

167. Furthermore, on information and belief, Defendant 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.

168. Defendant'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 Defendant.

169. Defendant's direct infringement of one or more claims of the '742 patent is, has been, and continues to be willful, intentional, deliberate, or in conscious disregard of IoT Innovations' rights under the patent.

### **JURY DEMAND**

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

### **PRAYER FOR RELIEF**

171. IoT Innovations requests that the Court find in its favor and against Defendant, 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 Defendant or others acting in concert therewith;
- b. A permanent injunction enjoining Defendant and its officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in concert therewith from infringement of the Asserted Patents; or, in the alternative, an award of a reasonable ongoing royalty for future infringement of said patents by such entities;
- c. Judgment that Defendant accounts for and pays to IoT Innovations all damages to and costs incurred by IoT Innovations because of Defendant's infringing activities and other conduct complained of herein;
- d. Judgment that Defendant's infringements be found willful as to the Asserted 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 Defendant'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 28, 2024

Respectfully submitted,

By: /s/ C. Matthew Rozier

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**Exhibits**

- A. Exemplary Claim Chart for U.S. Patent No. 7,165,224
- B. Exemplary Claim Chart for U.S. Patent No. 7,280,830
- C. Exemplary Claim Chart for U.S. Patent No. 7,379,464
- D. Exemplary Claim Chart for U.S. Patent No. 8,085,796
- E. Exemplary Claim Chart for U.S. Patent No. 8,401,571
- F. Exemplary Claim Chart for U.S. Patent No. 8,972,576
- G. Exemplary Claim Chart for U.S. Patent No. RE44742

**Attachments**

- Civil Cover Sheet
- Proposed Summons