

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

**WALKER DIGITAL, LLC**

**Plaintiff,**

**v.**

**AYRE ACOUSTICS, INC.; BEST BUY  
CO., INC.; D&M HOLDINGS U.S. INC.;  
DENON ELECTRONICS (USA), LLC;  
FUNAI CORPORATION, INC.; HAIER  
AMERICA TRADING, L.L.C.; HARMAN  
INTERNATIONAL INDUSTRIES,  
INCORPORATED; JVC AMERICAS  
CORP.; LG ELECTRONICS USA, INC.;  
MARANTZ AMERICA, INC.; ONKYO  
USA CORPORATION; OPPO DIGITAL,  
INC.; ORION ELECTRIC AMERICA,  
INC.; PANASONIC CORPORATION OF  
NORTH AMERICA; PHILIPS  
ELECTRONICS NORTH AMERICA  
CORPORATION; PIONEER  
ELECTRONICS (USA) INC.; SAMSUNG  
ELECTRONICS AMERICA; SHARP  
ELECTRONICS CORPORATION;  
SHERWOOD AMERICA  
INCORPORATED; SONY  
CORPORATION OF AMERICA; SONY  
ELECTRONICS, INC.; TECHNICOLOR  
USA, INC. dba RCA; TOSHIBA  
AMERICA INFORMATION SYSTEMS,  
INC.; VIZIO, INC. and YAMAHA  
CORPORATION OF AMERICA**

**Defendants.**

**Civil Action No. \_\_\_\_\_**

**JURY TRIAL DEMANDED**

**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff, Walker Digital, LLC, (“Walker Digital”) files this complaint for patent infringement against Defendants Ayre Acoustics, Inc. (“Ayre”); Best Buy Co., Inc. (“Best

Buy”); D&M Holdings U.S., Inc. (“D&M”); Denon Electronics (USA), LLC (“Denon”); Funai Corporation, Inc. (“Funai”); Haier America Trading, LLC (“Haier America”); Harman International Industries, Incorporated (“Harman”); JVC Americas Corp. (“JVC”); LG Electronics U.S.A., Inc. (“LGE”); Marantz America, Inc. (“Marantz”); Onkyo USA Corporation (“Onkyo”); OPPO Digital, Inc. (“OPPO”); Orion Electric America, Inc. (“Orion”); Panasonic Corporation of North America (“Panasonic”); Philips Electronics North America Corporation (“Philips”); Pioneer Electronics (USA) Inc. (“Pioneer”); Samsung Electronics America (“Samsung”); Sharp Electronics Corporation (“Sharp”); Sherwood America Incorporated (“Sherwood”); Sony Corporation of America (“Sony America”); Sony Electronics, Inc. (“Sony Electronics”); Technicolor USA, Inc. dba RCA (“Technicolor”); Toshiba America Information Systems, Inc. (“Toshiba”); VIZIO, Inc. (“VIZIO”); and Yamaha Corporation of America (“Yamaha”) (collectively the “Defendants”):

### **THE PARTIES AND PATENTS-IN-SUIT**

1. Plaintiff Walker Digital, LLC is a Delaware limited liability company with its principal place of business located at 2 High Ridge Park, Stamford, CT 06905. Walker Digital is a research and development laboratory that has been the genesis for many successful businesses, including Priceline.com and Synapse, Inc.

2. On information and belief, Defendant Ayre is a Colorado corporation with its principal place of business located at 2300 – B Central Avenue, Boulder, Colorado 80301.

3. On information and belief, Defendant Best Buy is a Minnesota corporation with its principal place of business located at 7601 Penn Avenue South Richfield, Minnesota 55423.

4. On information and belief, Defendant D&M is a Delaware corporation with its principal place of business located at 100 Corporate Drive, Mahway, New Jersey 07430.

5. On information and belief, Defendant Denon is a Delaware corporation with its principal place of business located at 100 Corporate Drive, Mahwah, New Jersey 07430.

6. On information and belief, Defendant Funai is a New Jersey corporation with its principal place of business located at 201 Route 17 North, Suite 903, Rutherford, New Jersey 07070.

7. On information and belief, Defendant Haier America is a New York corporation with its principal place of business located at 1356 Broadway, New York, New York 10018.

8. On information and belief, Defendant Harman is a Delaware corporation with its principal place of business located at 400 Atlantic Street, 15<sup>th</sup> Floor, Stamford, CT 06901.

9. On information and belief, Defendant JVC is a Delaware corporation with its principal place of business located at 1700 Valley Road, Wayne, New Jersey 07470.

10. On information and belief, Defendant LGE is a Delaware corporation with its principal place of business located at 100 Sylvan Avenue, Englewood Cliffs, New Jersey 07632.

11. On information and belief, Defendant Marantz is a California corporation with its principal place of business located at 100 Corporate Drive, Mahwah, New Jersey 07430.

12. On information and belief, Defendant Onkyo is a New Jersey corporation with its principal place of business located at 18 Park Way, Upper Saddle River, New Jersey 07458.

13. On information and belief, Defendant OPPO is a California corporation with its principal place of business located at 2629 Terminal Boulevard, Suite B, Mountain View, California 94043.

14. On information and belief, Defendant Orion is an Indiana corporation with its principal place of business at 3471 N. Union Drive, Olney, Illinois 62450.

15. On information and belief, Defendant Panasonic is a Delaware corporation with its principal place of business located at One Panasonic Way, Seacaucus, New Jersey 07094.

16. On information and belief, Defendant Philips is a Delaware corporation with its principal place of business located at 3000 Minuteman Road, Andover, Massachusetts 01810.

17. On information and belief, Defendant Pioneer is a Delaware corporation with its principal place of business located at 2265 E. 220<sup>th</sup> Street, Long Beach, California 90810.

18. On information and belief, Defendant Samsung is a New York corporation with its principal place of business located at 105 Challenger Road, Ridgefield Park, NJ 07660.

19. On information and belief, Defendant Sharp is a New York corporation with its principal place of business located at 1 Sharp Plaza, Mahwah, NJ 07495.

20. On information and belief, Defendant Sherwood is a California corporation with its principal place of business located at 13101 Moore Street, Cerritos, California 90703.

21. On information and belief, Defendant Sony America is a New York corporation with its principal place of business located at 550 Madison Avenue, New York, New York 10022.

22. On information and belief, Defendant Sony Electronics is a Delaware corporation with its principal place of business located at 6530 Via Esprillo, San Diego, CA 92127.

23. On information and belief, Defendant Technicolor is a Delaware corporation with its principal place of business located at 101 W. 103<sup>rd</sup> Street, Indianapolis, Indiana 46290.

24. On information and belief, Defendant Toshiba is a California corporation with its principal place of business located at 9740 Irvine Boulevard, Irvine, CA 92618-1697.

25. On information and belief, Defendant VIZIO is a California corporation with its principal place of business located at 39 Tesla, Irvine, California 92618.

26. On information and belief, Defendant Yamaha is a California corporation with its principal place of business located at 6600 Orangethorpe Avenue, Buena Park, California 90620.

### **JURISDICTION AND VENUE**

27. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

28. On information and belief, all of the Defendants are subject to this Court's jurisdiction because they have, upon information and belief: (1) transacted business in this district including such activities as (directly and/or through intermediaries) shipping, distributing, offering for sale, selling, and/or advertising (including via the provision of such services over the Internet) each of their accused products in the State of Delaware; and/or (2) delivered their products into the stream of commerce with the expectation that they will be purchased by consumers in Delaware. Moreover, Defendants D&M, Denon, Harman, JVC, LGE, Panasonic, Philips, Pioneer, Sony Electronic and Technicolor are corporations organized and existing under the laws of the State of Delaware. All the Defendants, upon information and belief, are doing substantial business in this District, and have committed acts of patent infringement in this District.

29. Venue is proper in this district under 28 U.S.C. §§ 1391(b) and (c), and 1400(b).

**THE ASSERTED PATENT**

30. On July 17, 2001, the United States Patent and Trademark Office (“USPTO”) duly and legally issued U.S. Patent No. 6,263,505 (“the ’505 patent”), entitled “System and Method for Supplying Supplemental Information for Video Programs” to Jay S. Walker, James A. Jorasch, Robert R. Lech and Thomas M. Sparico, who assigned their rights and interests in the ’505 patent to Walker Digital. A true and correct copy of the ’505 patent is attached as Exhibit A.

31. Walker Digital is thus the owner of the ’505 patent.

**FACTUAL BACKGROUND**

32. Walker Digital is a research and development laboratory that has invested many millions of dollars in the development of its intellectual property. Walker Digital is comprised of a diverse group of inventors who solve business problems by studying human behavior and designing innovative solutions utilizing modern information technologies. Walker Digital’s invention team has created a portfolio of more than 200 U.S. and international patents in a wide range of industries that include retail, vending, credit cards, security, gaming, educational testing, and entertainment. Jay Walker, the chairman of Walker Digital, is best known as the founder of Priceline.com, which brought unprecedented technology and a new level of value to the travel industry. The business processes that guide Priceline.com’s success were created in the invention lab of Walker Digital. As an inventor, Mr. Walker is named on more than 450 issued and pending U.S. and international patents.

33. Walker Digital has invested large sums of money to develop the inventions of Mr. Walker and Walker Digital’s team of innovators. This investment was used for many things, including the development of laboratory facilities to assist with the development and testing of

new inventions which, in turn, generated additional new inventions. Many of these new inventions have been the genesis for successful businesses, including Priceline.com and Synapse, Inc. Revolutionary technologies, including the method for supplying supplemental information for video programs described and claimed in the '505 patent, were a direct result of that investment.

34. The '505 patent represents breakthrough technology in the field of consumer electronics. Through the inventions of the '505 patent, a user can get synchronized supplemental information related to a video program while watching the video program. By way of example and not limitation, a Blu-Ray player receives a request from a viewer for supplemental information related to a video program (such as the name of the actor or actress in a particular scene), receives synchronization information relating to the video program, processes the request for the supplemental information, and transmits the synchronized supplemental information using the synchronization information. Thus, the information requested by the video user can be requested and received about a specific scene.

### **COUNT I**

#### **(Infringement of the '505 Patent)**

35. Walker Digital incorporates and realleges the allegations of paragraphs 1-34.

36. Upon information and belief, Defendant Ayre is infringing (literally and/or under the doctrine of equivalents) the '505 patent in this District and throughout the United States by, among other things, using Profile 2.0 Blu-Ray players, including DX-5, covered by, without limitation, claim 7 of the '505 patent. By way of example and without limitation, Defendant's Blu-Ray players receive a request from a viewer for supplemental information related to a video program (such as the name of the actor or actress in a particular scene), receive synchronization

information relating to the video program, process the request for the supplemental information, and transmit the synchronized supplemental information using the synchronization information.

37. Upon information and belief, Defendant Best Buy is infringing (literally and/or under the doctrine of equivalents) the '505 patent in this District and throughout the United States by, among other things, using Profile 2.0 Blu-Ray players, including Insignia NS-WBRDVD2; NS-WBRDVD2-CA; NS-BRDVD4; NS-BRDVD4-CA, covered by, without limitation, claim 7 of the '505 patent. By way of example and without limitation, Defendant's Blu-Ray players receive a request from a viewer for supplemental information related to a video program (such as the name of the actor or actress in a particular scene), receive synchronization information relating to the video program, process the request for the supplemental information, and transmit the synchronized supplemental information using the synchronization information.

38. Upon information and belief, Defendants D&M and Marantz are infringing (literally and/or under the doctrine of equivalents) the '505 patent in this District and throughout the United States by, among other things, using Profile 2.0 Blu-Ray players, including BD5004, UD5005, UD8004 and UD9004 covered by, without limitation, claim 7 of the '505 patent. By way of example and without limitation, Defendant's Blu-Ray players receive a request from a viewer for supplemental information related to a video program (such as the name of the actor or actress in a particular scene), receive synchronization information relating to the video program, process the request for the supplemental information, and transmit the synchronized supplemental information using the synchronization information.

39. Upon information and belief, Defendants Denon and D&M are infringing (literally and/or under the doctrine of equivalents) the '505 patent in this District and throughout the United States by, among other things, using Profile 2.0 Blu-Ray players, including Denon S-



5BD; Denon DVD-A1UDCI; Denon DBP-2010CI and DBP-1610, covered by, without limitation, claim 7 of the '505 patent. By way of example and without limitation, Defendant's Blu-Ray players receive a request from a viewer for supplemental information related to a video program (such as the name of the actor or actress in a particular scene), receive synchronization information relating to the video program, process the request for the supplemental information, and transmit the synchronized supplemental information using the synchronization information.

40. Upon information and belief, Defendant Funai is infringing (literally and/or under the doctrine of equivalents) the '505 patent in this District and throughout the United States by, among other things, using Profile 2.0 Blu-Ray players, including SYLVANIA NB620SL1 and Magnavox MBP5130, covered by, without limitation, claim 7 of the '505 patent. By way of example and without limitation, Defendant's Blu-Ray players receive a request from a viewer for supplemental information related to a video program (such as the name of the actor or actress in a particular scene), receive synchronization information relating to the video program, process the request for the supplemental information, and transmit the synchronized supplemental information using the synchronization information.

41. Upon information and belief, Defendant Haier is infringing (literally and/or under the doctrine of equivalents) the '505 patent in this District and throughout the United States by, among other things, using Profile 2.0 Blu-Ray players, including BDP100, covered by, without limitation, claim 7 of the '505 patent. By way of example and without limitation, Defendant's Blu-Ray players receive a request from a viewer for supplemental information related to a video program (such as the name of the actor or actress in a particular scene), receive synchronization information relating to the video program, process the request for the supplemental information, and transmit the synchronized supplemental information using the synchronization information.

42. Upon information and belief, Defendant Harman is infringing (literally and/or under the doctrine of equivalents) the '505 patent in this District and throughout the United States by, among other things, using Profile 2.0 Blu-Ray players, including Harman Kardon BDP-1 and Lexicon BD-30, covered by, without limitation, claim 7 of the '505 patent. By way of example and without limitation, Defendant's Blu-Ray players receive a request from a viewer for supplemental information related to a video program (such as the name of the actor or actress in a particular scene), receive synchronization information relating to the video program, process the request for the supplemental information, and transmit the synchronized supplemental information using the synchronization information.

43. Upon information and belief, Defendant JVC is infringing (literally and/or under the doctrine of equivalents) the '505 patent in this District and throughout the United States by, among other things, using Profile 2.0 Blu-Ray players, including XV-BP1, covered by, without limitation, claim 7 of the '505 patent. By way of example and without limitation, Defendant's Blu-Ray players receive a request from a viewer for supplemental information related to a video program (such as the name of the actor or actress in a particular scene), receive synchronization information relating to the video program, process the request for the supplemental information, and transmit the synchronized supplemental information using the synchronization information.

44. Upon information and belief, Defendant LGE is infringing (literally and/or under the doctrine of equivalents) the '505 patent in this District and throughout the United States by, among other things, using Profile 2.0 Blu-Ray players, including LG BD690; LG BD670; LG BD640; LG BD630, covered by, without limitation, claim 7 of the '505 patent. By way of example and without limitation, Defendant's Blu-Ray players receive a request from a viewer for supplemental information related to a video program (such as the name of the actor or actress in

a particular scene), receive synchronization information relating to the video program, process the request for the supplemental information, and transmit the synchronized supplemental information using the synchronization information.

45. Upon information and belief, Defendant Onkyo is infringing (literally and/or under the doctrine of equivalents) the '505 patent in this District and throughout the United States by, among other things, using Profile 2.0 Blu-Ray players, including BD-SP308; BD-SP808; Integra DBS-30.1; Integra DBS-50.2; covered by, without limitation, claim 7 of the '505 patent. By way of example and without limitation, Defendant's Blu-Ray players receive a request from a viewer for supplemental information related to a video program (such as the name of the actor or actress in a particular scene), receive synchronization information relating to the video program, process the request for the supplemental information, and transmit the synchronized supplemental information using the synchronization information.

46. Upon information and belief, Defendant OPPO is infringing (literally and/or under the doctrine of equivalents) the '505 patent in this District and throughout the United States by, among other things, using Profile 2.0 Blu-Ray players, including BDP-93; BDP-95 and PDB-83, covered by, without limitation, claim 7 of the '505 patent. By way of example and without limitation, Defendant's Blu-Ray players receive a request from a viewer for supplemental information related to a video program (such as the name of the actor or actress in a particular scene), receive synchronization information relating to the video program, process the request for the supplemental information, and transmit the synchronized supplemental information using the synchronization information.

47. Upon information and belief, Defendant Orion is infringing (literally and/or under the doctrine of equivalents) the '505 patent in this District and throughout the United States by,

among other things, using Profile 2.0 Blu-Ray players, BDP3959 covered by, without limitation, claim 7 of the '505 patent. By way of example and without limitation, Defendant's Blu-Ray players receive a request from a viewer for supplemental information related to a video program (such as the name of the actor or actress in a particular scene), receive synchronization information relating to the video program, process the request for the supplemental information, and transmit the synchronized supplemental information using the synchronization information.

48. Upon information and belief, Defendant Panasonic is infringing (literally and/or under the doctrine of equivalents) the '505 patent in this District and throughout the United States by, among other things, using Profile 2.0 Blu-Ray players, including DMP-BD65K; DMP-BDT210; DMP-BDT110; DMP-BD75, covered by, without limitation, claim 7 of the '505 patent. By way of example and without limitation, Defendant's Blu-Ray players receive a request from a viewer for supplemental information related to a video program (such as the name of the actor or actress in a particular scene), receive synchronization information relating to the video program, process the request for the supplemental information, and transmit the synchronized supplemental information using the synchronization information.

49. Upon information and belief, Defendant Philips is infringing (literally and/or under the doctrine of equivalents) the '505 patent in this District and throughout the United States by, among other things, using Profile 2.0 Blu-Ray players, including BDP3020/F7; BDP3010/F7; BDP3020/F7; BDP3306/F7; BDP5005/F7; BDP5010/F7; BDP5012/F7; BDP5110/F7; BDP5320/F7; BDP7310/F7; BDP7320/F7 and BDP7520/F7, covered by, without limitation, claim 7 of the '505 patent. By way of example and without limitation, Defendant's Blu-Ray players receive a request from a viewer for supplemental information related to a video program (such as the name of the actor or actress in a particular scene), receive synchronization

information relating to the video program, process the request for the supplemental information, and transmit the synchronized supplemental information using the synchronization information.

50. Upon information and belief, Defendant Pioneer is infringing (literally and/or under the doctrine of equivalents) the '505 patent in this District and throughout the United States by, among other things, using Profile 2.0 Blu-Ray players, including BDP-120; BDP-121; BDP-V6000; BDP-330; BDP-430; BDP-09FD, covered by, without limitation, claim 7 of the '505 patent. By way of example and without limitation, Defendant's Blu-Ray players receive a request from a viewer for supplemental information related to a video program (such as the name of the actor or actress in a particular scene), receive synchronization information relating to the video program, process the request for the supplemental information, and transmit the synchronized supplemental information using the synchronization information.

51. Upon information and belief, Defendant Samsung is infringing (literally and/or under the doctrine of equivalents) the '505 patent in this District and throughout the United States by, among other things, using Profile 2.0 Blu-Ray players, including Samsung BD-C5500; BD-D5700ZA; BD-C6500; BD-C6800; BD-C6900; BD-C7500; BD-C7900, covered by, without limitation, claim 7 of the '505 patent. By way of example and without limitation, Defendant's Blu-Ray players receive a request from a viewer for supplemental information related to a video program (such as the name of the actor or actress in a particular scene), receive synchronization information relating to the video program, process the request for the supplemental information, and transmit the synchronized supplemental information using the synchronization information.

52. Upon information and belief, Defendant Sharp is infringing (literally and/or under the doctrine of equivalents) the '505 patent in this District and throughout the United States by, among other things, using Profile 2.0 Blu-Ray players, including BD-HP16U; BD-HP24U; BD-

HP25U; BD-HP35U; BD-HP80U, covered by, without limitation, claim 7 of the '505 patent. By way of example and without limitation, Defendant's Blu-Ray players receive a request from a viewer for supplemental information related to a video program (such as the name of the actor or actress in a particular scene), receive synchronization information relating to the video program, process the request for the supplemental information, and transmit the synchronized supplemental information using the synchronization information.

53. Upon information and belief, Defendant Sherwood is infringing (literally and/or under the doctrine of equivalents) the '505 patent in this District and throughout the United States by, among other things, using Profile 2.0 Blu-Ray players, including BDP-5004, covered by, without limitation, claim 7 of the '505 patent. By way of example and without limitation, Defendant's Blu-Ray players receive a request from a viewer for supplemental information related to a video program (such as the name of the actor or actress in a particular scene), receive synchronization information relating to the video program, process the request for the supplemental information, and transmit the synchronized supplemental information using the synchronization information.

54. Upon information and belief, Defendant Sony America is infringing (literally and/or under the doctrine of equivalents) the '505 patent in this District and throughout the United States by, among other things, using Profile 2.0 Blu-Ray players, including BDP-S570; BDP-S360; BDP-S470; BDP-S350; Playstation 3, covered by, without limitation, claim 7 of the '505 patent. By way of example and without limitation, Defendant's Blu-Ray players receive a request from a viewer for supplemental information related to a video program (such as the name of the actor or actress in a particular scene), receive synchronization information relating to the

video program, process the request for the supplemental information, and transmit the synchronized supplemental information using the synchronization information.

55. Upon information and belief, Defendant Sony Electronics is infringing (literally and/or under the doctrine of equivalents) the '505 patent in this District and throughout the United States by, among other things, using Profile 2.0 Blu-Ray players, including BDP-S570; BDP-S360; BDP-S470; BDP-S350; Playstation 3, covered by, without limitation, claim 7 of the '505 patent. By way of example and without limitation, Defendant's Blu-Ray players receive a request from a viewer for supplemental information related to a video program (such as the name of the actor or actress in a particular scene), receive synchronization information relating to the video program, process the request for the supplemental information, and transmit the synchronized supplemental information using the synchronization information.

56. Upon information and belief, Defendant Technicolor is infringing (literally and/or under the doctrine of equivalents) the '505 patent in this District and throughout the United States by, among other things, using Profile 2.0 Blu-Ray players, including RCA's BRC11082, covered by, without limitation, claim 7 of the '505 patent. By way of example and without limitation, Defendant's Blu-Ray players receive a request from a viewer for supplemental information related to a video program (such as the name of the actor or actress in a particular scene), receive synchronization information relating to the video program, process the request for the supplemental information, and transmit the synchronized supplemental information using the synchronization information.

57. Upon information and belief, Defendant Toshiba is infringing (literally and/or under the doctrine of equivalents) the '505 patent in this District and throughout the United States by, among other things, using Profile 2.0 Blu-Ray players, including Toshiba BDXX1100;

BDX2000; BDX2200; BDX2500; BDX2700; BDX3000; BDX4200; BDX5200; covered by, without limitation, claim 7 of the '505 patent. By way of example and without limitation, Defendant's Blu-Ray players receive a request from a viewer for supplemental information related to a video program (such as the name of the actor or actress in a particular scene), receive synchronization information relating to the video program, process the request for the supplemental information, and transmit the synchronized supplemental information using the synchronization information.

58. Upon information and belief, Defendant VIZIO is infringing (literally and/or under the doctrine of equivalents) the '505 patent in this District and throughout the United States by, among other things, using Profile 2.0 Blu-Ray players, including VBR133 and VB334, covered by, without limitation, claim 7 of the '505 patent. By way of example and without limitation, Defendant's Blu-Ray players receive a request from a viewer for supplemental information related to a video program (such as the name of the actor or actress in a particular scene), receive synchronization information relating to the video program, process the request for the supplemental information, and transmit the synchronized supplemental information using the synchronization information.

59. Upon information and belief, Defendant Yamaha is infringing (literally and/or under the doctrine of equivalents) the '505 patent in this District and throughout the United States by, among other things, using Profile 2.0 Blu-Ray players, including Yamaha BD-A1000; BD-S667; BD-S1900; and BD-S1065, covered by, without limitation, claim 7 of the '505 patent. By way of example and without limitation, Defendant's Blu-Ray players receive a request from a viewer for supplemental information related to a video program (such as the name of the actor or actress in a particular scene), receive synchronization information relating to the video program,



process the request for the supplemental information, and transmit the synchronized supplemental information using the synchronization information.

60. Defendants committed these acts of infringement without license or authorization.

61. Walker Digital has suffered and will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting Defendants, their agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the '505 patent.

### **DEMAND FOR JURY TRIAL**

Plaintiff Walker Digital, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

### **PRAYER FOR RELIEF**

For the above reasons, Walker Digital respectfully asks this Court to grant the following relief in favor of Walker Digital and against Defendants:

(a) A judgment in favor of Walker Digital that Defendants have directly infringed (either literally or under the doctrine of equivalents) one or more claims of each of the '505 patent;

(b) A permanent injunction enjoining Defendants and their officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert or participation with them, from infringing the '505 patent;

(d) A judgment and order requiring Defendants to pay Walker Digital its damages, costs, expenses, and pre-judgment and post-judgment interest for Defendants' infringement of the '505 patent;

(e) A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding Walker Digital its reasonable attorneys' fees; and

(f) Any and all such other relief as the Court deems just and proper.

April 11, 2011

BAYARD, P.A.

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