

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

VB Assets, LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. _____
)	
Apple, Inc.,)	
)	JURY TRIAL DEMANDED
Defendants.)	

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff VB Assets, LLC (“Plaintiff” or “VoiceBox”) brings this Complaint against defendant Apple Inc. (“Defendant” or “Apple”) and alleges, on personal knowledge as to its own actions and on information and belief as to the actions of others, as follows:

NATURE OF THE ACTION

1. VoiceBox, through its predecessor companies VoiceBox Technologies Corporation and VoiceBox Technologies, Inc. (collectively “VoiceBox Technologies”), pioneered voice-based natural language understanding and artificial intelligence technology. In recognition of their many innovations, the U.S. Patent & Trademark Office awarded and issued the VoiceBox Patents, which include United States Patent Nos. 8,073,681 (“the ’681 patent”); 8,515,765 (“the ’765 patent”); 10,297,249 (“the ’249 patent”); 10,510,341 (“the ’341 patent”); 7,818,176 (“the ’176 patent”); 8,886,536 (“the ’536 Patent”); and 9,269,097 (“the ’097 patent”). The innovations in the VoiceBox Patents are fundamental to the development of voice assistants.

2. Apple began offering its infringing Siri Products¹ in or around 2011. But Apple, on information and belief, felt “naked” in its patent protection for the core technology powering Siri. On information and belief, Apple recognized the importance of the VoiceBox Patents by making multiple offers to buy or license the VoiceBox Patents. But Apple never ultimately secured rights to the patents-in-suit and instead decided to continue to use the patents-in-suit without the right to do so, thereby willfully infringing the patent-in-suit.

3. VoiceBox has brought this case to hold Apple accountable for its willful infringement of VoiceBox’s patent rights. VoiceBox seeks all available relief under the patent

¹ “Siri Products” collectively refers to Apple’s Siri voice assistant and Apple Intelligence Siri enhancements, as well as offerings that include Siri, including at least: the iOS, iPadOS, watchOS, macOS, tvOS, audioOS, and visionOS operating systems; the iPhone 4s and later iPhone models; 4th generation iPad and later models; the AirPods 2, 3, and 4 (both models), all generations of AirPods Pro, and AirPods Max; Beats headphones with the H1 chip or later; Macs with an M1 or later processor; all Apple Watch products; HomePod (1st gen and 2d gen), HomePod Mini; Apple TV 4K (1st generation and later), Apple TV HD, and the Siri Remote; Apple CarPlay on all iPhone models that are compatible with iOS 18 or later; Apple Vision Pro; as well as the cloud infrastructure that implements Siri.

laws of the United States, 35 U.S.C. § 100 et. Seq., including monetary damages for Apple's infringement, enhanced damages for willful infringement, and VoiceBox's attorneys' fees.

THE PARTIES

4. VB Assets, LLC is a limited liability company organized under the laws of Delaware and has its principal place of business at 1229A 120th Avenue NE, Bellevue, WA 98005. VB Assets, LLC is the owner of the entire right, title, and interest of the VoiceBox Patents, including the right to sue for and collect past, present, and future damages and to seek and obtain injunctive or any other relief for infringement.

5. On information and belief, Apple Inc. is a corporation incorporated under the laws of California and has its principal place of business at One Apple Park Way, Cupertino, CA 95014. On information and belief, Apple Inc. is responsible for making, using, offering for sale, and/or importing Siri Products. Apple is a publicly traded company that may be served through its registered agent for service, The Corporation Trust Company, 1209 Orange Street, Wilmington, Delaware 19801.

JURISDICTION AND VENUE

6. This is an action for patent infringement arising under the Patent Laws of the United States, 35 U.S.C. §§ 100, et seq., including 35 U.S.C. § 271.

7. This Court has original jurisdiction over the subject matter of this action under 28 U.S.C. §§ 1331 and 1338(a) because the action arises under the patent laws of the United States.

8. This Court has general and specific personal jurisdiction over Apple based on one or more of the following: Apple is present in this judicial district; Apple has availed itself of the rights and benefits of the laws of Delaware; and Apple has derived substantial revenue from Siri Products in Delaware, and Apple has systematic and continuous business contacts with Delaware.

Further, Apple designs Siri Products, which are advertised, offered for sale, sold, and used in Delaware.

9. Apple has employees and operates a retail store at 125 Christiana Mall, Newark, DE 19702.² Apple's retail store at 125 Christiana Mall offers for sale and sells products and services that infringe the VoiceBox Patents.

10. In addition, Apple, directly and through subsidiaries and intermediaries (including distributors, retailers, franchisees, and others), has regularly committed and continues to commit acts of patent infringement in this District, by, among other things, making, using, offering for sale, selling, and/or importing Siri Products.³

11. Venue is proper in this district under 28 U.S.C. § 1400(b) and 28 U.S.C. § 1391(b)(2). For purposes of § 1400(b), Apple has committed acts of infringement and has a regular and established place of business in Delaware. For purposes of § 1391(b)(2), Apple has committed substantial infringement of the VoiceBox Patents in Delaware.

BACKGROUND

A. VoiceBox Technologies Invents Groundbreaking Voice Technology

12. In 2001, three brothers—Mike, Rich, and Bob Kennewick—founded VoiceBox Technologies to bring voice-based natural language understanding (“NLU”) to a wide array of computer applications. They recognized that the typical computer speech-recognition systems forced human operators to adhere to a limited number of rigid speech prompts. These rigid prompts limited how systems were used and inhibited the widespread adoption of speech-

² <https://www.apple.com/retail/christianamall/>;
<https://www.christianamall.com/en/directory/apple-8718.html>.

³ <https://locate.apple.com/sales/> (enter Wilmington, DE as the location, select a product, e.g. iPhone, and click “Go” to find “99 iPhone sales locations near Wilmington, DE.”)

recognition systems. The brothers believed that VoiceBox Technologies could become the first company to enable people to naturally and effectively interact with computer speech systems.

13. From its inception, VoiceBox Technologies engaged in intense research efforts to develop its NLU technology. As part of these efforts, VoiceBox Technologies achieved a significant milestone when it developed an early prototype called “Cybermind.” As demonstrated on the King5 news, Cybermind was a voice-controlled speaker that could provide weather, recipes, sports scores, calendar updates, or play a song.⁴



Figure 1: Cybermind Prototype

14. VoiceBox Technologies’ groundbreaking work did not go unrecognized. After learning about VoiceBox Technologies’ technology, Toyota hired it to build a sophisticated NLU speech interface for its Lexus automobiles. VoiceBox Technologies built the voice and NLU capability for Toyota’s award-winning Entune multimedia system.

15. As part of the development effort of an NLU interface for Lexus, VoiceBox Technologies demonstrated a personal assistant called “Alexus” that showcased the power of its Conversational Voice technology.

⁴ <https://www.youtube.com/watch?v=DDcRyPnvWhw>.



Figure 2: “Alexus Demonstration

16. Throughout its research and development efforts, VoiceBox Technologies realized that its technology could be deployed in a wide range of applications from connected home to mobile personal assistants.



Figure 3: Connected Home



Figure 4: Mobile

17. By January 2012, VoiceBox Technologies was a leader in NLU and conversational voice technology. Leading companies throughout the world, including Toyota, Lexus, TomTom, Pioneer, Chrysler, Dodge, and Magellan used VoiceBox Technologies’ award-winning and patented contextual speech technology. VoiceBox Technologies had software applications that

ran on smart speakers, in-car systems, smartphones, smart TVs, computers, tablets, e-readers, and personal navigation devices.

18. In 2013, the Institute of Electrical and Electronics Engineers (IEEE) ranked VoiceBox Technologies number 13 in patent power for the computer software industry.⁵ VoiceBox Technologies had become a leader in conversational Artificial Intelligence (“AI”), including Voice Recognition, NLU, and AI services.⁶

19. As illustrated in the following company photograph, VoiceBox Technologies had invested in a large team of engineers, scientists, linguists, and other personnel—and was, at that time, optimistic about its technology and its future.



B. Apple Willfully Infringes the VoiceBox Patents

20. Apple released its first Siri Products in or around October 2011. But, on information and belief, despite releasing these products, Apple felt “naked” as to its patent protection in the NLU field around this time. In the years that followed, Apple tried to buy or license the VoiceBox Patents: beginning in or around July 2012 and continuing into or until around

⁵ See <https://web.archive.org/web/20210925234339/https://spectrum.ieee.org/patent-power-2013>.

⁶ See <https://www.databricks.com/company/newsroom/press-releases/voicebox-accelerates-voice-recognition-innovations-with-databricks-unified-analytics-platform>.

September of 2014, Apple made numerous—and increasing—eight-figure offers to buy or license a collection of patents that included the VoiceBox Patents.

21. In or around March 2012, Apple hired a patent broker to contact VoiceBox Technologies and make a seven-figure offer to buy patents. Not long after that, in July 2012, Apple’s broker increased the offer to eight-figures. VoiceBox Technologies was reluctant to include the VoiceBox Patents in the sale because of how valuable they were and are. On information and belief, Apple considered the VoiceBox Patents to be important deal drivers justifying the eight-figure price. Nevertheless, on information and belief, Apple decided in August 2012 not to move forward with a deal because Apple believed the negotiations were not progressing quickly enough.

22. But just the next month, in September 2012, on information and belief, Apple instructed its patent broker to revive discussions with VoiceBox Technologies. Around this time, VoiceBox Technologies had received an offer from another prominent technology company to buy the VoiceBox Patents.

23. Apple continued to express interest through June 2013. Around this time, Apple began evaluating a business partnership with VoiceBox Technologies, and Apple had its mergers and acquisitions team (M&A Team) involved.

24. The very next month, July 2013, Apple began dealing with VoiceBox Technologies directly, instead of through Apple’s broker. On information and belief, Apple wanted VoiceBox Technologies to meet the Siri team at Apple. At least as of this time, VoiceBox Technologies recognized how crucial the VoiceBox Patents were to Apple and other companies that wanted to compete in the voice assistant space. For example, by August 2013, VoiceBox Technologies promoted its “unique patent portfolio that can both improve Siri’s defensive and offensive position

as speech becomes i) more contextual, ii) as application domains such as navigation become more comprehensive in terms of the use of NL speech and [iii)] as voice-commerce becomes a common feature of Personal Assistants.”

25. By September of 2013, after Apple had expressed interest in a potential acquisition, VoiceBox Technologies offered its mobile business to Apple for \$200 million. In response, Apple offered high eight-figures for the company, but VoiceBox Technologies did not believe this was a fair price. Instead of an outright acquisition, VoiceBox Technologies asked Apple to increase its offer for the VoiceBox Patents.

26. By September of 2014, Apple did increase its offer and even sent a signed patent purchase agreement to VoiceBox Technologies. But the offer still did not adequately capture the value of the VoiceBox Patents. Therefore VoiceBox Technologies retained the VoiceBox Patents while Apple, on information and belief, decided to keep selling its infringing Siri Products without securing the right to use the VoiceBox Patents.

C. The VoiceBox Patents

27. The inventions contained in the VoiceBox Patents in this case relate to groundbreaking improvements to voice recognition and NLU and have particular application in consumer electronics such as smart phones, tablets, and other smart devices.

28. The '681 patent, entitled “SYSTEM AND METHOD FOR A COOPERATIVE CONVERSATIONAL VOICE USER INTERFACE,” was duly and legally issued on December 6, 2011, and names Larry Baldwin, Tom Freeman, Michael Tjalve, Blane Ebersold, and Chris Weider as the inventors. A true and correct copy of the '681 patent is attached hereto as **Exhibit A**.

29. The '681 patent claims, among other things, a system for providing a cooperative conversational voice user interface, comprising: a voice input device configured to receive an utterance during a current conversation with a user, wherein the utterance includes one or more words that have different meanings in different contexts; and a conversational speech engine, wherein the conversational speech engine includes one or more processors configured to: accumulate short-term shared knowledge about the current conversation, wherein the short-term shared knowledge includes knowledge about the utterance received during the current conversation; accumulate long-term shared knowledge about the user, wherein the long-term shared knowledge includes knowledge about one or more past conversations with the user; identify a context associated with the utterance from the short-term shared knowledge and the long-term shared knowledge; establish an intended meaning for the utterance within the identified context to disambiguate an intent that the user had in speaking the one or more words that have the different meanings in the different contexts; and generate a grammatically or syntactically adapted response to the utterance based on the intended meaning established within the identified context (claim 25).

30. VoiceBox is the assignee of the entire right, title, and interest in the '681 patent, including the right to sue for and collect past, present, and future damages and to seek and obtain injunctive or any other relief for infringement.

31. The '765 patent, entitled "SYSTEM AND METHOD FOR A COOPERATIVE CONVERSATIONAL VOICE USER INTERFACE," was duly and legally issued on August 20, 2013, and names Larry Baldwin, Tom Freeman, Michael Tjalve, Blane Ebersold, and Chris Weider as the inventors. A true and correct copy of the '765 patent is attached hereto as **Exhibit B**.

32. The '765 patent claims, among other things, a system for providing a voice interface, comprising: a speech engine configured to receive a natural language utterance from a voice-enabled device, the natural language utterance corresponding to a conversation type, wherein the speech engine includes a processor configured to: determine the conversation type corresponding to the natural language utterance based on whether a user that spoke the natural language utterance has a leader role in an interaction with the voice-enabled device or has a supporter role in the interaction with the voice enabled device; a response builder configured to generate a response to the natural language utterance with a format based on the conversation type, wherein the format is adapted to limit the user's future input to interjecting queries or requests for clarification if the user has the supporter role (claim 10).

33. VoiceBox is the assignee of the entire right, title, and interest in the '765 patent, including the right to sue for and collect past, present, and future damages and to seek and obtain injunctive or any other relief for infringement.

34. The '249 patent, entitled "SYSTEM AND METHOD FOR A COOPERATIVE CONVERSATIONAL VOICE USER INTERFACE," was duly and legally issued on May 21, 2019, and names Larry Baldwin, Tom Freeman, Michael Tjalve, Blane Ebersold, and Chris Weider as the inventors. A true and correct copy of the '765 patent is attached hereto as **Exhibit C**.

35. The '249 patent claims, among other things, a computer-implemented method of facilitating natural language system responses using short-term knowledge generated based on one or more prior multi-modal device interactions, the method being implemented by a computer system that includes one or more physical processors executing one or more computer program instructions which, when executed, perform the method, the method comprising: receiving, by the computer system during a first conversation, a first voice input via a first input device, the first

voice input comprising a first natural language utterance; receiving, by the computer system, a second voice input comprising the first natural language utterance via a second input device; comparing, by the computer system, the first voice input with the second voice input; filtering, by the computer system, sound from the first voice input and the second voice input based on the comparison; obtaining, by the computer system during the first conversation, a user interface state related to one or more non-voice inputs associated with the first voice input, the one or more non-voice inputs comprising at least a first non-voice input; generating, by the computer system, the short-term knowledge based on at least the first voice input and the first non-voice input; determining, by the computer system, based on the short-term knowledge, a first context for the first natural language utterance; determining, by the computer system, based on the first context, an interpretation of the first natural language utterance; and generating, by the computer system, based on the interpretation of the first natural language utterance, a first response to the first natural language utterance (claim 1).

36. VoiceBox is the assignee of the entire right, title, and interest in the '249 patent, including the right to sue for and collect past, present, and future damages and to seek and obtain injunctive or any other relief for infringement.

37. The '341 patent, entitled "SYSTEM AND METHOD FOR A COOPERATIVE CONVERSATIONAL VOICE USER INTERFACE," was duly and legally issued on December 17, 2019, and names Larry Baldwin, Tom Freeman, Michael Tjalve, Blane Ebersold, and Chris Weider as the inventors. A true and correct copy of the '341 patent is attached hereto as **Exhibit D**.

38. The '341 patent claims, among other things, a system for facilitating natural language system responses utilizing accumulated short-term and long-term knowledge, the system

comprising: one or more physical processors programmed with one or more computer program instructions which, when executed, configure the one or more physical processors to: accumulate short-term knowledge based on one or more natural language utterances received during a predetermined time period; expire one or more items of short-term knowledge that are based on one or more natural language utterances received prior to the predetermined time period; accumulate long-term knowledge based on one or more natural language utterances received prior to the predetermined time period, wherein the long-term knowledge includes at least one of the one or more expired items of short-term knowledge; receive a first natural language utterance via an input device; determine a first context for the first natural language utterance based on the short-term knowledge and the long-term knowledge; determine an interpretation of the first natural language utterance based on the first context; and generate a first response to the first natural language utterance based on the interpretation (claim 10).

39. VoiceBox is the assignee of the entire right, title, and interest in the '341 patent, including the right to sue for and collect past, present, and future damages and to seek and obtain injunctive or any other relief for infringement.

40. The '176 patent, entitled "SYSTEM AND METHOD FOR SELECTING AND PRESENTING ADVERTISEMENTS BASED ON NATURAL LANGUAGE PROCESSING OF VOICE-BASED INPUT," was duly and legally issued on October 19, 2010, and names Tom Freeman and Mike Kennewick as the inventors. A true and correct copy of the '176 patent is attached hereto as **Exhibit E**.

41. The '176 patent claims, among other things, a system for selecting and presenting advertisements in response to processing natural language utterances, comprising: an input device that receives a natural language utterance containing at least one request at an input device; a

speech recognition engine coupled to the input device, wherein the speech recognition engine recognizes one or more words or phrases in the natural language utterance, wherein to recognize the words or phrases in the natural language utterance, the speech recognition engine is configured to: map a stream of phonemes contained in the natural language utterance to one or more syllables that are phonemically represented in an acoustic grammar; and generate a preliminary interpretation for the natural language utterance from the one or more syllables, wherein the preliminary interpretation generated from the one or more syllables includes the recognized words or phrases; a conversational language processor coupled to the speech recognition engine, wherein the conversational language processor is configured to: interpret the recognized words or phrases, wherein interpreting the recognized words or phrases includes establishing a context for the natural language utterance; select an advertisement in the context established for the natural language utterance; and present the selected advertisement via an output device (claim 27).

42. VoiceBox is the assignee of the entire right, title, and interest in the '176 patent, including the right to sue for and collect past, present, and future damages and to seek and obtain injunctive or any other relief for infringement.

43. The '536 patent, entitled "SYSTEM AND METHOD FOR DELIVERING TARGETED ADVERTISEMENTS AND TRACKING ADVERTISEMENT INTERACTIONS IN VOICE RECOGNITION CONTEXTS," was duly and legally issued on November 11, 2014, and names Tom Freeman and Mike Kenn[e]wick⁷ as the inventors. A true and correct copy of the '536 patent is attached hereto as **Exhibit F**.

⁷ The '536 patent names "Mike Kennwick" as one of the inventors. *See* Exhibit F at 22. This is a typographical error, as the inventor's name is properly spelled Mike Kennewick.

44. The '536 patent claims, among other things, a system for providing promotional content related to one or more natural language utterances and/or responses, the system comprising: one or more physical processors programmed to execute one or more computer program instructions which, when executed, cause the one or more physical processors to: receive a first natural language utterance; provide a response to the first natural language utterance; receive a second natural language utterance relating to the first natural language utterance; identify requests associated with the second natural language utterance, wherein the requests include a first request associated with a first application and a second request associated with a second application different than the first application; determine promotional content that relates to one or more of the first request or the second request; and present the promotional content to a user (claim 43).

45. VoiceBox is the assignee of the entire right, title, and interest in the '536 patent, including the right to sue for and collect past, present, and future damages and to seek and obtain injunctive or any other relief for infringement.

46. The '097 patent, entitled "SYSTEM AND METHOD FOR DELIVERING TARGETED ADVERTISEMENTS AND/OR PROVIDING NATURAL LANGUAGE PROCESSING BASED ON ADVERTISEMENTS," was duly and legally issued on February 23, 2016, and names Tom Freeman and Mike Kennewick as the inventors. A true and correct copy of the '097 patent is attached hereto as **Exhibit G**.

47. The '097 patent claims, among other things, a method for providing natural language processing based on advertisements, the method being implemented on a computer system having one or more physical processors executing computer program instructions which, when executed, perform the method, the method comprising: providing, by the computer system,

an advertisement associated with a product or service for presentation to a user; receiving, at the computer system, a natural language utterance of the user; and interpreting, by the computer system, the natural language utterance based on the advertisement and, responsive to the existence of a pronoun in the natural language utterance, determining whether the pronoun refers to one or more of the product or service or a provider of the product or service (claim 1).

48. VoiceBox is the assignee of the entire right, title, and interest in the '097 patent, including the right to sue for and collect past, present, and future damages and to seek and obtain injunctive or any other relief for infringement.

COUNT 1: INFRINGEMENT OF THE '681 PATENT

49. VoiceBox realleges and incorporates the allegations of the preceding paragraphs of this complaint as though fully stated herein.

50. Apple, on its own or by conduct attributable to Apple, has and continues to infringe the '681 patent by making, using, selling, offering for sale, and/or importing into the United States, Siri Products, which embody or use the inventions of the '681 patent in violation of 35 U.S.C. § 271(a). Exemplary evidence and an exemplary chart mapping an exemplary claim (claim 25) to Siri Products can be found in **Exhibit H**. VoiceBox anticipates identifying additional asserted claims in accordance with the case schedule and its discovery obligations.

51. On information and belief, Apple knew of the existence of the '681 patent by sometime in or around July 2012 or before. Around this time, the '681 patent had already issued, Apple had been offering Siri Products, and Apple had offered to buy the '681 patent and family members from VoiceBox's predecessor VoiceBox Technologies. On information and belief, in or around July 2012, Apple knew that the Siri Products infringe the '681 patent, that Apple directly infringes the '681 patent, and that its actions would induce and contribute to infringement by Siri

Products' users. On information and belief, Apple was at least willfully blind to the facts that the Siri Products infringe the '681 patent, that Apple directly infringes the '681 patent, and that its actions would induce and contribute to infringement by Siri Products' users because: (1) Apple subjectively believed that there was a high probability these facts existed because Apple was investigating and analyzing the '681 patent and its family members for purchase; and (2) Apple took deliberate action to avoid learning of these facts.

52. Additionally, Apple has actual notice that the Siri Products infringe the '681 patent at least as of the date of the filing of this Complaint. Since no later than that date, Apple has known or been willfully blind to the facts that the Siri Products infringe the '681 patent, that Apple directly infringes the '681 patent, and that its actions would induce and contribute to infringement by Siri Products' users.

53. Apple has been and is inducing infringement of the '681 patent by actively and knowingly inducing others to make, use, sell, offer for sale, or import Siri Products that include Siri and embody or use the inventions claimed in the '681 patent in violation of 35 U.S.C. § 271(b). On information and belief, Apple knew of or was willfully blind to the '681 patent and the fact that the foregoing induced acts constitute patent infringement. On information and belief, Apple writes software for Siri Products and designs Siri Products to operate in an infringing manner. Apple causes Siri Products to be made available through its own website. Apple also profits from third parties who sell Siri Products. Apple instructs users to use Siri Products in an infringing manner and provides technical support for such use, including on its website.

54. Apple has been and is continuing to contributorily infringe the '681 patent by selling or offering to sell Siri Products, knowing them to be especially made or especially adapted for practicing the invention of the '681 patent and not a staple article or commodity of commerce

suitable for substantial non-infringing use in violation of 35 U.S.C. § 271(c). On information and belief, Apple writes software for Siri Products and designs Siri Products to operate in an infringing manner. Apple causes Siri Products to be made available through its own website. On information and belief, Apple also profits from third parties who sell Siri Products. Apple instructs users to use Siri Products in an infringing manner and provides technical support for such use, including on its website.

55. VoiceBox and its predecessors-in-interest have satisfied the marking requirements of 35 U.S.C. § 287 with respect to the '681 patent to the extent that any patented article is subject to a duty to mark.

56. Apple's infringement has been, and continues to be knowing, intentional, and willful. On information and belief, Apple has known of the existence of the '681 patent, and its acts of infringement have been willful and in disregard for the '681 patent, without any reasonable basis for believing that it had a right to engage in the infringing conduct.

57. Apple's acts of infringement of the '681 patent have caused and will continue to cause VoiceBox damages for which VoiceBox is entitled to compensation pursuant to 35 U.S.C. § 284.

58. This case is exceptional and, therefore, VoiceBox is entitled to an award of attorney's fees pursuant to 35 U.S.C. § 285.

COUNT 2: INFRINGEMENT OF THE '765 PATENT

59. VoiceBox realleges and incorporates the allegations of the preceding paragraphs of this complaint as though fully stated herein.

60. Apple, on its own or by conduct attributable to Apple, has and continues to infringe the '765 patent by making, using, selling, offering for sale, and/or importing into the United States,

Siri Products, which embodies or uses the inventions of the '765 patent in violation of 35 U.S.C. § 271(a). Exemplary evidence and an exemplary chart mapping an exemplary claim (claim 10) to Siri Products can be found in **Exhibit I**. VoiceBox anticipates identifying additional asserted claims in accordance with the case schedule and its discovery obligations.

61. On information and belief, Apple knew of or was willfully blind to the existence of the '765 patent by on or around August 20, 2013. Before that, in or around July 2012 the '681 patent had already issued, Apple had been offering Siri Products, and Apple had offered to buy the '681 patent and family members from VoiceBox's predecessor VoiceBox Technologies. On August 20, 2013, the '765 patent issued in the '681 patent family claiming priority to the '681 patent. On information and belief, on or around August 20, 2013, Apple knew that the Siri Products infringe the '765 patent, that Apple directly infringes the '765 patent, and that its actions would induce and contribute to infringement by Siri Products' users. On information and belief, Apple was at least willfully blind to the facts that the Siri Products infringe the '765 patent, that Apple directly infringes the '765 patent, and that its actions would induce and contribute to infringement by Siri Products' users because: (1) Apple subjectively believed that there was a high probability these facts existed because Apple was investigating and analyzing the '765 patent's family for purchase and (2) Apple took deliberate action to avoid learning of these facts.

62. Additionally, in or around May of 2014, Apple offered to buy the '765 patent from VoiceBox's predecessor, VoiceBox Technologies. On information and belief, in or around May of 2014, Apple knew that the Siri Products infringe the '765 patent, that Apple directly infringes the '765 patent, and that its actions would induce and contribute to infringement by Siri Products' users. On information and belief, Apple was at least willfully blind to the facts that the Siri Products infringe the '765 patent, that Apple directly infringes the '765 patent, and that its actions

would induce and contribute to infringement by Siri Products' users because: (1) Apple subjectively believed that there was a high probability these facts existed because Apple was investigating and analyzing the '765 patent and its family members for purchase and (2) Apple took deliberate action to avoid learning of these facts.

63. Additionally, Apple has actual notice that the Siri Products infringe the '765 patent at least as of the date of the filing of this Complaint. Since no later than that date, Apple has known or been willfully blind to the facts that the Siri Products infringe the '765 patent, that Apple directly infringes the '765 patent, and that its actions would induce and contribute to infringement by Siri Products' users.

64. Apple has been and is inducing infringement of the '765 patent by actively and knowingly inducing others to make, use, sell, offer for sale, or import Siri Products that include Siri and embody or use the inventions claimed in the '765 patent in violation of 35 U.S.C. § 271(b). On information and belief, Apple knew of or was willfully blind to the '765 patent and the fact that the foregoing induced acts constitute patent infringement. On information and belief, Apple writes software for Siri Products and designs Siri Products to operate in an infringing manner. Apple causes Siri Products to be made available through its own website. Apple also profits from third parties who sell Siri Products. Apple instructs users to use Siri Products in an infringing manner and provides technical support for such use, including on its website.

65. Apple has been and is continuing to contributorily infringe the '765 patent by selling or offering to sell Siri Products, knowing them to be especially made or especially adapted for practicing the invention of the '765 patent and not a staple article or commodity of commerce suitable for substantial non-infringing use in violation of 35 U.S.C. § 271(c). On information and belief, Apple writes software for Siri Products and designs Siri Products to operate in an infringing

manner. Apple causes Siri Products to be made available through its own website. On information and belief, Apple also profits from third parties who sell Siri Products. Apple instructs users to use Siri Products in an infringing manner and provides technical support for such use, including on its website.

66. VoiceBox and its predecessors-in-interest have satisfied the marking requirements of 35 U.S.C. § 287 with respect to the '765 patent to the extent that any patented article is subject to a duty to mark.

67. Apple's infringement has been, and continues to be knowing, intentional, and willful. On information and belief, Apple has known of the existence of the '765 patent, and its acts of infringement have been willful and in disregard for the '765 patent, without any reasonable basis for believing that it had a right to engage in the infringing conduct.

68. Apple's acts of infringement of the '765 patent have caused and will continue to cause VoiceBox damages for which VoiceBox is entitled to compensation pursuant to 35 U.S.C. § 284.

69. This case is exceptional and, therefore, VoiceBox is entitled to an award of attorney's fees pursuant to 35 U.S.C. § 285.

COUNT 3: INFRINGEMENT OF THE '249 PATENT

70. VoiceBox realleges and incorporates the allegations of the preceding paragraphs of this complaint as though fully stated herein.

71. Apple, on its own or by conduct attributable to Apple, has and continues to infringe the '249 patent by making, using, selling, offering for sale, and/or importing into the United States, Siri Products, which embodies or uses the inventions of the '249 patent in violation of 35 U.S.C. § 271(a). Exemplary evidence and an exemplary chart mapping an exemplary claim (claim 1) to

Siri Products can be found in **Exhibit J**. VoiceBox anticipates identifying additional asserted claims in accordance with the case schedule and its discovery obligations.

72. On information and belief, Apple knew of or was willfully blind to the existence of the '249 patent by on or around May 21, 2019. Before that, in or around July 2012 the '681 patent had already issued, Apple had been offering Siri Products, and Apple had offered to buy the '681 patent and family members from VoiceBox's predecessor VoiceBox Technologies. Continuing until on or around September 9, 2014, Apple made multiple offers to buy the '681 patent and its family members. On May 21, 2019, the '249 patent issued in the '681 patent family claiming priority to the '681 patent. On information and belief, on or around May 21, 2019, Apple knew that the Siri Products infringe the '249 patent, that Apple directly infringes the '249 patent, and that its actions would induce and contribute to infringement by Siri Products' users. On information and belief, Apple was at least willfully blind to the facts that the Siri Products infringe the '249 patent, that Apple directly infringes the '249 patent, and that its actions would induce and contribute to infringement by Siri Products' users because: (1) Apple subjectively believed that there was a high probability these facts existed because Apple was investigating and analyzing the '249 patent's family for purchase and (2) Apple took deliberate action to avoid learning of these facts.

73. Additionally, Apple has actual notice that the Siri Products infringe the '249 patent at least as of the date of the filing of this Complaint. Since no later than that date, Apple has known or been willfully blind to the facts that the Siri Products infringe the '249 patent, that Apple directly infringes the '249 patent, and that its actions would induce and contribute to infringement by Siri Products' users.

74. Apple has been and is inducing infringement of the '249 patent by actively and knowingly inducing others to make, use, sell, offer for sale, or import Siri Products that include Siri and embody or use the inventions claimed in the '249 patent in violation of 35 U.S.C. § 271(b). On information and belief, Apple knew of or was willfully blind to the '249 patent and the fact that the foregoing induced acts constitute patent infringement. On information and belief, Apple writes software for Siri Products and designs Siri Products to operate in an infringing manner. Apple causes Siri Products to be made available through its own website. Apple also profits from third parties who sell Siri Products. Apple instructs users to use Siri Products in an infringing manner and provides technical support for such use, including on its website.

75. Apple has been and is continuing to contributorily infringe the '249 patent by selling or offering to sell Siri Products, knowing them to be especially made or especially adapted for practicing the invention of the '249 patent and not a staple article or commodity of commerce suitable for substantial non-infringing use in violation of 35 U.S.C. § 271(c). On information and belief, Apple writes software for Siri Products and designs Siri Products to operate in an infringing manner. Apple causes Siri Products to be made available through its own website. On information and belief, Apple also profits from third parties who sell Siri Products. Apple instructs users to use Siri Products in an infringing manner and provides technical support for such use, including on its website.

76. VoiceBox and its predecessors-in-interest have satisfied the marking requirements of 35 U.S.C. § 287 with respect to the '249 patent to the extent that any patented article is subject to a duty to mark.

77. Apple's infringement has been, and continues to be knowing, intentional, and willful. On information and belief, Apple has known of the existence of the '249 patent, and its

acts of infringement have been willful and in disregard for the '249 patent, without any reasonable basis for believing that it had a right to engage in the infringing conduct.

78. Apple's acts of infringement of the '249 patent have caused and will continue to cause VoiceBox damages for which VoiceBox is entitled to compensation pursuant to 35 U.S.C. § 284.

79. This case is exceptional and, therefore, VoiceBox is entitled to an award of attorney's fees pursuant to 35 U.S.C. § 285.

COUNT 4: INFRINGEMENT OF THE '341 PATENT

80. VoiceBox realleges and incorporates the allegations of the preceding paragraphs of this complaint as though fully stated herein.

81. Apple, on its own or by conduct attributable to Apple, has and continues to infringe the '341 patent by making, using, selling, offering for sale, and/or importing into the United States, Siri Products, which embodies or uses the inventions of the '341 patent in violation of 35 U.S.C. § 271(a). Exemplary evidence and an exemplary chart mapping an exemplary claim (claim 10) to Siri Products can be found in **Exhibit K**. VoiceBox anticipates identifying additional asserted claims in accordance with the case schedule and its discovery obligations.

82. On information and belief, Apple knew of or was willfully blind to the existence of the '341 patent by on or around December 17, 2019. Before that, in or around July 2012 the '681 patent had already issued, Apple had been offering Siri Products, and Apple had offered to buy the '681 patent and family members from VoiceBox's predecessor VoiceBox Technologies. Continuing until on or around September 9, 2014, Apple made multiple offers to buy the '681 patent and its family members. On December 17, 2019, the '341 patent issued in the '681 patent family claiming priority to the '681 patent. On information and belief, on or around December 17,

2019, Apple knew that the Siri Products infringe the '341 patent, that Apple directly infringes the '341 patent, and that its actions would induce and contribute to infringement by Siri Products' users. On information and belief, Apple was at least willfully blind to the facts that the Siri Products infringe the '341 patent, that Apple directly infringes the '341 patent, and that its actions would induce and contribute to infringement by Siri Products' users because: (1) Apple subjectively believed that there was a high probability these facts existed because Apple was investigating and analyzing the '341 patent's family for purchase and (2) Apple took deliberate action to avoid learning of these facts.

83. Additionally, Apple has actual notice that the Siri Products infringe the '341 patent at least as of the date of the filing of this Complaint. Since no later than that date, Apple has known or been willfully blind to the facts that the Siri Products infringe the '341 patent, that Apple directly infringes the '341 patent, and that its actions would induce and contribute to infringement by Siri Products' users.

84. Apple has been and is inducing infringement of the '341 patent by actively and knowingly inducing others to make, use, sell, offer for sale, or import Siri Products that include Siri and embody or use the inventions claimed in the '341 patent in violation of 35 U.S.C. § 271(b). On information and belief, Apple knew of or was willfully blind to the '341 patent and the fact that the foregoing induced acts constitute patent infringement. On information and belief, Apple writes software for Siri Products and designs Siri Products to operate in an infringing manner. Apple causes Siri Products to be made available through its own website. Apple also profits from third parties who sell Siri Products. Apple instructs users to use Siri Products in an infringing manner and provides technical support for such use, including on its website.

85. Apple has been and is continuing to contributorily infringe the '341 patent by selling or offering to sell Siri Products, knowing them to be especially made or especially adapted for practicing the invention of the '341 patent and not a staple article or commodity of commerce suitable for substantial non-infringing use in violation of 35 U.S.C. § 271(c). On information and belief, Apple writes software for Siri Products and designs Siri Products to operate in an infringing manner. Apple causes Siri Products to be made available through its own website. On information and belief, Apple also profits from third parties who sell Siri Products. Apple instructs users to use Siri Products in an infringing manner and provides technical support for such use, including on its website.

86. VoiceBox and its predecessors-in-interest have satisfied the marking requirements of 35 U.S.C. § 287 with respect to the '341 patent to the extent that any patented article is subject to a duty to mark.

87. Apple's infringement has been, and continues to be knowing, intentional, and willful. On information and belief, Apple has known of the existence of the '341 patent, and its acts of infringement have been willful and in disregard for the '341 patent, without any reasonable basis for believing that it had a right to engage in the infringing conduct.

88. Apple's acts of infringement of the '341 patent have caused and will continue to cause VoiceBox damages for which VoiceBox is entitled to compensation pursuant to 35 U.S.C. § 284.

89. This case is exceptional and, therefore, VoiceBox is entitled to an award of attorney's fees pursuant to 35 U.S.C. § 285.

COUNT 5: INFRINGEMENT OF THE '176 PATENT

90. VoiceBox realleges and incorporates the allegations of the preceding paragraphs of this complaint as though fully stated herein.

91. Apple has and continues to infringe the '176 patent by making, using, selling, offering for sale, and/or importing into the United States, Siri Products, which embody or use the inventions of the '176 patent in violation of 35 U.S.C. § 271(a). Exemplary evidence and an exemplary chart mapping an exemplary claim (claim 27) to Siri Products can be found in **Exhibit L**. VoiceBox anticipates identifying additional asserted claims in accordance with the case schedule and its discovery obligations.

92. On information and belief, Apple knew of the existence of the '176 patent by sometime in or around July 2012 or before. Around this time, the '176 patent had already issued, Apple had been offering Siri Products, and Apple had offered to buy the '176 patent and family members from VoiceBox's predecessor VoiceBox Technologies. On information and belief, in or around July 2012, Apple knew that the Siri Products infringe the '176 patent, that Apple directly infringes the '176 patent, and that its actions would induce and contribute to infringement by Siri Products' users. On information and belief, Apple was at least willfully blind to the facts that the Siri Products infringe the '176 patent, that Apple directly infringes the '176 patent, and that its actions would induce and contribute to infringement by Siri Products' users because: (1) Apple subjectively believed that there was a high probability these facts existed because Apple was investigating and analyzing the '176 patent and its family members for purchase; and (2) Apple took deliberate action to avoid learning of these facts.

93. Additionally, Apple has actual notice that the Siri Products infringe the '176 patent at least as of the date of the filing of this Complaint. Since no later than that date, Apple has known

or been willfully blind to the facts that the Siri Products infringe the '176 patent, that Apple directly infringes the '176 patent, and that its actions would induce and contribute to infringement by Siri Products' users.

94. Apple has been and is inducing infringement of the '176 patent by actively and knowingly inducing others to make, use, sell, offer for sale, or import Siri Products that include Siri and embody or use the inventions claimed in the '176 patent in violation of 35 U.S.C. § 271(b). On information and belief, Apple knew of or was willfully blind to the '176 patent and the fact that the foregoing induced acts constitute patent infringement. On information and belief, Apple writes software for Siri Products and designs Siri Products to operate in an infringing manner. Apple causes Siri Products to be made available through its own website. Apple also profits from third parties who sell Siri Products. Apple instructs users to use Siri Products in an infringing manner and provides technical support for such use, including on its website.

95. Apple has been and is continuing to contributorily infringe the '176 patent by selling or offering to sell Siri Products, knowing them to be especially made or especially adapted for practicing the invention of the '176 patent and not a staple article or commodity of commerce suitable for substantial non-infringing use in violation of 35 U.S.C. § 271(c). On information and belief, Apple writes software for Siri Products and designs Siri Products to operate in an infringing manner. Apple causes Siri Products to be made available through its own website. On information and belief, Apple also profits from third parties who sell Siri Products. Apple instructs users to use Siri Products in an infringing manner and provides technical support for such use, including on its website.

96. VoiceBox and its predecessors-in-interest have satisfied the marking requirements of 35 U.S.C. § 287 with respect to the '176 patent to the extent that any patented article is subject to a duty to mark.

97. Apple's infringement has been, and continues to be knowing, intentional, and willful. On information and belief, Apple has known of the existence of the '176 patent, and its acts of infringement have been willful and in disregard for the '176 patent, without any reasonable basis for believing that it had a right to engage in the infringing conduct.

98. Apple's acts of infringement of the '176 patent have caused and will continue to cause VoiceBox damages for which VoiceBox is entitled to compensation pursuant to 35 U.S.C. § 284.

99. This case is exceptional and, therefore, VoiceBox is entitled to an award of attorney's fees pursuant to 35 U.S.C. § 285.

COUNT 6: INFRINGEMENT OF THE '536 PATENT

100. VoiceBox realleges and incorporates the allegations of the preceding paragraphs of this complaint as though fully stated herein.

101. Apple, on its own or by conduct attributable to Apple, has and continues to infringe the '536 patent by making, using, selling, offering for sale, and/or importing into the United States, Siri Products, which embodies or uses the inventions of the '536 patent in violation of 35 U.S.C. § 271(a). Exemplary evidence and an exemplary chart mapping an exemplary claim (claim 43) to Siri Products can be found in **Exhibit M**. VoiceBox anticipates identifying additional asserted claims in accordance with the case schedule and its discovery obligations.

102. On information and belief, Apple knew of or was willfully blind to the existence of the '536 patent by on or around November 11, 2014. Before that, in or around July 2012 the '176

patent had already issued, Apple had been offering Siri Products, and Apple had offered to buy the '176 patent and family members from VoiceBox's predecessor VoiceBox Technologies. On November 11, 2014, the '536 patent issued in the '176 patent family claiming priority to the '176 patent. On information and belief, on or around November 11, 2014, Apple knew that the Siri Products infringe the '536 patent, that Apple directly infringes the '536 patent, and that its actions would induce and contribute to infringement by Siri Products' users. On information and belief, Apple was at least willfully blind to the facts that the Siri Products infringe the '536 patent, that Apple directly infringes the '536 patent, and that its actions would induce and contribute to infringement by Siri Products' users because: (1) Apple subjectively believed that there was a high probability these facts existed because Apple was investigating and analyzing the '536 patent's family for purchase; and (2) Apple took deliberate action to avoid learning of these facts.

103. Additionally, Apple has actual notice that the Siri Products infringe the '536 patent at least as of the date of the filing of this Complaint. Since no later than that date, Apple has known or been willfully blind to the facts that the Siri Products infringe the '536 patent, that Apple directly infringes the '536 patent, and that its actions would induce and contribute to infringement by Siri Products' users.

104. Apple has been and is inducing infringement of the '536 patent by actively and knowingly inducing others to make, use, sell, offer for sale, or import Siri Products that include Siri and embody or use the inventions claimed in the '536 patent in violation of 35 U.S.C. § 271(b). On information and belief, Apple knew of or was willfully blind to the '536 patent and the fact that the foregoing induced acts constitute patent infringement. On information and belief, Apple writes software for Siri Products and designs Siri Products to operate in an infringing manner. Apple causes Siri Products to be made available through its own website. Apple also profits from

third parties who sell Siri Products. Apple instructs users to use Siri Products in an infringing manner and provides technical support for such use, including on its website.

105. Apple has been and is continuing to contributorily infringe the '536 patent by selling or offering to sell Siri Products, knowing them to be especially made or especially adapted for practicing the invention of the '536 patent and not a staple article or commodity of commerce suitable for substantial non-infringing use in violation of 35 U.S.C. § 271(c). On information and belief, Apple writes software for Siri Products and designs Siri Products to operate in an infringing manner. Apple causes Siri Products to be made available through its own website. On information and belief, Apple also profits from third parties who sell Siri Products. Apple instructs users to use Siri Products in an infringing manner and provides technical support for such use, including on its website.

106. VoiceBox and its predecessors-in-interest have satisfied the marking requirements of 35 U.S.C. § 287 with respect to the '536 patent to the extent that any patented article is subject to a duty to mark.

107. Apple's infringement has been, and continues to be knowing, intentional, and willful. On information and belief, Apple has known of the existence of the '536 patent, and its acts of infringement have been willful and in disregard for the '536 patent, without any reasonable basis for believing that it had a right to engage in the infringing conduct.

108. Apple's acts of infringement of the '536 patent have caused and will continue to cause VoiceBox damages for which VoiceBox is entitled to compensation pursuant to 35 U.S.C. § 284.

109. This case is exceptional and, therefore, VoiceBox is entitled to an award of attorney's fees pursuant to 35 U.S.C. § 285.

COUNT 7: INFRINGEMENT OF THE '097 PATENT

110. VoiceBox realleges and incorporates the allegations of the preceding paragraphs of this complaint as though fully stated herein.

111. Apple, on its own or by conduct attributable to Apple, has and continues to infringe the '097 patent by making, using, selling, offering for sale, and/or importing into the United States, Siri Products, which embodies or uses the inventions of the '097 patent in violation of 35 U.S.C. § 271(a). Exemplary evidence and an exemplary chart mapping an exemplary claim (claim 1) to Siri Products can be found in **Exhibit N**. VoiceBox anticipates identifying additional asserted claims in accordance with the case schedule and its discovery obligations.

112. On information and belief, Apple knew of or was willfully blind to the existence of the '097 patent by on or around February 23, 2016. Before that, in or around July 2012 the '176 patent had already issued, Apple had been offering Siri Products, and Apple had offered to buy the '176 patent and family members from VoiceBox's predecessor VoiceBox Technologies. On February 23, 2016, the '097 patent issued in the '176 patent family claiming priority to the '176 patent. On information and belief, on or around February 23, 2016, Apple knew that the Siri Products infringe the '097 patent, that Apple directly infringes the '097 patent, and that its actions would induce and contribute to infringement by Siri Products' users. On information and belief, Apple was at least willfully blind to the facts that the Siri Products infringe the '097 patent, that Apple directly infringes the '097 patent, and that its actions would induce and contribute to infringement by Siri Products' users because: (1) Apple subjectively believed that there was a high probability these facts existed because Apple was investigating and analyzing the '097 patent's family for purchase; and (2) Apple took deliberate action to avoid learning of these facts.

113. Additionally, Apple has actual notice that the Siri Products infringe the '097 patent at least as of the date of the filing of this Complaint. Since no later than that date, Apple has known or been willfully blind to the facts that the Siri Products infringe the '097 patent, that Apple directly infringes the '097 patent, and that its actions would induce and contribute to infringement by Siri Products' users.

114. Apple has been and is inducing infringement of the '097 patent by actively and knowingly inducing others to make, use, sell, offer for sale, or import Siri Products that include Siri and embody or use the inventions claimed in the '097 patent in violation of 35 U.S.C. § 271(b). On information and belief, Apple knew of or was willfully blind to the '097 patent and the fact that the foregoing induced acts constitute patent infringement. On information and belief, Apple writes software for Siri Products and designs Siri Products to operate in an infringing manner. Apple causes Siri Products to be made available through its own website. Apple also profits from third parties who sell Siri Products. Apple instructs users to use Siri Products in an infringing manner and provides technical support for such use, including on its website.

115. Apple has been and is continuing to contributorily infringe the '097 patent by selling or offering to sell Siri Products, knowing them to be especially made or especially adapted for practicing the invention of the '097 patent and not a staple article or commodity of commerce suitable for substantial non-infringing use in violation of 35 U.S.C. § 271(c). On information and belief, Apple writes software for Siri Products and designs Siri Products to operate in an infringing manner. Apple causes Siri Products to be made available through its own website. On information and belief, Apple also profits from third parties who sell Siri Products. Apple instructs users to use Siri Products in an infringing manner and provides technical support for such use, including on its website.

116. VoiceBox and its predecessors-in-interest have satisfied the marking requirements of 35 U.S.C. § 287 with respect to the '097 patent to the extent that any patented article is subject to a duty to mark.

117. Apple's infringement has been, and continues to be knowing, intentional, and willful. On information and belief, Apple has known of the existence of the '097 patent, and its acts of infringement have been willful and in disregard for the '097 patent, without any reasonable basis for believing that it had a right to engage in the infringing conduct.

118. Apple's acts of infringement of the '097 patent have caused and will continue to cause VoiceBox damages for which VoiceBox is entitled to compensation pursuant to 35 U.S.C. § 284.

119. This case is exceptional and, therefore, VoiceBox is entitled to an award of attorney's fees pursuant to 35 U.S.C. § 285.

DEMAND FOR A JURY TRIAL

VoiceBox demands a jury trial on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, VoiceBox, respectfully requests the Court to enter judgment in favor of VoiceBox and against Apple as to all claims asserted herein as follows:

- a. Judgment that Apple has infringed and is infringing, directly and indirectly, the '681 patent, the '765 patent, the '249 patent, the '341 patent, the '176 patent, the '536 patent, and the '097 patent;
- b. Judgment that Apple accounts for and pay damages adequate to compensate VoiceBox for Apple's infringement of the VoiceBox Patents, including for any infringing acts not

presented at trial and pre-judgment and post-judgment interest and costs, pursuant to 35 U.S.C. § 284;

- c. Judgment that Apple has willfully infringed the '681 patent, the '765 patent, the '249 patent, the '341 patent, the '176 patent, the '536 patent, and the '097 patent and an increase in the damages award to VoiceBox of up to three times the amount assessed, pursuant to 35 U.S.C. § 284;
- d. That this Court declare this case exceptional and award VoiceBox reasonable attorneys' fees and costs in accordance with 35 U.S.C. § 285;
- e. That VoiceBox be granted pre-judgment and post-judgment interest on the damages;
- f. An award of costs associated with bringing this action; and
- g. That VoiceBox be granted such other and further relief as the Court may deem just and proper under the circumstances.

JURY DEMAND

Pursuant to Federal Rules of Civil Procedure Rule 38, VoiceBox demands a trial by jury on all issues so triable.

Dated: December 13, 2024

Respectfully submitted,

Of Counsel:

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