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9 Development Innovation Group, LLC

10 **UNITED STATES DISTRICT COURT**
11 **SOUTHERN DISTRICT OF CALIFORNIA**
12

13 Development Innovation Group, LLC,
14 Plaintiff,
15 v.

- 16 1. Nokia Inc.;
- 17 2. Personal Communications
Devices, LLC;
- 18 3. Personal Communications
Devices Holdings, LLC;
- 19 4. Pantech Wireless, Inc.;
- 20 5. Cellco Partnership d/b/a Verizon
Wireless;
- 21 6. AT&T Mobility, LLC;
- 22 7. Sprint Spectrum L.P.;
- 23 8. T-Mobile USA, Inc.;
- 24 9. Cricket Communications, Inc.;
- 25 10. Virgin Mobile USA, L.P.;
- 26 11. United States Cellular
Corporation;
- 27 12. MetroPCS Wireless, Inc.;
- 28 13. TracFone Wireless, Inc.;
14. Boost Mobile, LLC;

Case No. 11-cv-2150-AJB (WVG)

Assigned to The Honorable
Anthony J. Battaglia, Courtroom 12

**FIRST AMENDED COMPLAINT;
AND DEMAND FOR JURY TRIAL**

RUSS, AUGUST & KABAT

- 1 15. Samsung Telecommunications
America LLC;
- 2 16. Research In Motion Corporation;
- 3 17. Motorola Mobility, Inc.;
- 4 18. HTC America, Inc.;
- 5 19. Sharp Electronics Corporation;
- 6 20. UTStarcom, Inc.
- 7 21. Hewlett-Packard Company;
- 8 22. Sony Ericsson Mobile
Communications (USA), Inc.;
- 9 23. Futurewei Technologies, Inc. dba
Huawei;
- 10 24. ZTE (USA) Inc.;
- 11 25. Kyocera Wireless Corp.; and
- 12 26. Sanyo North America
Corporation,
- 13 Defendants.

Plaintiff Development Innovation Group, LLC, (“DIG”) alleges as follows:

PARTIES

1. Development Innovation Group, LLC is a Delaware limited liability company with a principal place of business at 10755 Scripps Poway Pkwy, San Diego, California 92131.

2. Defendant Nokia Inc. (“Nokia”) is a Delaware corporation with its principal place of business at 102 Corporate Park Drive, White Plains, New York 10604. Nokia has appointed National Register Agents, Inc., 160 Greentree Drive, Suite 101, Dover, Delaware 19904, as its agent for service of process.

3. Defendant Personal Communications Devices, LLC is a Delaware limited liability company with its principal place of business at 555 Wireless Blvd., Hauppauge, New York 11788.

4. Defendant Personal Communications Devices Holdings, LLC, on information and belief, is a wholly-owned subsidiary of defendant Personal Communications Devices, LLC and is a Delaware limited liability company with its principal place of business at 555 Wireless Blvd., Hauppauge, New York 11788.

5. Defendants Personal Communications Devices, LLC and Personal Communications Devices Holdings, LLC will be referred to herein individually and collectively as the “PCD Defendants.” On information and belief, PCD Defendants have appointed California Civil Process, Inc., 1510 Merkley Avenue, Suite Five, West Sacramento, California 95691, as their agent for services of process.

6. Defendant Pantech Wireless, Inc. (“Pantech”) is a Georgia corporation with its principal place of business located at 5607 Glenridge Drive NE, Suite 500, Atlanta, Georgia 30342. Pantech has appointed Kathleen Elizabeth Jones, Secretary, Pantech Wireless, Inc., 5607 Glenridge Drive NE, Suite 500, Atlanta, Georgia 30342, as its agent for service of process.

7. Defendant Cellco Partnership, which does business as Verizon Wireless (“Verizon”), is a Delaware general partnership with its principal place of business at 1 Verizon Way, Basking Ridge, New Jersey 07920. Verizon has appointed The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801, as its agent for service of process.

8. Defendant AT&T Mobility, LLC (“AT&T”) is a Delaware limited liability company with its principal place of business at 5565 Glenridge Connector, Atlanta, Georgia 30342. AT&T has appointed The Corporation Trust Company, Corporation Trust Center 1209 Orange Street, Wilmington, Delaware 19801, as its agent for service of process.

9. Defendant Sprint Spectrum L.P. (“Sprint”) is a Delaware limited partnership with its principal place of business at 2001 Edmund Halley Drive, Reston, Virginia 20191. Sprint has appointed Corporation Service Company, 2711 Centerville, Road, Suite 400, Wilmington, Delaware 19808, as its agent for service of process.

10. Defendant T-Mobile USA, Inc. (“T-Mobile”) is a Delaware corporation with its principal place of business at 12920 SE 38th Street, Bellevue, Washington 98006. T-Mobile has appointed Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808, as its agent for service of process.

11. Defendant Cricket Communications, Inc. (“Cricket”) is a Delaware corporation, with its principal place of business at 5887 Copley Drive, San Diego, California 92111. Cricket has appointed Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808, as its agent for service of process.

12. Defendant Virgin Mobile USA, L.P. (“Virgin”) is a Delaware limited partnership, with its principal place of business at 10 Independence Boulevard,

1 Warren, New Jersey 07059. Virgin has appointed Corporation Service Company,
2 2711 Centerville, Road, Suite 400, Wilmington, Delaware 19808, as its agent for
3 service of process.

4 13. Defendant United States Cellular Corporation (“U.S. Cellular”) is a
5 Delaware corporation, with its principal place of business at 8410 West Bryn
6 Mawr, Suite 700, Chicago, Illinois 60631. U.S. Cellular has appointed The
7 Prentice-Hall Corporation System, Inc., 2711 Centerville Road, Suite 400,
8 Wilmington, Delaware 19808, as its agent for service of process.

9 14. Defendant MetroPCS Wireless, Inc. (“MetroPCS”) is a Delaware
10 corporation with its principal place of business at 2250 Lakeside Boulevard,
11 Richardson, Texas 75082. MetroPCS has appointed The Prentice-Hall Corporation
12 System, Inc., 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808, as
13 its agent for service of process.

14 15. Defendant TracFone Wireless, Inc. (“TracFone”) is a Delaware
15 corporation with its principal place of business at 9700 NW 112th Avenue,
16 Medley, Florida 33178. TracFone has appointed Corporate Creations Network
17 Inc., 3411 Silverside Road, Rodney Building, No. 104, Wilmington, Delaware
18 19810, as its agent for service of process.

19 16. Defendant Boost Mobile, LLC (“Boost Mobile”) is a Delaware
20 limited liability company, with a place of business at 8845 Irvine Center Drive,
21 Suite No. 200, Irvine, California 92618. Boost has appointed Corporation Service
22 Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808, as its
23 agent for service of process.

24 17. Defendant Samsung Telecommunications America, LLC (“Samsung”) is a Delaware limited liability company with its principal place of business at 1301
25 Lookout Drive, Richardson, Texas 75082. Samsung has appointed Corporation
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1 Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware
2 19808, as its agent for service of process.

3 18. Defendant Research In Motion Corporation (“RIM”) is a Delaware
4 corporation with its principal place of business at 122 West John Carpenter
5 Parkway, Suite 430, Irving, Texas 75039. RIM has appointed The California Trust
6 Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware
7 19801, as its agent for service of process.

8 19. Defendant Motorola Mobility, Inc. (“Motorola”) is a Delaware
9 corporation with its principal place of business at 600 North U.S. Highway 45,
10 Libertyville, Illinois 60048. Motorola has appointed The Corporation Trust
11 Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware
12 19801, as its agent for service of process.

13 20. Defendant HTC America, Inc. (“HTC”) is a Washington corporation
14 with its principal place of business at 13920 SE Eastgate Way, Suite 400, Bellevue,
15 Washington 98005. HTC has appointed National Registered Agents, Inc., 1780
16 Barnes Boulevard SW, Tumwater, Washington 98512, as its agent for service of
17 process.

18 21. Defendant Sharp Electronics Corporation (“Sharp”) is a New York
19 corporation with a principal place of business at 1 Sharp Plaza, Mahwah, New
20 Jersey 07495. Sharp has appointed C T Corporation System, 111 8th Avenue,
21 New York, New York 10011, as its agent for service of process.

22 22. Defendant UTStarcom, Inc. (“UTStarcom”) is a Delaware corporation
23 with a principal place of business at 1275 Harbor Bay Parkway, Suite 100,
24 Alameda, California 94502. UTStarcom has appointed James Lee, 1275 Harbor
25 Bay Parkway, Alameda, California 94502, as its agent for service of process.

26 23. Defendant Hewlett-Packard Company (“HP”) is a Delaware
27 corporation with its principal place of business at 3000 Hanover Street, Palo Alto,
28

1 California, 94304. HP has appointed CT Corporation System, 818 West Seventh
2 Street, Los Angeles, California 90017, as its agent for service of process.

3 24. Defendant Sony Ericsson Mobile Communications (USA), Inc.
4 (“Sony Ericsson”) is a Delaware corporation with its principal place of business
5 located at 3333 Piedmont Road, Suite 600, Atlanta, Georgia 30305. Sony Ericsson
6 has appointed Capital Services Inc., 1675 South State Street, Suite B, Dover,
7 Delaware 19901, as its agent for service of process.

8 25. Defendant Futurewei Technologies, Inc., which does business as
9 Huawei (“Huawei”) is a Delaware corporation with its principal place of business
10 at 5700 Tennyson Parkway, Suite No. 500, Plano, TX 75024. Huawei has
11 appointed The Corporation Trust Company, Corporation Trust Center, 1209
12 Orange Street, Wilmington, Delaware 19801, as its agent for service of process.

13 26. Defendant ZTE (USA) Inc. is a New Jersey corporation with its
14 principal place of business at 2425 North Central Expressway, Suite 600,
15 Richardson, Texas 75080. ZTE has appointed Lixin Cheng, 33 Wood Avenue
16 South, 2nd Floor, Iselin, New Jersey 08830, as its agent for service of process.

17 27. Defendant Kyocera Wireless Corp. (“Kyocera”) is a Delaware
18 corporation with its principal place of business at 10300 Campus Point Drive, San
19 Diego, California, 92121-1511. Kyocera has appointed Corporation Service
20 Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808, as its
21 agent for service of process.

22 28. Defendant Sanyo North America Corporation (“Sanyo”) is a Delaware
23 corporation, with its principal place of business at 2055 Sanyo Avenue, San Diego,
24 California, 92154. Sanyo has appointed Corporation Service Company, 2711
25 Centerville Road, Suite 400, Wilmington, Delaware 19808, as its agent for service
26 of process.

29. Defendants Verizon, AT&T, Sprint, T-Mobile, Cricket, Virgin Mobile, U.S. Cellular, MetroPCS, TracFone, and Boost Mobile are hereinafter collectively referred to as “Communications Handset Carriers.”

30. Defendants Nokia, PCD Defendants, Pantech, Samsung, RIM, Motorola, HTC, Sharp, UTStarcom, HP, Sony Ericsson, Huawei, ZTE, Kyocera, and Sanyo are hereinafter collectively referred to as “Communications Handset Manufacturers.”

JURISDICTION AND VENUE

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

32. Venue is proper in this district under 28 U.S.C. §§ 1391 (b)-(d) and 1400(b) because each defendant is subject to personal jurisdiction in this district, has committed acts of patent infringement in this district, or has a regular and established place of business in this district.

COUNT I

(Infringement of U.S. Patent No. 6,138,245)

33. DIG is the owner by assignment of United States Patent No. 6,138,245 (“the ’245 patent”), entitled “System and Method for Automatic Device Synchronization.” The ’245 patent issued on October 24, 2000. A true and correct copy of the ’245 patent is attached hereto as Exhibit A.

34. Defendant Verizon has infringed and still is infringing at least claims 1 and/or 12 of the ’245 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing portable electronic devices with an apparatus for initiating a synchronization process with a host computer, including, but not limited to, Sony Ericsson Xperia PLAY CDMA R800x, Motorola DroidBionic/XT875, Motorola Droid X2, Motorola XOOM CDMA,

1 Motorola E815 / E816 Hollywood, Motorola RAZR V3c, Motorola Droid A855,
 2 Motorola W315, Motorola Q CDMA, Motorola RAZR V3m, Motorola KRZR
 3 K1m, Motorola RAZR2 V9m, Motorola SLVR L7c, Motorola Q2/Q9m/Q9c,
 4 Motorola Droid 3/XT862, Motorola XOOM CDMA, Motorola Citrus WX445,
 5 Motorola Droid 2 - A955, Motorola Devour A555, Motorola Rival A455, Motorola
 6 Krave ZN4, Motorola Entice W766, Motorola W755, Motorola Rapture VU30,
 7 Motorola Adventure V750, Motorola Moto Z6cx, Motorola Z6c World, Motorola
 8 RIZR Z6tv, Motorola RAZR maxx Ve, Motorola VU204, Motorola v65p,
 9 Motorola Droid Pro A957/XT610, Motorola Droid Pro A947/XT610, Motorola
 10 Droid X ME811/MB810, Motorola Barrage V860, BlackBerry Bold 9930,
 11 BlackBerry Curve 3G 9330, BlackBerry Torch 9850, HTC Rhyme/Bliss, HTC
 12 Rezound, HTC Trophy, HTC DROID Incredible 2, HTC Thunderbolt/Incredible
 13 HD, HTC Droid Incredible, HTC Imagio / XV6975, HTC Ozone XV6175, HTC
 14 DROID ERIS, HTC Touch Diamond XV6950, Pantech Breakout, Pantech PN-820
 15 / 8200, Pantech Hotshot, Pantech Crux CDM8999, Pantech Jest TXT8040, Pantech
 16 Jest 2, Samsung Stratosphere/SCH-i405, Samsung Convoy 2, Samsung Droid
 17 Charge/Inspiration/ 4G LTE smartphone/ Stealth/Stealth V/SCH-i510, Samsung
 18 SCH-i760, Samsung SCH-i830, Samsung SCH-i730, Samsung Intensity II/SCH-
 19 U460, Intensity/DoubleTake/SCH-U450, Samsung FlipShot/SCH-U900, Samsung
 20 Alias/SCH-U740, Samsung SCH-U540, Samsung Gleam/SCH-U706/SCH-U700/
 21 Muse, Samsung SCH-A930, Samsung SCH-A990, Samsung SCH-A950, Samsung
 22 SCH-A970, Samsung Juke/SCH-U470, Nokia Intrigue 7205/RM-383, Nokia Twist
 23 7705, Nokia 6205, PCD SMT5800, Blitz 2/Razzle TXT8030, Sharp KIN ONE,
 24 Sharp KIN TWO, and Kyocera K312/K320/K322/K323/K325 Cyclops, and any
 25 other devices offered for sale or sold by Verizon that are alleged in this amended
 26 complaint as infringing the '245 patent.
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35. Defendant AT&T has infringed and still is infringing at least claims 1 and/or 12 of the '245 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing portable electronic devices with an apparatus for initiating a synchronization process with a host computer. Such devices include, but are not limited to, Xperia Play 4G, Vivaz a U5a, Xperia X10a, SonyEricsson 518a, SonyEricsson C905a, SonyEricsson W350, SonyEricsson W760, SonyEricsson Z750, SonyEricsson W300, SonyEricsson W810, SonyEricsson Z310, SonyEricsson Z525/Z525a, SonyEricsson Z520, SonyEricsson W550i/600i, Motorola ATRIX 4G/MB860, Motorola Atrix 2/MB865, Motorola FlipSide/MB508, Motorola Bravo/MB520, Motorola FlipOut, Motorola BackFlip/MB300, Motorola Karma QA1, Motorola Q Global/Q9h /Q Q9, Motorola Tundra/VA76r, Motorola ROKR/EM330, Motorola Moto Z9, RAZR2/V9x, Motorola RAZR2 V9, Motorola KRZR K1, Motorola V365, Motorola RAZR V3xx, Motorola SLVR L7, Motorola RAZR V3i / V3t / V3r, Motorola ROKR E1 (E790), Motorola SLVR L6, SLVR L6, Motorola RAZR V3, Motorola V551 / V547 / V555 / V330 / V540, BlackBerry Curve 9360, BlackBerry Bold 9900, BlackBerry Curve 9300 3G, BlackBerry Pearl 8100, HTC Titan, HTC Status/ChaCha, HTC HD7S, HTC Inspire 4G, HTC Freestlye, HTC Jetstream /Puccini, HTC Surround/Spark/7 Surround, HTC Typhoon/Qtek 8010, Pantech Pocket, Pantech Crossover, Pantech Matrix Pro C820, Pantech Duo C810, Pantech Laser P9050, Pantech Ease P2020, Pantech Pursuit P9020, Pantech Pursuit II P6010, Pantech Link II, Pantech Breeze III, Pantech Breeze II P2000, Pantech Link, Pantech Impact P7000, Pantech Reveal C790, Pantech C630 MARTHA, Pantech Matrix C740, Pantech C610, Samsung DoubleTime/SGH-i857, Samsung Focus Flash/SGHi677, Samsung Focus S/i937, Samsung Galaxy S II Skyrocket, Samsung Galaxy S II AT&T/SGH-i777/Attain, Samsung Infuse 4G/SGH-i997, Samsung Blackjack II SGH-i617, Samsung Blackjack SGH-i607, Samsung

1 Solstice II/SGH-A817, Samsung Flight II/SGH-A927, Samsung Evergreen/SGH-
 2 A667, Samsung Rugby II/SGH-A847, Samsung SGH-P207, Samsung SPH-A840,
 3 Samsung SPH, Samsung SGH-A737, Samsung SLM SGH-A747, Samsung SGH-
 4 A727, Samsung SGH-A517, Samsung SGH-A717, Samsung Sync SGH-A707,
 5 Samsung SGH-ZX10, Samsung SGH-P207, Samsung SGH-P777, Nokia E71x,
 6 Nokie Surge 6790, Nokia 6650 fold, Nokia E62, Nokia N75, Nokia 6682/6681,
 7 PCD Quickfire/Knick/GTX75, ZTE Avail/Z990, Sharp FX Plus, Sharp FX (STX-
 8 2), Huawei Impulse 4G, HP iPAQ Glisten, and HP iPAQ
 9 hw6900/6915/6920/6925/6945, and any other devices offered for sale or sold by
 10 AT&T that are alleged in this amended complaint as infringing the '245 patent.

11 36. Defendant Sprint has infringed and still is infringing at least claims 1
 12 and/or 12 of the '245 patent, literally and under the doctrine of equivalents, by
 13 making, using, selling, offering to sell, or importing portable electronic devices
 14 with an apparatus for initiating a synchronization process with a host computer.
 15 Such devices include, but are not limited to, Motorola Photon 4G, Motorola
 16 Admiral, Motorola XPRT, Motorola XOOM wi-fi, Motorola ES400, Motorola
 17 Q2/Q9m/Q9c, BlackBerry Curve 9350, BlackBerry Bold 9930, BlackBerry Torch
 18 9850, Blackberry Curve 3G 9330, BlackBerry Curve 8330, BlackBerry Curve
 19 8350i, BlackBerry 8830, HTC Evo Design 4G/Hero 4G, HTC EVO 3D/Shooter,
 20 HTC EVO View 4G, HTC Arrive/7Pro, HTC Touch Diamond XV6950, Kyocera
 21 Milano/KYC5120/C5120, Kyocera Brio, DuraMax, Sanyo Incognito SCP 6760,
 22 Sanyo Tahoe E4100, Sanyo Katana Eclipse X, Sanyo Katana LX, Samsung Nexus S
 23 4G, Samsung Nexus S, Samsung Transform Ultra SPH M930, Samsung Epic
 24 4G/Galaxy S Pro/Notion, Samsung SCH-i830/IP-830W, Samsung Highnote SPH
 25 M630, Samsung MM-A940 / SPH-A940, Samsung SPH-A840, Samsung SPH-
 26 A900, Samsung SPH-A880/MM-A880, and Sprint Express, and any other devices

1 offered for sale or sold by Sprint that are alleged in this amended complaint as
2 infringing the '245 patent.

3 37. Defendant T-Mobile has infringed and still is infringing at least claims
4 1 and/or 12 of the '245 patent, literally and under the doctrine of equivalents, by
5 making, using, selling, offering to sell, or importing portable electronic devices
6 with an apparatus for initiating a synchronization process with a host computer.
7 Such devices include, but are not limited to, SonyEricsson Equinox TM717,
8 Motorola CLIQ2, Motorola Defy ME525/MB525, Motorola CHARM
9 MB502/ME502, Motorola CLIQ XT MB501, Motorola CLIQ MB200, Motorola
10 W233 Renew, MOTOACTV W450, MOTOZINE ZN5, BlackBerry Curve 9360,
11 BlackBerry Bold 9900, BlackBerry Torch 9810, BlackBerry Curve 9300 3G,
12 BlackBerry Bold 9780, BlackBerry Pearl 8100, HTC Radar/Omega, HTC Amaze
13 4G/Ruby, HTC Flyer, HTC Wildfire S, HTC Sensation 4G/Pyramid, Samsung
14 Exhibit 4G/SGH-T759/Hawk, Samsung Gravity SMART SGH-T589/Gravity
15 Touch 2/Smart/GT2/Galaxy Q, Samsung Exhibit II 4G/SGH-T679/Ancora,
16 Samsung SGH-T339, Samsung SGH-T639, Samsung SGH T-729/Blast, Nokia
17 Lumia 710, Nokia 5230 Nuron, Nokia Astound C7/Tiger, Nokia E73 Mode, PCD
18 Tap, PCD Sidekick LS, Huawei Comet U8150 IDEOS, Huawei Tap U7519, , and
19 Nokia X2-01, and any other devices offered for sale or sold by T-Mobile that are
20 alleged in this amended complaint as infringing the '245 patent.

21 38. Defendant Cricket has infringed and still is infringing at least claims 1
22 and/or 12 of the '245 patent, literally and under the doctrine of equivalents, by
23 making, using, selling, offering to sell, or importing portable electronic devices
24 with an apparatus for initiating a synchronization process with a host computer.
25 Such devices include, but are not limited to, Motorola Evoke QA4, Motorola VE
26 465, Motorola Hint QA30, Motorola VE 240, Motorola RAZR2 V9M, Motorola
27 ROKR 26m, Motorola KRZR K1m, Motorola SLVR L7c, Motorola W315,
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1 Motorola RAZR V3c, Pantech TXT8026, Zio M6000, Kyocera Rio E3100,
2 Kyocera Slider Remix Kx5, Samsung Messenger SCH-R450, Samsung JetSet
3 SCH-R550, SCH-R500, SCH-R610, ZTE Chorus D930, ZTE Score, ZTE Chorus,
4 TXTM8, Huawei Ascend II M865, and Huawei Ascend M860, and any other
5 devices offered for sale or sold by Cricket that are alleged in this amended
6 complaint as infringing the '245 patent.

7 39. Defendant Virgin Mobile has infringed and still is infringing at least
8 claims 1 and/or 12 of the '245 patent, literally and under the doctrine of
9 equivalents, by making, using, selling, offering to sell, or importing portable
10 electronic devices with an apparatus for initiating a synchronization process with a
11 host computer. Such devices include, but are not limited to, Motorola
12 Triumph/WX435, OZ2 Ocean 2, Kyocera G2GO M2000, Kyocera Slider Remix
13 Kx5, SPH-A523/Helio Mysto, and SPH-A513/Helio Fin, and any other devices
14 offered for sale or sold by Virgin Mobile that are alleged in this amended
15 complaint as infringing the '245 patent.

16 40. Defendant U.S. Cellular has infringed and still is infringing at least
17 claims 1 and/or 12 of the '245 patent, literally and under the doctrine of
18 equivalents, by making, using, selling, offering to sell, or importing portable
19 electronic devices with an apparatus for initiating a synchronization process with a
20 host computer. Such devices include, but are not limited to, Motorola Photon 4G,
21 Motorola XOOM WiFi, Motorola RAZR V3m, Motorola KRZR K1m, Motorola
22 SLVR L7c, Motorola RAZR V3c, BlackBerry Torch 9850, BlackBerry Curve 3G
23 9330, BlackBerry Curve 8330, HTC Arrive/7 Pro, HTC Merge/ADR6325/Lexicon,
24 Kyocera Slider Remix Kx5, Kyocera Tempo E2000, Samsung SCH-R500,
25 Samsung SCH-R610, and Samsung SCH-U520, and any other devices offered for
26 sale or sold by U.S. Cellular that are alleged in this amended complaint as
27 infringing the '245 patent.

41. Defendant MetroPCS has infringed and still is infringing at least claims 1 and/or 12 of the '245 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing portable electronic devices with an apparatus for initiating a synchronization process with a host computer. Such devices include, but are not limited to, Motorola Quantico W845, Motorola VE440, Motorola Hint QA30, Motorola VE240, Motorola ROKR 26m, Motorola RAZR V3m, Motorola KRZR K1m, Motorola SLVR L7c, Motorola W315, Motorola RAZR V3c, BlackBerry Curve 8330, Pantech PN-320/PN-3200/CDM-8932, Kyocera Tempo E2000, Samsung Craft SCH-R900, Samsung SCH-R860 Caliber, Samsung Messenger SCH-R450, Samsung SCH-U520, ZTE Agent E520, Huawei M825, Huawei M835, and Huawei Ascend M860, and any other devices offered for sale or sold by MetroPCS that are alleged in this amended complaint as infringing the '245 patent.

42. Defendant TracFone has infringed and still is infringing at least claims 1 and/or 12 of the '245 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing portable electronic devices with an apparatus for initiating a synchronization process with a host computer. Such devices include, but are not limited to, Motorola EX124G, and any other devices offered for sale or sold by TracFone that are alleged in this amended complaint as infringing the '245 patent.

43. Defendant Boost Mobile has infringed and still is infringing at least claims 1 and/or 12 of the '245 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing portable electronic devices with an apparatus for initiating a synchronization process with a host computer. Such devices include, but are not limited to, Motorola BALI, Motorola i856/Debut, Motorola Stature i9, Motorola i776, Motorola i1/Opus 1, BlackBerry Curve 8330, Sanyo Incognito SCP-6760, Sanyo Innuendo, Samsung

1 Transform Ultra SPH-M930, and ZTE Warp, and any other devices offered for sale
 2 or sold by Boost Mobile that are alleged in this amended complaint as infringing
 3 the '245 patent.

4 44. Defendant Nokia has infringed and still is infringing at least claims 1
 5 and/or 12 of the '245 patent, literally and under the doctrine of equivalents, by
 6 making, using, selling, offering to sell, or importing portable electronic devices
 7 with an apparatus for initiating a synchronization process with a host computer.
 8 Such devices include, but are not limited to, Lumia 710, 5230 Nuron, Astound
 9 C7/Tiger, E73 Mode, E71x, Surge 6790, 6650 fold, E62, N75, 6682/6681, Intrigue
 10 7205/ RM-383, Twist 7705, and 6205.

11 45. PCD Defendants have infringed and are still infringing at least claims
 12 1 and/or 12 of the '245 patent, literally and under the doctrine of equivalents, by
 13 making, using, selling, offering to sell, or importing portable electronic devices
 14 with an apparatus for initiating a synchronization process with a host computer.
 15 Such devices include, but are not limited to, Sprint Express, PCD SMT5800, Blitz
 16 2/Razzle TXT8030, Tap, Sidekick LX, FX Plus, Sharp FX (STX-2), KIN ONE,
 17 and KIN TWO.

18 46. Defendant Pantech has infringed and still is infringing at least claims
 19 1 and/or 12 of the '245 patent, literally and under the doctrine of equivalents, by
 20 making, using, selling, offering to sell, or importing portable electronic devices
 21 with an apparatus for initiating a synchronization process with a host computer.
 22 Such devices include, but are not limited to, Pocket, Breakout, Crossover, Matrix
 23 Pro C820, Duo C810, PN-820/8200, Hotshot, Crux CDM8999, Laser P9050, Ease
 24 P2020, Pursuit P9020, Pursuit II P6010, Link II, Breeze III, Jest TXT8040, Breeze
 25 II P2000, Link, Impact P7000, Reveal C790, TXT8026, OZ2 Ocean2, C630
 26 MARTHA, Matrix C740, C610, PN-810 OCEAN, PN-8300 HERO, Jest 2, and
 27 PN-320/PN-3200/CDM-8932.

47. Defendant Samsung has infringed and still is infringing at least claims 1 and/or 12 of the '245 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing portable electronic devices with an apparatus for initiating a synchronization process with a host computer. Such devices include, but are not limited to, Nexus S 4G, Nexus S, Stratosphere/SCH-I405, Convoy 2, Droid Charge/Inspiration/4G LTE smartphone/Stealth/Stealth V/SCH-i510, DoubleTime/SGH-I857, Focus Flash/SGH-i677, Focus S/i937, Galaxy S II - Skyrocket, Galaxy S II AT&T/SGH-i777/Attain, Infuse 4G/SGH-I997, Exhibit 4G/SGH-T759/Hawk, Gravity SMART SGH-T589/Gravity Touch 2/Smart/GT2/Galaxy Q, Transform Ultra SPH-M930, Epic 4G/Galaxy S Pro/ Notion, SCH-i760, Blackjack II SGH-i617, Blackjack SGH-i607, SCH-i830/IP-830W, SCH-i730, Solstice II/SGH-A817, Flight II/SGH-A927, Craft SCH-R900, SCH-R860 Caliber, Behold SGH-T919/Roxy, Delve SCH-R800, Exhibit II 4G /SGH-T679/Ancora, Intensity II/SCH-U460, Evergreen/SGH-A667, Rugby II/SGH-A847, Convoy SCH-U640, Intensity/DoubleTake/SCH-U450, Highnote SPH-M630, SGH-T339, Hue II SCH-R600, Messenger SCH-R450, JetSet SCH-R550, SPH-M510, SCH-R500, SCH-R510/Wafer, SPH-A523/Helio Mysto, SPH-A513/Helio Fin, FlipShot/SCH-U900, Alias/SCH-U740, SCH-U540, Gleam/SCH-U706/SCH-U700/Muse, SCH-A930, SGH-A737, SLM SGH-A747, SGH-A727, SGH-A517, SGH-A717, UpStage SPH-M620/B'Phone, SGH-T639, SGH-T729/Blast, Katalyst SGH-T739, SGH-T439, Beat SGH-T539, SCH-R610, Trace SGH-T519, SCH-A990, Sync SGH-A707, SGH-ZX10, SPH-M500, SPH-M610, SGH-T629, SCH-A950, SCH-A970, MM-A940/SPH-A940, SPH-A920/MM-A920, SGH-T809/SGH-D820, SCH-U520, Juke/SCH-U470, SGH-T429, SPH-A640, SPH-A580, SGH-T619, SGH-T719, SGH-T609, SGH-P207, SGH-P777, SPH-A840, SPH-A900, SPH-

1 A800/MM-A800, SPH-A560, SPH-A880/MM-A880, SPH-A820/VI-A820, SGH-
 2 E635/E630, SGH-X495, SGH-X475, and SGH-E335.

3 48. Defendant RIM has infringed and still is infringing at least claims 1
 4 and/or 12 of the '245 patent, literally and under the doctrine of equivalents, by
 5 making, using, selling, offering to sell, or importing portable electronic devices
 6 with an apparatus for initiating a synchronization process with a host computer.
 7 Such devices include, but are not limited to, BlackBerry Curve 9350, BlackBerry
 8 Curve 9360, BlackBerry Bold 9900, BlackBerry Bold 9930, BlackBerry Torch
 9 9850, BlackBerry Curve 9300 3G, BlackBerry Bold 9780, BlackBerry Curve 3G
 10 9330, BlackBerry Curve 8330, BlackBerry Curve 8350i, and BlackBerry Pearl
 11 8100.

12 49. Defendant Motorola has infringed and still is infringing at least claims
 13 1 and/or 12 of the '245 patent, literally and under the doctrine of equivalents, by
 14 making, using, selling, offering to sell, or importing portable electronic devices
 15 with an apparatus for initiating a synchronization process with a host computer.
 16 Such devices include, but are not limited to, DroidBionic/XT875, Droid X2, Droid
 17 3/XT862, XOOM CDMA, ATRIX 4G/MB860, PHOTON 4G, Atrix 2/ MB865,
 18 Admiral, TITANIUM, XPRT, XOOM wi-fi, CLIQ2, Triumph/WX435, Citrus
 19 WX445, Droid Pro A947/XT610, Droid 2 - A955, Droid X ME811/MB810,
 20 Devour A555, FlipSide/MB508, Bravo/MB520, FlipOut, BackFlip/MB300,
 21 ES400, Brute i680, i1/Opus 1, Defy ME525/MB525, CHARM MB502/ME502,
 22 CLIQ XT MB501, DROID PRO A957/XT610, Droid A855, CLIQ MB200,
 23 Q2/Q9m/Q9c, Q Global/Q9h/Q Q9, Q CDMA, EX124G, Rival A455, Evoke QA4,
 24 Crush, Krave ZN4, Brute i686, i886, GRASP, BALI, i856/Debut, Barrage V860,
 25 Entice W766, Karma QA1, i890/Sable, Stature i9, W233 Renew, VE465, Quantico
 26 W845, VE440, Renegade V950, RAZR VE20, W755, Rapture VU30, Adventure
 27 V750, Moto Z6cx, Tundra/VA76r, ROKR/EM330, Moto Z9, RAZR2/V9x,
 28

MOTOACTV W450, MOTOZINE ZN5, Hint QA30, VE240, i877, Z6c World, RIZR Z6tv, RAZR2 V9m, RAZR maxx Ve, RAZR2 V9, ic902, W490, ROKR E8, ROKR Z6m, i876, KRZR K1, RAZR V3m, KRZR K1m, SLVR L7c, V365, RAZR V3xx, i580, i880, RIZR Z3, i930/i920, SLVR L7, E815/E816 Hollywood, RAZR V3i/V3t/V3r, ROKR E1 (E790), V360, i870, i776, VU204, i576, W315, V195/V197, SLVR L6, SLVR L2, RAZR V3c, v65p, RAZR V3, Motorola V551/V547/V555/V330/V540, i850, i760, and PEBL U6 (V6).

50. Defendant HTC has infringed and still is infringing at least claims 1 and/or 12 of the '245 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing portable electronic devices with an apparatus for initiating a synchronization process with a host computer. Such devices include, but are not limited to, Titan, Rhyme/Bliss, Rezound, Trophy, DROID Incredible 2, Thunderbolt /Incredible HD, Jetstream/Puccini, Status/ChaCha, HD7S, Inspire 4G, Freestyle, EVO Design 4G/Hero 4G, EVO 3D/Shooter, EVO View 4G, Arrive/7 Pro, EVO Shift 4G/Knight/Speedy, Radar/Omega, Amaze 4G/Ruby, Flyer, Wildfire S /Marvel, Sensation 4G/Pyramid, Merge/ADR6325/Lexicon, Droid Incredible, Surround/Spark/7 Surround, DROID ERIS, Touch Diamond XV6950, and Typhoon/Qtek 8010.

51. Defendant Sharp has infringed and still is infringing at least claims 1 and/or 12 of the '245 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing portable electronic devices with an apparatus for initiating a synchronization process with a host computer. Such devices include, but are not limited to, FX Plus, Sharp FX (STX-2), KIN ONE, and KIN TWO.

52. Defendant UTStarcom has infringed and still is infringing at least claims 1 and/or 12 of the '245 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing portable

1 electronic devices with an apparatus for initiating a synchronization process with a
2 host computer. Such devices include, but are not limited to, Sprint Express, PCD
3 SMT5800, Blitz 2/Razzle TXT8030, Tap, and Sidekick LX.

4 53. Defendant HP has infringed and still is infringing at least claims 1
5 and/or 12 of the '245 patent, literally and under the doctrine of equivalents, by
6 making, using, selling, offering to sell, or importing portable electronic devices
7 with an apparatus for initiating a synchronization process with a host computer.
8 Such devices include, but are not limited to, iPAQ Glisten and iPAQ
9 hw6900/6915/6920/6925/6945.

10 54. Defendant Sony Ericsson has infringed and still is infringing at least
11 claims 1 and/or 12 of the '245 patent, literally and under the doctrine of
12 equivalents, by making, using, selling, offering to sell, or importing portable
13 electronic devices with an apparatus for initiating a synchronization process with a
14 host computer. Such devices include, but are not limited to, Xperia PLAY 4G,
15 Xperia PLAY CDMA R800x, Vivaz a U5a, Xperia X10a, Xperia x1, 518a,
16 Equinox TM717, TM506, C905a, W350, W760, Z750, W300, W810, Z310,
17 Z525/Z525a, Z520, and W550i/600i.

18 55. Defendant Huawei has infringed and still is infringing at least claims
19 1 and/or 12 of the '245 patent, literally and under the doctrine of equivalents, by
20 making, using, selling, offering to sell, or importing portable electronic devices
21 with an apparatus for initiating a synchronization process with a host computer.
22 Such devices include, but are not limited to, Impulse 4G, Sprint Express/M650,
23 Ascend II M865, M825, M835, Comet U8150 IDEOS, Ascend M860, M735, and
24 Tap U7519.

25 56. Defendant ZTE has infringed and still is infringing at least claims 1
26 and/or 12 of the '245 patent, literally and under the doctrine of equivalents, by
27 making, using, selling, offering to sell, or importing portable electronic devices
28

1 with an apparatus for initiating a synchronization process with a host computer.
 2 Such devices include, but are not limited to, Chorus D930, Score, Warp,
 3 Avail/Z990, Chorus, TXTM8, and Agent E520.

4 57. Defendant Kyocera has infringed and still is infringing at least claims
 5 1 and/or 12 of the '245 patent, literally and under the doctrine of equivalents, by
 6 making, using, selling, offering to sell, or importing portable electronic devices
 7 with an apparatus for initiating a synchronization process with a host computer.
 8 Such devices include, but are not limited to, Kyocera Milano/KYC5120/C5120,
 9 Echo/M9300, Zio M6000, Kyocera Rio E3100, Kyocera Brio, DuraMax, Sanyo
 10 Incognito SCP-6760, Sanyo Tahoe E4100, Sanyo Innuendo, Kyocera G2GO
 11 M2000, Sanyo Katana Eclipse X, Kyocera Slider Remix Kx5, Sanyo Katana DLX,
 12 Kyocera Tempo E2000, Sanyo SCP-8400, Sanyo SCP-9000-MM-9000, Sanyo
 13 MM-5600, Sanyo Katana LX, Sanyo SCP-7050, and Sanyo M1.

14 58. Defendant Sanyo has infringed and still is infringing at least claims 1
 15 and/or 12 of the '245 patent, literally and under the doctrine of equivalents, by
 16 making, using, selling, offering to sell, or importing portable electronic devices
 17 with an apparatus for initiating a synchronization process with a host computer.
 18 Such devices include, but are not limited to, Sanyo Incognito SCP-6760, Sanyo
 19 Tahoe E4100, Sanyo Innuendo, Sanyo Katana Eclipse X, Sanyo Katana DLX,
 20 Sanyo SCP-8400, Sanyo SCP-9000-MM-9000, Sanyo MM-5600, Sanyo Katana
 21 LX, Sanyo SCP-7050, and Sanyo M1.

22 59. As a result of each defendant's infringement of the '245 patent, DIG
 23 has suffered monetary damages in an amount not yet determined, and will continue
 24 to suffer damages in the future unless each defendant's infringing activities are
 25 enjoined by this Court.

26 60. Unless a permanent injunction is issued enjoining each defendant and
 27 its agents, servants, employees, attorneys, representatives, affiliates, and all others
 28

1 acting on its behalf from infringing the '245 patent, DIG will suffer irreparable
2 harm.

3 COUNT II

4 (Infringement of U.S. Patent No. 6,278,887)

5 61. DIG is the owner by assignment of United States Patent No.
6 6,278,887 ("the '887 patent"), entitled "System and Method for Power
7 Conservation in a Wireless Communication Handset." The '887 patent issued on
8 August 21, 2001. A true and correct copy of the '887 patent is attached hereto as
9 Exhibit B.

10 62. Defendant Verizon has infringed and still is infringing at least claim
11 26 of the '887 patent, literally and under the doctrine of equivalents, by making,
12 using, selling, offering to sell, or importing wireless communication handsets
13 containing a processor, a display, a keypad, a transceiver, and computer program
14 logic for enabling the display to shut off after a timeout period has expired. Such
15 handsets include, but are not limited to, Xperia PLAY CDMA R800x, Motorola
16 DroidBionic /XT875, Motorola Droid X2, Motorola Droid 3 /XT862, Motorola
17 XOOM CDMA, Motorola Citrus WX445, Motorola Droid Pro A947/XT610,
18 Motorola Droid X ME811/MB810, Motorola Droid X ME811/MB810, Motorola
19 DROID PRO A957 / XT610, Motorola Rival A455, Motorola Entice W766,
20 Motorola W755, Motorola Rapture VU30, BlackBerry Bold 9930, BlackBerry
21 Bold 9650, BlackBerry Curve 9330, BlackBerry Curve 8330, HTC Rhyme/Bliss,
22 HTC Rezound, HTC Trophy, HTC DROID Incredible 2, HTC
23 Thunderbolt/Incredible HD, DROID ERIS, HTC Touch Diamond XV6950,
24 Pantech Breakout, PN-820 / 8200, Pantech Hotshot, Jest, PN-230, Caper
25 TXT8035PP, Escapade WP8990VW, PN-300, PN-315, TXT8040, Jest 2, Samsung
26 Stratosphere/SCH-I405, Droid Charge/Inspiration/ 4G LTE smartphone / Stealth /
27 Stealth V / SCH-i510, Samsung SCH-i760, Samsung SCH-i830, Samsung Gusto,
28

SCH-U410, Snap/SCH-U340, SCH-A630, SCH-A850, SCH-N330, Siren/SCH-A870, Nokia Twist 7705, Nokia 6205, PCD Escapade WP8990, PCD SMT5800, Blitz 2/Razzle TXT8030, ZTE Salute F350, KIN ONE, KIN TWO, and Kyocera K312/K320/K322/K323/K325 Cyclops, and any other devices offered for sale or sold by Verizon that are alleged in this amended complaint as infringing the '887 patent.

63. Defendant AT&T has infringed and still is infringing at least claim 26 of the '887 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing wireless communication handsets containing a processor, a display, a keypad, a transceiver, and computer program logic for enabling the display to shut off after a timeout period has expired. Such handsets include, but are not limited to, Xperia Play 4G, Xperia X10a, SonyEricsson 518a, SonyEricsson C905a, SonyEricsson W760, SonyEricsson Z300a/Z300, SonyEricsson J220, Motorola ATRIX 4G/MB860, Motorola Atrix 2/MB865, Motorola FlipSide/MB508, Motorola Bravo/MB520, Motorola FlipOut, Motorola BackFlip/MB300, Motorola Karma QA1, Motorola C168i, Motorola C139, V190, V235/V230, V557, BlackBerry Curve 9360, BlackBerry Bold 9900, BlackBerry Torch 9810, BlackBerry Curve 9300 3G, BlackBerry Curve 9330, BlackBerry Pearl 8100, HTC Status/ChaCha, HTC HD7S, HTC Inspire 4G, HTC Freestlye, HTC Surround/Spark/7 Surround, HTC Typhoon/Qtek 8010, Pantech Crossover, Pantech Matrix Pro C820, Pantech Duo C810, Pantech Laser P9050, Pantech Ease P2020, Pantech Pursuit P9020, Pantech Pursuit II P6010, Pantech Link II, Pantech Breeze III, Pantech Breeze II P2000, Pantech Breeze C520, C150, Slate C530, Pantech PG-C3b, Pantech PG-C120, Samsung DoubleTime/SGH-i857, Samsung Focus Flash/SGHi677, Samsung Focus S/i937, Samsung Galaxy S II Skyrocket, Samsung Galaxy S II AT&T/SGH-i777/Attain, Samsung Infuse 4G/SGH-i997, Samsung Solstice II/SGH-A817, Samsung Flight II/SGH-A927,

1 Samsung Evergreen/SGH-A667, Samsung Rugby II/SGH-A847, Samsung SGH-
 2 P207, Samsung SPH-A840, GH-ZX20, SGH-A437, SGH-A127, SGH-A117,
 3 SGH-D807, SGH-D407, SGH-D347, SGH-X507/SGH-X506, SGH-D307/D300,
 4 SGH-D357, SGH-X497/SGH-X496, SGH-P207, SGH-C207/C207L, SGH-P777,
 5 Nokia E71x, Nokie Surge 6790, Nokia 6650 fold, Nokia E62, Nokia N75, Nokia
 6 6682/6681, PCD Quickfire/Knick/GTX75, ZTE Avail/Z990, ZTE Z331, ZTE
 7 F160, ZTE Z221, Sharp FX Plus, Sharp FX (STX-2), Huawei Impulse 4G, HP
 8 iPAQ Glisten, and HP iPAQ hw6900/6915/6920/6925/6945, and any other devices
 9 offered for sale or sold by AT&T that are alleged in this amended complaint as
 10 infringing the '887 patent.

11 64. Defendant Sprint has infringed and still is infringing at least claim 26
 12 of the '887 patent, literally and under the doctrine of equivalents, by making,
 13 using, selling, offering to sell, or importing wireless communication handsets
 14 containing a processor, a display, a keypad, a transceiver, and computer program
 15 logic for enabling the display to shut off after a timeout period has expired. Such
 16 handsets include, but are not limited to, Motorola i1/Opus 1, Motorola Photon 4G,
 17 Motorola Admiral, Motorola XPRT, Motorola XOOM wi-fi, Motorola ES400,
 18 Motorola Q2/Q9m/Q9c, Motorola i365, Motorola i335, Motorola r765is, Motorola
 19 ic602, Sprint i570, Motorola ic502 Buzz, Motorola i670, Motorola i615, Motorola
 20 ic402 Blend, Motorola C290, Motorola i560, BlackBerry Curve 9350, BlackBerry
 21 Bold 9930, BlackBerry Torch 9850, Blackberry Curve 3G 9330, BlackBerry Curve
 22 8330, BlackBerry Curve 8350i, BlackBerry 8830, HTC Evo Design 4G/Hero 4G,
 23 HTC EVO 3D/Shooter, HTC EVO View 4G, HTC Arrive/7Pro, HTC Touch
 24 Diamond XV6950, DuraCore, Sanyo Juno SCP-2700, Sanyo Mirro SCP-3810,
 25 Sanyo SCP4930/RL-4930, Sanyo VI-2300, Sanyo MM-8300, Sanyo MM-7500,
 26 Sanyo SCP-200, PM8200, Kyocera Milano/KYC5120/C5120, Kyocera Brio,
 27 DuraMax, Sanyo Incognito SCP 6760, Sanyo Tahoe E4100, Sanyo Katana Eclipse
 28

1 X, Sanyo Katana LX, Samsung Nexus S 4G, Samsung Nexus S, Samsung
 2 Transform Ultra SPH M930, Samsung Epic 4G/Galaxy S Pro/Notion, Samsung
 3 SCH-i830/IP-830W, Samsung Highnote SPH M630, Samsung MM-A940 / SPH-
 4 A940, Samsung SPH-A840, Samsung SPH-A900, Samsung SPH-A880/MM-
 5 A880, Samsung SPH-M300, PCD CDM-7025/CDM-120, and Sprint Express, and
 6 any other devices offered for sale or sold by Sprint that are alleged in this amended
 7 complaint as infringing the '887 patent.

8 65. Defendant T-Mobile has infringed and still is infringing at least claim
 9 26 of the '887 patent, literally and under the doctrine of equivalents, by making,
 10 using, selling, offering to sell, or importing wireless communication handsets
 11 containing a processor, a display, a keypad, a transceiver, and computer program
 12 logic for enabling the display to shut off after a timeout period has expired. Such
 13 handsets include, but are not limited to, SonyEricsson Equinox TM717, Motorola
 14 CLIQ2, Motorola Defy ME525/MB525, Motorola CHARM MB502/ME502,
 15 Motorola CLIQ XT MB501, Motorola CLIQ MB200, Motorola W233 Renew,
 16 MOTOACTV W450, MOTOZINE ZN5, BlackBerry Curve 9360, BlackBerry
 17 Bold 9900, BlackBerry Torch 9810, BlackBerry Curve 9300 3G, BlackBerry Bold
 18 9780, BlackBerry Pearl 8100, HTC Radar/Omega, HTC Amaze 4G/Ruby, HTC
 19 Flyer, HTC Wildfire S, HTC Sensation 4G/Pyramid, Samsung Exhibit 4G/SGH-
 20 T759/Hawk, Samsung Gravity SMART SGH-T589/Gravity Touch
 21 2/Smart/GT2/Galaxy Q, Samsung Exhibit II 4G/SGH-T679/Ancora, Samsung
 22 SGH-T339, Samsung SGH-T639, Samsung SGH T-729/Blast, Samsung Stripe
 23 SGH-T139, Samsung SGH-T509, Samsung SGH-T319, Samsung SGH-T209,
 24 Samsung SGH-T309, Nokia Lumia 710, Nokia 5230 Nuron, Nokia Astound
 25 C7/Tiger, Nokia E73 Mode, PCD Tap, PCD Sidekick LS, Huawei Comet U8150
 26 IDEOS, and Huawei Tap U7519, and any other devices offered for sale or sold by
 27 T-Mobile that are alleged in this amended complaint as infringing the '887 patent.

66. Defendant Cricket has infringed and still is infringing at least claim 26 of the '887 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing wireless communication handsets containing a processor, a display, a keypad, a transceiver, and computer program logic for enabling the display to shut off after a timeout period has expired. Such handsets include, but are not limited to, Motorola Evoke QA4, Motorola VE 465, Motorola Hint QA30, Motorola VE 240, Motorola RAZR2 V9M, Motorola ROKR 26m, Motorola KRZR K1m, Motorola SLVR L7c, Motorola W315, Motorola RAZR V3c, Motorola RAZR V3s, Motorola RAZR V3a, Pantech TXT8026, Zio M6000, Kyocera Rio E3100, Kyocera Slider Remix Kx5, Kyocera Luno/S2100, Kyocera Domino S1310, Kyocera Melo S1300, Kyocera Lingo M1000 Wild Card, Kyocera KX9e, Kyocera KX9B/KX9C/Milan, Kyocera Energi K490/K493, Kyocera K312/K320/K322/K323/Cyclops, Kyocera Marbl K132, Kyocera KX160 Xcursion, Samsung Messenger SCH-R450, Samsung JetSet SCH-R550, SCH-R500, Samsung SCH-R610, Samsung Snap/SCH-U340, Samsung Siren/SCH-A870, ZTE Chorus D930, PCD CDM-7025/CDM-120, ZTE Score, ZTE Chorus, ZTE CAPTR II, TXTM8, Huawei Ascend II M865, and Huawei Ascend M860, and any other devices offered for sale or sold by Cricket that are alleged in this amended complaint as infringing the '887 patent.

67. Defendant Virgin Mobile has infringed and still is infringing at least claim 26 of the '887 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing wireless communication handsets containing a processor, a display, a keypad, a transceiver, and computer program logic for enabling the display to shut off after a timeout period has expired. Such handsets include, but are not limited to, Motorola Triumph/WX435, OZ2 Ocean 2, Kyocera G2GO M2000, Kyocera Slider Remix Kx5, Kyocera Luno/S2100, Kyocera Torino/Loft S2300, Kyocera Melo S1300, Kyocera TNT

Adreno S2400, Kyocera Lingo M1000 Wild Card, Kyocera K312/K320/K322/K323/K325 Cyclops, Kyocera Strobe/Switch Back KX21/K612, Kyocera Marbl K 132, Kyocera Oystre KX9d, Samsung SPH-A303/Helio Heat, Samsung SPH-A523/Helio Mysto, and SPH-A513/Helio Fin, and any other devices offered for sale or sold by Virgin Mobile that are alleged in this amended complaint as infringing the '887 patent.

68. Defendant U.S. Cellular has infringed and still is infringing at least claim 26 of the '887 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing wireless communication handsets containing a processor, a display, a keypad, a transceiver, and computer program logic for enabling the display to shut off after a timeout period has expired. Such handsets include, but are not limited to, Motorola V325/V323/V323i/V325i, Motorola Photon 4G, Motorola XOOM WiFi, Motorola RAZR V3m, Motorola KRZR K1m, Motorola SLVR L7c, Motorola RAZR V3c, BlackBerry Torch 9850, BlackBerry Curve 3G 9330, BlackBerry Curve 8330, HTC Arrive/7 Pro, HTC Merge/ADR6325/Lexicon, Kyocera Slider Remix Kx5, Kyocera Tempo E2000, Kyocera Neo E1100, Kyocera KX9B/KX9C/Milan, Kyocera K312/K320/K322/K323/K325 Cyclops, Kyocera Strobe/Switch Back KX21/K612, Kyocera Marbl K 132, Kyocera KX160 Xcursion, Samsung SCH-R500, Samsung SCH-R610, Samsung SCH-U520, Samsung Snap/SCH-U340, Samsung SCH-A645, Samsung Siren/SCH-A870, Samsung SCH-A850, and PCD CDM-7025/CDM-120, and any other devices offered for sale or sold by U.S. Cellular that are alleged in this amended complaint as infringing the '887 patent.

69. Defendant MetroPCS has infringed and still is infringing at least claim 26 of the '887 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing wireless communication handsets containing a processor, a display, a keypad, a transceiver, and computer program

logic for enabling the display to shut off after a timeout period has expired. Such handsets include, but are not limited to, Motorola V325/V323/V323i/V325i, Motorola Quantico W845, Motorola VE440, Motorola Hint QA30, Motorola VE240, Motorola ROKR 26m, Motorola RAZR V3m, Motorola KRZR K1m, Motorola SLVR L7c, Motorola W315, Motorola RAZR V3c, Motorola RAZR V3s, Motorola RAZR V3a, Motorola W385, BlackBerry Curve 8330, Pantech PN-320/PN-3200/CDM-8932, Kyocera Tempo E2000, Kyocera Torino/Loft S2300, Kyocera Laylo M1400, Kyocera Melo S1300, Kyocera Domino S1310, Kyocera Mako S4000, Kyocera Neo E1100, Kyocera Presto S1350, Kyocera Strobe/Switch Back KX21/K612, Samsung Craft SCH-R900, Samsung SCH-R860 Caliber, Samsung Messenger SCH-R450, Samsung SCH-R400, Samsung SCH-A645, Samsung Siren/Sch-A870, Samsung SCH-A850, Samsung SCH-N330, Samsung Byline SCH-R310, Samsung SCH-R410, Samsung SCH-R400, Samsung SCH-A645, Samsung SCH-U520, PCD CDM-7025/CDM-120, ZTE Agent E520, Huawei M825, Huawei M835, and Huawei Ascend M860, and any other devices offered for sale or sold by MetroPCS that are alleged in this amended complaint as infringing the '887 patent.

70. Defendant TracFone has infringed and still is infringing at least claim 26 of the '887 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing wireless communication handsets containing a processor, a display, a keypad, a transceiver, and computer program logic for enabling the display to shut off after a timeout period has expired. Such handsets include, but are not limited to, Motorola EX124G, Motorola W260g, Motorola W376g/377g, Motorola W175/W175g/W180, Motorola C139, Motorola C257/C261, Motorola W375/W370, Motorola V176, and Kyocera S1000/K126c, and any other devices offered for sale or sold by TracFone that are alleged in this amended complaint as infringing the '887 patent.

71. Defendant Boost Mobile has infringed and still is infringing at least claim 26 of the '887 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing wireless communication handsets containing a processor, a display, a keypad, a transceiver, and computer program logic for enabling the display to shut off after a timeout period has expired. Such handsets include, but are not limited to, Motorola i776w, Motorola W385, Motorola i290, Motorola Theory, Motorola i412, Motorola Clutch/i475, Motorola RAMBLER, Motorola i296, Motorola i465/Clutch, Motorola i410, Motorola i335, Motorola BALI, Motorola i856/Debut, Motorola Stature i9, Motorola i776, Motorola i1/Opus 1, BlackBerry Curve 8330, Sanyo Incognito SCP-6760, Sanyo Innuendo, Sanyo Juno SCP-2700, Sanyo Mirro SCP-3810, Samsung Transform Ultra SPH-M930, Samsung SPH-420, and ZTE Warp, and any other devices offered for sale or sold by Boost Mobile that are alleged in this amended complaint as infringing the '887 patent.

72. Defendant Nokia has infringed and still is infringing at least claim 26 of the '887 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing wireless communication handsets containing a processor, a display, a keypad, a transceiver, and computer program logic for enabling the display to shut off after a timeout period has expired. Such handsets include, but are not limited to, Lumia 710, 5230 Nuron, Astound C7/Tiger, E73 Mode, E71x, Surge 6790, 6650 fold, E62, N75, and 6682 /6681.

73. PCD Defendants have infringed and are still infringing at least claim 26 of the '887 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing wireless communication handsets containing a processor, a display, a keypad, a transceiver, and computer program logic for enabling the display to shut off after a timeout period has expired. Such handsets include, but are not limited to, Sprint Express, Sharp FX Plus, Sharp FX

(STX-2), PCD SMT5800, Blitz 2/Razzle TXT8030, Tap, PCD Wrangler, Sidekick LX, Escapade WP8990, and CDM-7025/CDM-120.

74. Defendant Pantech has infringed and still is infringing at least claim 26 of the '887 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing wireless communication handsets containing a processor, a display, a keypad, a transceiver, and computer program logic for enabling the display to shut off after a timeout period has expired. Such handsets include, but are not limited to, Pocket, Breakout, Crossover, Matrix Pro C820, Duo C810, PN-820/8200, Hotshot, Crux CDM8999, Laser P9050, Ease P2020, Pursuit P9020, Pursuit II P6010, Link II, Breeze III, Jest TXT8040, Breeze II P2000, Link, Impact P7000, Reveal C790, TXT8026, OZ2 Ocean2, C630 MARTHA, Matrix C740, C610, PN-810 OCEAN, PN-8300 HERO, PN-230, Jest 2, Breeze C520, C150, Caper TXT8035PP, Escapade WP8990VW, Slate C530, PG-C3b, PN-320/PN-3200/CDM-8932, PN-300, PN-315, PG-C120, and PN-218.

75. Defendant Samsung has infringed and still is infringing at least claim 26 of the '887 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing wireless communication handsets containing a processor, a display, a keypad, a transceiver, and computer program logic for enabling the display to shut off after a timeout period has expired. Such handsets include, but are not limited to, Nexus S 4G, Nexus S, Stratosphere/SCH-I405, Convoy 2, Droid Charge/Inspiration/4G LTE smartphone/Stealth/Stealth V/SCH-i510, DoubleTime/SGH-I857, Focus Flash/SGH-i677, Focus S/i937, Galaxy S II - Skyrocket, Galaxy S II AT&T/SGH-i777/Attain, Infuse 4G/SGH-I997, Exhibit 4G/SGH-T759/Hawk, Gravity SMART SGH-T589/Gravity Touch 2/Smart/GT2/Galaxy Q, Transform Ultra SPH-M930, Epic 4G/Galaxy S Pro/Notion, SCH-i760, Blackjack II SGH-i617, Blackjack SGH-i607, SCH-i830/IP-830W, SCH-i730, Solstice II/SGH-A817, Flight II/SGH-A927, Craft SCH-

R900, SCH-R860 Caliber, Behold SGH-T919/Roxy, Delve SCH-R800, Exhibit II 4G/SGH-T679/Ancora, Intensity II/SCH-U460, Evergreen/SGH-A667, Rugby II/SGH-A847, Convoy SCH-U640, Intensity/DoubleTake/SCH-U450, Highnote SPH-M630, SGH-T339, Hue II SCH-R600, Messenger SCH-R450, JetSet SCH-R550, SPH-M510, SCH-R500, SCH-R510/Wafer, SPH-A523/Helio Mysto, SPH-A513/Helio Fin, FlipShot/SCH-U900, Alias/SCH-U740, SCH-U540, Gleam/SCH-U706/SCH-U700/Muse, SCH-A930, SGH-A737, SLM SGH-A747, SGH-A727, SGH-A517, SGH-A717, UpStage SPH-M620/B'Phone, SGH-T639, SGH-T729/Blast, Katalyst SGH-T739, SGH-T439, Beat SGH-T539, SCH-R610, Trace SGH-T519, SCH-A990, Sync SGH-A707, SGH-ZX20, SGH-ZX10, SPH-M500, SPH-M610, SGH-T629, SCH-A950, SCH-A970, MM-A940/SPH-A940, SPH-A920/MM-A920, SGH-T809/SGH-D820, SCH-U520, Gusto, SPH-M360, Byline SCH-R310, SCH-R200, SCH-R410, SPH-A303/Helio Heat, SCH-U410, Snap/SCH-U340, Juke/SCH-U470, SGH-A437, SGH-A127, SGH-A117, SPH-M300, SGH-T429, SGH-T219, SGH-T409, Stripe SGH-T329, SCH-R400, SGH-T509/T509s, SCH-U420 Nimbus, SCH-A645, Siren/SCH-A870, SGH-C417/SGH-C416, SGH-D807, SGH-D407, SGH-D347, SGH-X507/SGH-X506, SGH-D307/D300, SPH-A420, SPH-A640, SPH-A580, SPH-A960, SGH-T319, SGH-T209, SGH-T619, SGH-T719, SGH-T609, SCH-A630, SCH-A850, SCH-N330, SGH-D357, SGH-X497/SGH-X496, SGH-P207, SGH-C207/C207L, SGH-P777, SPH-A840, SPH-A900, SPH-A800/MM-A800, SPH-A560, SPH-A880/MM-A880, SPH-A820/VI-A820, SGH-T309, SGH-E635/E630, SGH-X495, SGH-X475, and SGH-E335.

76. Defendant RIM has infringed and still is infringing at least claim 26 of the '887 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing wireless communication handsets containing a processor, a display, a keypad, a transceiver, and computer program logic for

enabling the display to shut off after a timeout period has expired. Such handsets include, but are not limited to, BlackBerry Curve 9350, BlackBerry Curve 9360, BlackBerry Bold 9900, BlackBerry Bold 9930, BlackBerry Torch 9850, BlackBerry Curve 9300 3G, BlackBerry Bold 9780, BlackBerry Curve 3G 9330, BlackBerry Curve 8330, BlackBerry Curve 8350i, and BlackBerry Pearl 8100.

77. Defendant Motorola has infringed and still is infringing at least claim 26 of the '887 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing wireless communication handsets containing a processor, a display, a keypad, a transceiver, and computer program logic for enabling the display to shut off after a timeout period has expired. Such handsets include, but are not limited to, DroidBionic/XT875, Droid X2, Droid 3/XT862, XOOM CDMA, ATRIX 4G/MB860, PHOTON 4G, Atrix 2/MB865, Admiral, TITANIUM, XPRT, XOOM wi-fi, CLIQ2, Triumph/WX435, Droid 2 Global-A956, Citrus WX445, Droid Pro A947/XT610, Droid 2 - A955, Droid X ME811/MB810, Devour A555, FlipSide/MB508, Bravo/MB520, FlipOut, BackFlip/MB300, ES400, Brute i680, i1/Opus 1, Defy ME525/MB525, CHARM MB502/ME502, CLIQ XT MB501, DROID PRO A957/XT610, Droid A855, CLIQ MB200, Q2/Q9m/Q9c, Q Global/Q9h/Q Q9, Q CDMA, EX124G, Rival A455, Evoke QA4, Crush, Krave ZN4, Brute i686, i886, GRASP, BALI, i856/Debut, Barrage V860, Entice W766, Karma QA1, i890/Sable, Stature i9, W233 Renew, VE465, Quantico W845, VE440, Renegade V950, RAZR VE20, W755, Rapture VU30, Adventure V750, Moto Z6cx, Tundra/VA76r, ROKR/EM330, Moto Z9, RAZR2/V9x, MOTOACTV W450, MOTOZINE ZN5, Hint QA30, VE240, i877, Z6c World, RIZR Z6tv, RAZR2 V9m, RAZR maxx Ve, RAZR2 V9, ic902, W490, ROKR E8, ROKR Z6m, i876, KRZR K1, RAZR V3m, KRZR K1m, SLVR L7c, V365, RAZR V3xx, i580, i880, RIZR Z3, i930/i920, SLVR L7, E815/E816 Hollywood, RAZR V3i/V3t/V3r, ROKR E1 (E790), V360,

i870, Theory , i412, Clutch/i475, i420, RAMBLER, i296, i465/Clutch, i410, i365IS, i776, VU204, i576, i365, i335, r765is, RAZR V3s, W260g, W376g/W377g, i776w, W385, C168i, ic602, i570, RAZR V3a, W175/W175g/W180, i290, W315, C139, ic502 Buzz, i670, i615, ic402 Blend, C290, V195/V197, C257/C261, W375/W370, V190, SLVR L6, SLVR L2, T300p, V325/V323/V323i/ V325i, RAZR V3c, v65p, V235/V230, V557, RAZR V3, Motorola V551/V547/V555/V330/V540, i850, i760, i560, PEBL U6 (V6), V176, i355, i275, and i605.

78. Defendant HTC has infringed and still is infringing at least claim 26 of the '887 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing wireless communication handsets containing a processor, a display, a keypad, a transceiver, and computer program logic for enabling the display to shut off after a timeout period has expired. Such handsets include, but are not limited to, Titan, Rhyme/Bliss, Rezound, Trophy, DROID Incredible 2, Thunderbolt /Incredible HD, Jetstream /Puccini, Status / ChaCha, HD7S, Inspire 4G, Freestyle, EVO Design 4G/Hero 4G, EVO 3D/Shooter, EVO View 4G, Arrive/7 Pro, EVO Shift 4G/Knight/Speedy, Radar/Omega, Amaze 4G/Ruby, Flyer, Wildfire S /Marvel, Sensation 4G/Pyramid, Merge/ADR6325/Lexicon, Droid Incredible, Surround/Spark/7 Surround, DROID ERIS, Touch Diamond XV6950, and Typhoon/Qtek 8010.

79. Defendant Sharp has infringed and still is infringing at least claim 26 of the '887 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing wireless communication handsets containing a processor, a display, a keypad, a transceiver, and computer program logic for enabling the display to shut off after a timeout period has expired. Such handsets include, but are not limited to, FX Plus, Sharp FX (STX-2), KIN ONE, and KIN TWO.

1 80. Defendant UTStarcom has infringed and still is infringing at least
2 claim 26 of the '887 patent, literally and under the doctrine of equivalents, by
3 making, using, selling, offering to sell, or importing wireless communication
4 handsets containing a processor, a display, a keypad, a transceiver, and computer
5 program logic for enabling the display to shut off after a timeout period has
6 expired. Such handsets include, but are not limited to, Sprint Express, PCD
7 SMT5800, Blitz 2/Razzle TXT8030, Tap, PCD Wrangle, Sidekick LX, Escapade
8 WP8990, and CDM-7025/CDM-120.

9 81. Defendant HP has infringed and still is infringing at least claim 26 of
10 the '887 patent, literally and under the doctrine of equivalents, by making, using,
11 selling, offering to sell, or importing wireless communication handsets containing
12 a processor, a display, a keypad, a transceiver, and computer program logic for
13 enabling the display to shut off after a timeout period has expired. Such handsets
14 include, but are not limited to, iPAQ Glisten, hw6900, 6915, 6920, 6925, and 6945.

15 82. Defendant Sony Ericsson has infringed and still is infringing at least
16 claim 26 of the '887 patent, literally and under the doctrine of equivalents, by
17 making, using, selling, offering to sell, or importing wireless communication
18 handsets containing a processor, a display, a keypad, a transceiver, and computer
19 program logic for enabling the display to shut off after a timeout period has
20 expired. Such handsets include, but are not limited to, Xperia PLAY 4G, Xperia
21 PLAY CDMA R800x, Vivaz a U5a, Xperia X10a, Xperia x1, 518a, Equinox
22 TM717, TM506, C905a, W350, W760, Z750, W300, W810, Z310, Z525/Z525a,
23 Z300a/Z300, Z520, W550i/600i, and J220.

24 83. Defendant Huawei has infringed and still is infringing at least claim
25 26 of the '887 patent, literally and under the doctrine of equivalents, by making,
26 using, selling, offering to sell, or importing wireless communication handsets
27 containing a processor, a display, a keypad, a transceiver, and computer program
28

logic for enabling the display to shut off after a timeout period has expired. Such handsets include, but are not limited to, Impulse 4G, Sprint Express/M650, Ascend II M865, M825, M835, Comet U8150 IDEOS, Ascend M860, and Tap U7519.

84. Defendant ZTE has infringed and still is infringing at least claim 26 of the '887 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing wireless communication handsets containing a processor, a display, a keypad, a transceiver, and computer program logic for enabling the display to shut off after a timeout period has expired. Such handsets include, but are not limited to, Chorus D930, Score, Warp, Avail/Z990, Chorus, Z331, F160, TXTM8, Agent E520, Z221, CAPTR II, and Salute F350.

85. Defendant Kyocera has infringed and still is infringing at least claim 26 of the '887 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing wireless communication handsets containing a processor, a display, a keypad, a transceiver, and computer program logic for enabling the display to shut off after a timeout period has expired. Such handsets include, but are not limited to, Kyocera Milano/KYC5120/C5120, Echo/M9300, Zio M6000, Kyocera Rio E3100, Kyocera Brio, DuraMax, Sanyo Incognito SCP-6760, Sanyo Tahoe E4100, Sanyo Innuerdo, Kyocera G2GO M2000, Sanyo Katana Eclipse X, Kyocera Slider Remix Kx5, Sanyo Katana DLX, Kyocera Tempo E2000, Sanyo SCP-8400, Sanyo SCP-9000 - MM-9000, Sanyo MM-5600, DuraCore, Kyocera Presto S1350, Kyocera Luno/S2100, Sanyo Vero, Kyocera Torino/Loft S2300, Kyocera Domino S1310, Sanyo Juno SCP-2700, Sanyo Mirro SCP-3810, Kyocera Laylo M1400, Kyocera Melo S1300, Sanyo Pro-200, Sanyo Pro-700, Sanyo Katana LX, Kyocera Mako S4000, Kyocera Neo E1100, Kyocera TNT Adreno S2400, Sanyo SCP-7050, Sanyo Katana II SCP-6650, Sanyo S1, Sanyo SCP-3200, Kyocera Lingo M1000 Wild Card, Kyocera S1000/K126C, Kyocera KX9e, Kyocera KX9B/KX9C/Milan, Kyocera Energi

1 K490/K493, Kyocera K312/K320/K322/K323/K325 Cyclops, Sanyo SCP-3100,
 2 SCP-6600/Katana, Sanyo M1, Sanyo SCP-2400, Sanyo SCP-7000, Kyocera KX12,
 3 Kyocera Strobe/Switch Back KX21/K612, Kyocera Marbl K132, Kyocera Oyst
 4 KX9d, Sanyo SCP-4930/RL-4930, Sanyo VI-2300, Sanyo MM-8300, Sanyo MM-
 5 7500, Sanyo SCP-200, Kyocera KX160 Xcursion, and PM8200.

6 86. Defendant Sanyo has infringed and still is infringing at least claim 26
 7 of the '887 patent, literally and under the doctrine of equivalents, by making,
 8 using, selling, offering to sell, or importing wireless communication handsets
 9 containing a processor, a display, a keypad, a transceiver, and computer program
 10 logic for enabling the display to shut off after a timeout period has expired. Such
 11 handsets include, but are not limited to, Sanyo Incognito SCP-6760, Sanyo Tahoe
 12 E4100, Sanyo Innuendo, Sanyo Katana Eclipse X, Sanyo Katana DLX, Sanyo
 13 SCP-8400, Sanyo SCP-9000 - MM-9000, Sanyo MM-5600, Sanyo Vero, Sanyo
 14 Juno SCP-2700, Sanyo Mirro SCP-3810, Sanyo Pro-200, Sanyo Pro-700, Sanyo
 15 Katana LX, Sanyo SCP-7050, Sanyo Katana II SCP-6650, Sanyo S1, Sanyo SCP-
 16 3200, Sanyo SCP-3100, SCP-6600/Katana, Sanyo M1, Sanyo SCP-2400, Sanyo
 17 SCP-7000, Sanyo SCP-4930/RL-4930, Sanyo VI-2300, Sanyo MM-8300, Sanyo
 18 MM-7500, and Sanyo SCP-200.

19 87. As a result of each defendant's infringement of the '887 patent, DIG
 20 has suffered monetary damages in an amount not yet determined, and will continue
 21 to suffer damages in the future unless each defendant's infringing activities are
 22 enjoined by this Court.

23 88. Unless a permanent injunction is issued enjoining each defendant and
 24 its agents, servants, employees, attorneys, representatives, affiliates, and all others
 25 acting on its behalf from infringing the '887 patent, DIG will suffer irreparable
 26 harm.

27 ///

COUNT III**(Infringement of U.S. Patent No. 6,212,408)**

89. DIG is the owner by assignment of United States Patent No. 6,212,408 (“the ’408 patent”), entitled “Voice Command System and Method.” The ’408 patent issued on April 3, 2001. A true and correct copy of the ’408 patent is attached hereto as Exhibit C.

90. Defendant Verizon has infringed and still is infringing at least claims 1, 9, and 44 of the ’408 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing voice-controllable communications handsets capable of recognizing audible commands to execute or dial key sequences or commands to control device functionality. Such handsets include, but are not limited to, Xperia PLAY CDMA R800x, DroidBionic /XT875, Droid X2, Droid 3 /XT862, XOOM CDMA, BlackBerry Bold 9930, BlackBerry Bold 9650, BlackBerry Curve 9330, BlackBerry Curve 8330, HTC Rhyme/Bliss, HTC Rezound, HTC Trophy, HTC DROID Incredible 2, HTC Thunderbolt/Incredible HD, DROID ERIS, HTC Touch Diamond XV6950, Pantech Breakout, PN-820 / 8200, Pantech Hotshot, Jest, PN-230, Caper TXT8035PP, Escapade WP8990VW, PN-300, PN-315, TXT8040, Jest 2, Samsung Stratosphere/SCH-I405, Droid Charge/Inspiration/ 4G LTE smartphone/ Stealth/Stealth V/SCH-i510, Samsung SCH-i760, Samsung SCH-i830, Samsung Gusto, SCH-U410, Snap/SCH-U340, SCH-A630, SCH-A850, SCH-N330, Siren/SCH-A870, Nokia Twist 7705, Nokia 6205, Nokia Intrigue 7205/RM-383, PCD Escapade WP8990, PCD SMT5800, Blitz 2/Razzle TXT8030, ZTE Salute F350, KIN ONE, KIN TWO, and Kyocera K312/K320/K322/K323/K325 Cyclops, and any other devices offered for sale or sold by Verizon that are alleged in this amended complaint as infringing the ’408 patent.

91. Defendant AT&T has infringed and still is infringing at least claims 1, 9, and 44 of the '408 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing voice-controllable communications handsets capable of recognizing audible commands to execute or dial key sequences or commands to control device functionality. Such handsets include, but are not limited to, Xperia Play 4G, Xperia X10a, SonyEricsson 518a, SonyEricsson C905a, SonyEricsson W760, Motorola ATRIX 4G/MB860, Motorola Atrix 2/ MB865, Motorola FlipSide/MB508, Motorola Bravo/MB520, Motorola FlipOut, Motorola BackFlip/MB300, Motorola Karma QA1, Motorola C168i, Motorola C139, V190, V235/V230, V557, BlackBerry Curve 9360, BlackBerry Bold 9900, BlackBerry Torch 9810, BlackBerry Curve 9300 3G, BlackBerry Curve 9330, BlackBerry Pearl 8100, HTC Status/ChaCha, HTC HD7S, HTC Inspire 4G, HTC Freestlye, HTC Surround/Spark/7 Surround, HTC Typhoon/Qtek 8010, Pantech Crossover, Pantech Matrix Pro C820, Pantech Duo C810, Pantech Laser P9050, Pantech Ease P2020, Pantech Pursuit II P6010, Pantech Breeze III, Pantech Breeze II P2000, Samsung DoubleTime/SGH-i857, Samsung Focus Flash/SGHi677, Samsung Focus S/i937, Samsung Galaxy S II Skyrocket, Samsung Galaxy S II AT&T/SGH-i777/Attain, Samsung Infuse 4G/SGH-i997, Samsung Solstice II/SGH-A817, Samsung Flight II/SGH-A927, Samsung Evergreen/SGH-A667, Samsung Rugby II/SGH-A847, Samsung SGH-P207, Samsung SPH-A840, SGH-D807, SGH-D407, SGH-D347, SGH-D307/D300, SGH-D357, SGH-P207, SGH-C207/C207L, SGH-P777, Nokia E71x, Nokie Surge 6790, Nokia 6650 fold, Nokia E62, Nokia N75, Nokia 6682/6681, PCD Quickfire/Knick/GTX75, ZTE Avail/Z990, Sharp FX Plus, Huawei Impulse 4G, and HP iPAQ Glisten, and any other devices offered for sale or sold by AT&T that are alleged in this amended complaint as infringing the '408 patent.

92. Defendant Sprint has infringed and still is infringing at least claims 1, 9, and 44 of the '408 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing voice-controllable communications handsets capable of recognizing audible commands to execute or dial key sequences or commands to control device functionality. Such handsets include, but are not limited to, Motorola i1/Opus 1, vMotorola Photon 4G, Motorola Admiral, Motorola XPRT, Motorola XOOM wi-fi, Motorola ES400, Motorola Q2/Q9m/Q9c, Motorola i365, Motorola i335, Motorola r765is, Motorola ic602, Sprint i570, Motorola ic502 Buzz, Motorola i670, Motorola i615, Motorola C290, Motorola i560, BlackBerry Curve 9350, BlackBerry Bold 9930, BlackBerry Torch 9850, Blackberry Curve 3G 9330, BlackBerry Curve 8330, BlackBerry Curve 8350i, BlackBerry 8830, HTC Evo Design 4G/Hero 4G, HTC EVO 3D/Shooter, HTC EVO View 4G, HTC Arrive/7Pro, HTC Touch Diamond XV6950, DuraCore, Sanyo Juno SCP-2700, Sanyo Mirro SCP-3810, Sanyo SCP4930/RL-4930, Sanyo VI-2300, Sanyo MM-8300, Sanyo MM-7500, Sanyo SCP-200, PM8200, Kyocera Milano/KYC5120/C5120, Kyocera Brio, DuraMax, Sanyo Incognito SCP 6760, Sanyo Tahoe E4100, Sanyo Katana Eclipse X, Sanyo Katana LX, Samsung Nexus S 4G, Samsung Nexus S, Samsung Transform Ultra SPH M930, Samsung Epic 4G/Galaxy S Pro/Notion, Samsung SCH-i830/IP-830W, Samsung Highnote SPH M630, Samsung MM-A940 / SPH-A940, Samsung SPH-A840, Samsung SPH-A900, Samsung SPH-A880/MM-A880, Samsung SPH-M300, PCD CDM-7025/CDM-120, and Sprint Express, and any other devices offered for sale or sold by Sprint that are alleged in this amended complaint as infringing the '408 patent.

93. Defendant T-Mobile has infringed and still is infringing at least claims 1, 9, and 44 of the '408 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing voice-controllable

1 communications handsets capable of recognizing audible commands to execute or
 2 dial key sequences or commands to control device functionality. Such handsets
 3 include, but are not limited to, SonyEricsson Equinox TM717, Motorola CLIQ2,
 4 Motorola Defy ME525/MB525, Motorola CHARM MB502/ME502, Motorola
 5 CLIQ XT MB501, Motorola CLIQ MB200, MOTOACTV W450, MOTOZINE
 6 ZN5, BlackBerry Curve 9360, BlackBerry Bold 9900, BlackBerry Torch 9810,
 7 BlackBerry Curve 9300 3G, BlackBerry Bold 9780, BlackBerry Pearl 8100, HTC
 8 Radar/Omega, HTC Amaze 4G/Ruby, HTC Flyer, HTC Wildfire S, HTC
 9 Sensation 4G/Pyramid, Samsung Exhibit 4G/SGH-T759/Hawk, Samsung Gravity
 10 SMART SGH-T589/Gravity Touch 2/Smart/GT2/Galaxy Q, Samsung Exhibit II
 11 4G/SGH-T679/Ancora, Samsung SGH-T339, Samsung SGH-T639, Samsung SGH
 12 T-729/Blast, Samsung Stripe SGH-T139, Samsung SGH-T509, Samsung SGH-
 13 T309, Nokia Lumia 710, Nokia 5230 Nuron, Nokia Astound C7/Tiger, Nokia E73
 14 Mode, PCD Sidekick LS, and Huawei Comet U8150 IDEOS, and any other
 15 devices offered for sale or sold by T-Mobile that are alleged in this amended
 16 complaint as infringing the '408 patent.

17 94. Defendant Cricket has infringed and still is infringing at least claims
 18 1, 9, and 44 of the '408 patent, literally and under the doctrine of equivalents, by
 19 making, using, selling, offering to sell, or importing voice-controllable
 20 communications handsets capable of recognizing audible commands to execute or
 21 dial key sequences or commands to control device functionality. Such handsets
 22 include, but are not limited to, Motorola Evoke QA4, Motorola VE 465, Motorola
 23 Hint QA30, Motorola VE 240, Motorola RAZR2 V9M, Motorola ROKR 26m,
 24 Motorola KRZR K1m, Motorola SLVR L7c, Motorola W315, Motorola RAZR
 25 V3c, Motorola RAZR V3s, Motorola RAZR V3a, Pantech TXT8026, Zio M6000,
 26 Kyocera Rio E3100, Kyocera Slider Remix Kx5, Kyocera Luno/S2100, Kyocera
 27 Lingo M1000 Wild Card, Kyocera KX9e, Kyocera KX9B/KX9C/Milan, Kyocera
 28

1 Energi K490/K493, Kyocera K312/K320/K322/K323/Cyclops, Kyocera Marbl
 2 K132, Kyocera KX160 Xcursion, Samsung Messenger SCH-R450, Samsung
 3 JetSet SCH-R550, SCH-R500, Samsung SCH-R610, Samsung Snap/SCH-U340,
 4 Samsung Siren/SCH-A870, PCD CDM-7025/CDM-120, ZTE Chorus D930, ZTE
 5 Score, ZTE Chorus, ZTE CAPTR II, TXTM8, Huawei Ascend II M865, and
 6 Huawei Ascend M860, and any other devices offered for sale or sold by Cricket
 7 that are alleged in this amended complaint as infringing the '408 patent.

8 95. Defendant Virgin Mobile has infringed and still is infringing at least
 9 claims 1, 9, and 44 of the '408 patent, literally and under the doctrine of
 10 equivalents, by making, using, selling, offering to sell, or importing voice-
 11 controllable communications handsets capable of recognizing audible commands
 12 to execute or dial key sequences or commands to control device functionality.
 13 Such handsets include, but are not limited to, Motorola Triumph/WX435, OZ2
 14 Ocean 2, Kyocera G2GO M2000, Kyocera Slider Remix Kx5, Kyocera
 15 Luno/S2100, Kyocera Torino/Loft S2300, Kyocera TNT Adreno S2400, Kyocera
 16 Lingo M1000 Wild Card, Kyocera K312/K320/K322/K323/K325 Cyclops,
 17 Kyocera Strobe/Switch Back KX21/K612, Kyocera Marbl K 132, Kyocera Oyst
 18 KX9d, Samsung SPH-A523/Helio Mysto, and SPH-A513/Helio Fin, and any other
 19 devices offered for sale or sold by Virgin Mobile that are alleged in this amended
 20 complaint as infringing the '408 patent.

21 96. Defendant U.S. Cellular has infringed and still is infringing at least
 22 claims 1, 9, and 44 of the '408 patent, literally and under the doctrine of
 23 equivalents, by making, using, selling, offering to sell, or importing voice-
 24 controllable communications handsets capable of recognizing audible commands
 25 to execute or dial key sequences or commands to control device functionality.
 26 Such handsets include, but are not limited to, Motorola V325/V323/V323i/V325i,
 27 Motorola Photon 4G, Motorola XOOM WiFi, Motorola RAZR V3m, Motorola
 28

1 KRZR K1m, Motorola SLVR L7c, Motorola RAZR V3c, BlackBerry Torch 9850,
 2 BlackBerry Curve 3G 9330, BlackBerry Curve 8330, HTC Arrive/7 Pro, HTC
 3 Merge/ADR6325/Lexicon, Kyocera Slider Remix Kx5, Kyocera Tempo E2000,
 4 Kyocera Neo E1100, Kyocera KX9B/KX9C/Milan, Kyocera
 5 K312/K320/K322/K323/K325 Cyclops, Kyocera Strobe/Switch Back KX21/K612,
 6 Kyocera Marbl K 132, Kyocera KX160 Xcursion, Samsung SCH-R500, Samsung
 7 SCH-R610, Samsung SCH-U520, Samsung Snap/SCH-U340, Samsung SCH-
 8 A645, Samsung Siren/SCH-A870, Samsung SCH-A850, and PCD CDM-
 9 7025/CDM-120, and any other devices offered for sale or sold by U.S. Cellular
 10 that are alleged in this amended complaint as infringing the '408 patent.

11 97. Defendant MetroPCS has infringed and still is infringing at least
 12 claims 1, 9, and 44 of the '408 patent, literally and under the doctrine of
 13 equivalents, by making, using, selling, offering to sell, or importing voice-
 14 controllable communications handsets capable of recognizing audible commands
 15 to execute or dial key sequences or commands to control device functionality.
 16 Such handsets include, but are not limited to, Motorola V325/V323/V323i/V325i,
 17 Motorola Quantico W845, Motorola VE440, Motorola Hint QA30, Motorola
 18 VE240, Motorola ROKR 26m, Motorola RAZR V3m, Motorola KRZR K1m,
 19 Motorola SLVR L7c, Motorola W315, Motorola RAZR V3c, Motorola RAZR
 20 V3s, Motorola RAZR V3a, Motorola W385, BlackBerry Curve 8330, Pantech PN-
 21 320/PN-3200/CDM-8932, Kyocera Tempo E2000, Kyocera Torino/Loft S2300,
 22 Kyocera Laylo M1400, Kyocera Melo S1300, Kyocera Mako S4000, Kyocera Neo
 23 E1100, Kyocera Presto S1350, Kyocera Strobe/Switch Back KX21/K612,
 24 Samsung Craft SCH-R900, Samsung SCH-R860 Caliber, Samsung Messenger
 25 SCH-R450, Samsung SCH-A645, Samsung Siren/Sch-A870, Samsung SCH-A850,
 26 Samsung SCH-N330, Samsung Byline SCH-R310, Samsung SCH-R410, Samsung
 27 SCH-R400, Samsung SCH-A645, Samsung SCH-U520, PCD CDM-7025/CDM-
 28

120, Huawei M825, Huawei M835, and Huawei Ascend M860, and any other devices offered for sale or sold by MetroPCS that are alleged in this amended complaint as infringing the '408 patent.

98. Defendant TracFone has infringed and still is infringing at least claims 1, 9, and 44 of the '408 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing voice-controllable communications handsets capable of recognizing audible commands to execute or dial key sequences or commands to control device functionality. Such handsets include, but are not limited to, Kyocera S1000/K126c, and any other devices offered for sale or sold by TracFone that are alleged in this amended complaint as infringing the '408 patent.

99. Defendant Boost Mobile has infringed and still is infringing at least claims 1, 9, and 44 of the '408 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing voice-controllable communications handsets capable of recognizing audible commands to execute or dial key sequences or commands to control device functionality. Such handsets include, but are not limited to, Motorola i776w, Motorola W385, Motorola i290, Motorola Theory, Motorola i412, Motorola Clutch/i475, Motorola RAMBLER, Motorola i296, Motorola i465/Clutch, Motorola i410, Motorola i335, Motorola BALI, Motorola i856/Debut, Motorola Stature i9, Motorola i776, Motorola i1/Opus 1, BlackBerry Curve 8330, Sanyo Incognito SCP-6760, Sanyo Innuendo, Sanyo Juno SCP-2700, Sanyo Mirro SCP-3810, Samsung Transform Ultra SPH-M930, Samsung SPH-420, and ZTE Warp, and any other devices offered for sale or sold by Boost Mobile that are alleged in this amended complaint as infringing the '408 patent.

100. Defendant Nokia has infringed and still is infringing at least claims 1, 9, and 44 of the '408 patent, literally and under the doctrine of equivalents, by

1 making, using, selling, offering to sell, or importing voice-controllable
2 communications handsets capable of recognizing audible commands to execute or
3 dial key sequences or commands to control device functionality. Such handsets
4 include, but are not limited to, Lumia 710, 5230 Nuron, Astound C7/Tiger, E73
5 Mode, E71x, Surge 6790, 6650 fold, E62, N75, 6682/6681, Intrigue 7205/ RM-
6 383, Twist 7705, and 6205.

7 101. PCD Defendants have infringed and are still infringing at least claims
8 1, 9, and 44 of the '408 patent, literally and under the doctrine of equivalents, by
9 making, using, selling, offering to sell, or importing voice-controllable
10 communications handsets capable of recognizing audible commands to execute or
11 dial key sequences or commands to control device functionality. Such handsets
12 include, but are not limited to, Sprint Express, Sharp FX Plus, PCD SMT5800,
13 Blitz 2/Razzle TXT8030, PCD Wrangler, Escapade WP8990, and CDM-
14 7025/CDM-120.

15 102. Defendant Pantech has infringed and still is infringing at least claims
16 1, 9, and 44 of the '408 patent, literally and under the doctrine of equivalents, by
17 making, using, selling, offering to sell, or importing voice-controllable
18 communications handsets capable of recognizing audible commands to execute or
19 dial key sequences or commands to control device functionality. Such handsets
20 include, but are not limited to, Pocket, Breakout, Crossover, Matrix Pro C820, Duo
21 C810, PN-820/8200, Hotshot, Crux CDM8999, Ease P2020, Pursuit II P6010,
22 Breeze III, Jest TXT8040, Breeze II P2000, TXT8026, PN-230, Jest 2, Caper
23 TXT8035PP, Escapade WP8990VW, PN-320/PN-3200/CDM-8932, PN-300, PN-
24 315, and PN-218.

25 103. Defendant Samsung has infringed and still is infringing at least claims
26 1, 9, and 44 of the '408 patent, literally and under the doctrine of equivalents, by
27 making, using, selling, offering to sell, or importing voice-controllable
28

communications handsets capable of recognizing audible commands to execute or dial key sequences or commands to control device functionality. Such handsets include, but are not limited to, Nexus S 4G, Nexus S, Stratosphere/SCH-I405, Convoy 2, Droid Charge/Inspiration/4G LTE smartphone/Stealth/Stealth V/SCH-i510, DoubleTime/SGH-I857, Focus Flash/SGH-i677, Focus S/i937, Galaxy S II - Skyrocket, Galaxy S II AT&T/SGH-i777/Attain, Infuse 4G/SGH-I997, Exhibit 4G/SGH-T759/Hawk, Gravity SMART SGH-T589/Gravity Touch 2/Smart/GT2/Galaxy Q, Transform Ultra SPH-M930, Epic 4G/Galaxy S Pro/Notion, SCH-i760, Blackjack II SGH-i617, SCH-i830/IP-830W, SCH-i730, Solstice II/SGH-A817, Flight II/SGH-A927, Craft SCH-R900, SCH-R860 Caliber, Behold SGH-T919/Roxy, Delve SCH-R800, Exhibit II 4G/SGH-T679/Ancora, Intensity II/SCH-U460, Evergreen/SGH-A667, Rugby II/SGH-A847, Convoy SCH-U640, Intensity/DoubleTake/SCH-U450, Highnote SPH-M630, Hue II SCH-R600, Messenger SCH-R450, JetSet SCH-R550, SPH-M510, SCH-R500, SCH-R510/Wafer, SPH-A523/Helio Mysto, SPH-A513/Helio Fin, FlipShot/SCH-U900, Alias/SCH-U740, SCH-U540, Gleam/SCH-U706/SCH-U700/Muse, SCH-A930, UpStage SPH-M620/B'Phone, SGH-T729/Blast, Katalyst SGH-T739, SGH-T439, Beat SGH-T539, SCH-R610, SCH-A990, SPH-M500, SPH-M610, SGH-T629, SCH-A950, SCH-A970, MM-A940/SPH-A940, SPH-A920/MM-A920, SCH-U520, Gusto, M360/SPH-M360, SGH-T109, Byline SCH-R310, SCH-R200, SCH-R410, SCH-U410, Snap/SCH-U340, Juke/SCH-U470, SPH-M300, SCH-U420 Nimbus, SCH-A645, Siren/SCH-A870, SGH-D807, SGH-D407, SGH-D347, SGH-D307/D300, SPH-A420, SPH-A640, SPH-A580, SPH-A960, SGH-T619, SGH-T719, SGH-T609, SCH-A630, SCH-A850, SCH-N330, SGH-D357, SGH-P207, SPH-A840, SPH-A900, SPH-A800/MM-A800, SPH-A560, SPH-A880/MM-A880, and SPH-A820 / VI-A820.

104. Defendant RIM has infringed and still is infringing at least claims 1, 9, and 44 of the '408 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing voice-controllable communications handsets capable of recognizing audible commands to execute or dial key sequences or commands to control device functionality. Such handsets include, but are not limited to, BlackBerry Curve 9350, BlackBerry Curve 9360, BlackBerry Bold 9900, BlackBerry Bold 9930, BlackBerry Torch 9850, BlackBerry Curve 9300 3G, BlackBerry Bold 9780, BlackBerry Curve 3G 9330, BlackBerry Curve 8330, BlackBerry Curve 8350i, and BlackBerry Pearl 8100.

105. Defendant Motorola has infringed and still is infringing at least claims 1, 9, and 44 of the '408 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing voice-controllable communications handsets capable of recognizing audible commands to execute or dial key sequences or commands to control device functionality. Such handsets include, but are not limited to, DroidBionic/XT875, Droid X2, Droid 3/XT862, XOOM CDMA, ATRIX 4G/MB860, PHOTON 4G, Atrix 2/MB865, Admiral, TITANIUM, XPRT, XOOM wi-fi, CLIQ2, Triumph/WX435, Droid 2 Global-A956, Citrus WX445, Droid Pro A947/XT610, Droid 2 - A955, Droid X ME811/MB810, Devour A555, FlipSide/MB508, Bravo/MB520, FlipOut, BackFlip/MB300, ES400, Brute i680, i1/Opus 1, Defy ME525/MB525, CHARM MB502/ME502, CLIQ XT MB501, DROID PRO A957/XT610, Droid A855, CLIQ MB200, Q2/Q9m/Q9c, Q Global/Q9h/Q Q9, Q CDMA, Rival A455, Evoke QA4, Crush, Krave ZN4, Brute i686, i886, GRASP, BALI, i856/Debut, Barrage V860, Entice W766, Karma QA1, i890/Sable, Stature i9, VE465, Quantico W845, VE440, Renegade V950, RAZR VE20, W755, Rapture VU30, Adventure V750, Moto Z6cx, Tundra/VA76r, Moto Z9, RAZR2/V9x, MOTOACTV W450, MOTOZINE ZN5, Hint QA30, VE240, i877, Z6c World, RIZR Z6tv, RAZR2

V9m, RAZR maxx Ve, RAZR2 V9, ic902, W490, ROKR E8, ROKR Z6m, i876, KRZR K1, RAZR V3m, KRZR K1m, SLVR L7c, V365, RAZR V3xx, i580, i880, RIZR Z3, i930/i920, SLVR L7, E815/E816 Hollywood, RAZR V3i/V3t/V3r, ROKR E1 (E790), V360, i870, Theory, i412, Clutch/i475, i420, RAMBLER, i296, i465/Clutch, i410, i365IS, i776, VU204, i576, i365, i335, r765is, RAZR V3s, W260g, i776w, W385, ic602, i570, RAZR V3a, i290, W315, ic502 Buzz, i670, i615, C290, V195/V197, V190, SLVR L6, SLVR L2, V325/V323/V323i/ V325i, RAZR V3c, v65p, V235/V230, V557, RAZR V3, V551, V547, V555, V330, V540, i850, i760, i560, PEBL U6 (V6), i355, i275, and i605.

106. Defendant HTC has infringed and still is infringing at least claims 1, 9, and 44 of the '408 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing voice-controllable communications handsets capable of recognizing audible commands to execute or dial key sequences or commands to control device functionality. Such handsets include, but are not limited to, Titan, Rhyme/Bliss, Rezound, Trophy, DROID Incredible 2, Thunderbolt /Incredible HD, Jetstream /Puccini, Status / ChaCha, HD7S, Inspire 4G, Freestyle, EVO Design 4G/Hero 4G, EVO 3D/Shooter, EVO View 4G, Arrive/7 Pro, EVO Shift 4G/Knight/Speedy, Radar/Omega, Amaze 4G/Ruby, Flyer, Wildfire S /Marvel, Sensation 4G/Pyramid, Merge/ADR6325/Lexicon, Droid Incredible, Surround/Spark/7 Surround, DROID ERIS, Touch Diamond XV6950, and Typhoon/Qtek 8010.

107. Defendant Sharp has infringed and still is infringing at least claims 1, 9, and 44 of the '408 patent, literally and under the doctrine of equivalents, by making, using, selling, offering to sell, or importing voice-controllable communications handsets capable of recognizing audible commands to execute or dial key sequences or commands to control device functionality. Such handsets include, but are not limited to, FX Plus.

1 108. Defendant UTStarcom has infringed and still is infringing at least
2 claims 1, 9, and 44 of the '408 patent, literally and under the doctrine of
3 equivalents, by making, using, selling, offering to sell, or importing voice-
4 controllable communications handsets capable of recognizing audible commands
5 to execute or dial key sequences or commands to control device functionality.
6 Such handsets include, but are not limited to, Sprint Express, PCD SMT5800, Blitz
7 2/Razzle TXT8030, PCD Wrangler, Escapade WP8990, and CDM-7025/CDM-
8 120.

9 109. Defendant HP has infringed and still is infringing at least claims 1, 9,
10 and 44 of the '408 patent, literally and under the doctrine of equivalents, by
11 making, using, selling, offering to sell, or importing voice-controllable
12 communications handsets capable of recognizing audible commands to execute or
13 dial key sequences or commands to control device functionality. Such handsets
14 include, but are not limited to, iPAQ Glisten.

15 110. Defendant Sony Ericsson has infringed and still is infringing at least
16 claims 1, 9, and 44 of the '408 patent, literally and under the doctrine of
17 equivalents, by making, using, selling, offering to sell, or importing voice-
18 controllable communications handsets capable of recognizing audible commands
19 to execute or dial key sequences or commands to control device functionality.
20 Such handsets include, but are not limited to, Xperia PLAY 4G, Xperia PLAY
21 CDMA R800x, Vivaz a U5a, Xperia X10a, Xperia x1, 518a, Equinox TM717,
22 TM506, C905a, W760, Z750, W300, W810, Z525/Z525a, Z520, and W550i/600i.

23 111. Defendant Huawei has infringed and still is infringing at least claims
24 1, 9, and 44 of the '408 patent, literally and under the doctrine of equivalents, by
25 making, using, selling, offering to sell, or importing voice-controllable
26 communications handsets capable of recognizing audible commands to execute or
27 dial key sequences or commands to control device functionality. Such handsets
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1 include, but are not limited to, Impulse 4G, Sprint Express/M650, Ascend II M865,
2 M825, M835, Comet U8150 IDEOS, and Ascend M860.

3 112. Defendant ZTE has infringed and still is infringing at least claims 1, 9,
4 and 44 of the '408 patent, literally and under the doctrine of equivalents, by
5 making, using, selling, offering to sell, or importing voice-controllable
6 communications handsets capable of recognizing audible commands to execute or
7 dial key sequences or commands to control device functionality. Such handsets
8 include, but are not limited to, Chorus D930, Score, Warp, Avail/Z990, Chorus,
9 TXTM8, CAPTR II, and Salute F350.

10 113. Defendant Kyocera has infringed and still is infringing at least claims
11 1, 9, and 44 of the '408 patent, literally and under the doctrine of equivalents, by
12 making, using, selling, offering to sell, or importing voice-controllable
13 communications handsets capable of recognizing audible commands to execute or
14 dial key sequences or commands to control device functionality. Such handsets
15 include, but are not limited to, Kyocera Milano/KYC5120/C5120, Echo/M9300,
16 Zio M6000, Kyocera Rio E3100, Kyocera Brio, DuraMax, Sanyo Incognito SCP-
17 6760, Sanyo Tahoe E4100, Sanyo Innuendo, Kyocera G2GO M2000, Sanyo Katana
18 Eclipse X, Kyocera Slider Remix Kx5, Sanyo Katana DLX, Kyocera Tempo
19 E2000, Sanyo SCP-8400, Sanyo SCP-9000 - MM-9000, Sanyo MM-5600,
20 DuraCore, Kyocera Presto S1350, Kyocera Luno/S2100, Sanyo Vero, Kyocera
21 Torino/Loft S2300, Sanyo Juno SCP-2700, Sanyo Mirro SCP-3810, Kyocera
22 Laylo M1400, Sanyo Pro-200, Sanyo Pro-700, Sanyo Katana LX, Kyocera Mako
23 S4000, Kyocera Neo E1100, Kyocera TNT Adreno S2400, Sanyo SCP-7050,
24 Sanyo Katana II SCP-6650, Sanyo S1, Sanyo SCP-3200, Kyocera Lingo M1000
25 Wild Card, Kyocera S1000/K126C, Kyocera KX9e, Kyocera KX9B/KX9C/Milan,
26 Kyocera Energi K490/K493, Kyocera K312/K320/K322/K323/K325 Cyclops,
27 Sanyo SCP-3100, SCP-6600/Katana, Sanyo M1, Sanyo SCP-2400, Sanyo SCP-

1 7000, Kyocera KX12, Kyocera Strobe/Switch Back KX21/K612, Kyocera Marbl
2 K132, Kyocera Oystre KX9d, Sanyo SCP-4930/RL-4930, Sanyo VI-2300, Sanyo
3 MM-8300, Sanyo MM-7500, Sanyo SCP-200, Kyocera KX160 Xcursion, and
4 PM8200.

5 114. Defendant Sanyo has infringed and still is infringing at least claims 1,
6 9, and 44 of the '408 patent, literally and under the doctrine of equivalents, by
7 making, using, selling, offering to sell, or importing voice-controllable
8 communications handsets capable of recognizing audible commands to execute or
9 dial key sequences or commands to control device functionality. Such handsets
10 include, but are not limited to, Sanyo Incognito SCP-6760, Sanyo Tahoe E4100,
11 Sanyo Innuendo, Sanyo Katana Eclipse X, Sanyo Katana DLX, Sanyo SCP-8400,
12 Sanyo SCP-9000 - MM-9000, Sanyo MM-5600, Sanyo Vero, Sanyo Juno SCP-
13 2700, Sanyo Mirro SCP-3810, Sanyo Pro-200, Sanyo Pro-700, Sanyo Katana LX,
14 Sanyo SCP-7050, Sanyo Katana II SCP-6650, Sanyo S1, Sanyo SCP-3200, Sanyo
15 SCP-3100, SCP-6600/Katana, Sanyo M1, Sanyo SCP-2400, Sanyo SCP-7000,
16 Sanyo SCP-4930/RL-4930, Sanyo VI-2300, Sanyo MM-8300, Sanyo MM-7500,
17 and Sanyo SCP-200.

18 115. As a result of each defendant's infringement of the '408 patent, DIG
19 has suffered monetary damages in an amount not yet determined, and will continue
20 to suffer damages in the future unless each defendant's infringing activities are
21 enjoined by this Court.

22 116. Unless a permanent injunction is issued enjoining each defendant and
23 its agents, servants, employees, attorneys, representatives, affiliates, and all others
24 acting on its behalf from infringing the '408 patent, DIG will suffer irreparable
25 harm.

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PRAYER FOR RELIEF

DIG prays for the following relief:

1. A judgment that each defendant has infringed—either literally or under the doctrine of equivalents—one or more claims of the '245 patent;

2. A permanent injunction enjoining each defendant and its officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in concert or privity with it from infringing the '245 patent;

3. An accounting for damages arising from the infringement of the '245 patent by each defendant and all those in privity with it;

4. A judgment that each defendant has infringed—either literally or under the doctrine of equivalents—one or more claims of the '887 patent;

5. A permanent injunction enjoining each defendant and its officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in concert or privity with it from infringing the '887 patent;

6. An accounting for damages arising from the infringement of the '887 patent by each defendant and all those in privity with it;

7. A judgment that each defendant has infringed—either literally or under the doctrine of equivalents—one or more claims of the '408 patent;

8. A permanent injunction enjoining each defendant and its officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in concert or privity with it from infringing the '408 patent;

9. An accounting for damages arising from the infringement of the '408 patent by each defendant and all those in privity with it;

1 10. An award of damages resulting from each defendant's acts of
2 infringement in accordance with 35 U.S.C. § 284;

3 11. A judgment and order finding that this is an exceptional case within
4 the meaning of 35 U.S.C. § 285 and awarding to DIG its reasonable attorneys' fees
5 against each defendant;

6 12. A judgment and order requiring defendants to provide an accounting
7 and to pay supplemental damages to DIG, including without limitation, pre-
8 judgment and post-judgment interest; and

9 13. Any and all other relief to which DIG may show itself to be entitled.

10 DATED: January 13, 2012

Respectfully submitted,

11
12 RUSS AUGUST & KABAT
13 Marc A. Fenster
14 Irene Y. Lee

15 By: /s/ Marc A. Fenster
16 Marc A. Fenster
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RUSS, AUGUST & KABAT

DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff Development Innovation Group, LLC demands a trial by jury on all issues so triable.

DATED: January 13, 2012

Respectfully submitted,

RUSS AUGUST & KABAT
Marc A. Fenster
Irene Y. Lee

By: /s/ Marc A. Fenster
Marc A. Fenster