

2. Samsung, on information and belief, is a corporation organized under the laws of the State of Delaware. Samsung is doing business in Texas, and, on information and belief, has a principal place of business at 1130 E. Arapaho Road, Richardson, TX 75081. Samsung may be served with process by serving its registered agent, Jeong Han Kimat 1130 Arapaho Road, Richardson, TX 75081.
3. Motorola, on information and belief, is a corporation organized under the laws of the State of Delaware. Motorola is doing business in Texas, and, on information and belief, has a principal place of business at 1303 Algonquin Road, Schaumburg, IL 60196. Motorola may be served with process by serving its registered agent, CT Corp. System, 350 N. St. Paul Street, Dallas, TX 75201.
4. Nokia, on information and belief, is a corporation organized under the laws of the State of Delaware. Nokia is doing business in Texas, and, on information and belief, has a principal place of business at 6000 Connection Drive, Irving, TX 75039. Nokia may be served with process by serving its registered agent, National Registered Agents, Inc., at 1614 Sidney Baker Street, Kerrville, TX 78208.
5. Sony, on information and belief, is a corporation organized under the laws of the State of Delaware. Sony is doing business in Texas, and, on information and belief, has a principal place of business at 6300 Legacy Drive, Plano, TX 75024. Sony may be served with process by serving its registered agent, National Registered Agents, Inc., 1614 Sidney Baker Street, Kerrville, TX 78028.
6. Siemens, on information and belief, is a corporation organized under the laws of the State of Delaware. Siemens is doing business in Texas, and, on information and belief, has a

principal place of business at 170 Wood Avenue South, Iselin, NJ 08830. Siemens may be served with process by serving its registered agent, CT Corporation System, 350 N. St. Paul Street, Dallas, TX 75201.

7. LG, on information and belief, is a corporation organized under the laws of the State of California. LG is doing business in Texas, and, on information and belief, has a principal place of business at 9820 Willow Creek Road, San Diego, CA 92131. LG may be served with process by serving its registered agent, CT Corporation System, 350 N. St. Paul Street, Dallas, TX 75201.
8. RIM, on information and belief, is a corporation organized under the laws of the State of Delaware. RIM is doing business in Texas, and, on information and belief, has a principal place of business at 122 West John Carpenter Parkway, Suite 430, Irving, TX 75039. RIM may be served with process by serving its registered agent, Corporation Service Company DBA CSC-Lawyers Incorporating Service Company, 701 Brazos Street, Suite 1050, Austin, TX 78701
9. Palm, on information and belief, is a corporation organized under the laws of the State of Delaware. Palm is doing business in Texas, and, on information and belief, has a principal place of business at 950 W. Maude Avenue, Sunnyvale, CA 94085. Palm may be served with process by serving its registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, DE 19808.

JURISDICTION & VENUE

10. This is an action for infringement of a United States patent. Accordingly, this action arises under the patent laws of the United States of America, 35 U.S.C. § 1 et. seq. and jurisdiction

is properly based on Title 35 United States Code, particularly § 271, and title 28 United States Code, particularly § 1338(a).

11. Samsung, upon information and belief, transacts business in this judicial district by manufacturing, using, selling, or offering to sell products as described and claimed in United States Patent No. 6,427,009, the patent at issue in this lawsuit, and/or by conducting other business in this judicial district.
12. Motorola, upon information and belief, transacts business in this judicial district by manufacturing, using, selling, or offering to sell products as described and claimed in United States Patent No. 6,427,009, the patent at issue in this lawsuit, and/or by conducting other business in this judicial district.
13. Nokia, upon information and belief, transacts business in this judicial district by manufacturing, using, selling, or offering to sell products as described and claimed in United States Patent No. 6,427,009, the patent at issue in this lawsuit, and/or by conducting other business in this judicial district.
14. Sony, upon information and belief, transacts business in this judicial district by manufacturing, using, selling, or offering to sell products as described and claimed in United States Patent No. 6,427,009, the patent at issue in this lawsuit, and/or by conducting other business in this judicial district.
15. Siemens, upon information and belief, transacts business in this judicial district by manufacturing, using, selling, or offering to sell products as described and claimed in United States Patent No. 6,427,009, the patent at issue in this lawsuit, and/or by conducting other business in this judicial district.

16. LG, upon information and belief, transacts business in this judicial district by manufacturing, using, selling, or offering to sell products as described and claimed in United States Patent No. 6,427,009, the patent at issue in this lawsuit, and/or by conducting other business in this judicial district.
17. RIM, upon information and belief, transacts business in this judicial district by manufacturing, using, selling, or offering to sell products as described and claimed in United States Patent No. 6,427,009, the patent at issue in this lawsuit, and/or by conducting other business in this judicial district.
18. Palm, upon information and belief, transacts business in this judicial district by manufacturing, using, selling, or offering to sell products as described and claimed in United States Patent No. 6,427,009, the patent at issue in this lawsuit, and/or by conducting other business in this judicial district.
19. Venue is proper in this court under Title 28 United States Code § 1391(b) and 1400(b).

PATENT INFRINGEMENT COUNT

20. On July 30, 2002, United States Patent No. 6,427,009 (“the ‘009 patent”) entitled “Enhanced Apparatus for Use With Caller ID System” was duly and legally issued. A true and correct copy of the ‘009 patent is attached as Exhibit A.
21. Pursuant to 35 U.S.C. § 282, the above-listed United States Patent is presumed valid.
22. Plaintiff, Morris Reese, is the owner and sole inventor of the ‘009 patent.
23. Plaintiff has previously asserted Claim 14 the ‘009 patent in litigation against Aastra Technologies, Ltd, Cidco Communications Corp., Cortelco, Inc., Command Communications, Inc., Coby Electronics Corp., Fanstel Corp., Matsushita Electric Corp. of

America, Talkomatic Corp., Vtech Communications, Inc., Radioshack Corp., and Altlinks USA, Inc., each of whom took a non-exclusive license to the '009 patent. Plaintiff's Third Amended Complaint for Patent Infringement in Case No. 2:03-cv-00267-TJW is attached as Exhibit B.

24. Samsung, on information and belief, manufactures, uses, and sells products that infringe at least Claims 14-18 and 20 of the '009 patent, including for example and without limitation Samsung's SPH-a660 and SCH-a310 cellular telephones, as well as any other cellular telephones or devices acting or capable of acting in the manner described and claimed in the '009 patent.
25. Motorola, on information and belief, manufactures, uses, and sells products that infringe at least Claims 14-18 and 20 of the '009 patent, including for example and without limitation Motorola's V400 cellular telephone, as well as any other cellular telephones or devices acting or capable of acting in the manner described and claimed in the '009 patent.
26. Nokia, on information and belief, manufactures, uses, and sells products that infringe at least Claims 14-18 and 20 of the '009 patent, including for example and without limitation Nokia's 6620 cellular telephone, as well as any other cellular telephones or devices acting or capable of acting in the manner described and claimed in the '009 patent.
27. Sony, on information and belief, manufactures, uses, and sells products that infringe at least Claims 14-18 and 20 of the '009 patent, including for example and without limitation Sony's S710a cellular telephone, as well as any other cellular telephones or devices acting or capable of acting in the manner described and claimed in the '009 patent.

28. Siemens, on information and belief, manufactures, uses, and sells products that infringe at least Claims 14-18 and 20 of the '009 patent, including for example and without limitation Siemens's SX66 cellular telephone, as well as any other cellular telephones or devices acting or capable of acting in the manner described and claimed in the '009 patent.
29. LG, on information and belief, manufactures, uses, and sells products that infringe at least Claims 14-18 and 20 of the '009 patent, including for example and without limitation LG's VX4500 and UI5225 cellular telephones, as well as any other cellular telephones or devices acting or capable of acting in the manner described and claimed in the '009 patent.
30. RIM, on information and belief, manufactures, uses, and sells products that infringe at least Claims 14-18 and 20 of the '009 patent, including for example and without limitation RIM's Blackberry 7100t cellular telephone device, as well as any other cellular telephones or devices acting or capable of acting in the manner described and claimed in the '009 patent.
31. Palm, on information and belief, manufactures, uses, and sells products that infringe at least Claims 14-18 and 20 of the '009 patent, including for example and without limitation Palm's Treo 650 cellular telephone device, as well as any other cellular telephones or devices acting or capable of acting in the manner described and claimed in the '009 patent.
32. The infringement of the '009 patent alleged above has injured the Plaintiff and thus, it is entitled to recover damages adequate to compensate for Samsung, Motorola, Nokia, Sony, Siemens, LG, RIM, and Palm's infringement, which in no event can be less than a reasonable royalty.

DEMAND FOR JURY TRIAL

33. Plaintiff hereby demands a jury trial on all claims and issues.

PRAYER FOR RELIEF

Wherefore, Plaintiff prays for entry of judgment:

- A. that Defendants, Samsung, Motorola, Nokia, Sony, Siemens, LG, RIM, and Palm, have infringed one or more claims of the '009 patent;
- B. that Defendants, Samsung, Motorola, Nokia, Sony, Siemens, LG, RIM, and Palm, account for and pay to Plaintiff all damages caused by the infringement of the '009 patent, which by statute can be no less than a reasonable royalty;
- C. that Plaintiff be granted pre-judgment and post-judgment interest on the damages caused to them by reason of Defendants, Samsung, Motorola, Nokia, Sony, Siemens, LG, RIM, and Palm's infringement of the '009 patent;
- D. that Plaintiff be granted its attorneys' fees in this action;
- E. that costs be awarded to Plaintiff;
- F. that Plaintiff be granted such other and further relief as the Court may deem just and proper under the current circumstances.

Respectfully submitted,

Date: October 19, 2005

/s/ John Ward, Jr.

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served via electronic delivery, on this the 19th day of October, 2005 to all counsel of record.

/s/ John Ward, Jr.
T. John Ward, Jr.