

PRAYER FOR RELIEF

WHEREFORE, Plaintiff MTel prays for entry of judgment against LG as follows:

- A. That LG has directly infringed each of the asserted Patents under 35 U.S.C. §271(a);
- B. That LG has induced the infringement by others of each of the asserted Patents under 35 U.S.C. §271(b);
- C. That LG has contributed to the infringement by others of each of the asserted Patents under 35 U.S.C. §271(c);
- D. That LG provide to MTel an accounting of all gains, profits, savings, and advantages derived by LG's direct or indirect infringement of the asserted Patents, and that MTel be awarded damages adequate to compensate for the wrongful infringement by LG, in accordance with 35 U.S.C. §284;
- E. That the damages awarded to MTel with respect to each of the asserted Patents be increased up to three times, in view of LG's willful infringement, in accordance with 35 U.S.C. §284;
- F. That this case be declared an exceptional one in favor of MTel under 35 U.S.C. §285, and that MTel be awarded its reasonable attorneys' fees and all other costs and expenses incurred in connection with this civil action in accordance with 35 U.S.C. §285 and Rule 54(d) of the Federal Rules of Civil Procedure;
- G. That LG, its officers, agents, servants, employees, attorneys, and those persons in active concert or participation with any of them, be preliminarily and permanently restrained and enjoined from infringing any of the asserted Patents; and
- H. That MTel receive all other or further relief as this Court may deem just or proper.

DEMAND FOR JURY TRIAL

Pursuant to Federal Rule of Civil Procedure 38(b), MTel hereby demands a trial by jury on all issues triable to a jury.

Dated: July 21, 2014

Respectfully Submitted,

/s/ Dustin L. Taylor

Daniel R. Scardino

Texas State Bar No. 24033165

Craig S. Jepson

Texas State Bar No. 24061364

Dustin L. Taylor

Texas State Bar No. 24088510

REED & SCARDINO LLP

301 Congress Avenue, Suite 1250

Austin, TX 78701

Tel. (512) 474-2449

Fax (512) 474-2622

dscardino@reedscardino.com

cjepson@reedscardino.com

dtaylor@reedscardino.com

Deron Dacus

Texas State Bar No. 00790553

THE DACUS FIRM, P.C.

821 ESE Loop 323, Suite 430

Tyler, Texas 75701

903-705-1117 (phone & fax)

ddacus@dacusfirm.com

ATTORNEYS FOR PLAINTIFF

MOBILE TELECOMMUNICATIONS

TECHNOLOGIES, LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed.R.Civ.P. 5(d) and Local Rule CV-5(e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of this document via email, facsimile and/or U.S. First Class Mail this 21st day of July, 2014.

/s/ Dustin L. Taylor

Dustin L. Taylor

EXHIBIT 10

**2:13cv947, Mobile Telecommunications Technologies, Llc V. Lg Electronics
Mobilecomm U.S.A., Inc.**

US District Court Docket
United States District Court, Texas Eastern
(Marshall)

This case was retrieved on 12/22/2022

Header

Case Number: 2:13cv947

Date Filed: 11/07/2013

Assigned To: Judge Rodney Gilstrap

Referred To: Magistrate Judge Roy S. Payne

Nature of Suit: Patent (830)

Cause: Patent Infringement

Lead Docket: None

Other Docket: None

Jurisdiction: Federal Question

Class Code: Closed

Closed: 03/15/2016

Statute: 35:271

Jury Demand: Both

Demand Amount: \$0

NOS Description: Patent

Participants

Litigants

David Folsom
Mediator

David Keyzer
5170 Golden Foothill Parkway | El Dorado Hills, CA 95762 |
916-243-5259 |
Technical Advisor

Mobile Telecommunications Technologies, LLC
Plaintiff

Attorneys

David Folsom
PRO SE
Jackson Walker, LLP
6002-B Summerfield Drive
Texarkana, TX 75503
USA
Email:Dfolsom@jw.Com
David Michael Keyzer
ATTORNEY TO BE NOTICED
Law Office of David Keyzer, PC
5170 Golden Foothill Parkway
El Dorado Hills, CA 95762
USA
916-243-5259 Fax: 916-404-0436
Email:David@keyzerlaw.Com
Anthony D'Ascenzo Seach
ATTORNEY TO BE NOTICED
Ameredev II LLC - Austin
2901 Via Fortuna Suite 600
Austin, TX 78746
USA
737-300-4737 Email:Anthony@seachlegal.Com

Catherine Bentley Harris
ATTORNEY TO BE NOTICED
Reed & Scardino LLP
301 Congress Ave, Suite 1250

IPR2023-01267, -01268, -01269,
-01270, -01272, -01273

Pantech Wireless, LLC Ex. 2003 - Part 2

2:13cv947, Mobile Telecommunications Technologies, Llc V. Lg Electronics Mobilecomm U.S.A., Inc.

Litigants

Attorneys

Austin, TX 78701
USA
512-474-2449 Fax: 512-474-2622
Email: Bentley.Harris@akerman.Com

Craig Steven Jepson
ATTORNEY TO BE NOTICED
Toler Law Group, PC
8500 Bluffstone Cove Ste A201
Austin, TX 78759
USA
512-327-5515 Fax: 512-327-5575
Email: Cjepson@tlgplaw.Com

Debra L Dennett
ATTORNEY TO BE NOTICED
Reed & Scardino LLP
301 Congress Ave Suite 1250
Austin, TX 78701
USA
512-474-2449 Fax: 512-474-2622
Email: Ddennett@reedscardino.Com

Deron R Dacus
ATTORNEY TO BE NOTICED
The Dacus Firm, PC
821 Ese Loop 323 Suite 430
Tyler, TX 75701
USA
903/705-1117 Fax: 903/581-2543
Email: Ddacus@dacusfirm.Com

Dustin Lee Taylor
ATTORNEY TO BE NOTICED
Husch Blackwell LLP - Chicago
120 S Riverside Plaza 22nd Floor
Chicago, IL 60606
USA
312-526-1517 Fax: 312-655-1501
Email: Dustin.Taylor@huschblackwell.Com

Raymond William Mort , III
ATTORNEY TO BE NOTICED
The Mort Law Firm, PLLC
501 Congress Ave Ste 150
Austin, TX 78701
USA
512-865-7950 Fax: 512-865-7950
Email: Raymort@austinlaw.Com

Daniel Scardino
ATTORNEY TO BE NOTICED
Reed & Scardino LLP
301 Congress Ave, Suite 1250
Austin, TX 78701
USA
512-443-1667 Fax: 512-487-7606
Email: Daniel@scardinollp.Com

2:13cv947, Mobile Telecommunications Technologies, Llc V. Lg Electronics Mobilecomm U.S.A., Inc.

Litigants

Defendant

Attorneys

LEAD ATTORNEY; ATTORNEY TO BE NOTICED

Mayer Brown, LLP - DC

1999 K Street, Nw

Washington, DC 20006-1101

USA

202-263-3000 Fax: 202-263-3300

Email: Jbeaber@mayerbrown.Com

Alison T Gelsleichter

PRO HAC VICE; ATTORNEY TO BE NOTICED

Mayer Brown LLP - DC

1999 K Street, Nw

Washington, DC 20006

USA

202-263-3245 Fax: 202-830-0324

Email: Agelsleichter@mayerbrown.Com

Hyunho Park

ATTORNEY TO BE NOTICED

Mayer Brown, LLP - Washington

1999 K Street, Nw

Washington, DC 20006-1101

USA

202-263-3124 Fax: 202-830-0304

Email: Harrypark@mayerbrown.Com

John X Zhu

[Terminated: 12/21/2015]

Mayer Brown, LLP - DC

1999 K Street, Nw

Washington, DC 20006-1101

USA

202.263.3000 Fax: 202.263.3300

Email: Jzhu@mayerbrown.Com

Kfir B Levy

ATTORNEY TO BE NOTICED

Mayer Brown, LLP - DC

1999 K Street, Nw

Washington, DC 20006-1101

USA

202-263-3000 Fax: 202-263-3300

Email: Klevy@mayerbrown.Com

Michael E Jones

[Terminated: 02/29/2016]

Potter Minton

102north College Ste 900

Tyler, TN 375702

USA

903-525-2239 Email: Mikejones@potterminton.Com

Tiffany A Miller

ATTORNEY TO BE NOTICED

Mayer Brown, LLP - Washington

1999 K Street, Nw

IPR2023-01267, -01268, -01269,

-01270, -01272, -01273

Pantech Wireless, LLC Ex. 2003 - Part 2

2:13cv947, Mobile Telecommunications Technologies, Llc V. Lg Electronics Mobilecomm U.S.A., Inc.

Litigants

LG Electronics Mobilecomm U.S.A., Inc.
Counter Claimant

Attorneys

Washington, DC 20006-1101
USA
202/263-3000 Fax: 202/263-3300
Email:Tmiller@mayerbrown.Com

William Justin Barrow
ATTORNEY TO BE NOTICED
Mayer Brown, LLP - Washington
1999 K Street, Nw
Washington, DC 20006-1101
USA
202-263-3154 Fax: 202-830-0307
Email:Wbarrow@mayerbrown.Com

Allen Franklin Gardner
ATTORNEY TO BE NOTICED
Allen Gardner Law, PLLC
609 South Fannin
Tyler, TX 75701
USA
903-944-7537 Fax: 903-944-7856
Email:Allen@allengardnerlaw.Com
John X Zhu

[Terminated: 12/21/2015]
Mayer Brown, LLP - DC
1999 K Street, Nw
Washington, DC 20006-1101
USA
202.263.3000 Fax: 202.263.3300
Email:Jzhu@mayerbrown.Com

Michael W Maas
PRO HAC VICE
[Terminated: 12/21/2015]
Mayer Brown, LLP - DC
1999 K Street, Nw
Washington, DC 20006-1101
USA
202-263-3000 Fax: 202-263-3300
Email:Mmaas@mayerbrown.Com

William Justin Barrow
ATTORNEY TO BE NOTICED
Mayer Brown, LLP - Washington
1999 K Street, Nw
Washington, DC 20006-1101
USA
202-263-3154 Fax: 202-830-0307
Email:Wbarrow@mayerbrown.Com

Allen Franklin Gardner
ATTORNEY TO BE NOTICED
Allen Gardner Law, PLLC
609 South Fannin
Tyler, TX 75701
USA
903-944-7537 Fax: 903-944-7856
Email:Allen@allengardnerlaw.Com

Case 5:22-cv-00113-RWS-JBB Document 40-14 Filed 01/06/23 Page 5 of 9 PageID #: 869
-01267, -01268, -01269,
-01270, -01272, -01273

Pantech Wireless, LLC Ex. 2003 - Part 2

2:13cv947, Mobile Telecommunications Technologies, LLC V. Lg Electronics Mobilecomm U.S.A., Inc.

Litigants

Mobile Telecommunications Technologies, LLC
Counter Defendant

LG Electronics Mobilecomm U.S.A., Inc.
Counter Claimant

Attorneys

Daniel Scardino
ATTORNEY TO BE NOTICED
Reed & Scardino LLP
301 Congress Ave, Suite 1250
Austin, TX 78701
USA
512-443-1667 Fax: 512-487-7606
Email:Daniel@scardinollp.Com

Jamie B Beaber
LEAD ATTORNEY; ATTORNEY TO BE NOTICED
Mayer Brown, LLP - DC
1999 K Street, Nw
Washington, DC 20006-1101
USA
202-263-3000 Fax: 202-263-3300
Email:Jbeaber@mayerbrown.Com

John X Zhu

[Terminated: 12/21/2015]
Mayer Brown, LLP - DC
1999 K Street, Nw
Washington, DC 20006-1101
USA
202.263.3000 Fax: 202.263.3300
Email:Jzhu@mayerbrown.Com

Kfir B Levy
ATTORNEY TO BE NOTICED
Mayer Brown, LLP - DC
1999 K Street, Nw
Washington, DC 20006-1101
USA
202-263-3000 Fax: 202-263-3300
Email:Klevy@mayerbrown.Com

Michael E Jones

[Terminated: 02/29/2016]
Potter Minton
102north College Ste 900
Tyler, TN 75702
USA
903-525-2239 Email:Mikejones@potterminton.Com

William Justin Barrow
ATTORNEY TO BE NOTICED
Mayer Brown, LLP - Washington
1999 K Street, Nw
Washington, DC 20006-1101
USA
202-263-3154 Fax: 202-830-0307
Email:Wbarrow@mayerbrown.Com

Allen Franklin Gardner
ATTORNEY TO BE NOTICED
Allen Gardner Law, PLLC
609 South Fannin

IPR2023-01267, -01268, -01269,
-01270, -01272, -01273

Pantech Wireless, LLC Ex. 2003 - Part 2

2:13cv947, Mobile Telecommunications Technologies, LLC V. Lg Electronics Mobilecomm U.S.A., Inc.

Litigants

Mobile Telecommunications Technologies, LLC
Counter Defendant

LG Electronics Mobilecomm U.S.A., Inc.
Counter Claimant

Attorneys

Tyler, TX 75701
USA
903-944-7537 Fax: 903-944-7856
Email:Allen@allengardnerlaw.Com
Craig Steven Jepson
ATTORNEY TO BE NOTICED
Toler Law Group, PC
8500 Bluffstone Cove Ste A201
Austin, TX 78759
USA
512-327-5515 Fax: 512-327-5575
Email:Cjepson@tligiplaw.Com

Deron R Dacus
ATTORNEY TO BE NOTICED
The Dacus Firm, PC
821 Ese Loop 323 Suite 430
Tyler, TX 75701
USA
903/705-1117 Fax: 903/581-2543
Email:Ddacus@dacusfirm.Com

Dustin Lee Taylor
ATTORNEY TO BE NOTICED
Husch Blackwell LLP - Chicago
120 S Riverside Plaza 22nd Floor
Chicago, IL 60606
USA
312-526-1517 Fax: 312-655-1501
Email:Dustin.Taylor@huschblackwell.Com

Daniel Scardino
ATTORNEY TO BE NOTICED
Reed & Scardino LLP
301 Congress Ave, Suite 1250
Austin, TX 78701
USA
512-443-1667 Fax: 512-487-7606
Email:Daniel@scardinollp.Com

Jamie B Beaber
LEAD ATTORNEY; ATTORNEY TO BE NOTICED
Mayer Brown, LLP - DC
1999 K Street, Nw
Washington, DC 20006-1101
USA
202-263-3000 Fax: 202-263-3300
Email:Jbeaber@mayerbrown.Com

Alison T Gelsleichter
PRO HAC VICE; ATTORNEY TO BE NOTICED
Mayer Brown LLP - DC
1999 K Street, Nw
Washington, DC 20006
USA
202-263-3245 Fax: 202-830-0324
Email:Agelsleichter@mayerbrown.Com

Hyunho Park
ATTORNEY TO BE NOTICED
Pantech Wireless, LLC Ex. 2003 - Part 2

IPR 2023-01267, -01268, -01269,
-01270, -01272, -01273

2:13cv947, Mobile Telecommunications Technologies, Llc V. Lg Electronics Mobilecomm U.S.A., Inc.

Litigants

Attorneys

Mayer Brown, LLP - Washington
1999 K Street, Nw
Washington, DC 20006-1101
USA
202-263-3124 Fax: 202-830-0304
Email:Harrypark@mayerbrown.Com

John X Zhu

[Terminated: 12/21/2015]
Mayer Brown, LLP - DC
1999 K Street, Nw
Washington, DC 20006-1101
USA
202.263.3000 Fax: 202.263.3300
Email:Jzhu@mayerbrown.Com

Kfir B Levy
ATTORNEY TO BE NOTICED
Mayer Brown, LLP - DC
1999 K Street, Nw
Washington, DC 20006-1101
USA
202-263-3000 Fax: 202-263-3300
Email:Klevy@mayerbrown.Com

Michael E Jones

[Terminated: 02/29/2016]
Potter Minton
102north College Ste 900
Tyler, TN 75702
USA
903-525-2239 Email:Mikejones@potterminton.Com

Tiffany A Miller
ATTORNEY TO BE NOTICED
Mayer Brown, LLP - Washington
1999 K Street, Nw
Washington, DC 20006-1101
USA
202/263-3000 Fax: 202/263-3300
Email:Tmiller@mayerbrown.Com

William Justin Barrow
ATTORNEY TO BE NOTICED
Mayer Brown, LLP - Washington
1999 K Street, Nw
Washington, DC 20006-1101
USA
202-263-3154 Fax: 202-830-0307
Email:Wbarrow@mayerbrown.Com

Allen Franklin Gardner
ATTORNEY TO BE NOTICED
Allen Gardner Law, PLLC
609 South Fannin
Tyler, TX 75701

IPR2023-01267, -01268, -01269,
-01270, -01272, -01273

Pantech Wireless, LLC Ex. 2003 - Part 2

2:13cv947, Mobile Telecommunications Technologies, LLC V. Lg Electronics Mobilecomm U.S.A., Inc.

#	Date	Proceeding Text	Source
		Extend Stay (Dkt. 243) and Notice Regarding Settlement) by Mobile Telecommunications Technologies, LLC. (Attachments: # 1 Text of Proposed Order)(Scardino, Daniel) (Entered: 03/07/2016)	
250	03/08/2016	ORDER granting 249 Joint MOTION for Extension of Time to File (Joint Motion to Extend Stay (Dkt. 243) and Notice Regarding Settlement) filed by Mobile Telecommunications Technologies, LLC., Status Conference set for 3/14/2016 09:00 AM in Mag Ctrm (Marshall) before Magistrate Judge Roy S. Payne. Signed by Magistrate Judge Roy S. Payne on 03/08/2016. (nkl,) (Entered: 03/08/2016)	
251	03/11/2016	Joint MOTION to Dismiss by Mobile Telecommunications Technologies, LLC. (Attachments: # 1 Text of Proposed Order)(Scardino, Daniel) (Entered: 03/11/2016)	
252	03/15/2016	ORDER granting 251 Motion to Dismiss with prejudice. Signed by Magistrate Judge Roy S. Payne on 3/14/2016. (ch,) (Entered: 03/15/2016)	
253	02/25/2018	ORDER GRANTING 245 MOTION to Redact 211 Transcript. Signed by Magistrate Judge Roy S. Payne on 2/25/2018. (ch,) (Entered: 02/26/2018)	

Patents

Number	Title	Issued	Class	Subclass
5,754,946	Nationwide communication system	05/19/1998	340	7.22
5,809,428	Method and device for processing undelivered data messages in a two-way wireless communications system	09/15/1998	455	517

Copyright © LexisNexis CourtLink, Inc. All Rights Reserved.

*** THIS DATA IS FOR INFORMATIONAL PURPOSES ONLY ***

End of Document

EXHIBIT 11

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

JENAM TECH, LLC,

Plaintiff

v.

LG ELECTRONICS, INC. and LG
ELECTRONICS MOBILECOMM
U.S.A., INC.,

Defendants.

Civil Action No.: 4:19-cv-00249

JURY TRIAL DEMANDED

PATENT CASE

PLAINTIFF'S ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Jenam Tech, LLC ("Jenam Tech" or "Plaintiff") files this Complaint against LG Electronics, Inc. and LG Electronics MobileComm U.S.A., Inc. (together "Defendants") seeking damages and other relief for patent infringement, and alleges with knowledge to its own acts, and on information and belief as to other matters, as follows:

PARTIES

1. Plaintiff is a limited liability company organized and existing under the laws of the State of Texas, having its principal place of business at 211 West Tyler Street, Suite C, Longview, Texas, 75601.

2. Defendant LG Electronics, Inc. is a foreign corporation organized under the laws of Korea, with its principal place of business at 150-721, LG Twin Towers, Yeouido-daero, Yeongdeungpo-Gu, Seoul, South Korea.

3. Defendant LG Electronics MobileComm U.S.A., Inc. is a California corporation with a place of business at 1000 Sylvan Ave., Englewood Cliffs, NJ 07632-3302.

4. Defendants do business in Texas, directly or through intermediaries and offer products or services, including those accused herein of infringement, to customers, and potential customers located in Texas, including in the Eastern District of Texas.

JURISDICTION AND VENUE

5. This action arises under the patent laws of the United States, 35 U.S.C. §101, *et seq.* This Court has subject matter jurisdiction under 28 U.S.C. §§1331 and 1338(a).

6. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(c)(3), 1400(b). Defendant LG Electronics, Inc. is a foreign corporation that may be sued in this judicial district. LG Electronics MobileComm U.S.A., Inc. maintains a physical place of business within the State, including in the Eastern District of Texas at 2151-2155 Eagle Parkway, Fort Worth, Texas 76177.

7. Defendants are subject to this Court’s specific and general personal jurisdiction pursuant to due process or the Texas Long Arm Statute, because Defendants do substantial business in this forum, including: (i) making, using, selling, importing, and/or offering for sale smartphones and tablets (e.g., LG V40 series, V35 series, G7 series, LG Gpad, G Pad X, G Pad II, etc.), each including a non-transitory computer readable medium (e.g., memory) and running a web browser (e.g., Google Chrome, etc.) (“Accused Devices”); or (ii) regularly doing or soliciting business, engaging in other persistent courses of conduct, or deriving substantial revenue from goods and services provided to citizens and residents in Texas and in this District.

THE PATENTS-IN-SUIT

8. On September 3, 2017, Robert Paul Morris filed United States Patent Application No. 15/694,802 (“the ’802 Application”). The ’802 Application was duly examined and issued as United States Patent No. 9,923,995 (“the ’995 Patent”) (entitled “Methods, Systems, and Computer

Program Products for Sharing Information for Detecting an Idle TCP Connection”), on March 20, 2018.

9. Jenam Tech is the owner of the ’995 Patent and has the full and exclusive right to bring actions and recover past, present, and future damages for the Defendants’ infringement of the ’995 Patent.

10. The ’995 Patent is valid and enforceable. A true and correct copy of the ’995 Patent is attached hereto as Exhibit A.

11. On September 3, 2017, Robert Paul Morris filed United States Patent Application No. 15/694,803 (“the ’803 Application”). The ’803 Application was duly examined and issued as United States Patent No. 9,923,996 (“the ’996 Patent”) (entitled “Methods, Systems, and Computer Program Products for Sharing Information for Detecting an Idle TCP Connection”), on March 20, 2018.

12. Jenam Tech is the owner of the ’996 Patent and has the full and exclusive right to bring actions and recover past, present, and future damages for the Defendants’ infringement of the ’996 Patent.

13. The ’996 Patent is valid and enforceable. A true and correct copy of the ’995 Patent is attached hereto as Exhibit B.

14. The ’995 and ’996 Patents are collectively referred to herein as the “Patents” or the “Patents-in-Suit.”

15. Jenam Tech has not practiced any claimed invention of the Patents-in-Suit.

16. Defendants infringe the Patents at least through making, using, selling, importing, and/or offering to sell the Accused Devices.

COUNT I: INFRINGEMENT OF THE ’995 PATENT

17. Jenam Tech repeats and re-alleges the allegations of the above paragraphs as if fully set forth herein.

18. The '995 Patent includes 30 claims. '995 Patent, Ex. A at 23:4–28:16.

19. Defendants directly infringe one or more claims of the '995 Patent without authority by making, using (including without limitation testing), selling, importing, and/or offering to sell products and systems, including by way of example, the Accused Devices. *See* Claim Chart for the '995 Patent, attached hereto as Exhibit C.

20. Defendants have been and are directly infringing, either literally or under the doctrine of equivalents, at least Claim 1 of the '995 Patent by making, using (including without limitation testing), selling, importing, and/or offering to sell the Accused Devices. *See* Claim Chart for the '995 Patent, attached hereto as Exhibit C. As demonstrated by the attached claim chart, each and every element of Claim 1 of the '995 Patent is found in the Accused Devices.

21. Defendants have had actual knowledge of the '995 Patent at least as early as the date of service of this Complaint.

22. Defendants' acts of infringement have occurred within this District and elsewhere throughout the United States.

COUNT II: INFRINGEMENT OF THE '996 PATENT

23. Jenam Tech repeats and re-alleges the allegations of the above paragraphs as if fully set forth herein.

24. The '996 Patent includes 30 claims. '996 Patent, Ex. B at 23:27–28:42.

25. Defendants directly infringe one or more claims of the '996 Patent without authority by making, using (including without limitation testing), selling, importing, and/or

offering to sell products and systems, including by way of example, the Accused Devices. *See* Claim Chart for the '996 Patent, attached hereto as Exhibit D.

26. Defendants have been and are directly infringing, either literally or under the doctrine of equivalents, at least Claim 1 of the '996 Patent by making, using (including without limitation testing), selling, importing, and/or offering to sell the Accused Devices. *See* Claim Chart for the '996 Patent, attached hereto as Exhibit D. As demonstrated by the attached claim chart, each and every element of Claim 1 of the '996 Patent is found in the Accused Devices.

27. Defendants have had actual knowledge of the '996 Patent at least as early as the date of service of this Complaint.

28. Defendants' acts of infringement have occurred within this District and elsewhere throughout the United States.

RELIEF REQUESTED

WHEREFORE, Plaintiff respectfully requests that the Court:

- A. Declaring that Defendants have infringed the Patents;
- B. Awarding damages in an amount to be proven at trial, but in no event less than a reasonable royalty for Defendants' infringement including pre-judgment and post-judgment interest at the maximum rate permitted by law;
- C. Ordering an award of reasonable attorneys' fees and enhanced damages as appropriate against Defendant to Jenam Tech as provided by 35 U.S.C. § 285;
- D. Awarding expenses, costs, and disbursements in this action against Defendants, including prejudgment interest; and
- E. All other relief necessary or appropriate.

JURY DEMAND

Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff hereby demands a trial by jury
on all issues so triable.

Dated: April 3, 2019

Respectfully submitted,

By: /s/

Jeffrey G. Toler
Texas State Bar No. 24011201
Benjamin Johnson
Texas State Bar No. 24065495

TOLER LAW GROUP, PC
8500 Bluffstone Cove, Suite A201
Austin, Texas 78759
Tel. (512) 327-5515
Fax (512) 327-5575
bjohnson@tlgiplaw.com
ATTORNEYS FOR PLAINTIFF
JENAM TECH, LLC

EXHIBIT 12

4:19cv249, Jenam Tech, Llc V. Lg Electronics, Inc., Lg Electronics U.S.A., Inc.

US District Court Docket
United States District Court, Texas Eastern
(Sherman)

This case was retrieved on 12/22/2022

Header

Case Number: 4:19cv249

Date Filed: 04/03/2019

Assigned To: District Judge Amos L. Mazzant, III

Referred To: Magistrate Judge Kimberly C Priest Johnson

Nature of Suit: Patent (830)

Cause: Patent Infringement

Lead Docket: None

Other Docket: None

Jurisdiction: Federal Question

Class Code: Closed

Closed: 06/03/2020

Statute: 35:271

Jury Demand: Plaintiff

Demand Amount: \$0

NOS Description: Patent

Participants

Litigants

Jenam Tech, LLC
Plaintiff

Attorneys

Timothy Devlin
LEAD ATTORNEY; ATTORNEY TO BE NOTICED
Devlin Law Firm LLC - Wilmington
1526 Gilpin Ave.
Wilmington, DE 19806
USA
302-449-9010 Fax: 302-353-4251
Email: Tdevlin@devlinlawfirm.Com

Benjamin R Johnson
ATTORNEY TO BE NOTICED
[Terminated: 10/03/2019]
Toler Law Group, PC
8500 Bluffstone Cove Ste A201
Austin, TX 78759
USA
512-327-5515 Fax: 512-327-5575
Email: Bjohnson@tlgiplaw.Com

Cory Edwards
ATTORNEY TO BE NOTICED
Devlin Law Firm LLC - Wilmington
1526 Gilpin Ave.
Wilmington, DE 19806
USA
302-449-9010 Fax: 302-353-4251
Email: Cedwards@devlinlawfirm.Com

IPR2023-01267, -01268, -01269,
-01270, -01272, -01273

Pantech Wireless, LLC Ex. 2003 - Part 2

Page 21 of 50

4:19cv249, Jenam Tech, Llc V. Lg Electronics, Inc., Lg Electronics U.S.A., Inc.

Litigants

LG Electronics, Inc.
Defendant

Attorneys

Derek Dahlgren
ATTORNEY TO BE NOTICED
Devlin Law Firm LLC - Wilmington
1526 Gilpin Ave.
Wilmington, DE 19806
USA
302-449-9010 Fax: 302-353-4251
Email:Ddahlgren@devlinlawfirm.Com

Nadiia S. Loizides
ATTORNEY TO BE NOTICED
Devlin Law Firm LLC - Wilmington
1526 Gilpin Ave.
Wilmington, DE 19806
USA
302-449-9010 Fax: 302-353-4251
Email:Nloizides@devlinlawfirm.Com

Jeffrey G Toler
ATTORNEY TO BE NOTICED
[Terminated: 11/12/2019]
McDonnell Boehnen Hulbert & Berghoff LLP
300 South Wacker Drive 32nd Floor
Chicago, IL 60606
USA
312-913-3311 Fax: 312-913-0002 Email:Toler@mbhb.Com
Brian L Ferrall
LEAD ATTORNEY;ATTORNEY TO BE NOTICED
Keker, Van, Nest & Peters LLP - San Francisco
633 Battery Street
San Francisco, CA 94111
USA
415-391-5400 Fax: 415-397-7188 Email:Bferrall@keker.Com

Jamie B Beaber
LEAD ATTORNEY;ATTORNEY TO BE NOTICED
Mayer Brown, LLP - DC
1999 K Street, Nw
Washington, DC 20006-1101
USA
202-263-3000 Fax: 202-263-3300
Email:Jbeaber@mayerbrown.Com

Amanda Streff Bonner
ATTORNEY TO BE NOTICED
Mayer Brown LLP - Chicago
71 South Wacker Dr
Chicago, IL 60606
USA
312-701-8645 Fax: 312-706-8157
Email:Astreff@mayerbrown.Com

Baldine Brunel Paul
ATTORNEY TO BE NOTICED
Mayer Brown, LLP - DC
1999 K Street, Nw
Washington, DC 20006-1101
USA

IPR2023-01267, -01268, -01269,
-01270, -01272, -01273

Pantech Wireless, LLC Ex. 2003 - Part 2

4:19cv249, Jenam Tech, LLC v. Lg Electronics, Inc., Lg Electronics U.S.A., Inc.

Litigants

Attorneys

202-263-3139 Fax: 202-830-0305
Email: Bpaul@mayerbrown.com

Kristin E. Hucek
ATTORNEY TO BE NOTICED
Keker, Van, Nest & Peters LLP - San Francisco
633 Battery Street
San Francisco, CA 94111
USA
415-391-5400 Fax: 415-397-7188 Email: Khucek@keker.com

Matthew M Werdegarr
ATTORNEY TO BE NOTICED
Keker & Van Nest LLP
633 Battery Street
San Francisco, CA 94111
USA
415-391-5400 Fax: 415-397-7188
Email: Mwerdegarr@keker.com

Melissa Richards Smith
ATTORNEY TO BE NOTICED
[Terminated: 09/09/2019]
Gillam & Smith, LLP
303 South Washington Avenue
Marshall, TX 75670
USA
903-934-8450 Fax: 903-934-9257
Email: Melissa@gillamsmithlaw.com

Michael E Jones
ATTORNEY TO BE NOTICED
Potter Minton
102 North College Ste 900
Tyler, TN 75702
USA
903-525-2239 Email: Mikejones@potterminton.com

Michelle S Ybarra
PRO HAC VICE; ATTORNEY TO BE NOTICED
Keker, Van, Nest & Peters LLP - San Francisco
633 Battery Street
San Francisco, CA 94111
USA
415-676-2271 Fax: 415/397-7188
Email: Mybarra@keker.com

Patrick Colbert Clutter, IV
ATTORNEY TO BE NOTICED
Potter Minton, a Professional Corporation
110 North College Avenue, Suite 500
Tyler, TX 75702
USA
903/597-8311 Email: Patrickclutter@potterminton.com

Robert Gary Pluta
ATTORNEY TO BE NOTICED
Mayer Brown LLP - Chicago

IPR2023-01267, -01268, -01269,
-01270, -01272, -01273

Pantech Wireless, LLC Ex. 2003 - Part 2

4:19cv249, Jenam Tech, Llc V. Lg Electronics, Inc., Lg Electronics U.S.A., Inc.

Litigants

Attorneys

71 South Wacker Dr
Chicago, IL 60606
USA
312.701.8641 Fax: 312.701.7711
Email:Rpluta@mayerbrown.Com

Robert A Van Nest
ATTORNEY TO BE NOTICED
Keker & Van Nest LLP
633 Battery Street
San Francisco, CA 94111
USA
415/391-5400 Fax: 415/397-7188
Email:Rvannest@keker.Com

Ryan K Wong
ATTORNEY TO BE NOTICED
Keker & Van Nest LLP
633 Battery Street
San Francisco, CA 94111
USA
415-391-5400 Fax: 415-397-7188 Email:Rwong@keker.Com

Rylee Olm
ATTORNEY TO BE NOTICED
Keker, Van, Nest & Peters LLP - San Francisco
633 Battery Street
San Francisco, CA 94111
USA
415-391-5400 Fax: 415-397-7188 Email:Rolm@keker.Com

Saqib Javaid Siddiqui
ATTORNEY TO BE NOTICED
Mayer Brown, LLP - DC
1999 K Street, Nw
Washington, DC 20006-1101
USA
202.263.3167 Fax: 202.263.5367
Email:Ssiddiqui@mayerbrown.Com

Shayne Henry
ATTORNEY TO BE NOTICED
[Terminated: 03/23/2020]
Keker, Van, Nest & Peters LLP - San Francisco
633 Battery Street
San Francisco, CA 94111
USA
415-391-5400 Fax: 415-397-7188 Email:Shenry@keker.Com

Tiffany A Miller
ATTORNEY TO BE NOTICED
Mayer Brown, LLP - DC
1999 K Street, Nw
Washington, DC 20006-1101
USA
202/263-3000 Fax: 202/263-3300
Email:Tmiller@mayerbrown.Com

Brian L Ferrall
LEAD ATTORNEY; ATTORNEY TO BE NOTICED
IN RE: 2023-01-1267, -01268, -01269,

LG Electronics U.S.A., Inc.
Defendant

-01270, -01272, -01273
Pantech Wireless, LLC Ex. 2003 - Part 2

4:19cv249, Jenam Tech, Llc V. Lg Electronics, Inc., Lg Electronics U.S.A., Inc.

Litigants

Attorneys

Keker, Van, Nest & Peters LLP - San Francisco
633 Battery Street
San Francisco, CA 94111
USA
415-391-5400 Fax: 415-397-7188 Email:Bferrall@keker.Com

Jamie B Beaber
LEAD ATTORNEY;ATTORNEY TO BE NOTICED
Mayer Brown, LLP - DC
1999 K Street, Nw
Washington, DC 20006-1101
USA
202-263-3000 Fax: 202-263-3300
Email:Jbeaber@mayerbrown.Com

Amanda Streff Bonner
ATTORNEY TO BE NOTICED
Mayer Brown LLP - Chicago
71 South Wacker Dr
Chicago, IL 60606
USA
312-701-8645 Fax: 312-706-8157
Email:Astreff@mayerbrown.Com

Baldine Brunel Paul
ATTORNEY TO BE NOTICED
Mayer Brown, LLP - DC
1999 K Street, Nw
Washington, DC 20006-1101
USA
202-263-3139 Fax: 202-830-0305
Email:Bpaul@mayerbrown.Com

Kristin E. Hucek
ATTORNEY TO BE NOTICED
Keker, Van, Nest & Peters LLP - San Francisco
633 Battery Street
San Francisco, CA 94111
USA
415-391-5400 Fax: 415-397-7188 Email:Khucek@keker.Com

Matthew M Werdegar
ATTORNEY TO BE NOTICED
Keker & Van Nest LLP
633 Battery Street
San Francisco, CA 94111
USA
415-391-5400 Fax: 415-397-7188
Email:Mwerdegar@keker.Com

Melissa Richards Smith
ATTORNEY TO BE NOTICED
[Terminated: 09/09/2019]
Gillam & Smith, LLP
303 South Washington Avenue
Marshall, TX 75670
USA
903-934-8450 Fax: 903-934-9257
Email:Melissa@gillamsmith.com

IP R2023-01267, -01268, -01269,
-01270, -01272, -01273

Pantech Wireless, LLC Ex. 2003 - Part 2

4:19cv249, Jenam Tech, Llc V. Lg Electronics, Inc., Lg Electronics U.S.A., Inc.

Litigants

Attorneys

Michael E Jones
ATTORNEY TO BE NOTICED
Potter Minton
102north College Ste 900
Tyler, TN 75702
USA
903-525-2239 Email:Mikejones@potterminton.Com

Michelle S Ybarra
PRO HAC VICE;ATTORNEY TO BE NOTICED
Keker, Van, Nest & Peters LLP - San Francisco
633 Battery Street
San Francisco, CA 94111
USA
415-676-2271 Fax: 415/397-7188
Email:Mybarra@keker.Com

Patrick Colbert Clutter , IV
ATTORNEY TO BE NOTICED
Potter Minton, a Professional Corporation
110 North College Avenue, Suite 500
Tyler, TX 75702
USA
903/597-8311 Email:Patrickclutter@potterminton.Com

Robert Gary Pluta
ATTORNEY TO BE NOTICED
Mayer Brown LLP - Chicago
71 South Wacker Dr
Chicago, IL 60606
USA
312.701.8641 Fax: 312.701.7711
Email:Rpluta@mayerbrown.Com

Robert A Van Nest
ATTORNEY TO BE NOTICED
Keker & Van Nest LLP
633 Battery Street
San Francisco, CA 94111
USA
415/391-5400 Fax: 415/397-7188
Email:Rvannest@keker.Com

Ryan K Wong
ATTORNEY TO BE NOTICED
Keker & Van Nest LLP
633 Battery Street
San Francisco, CA 94111
USA
415-391-5400 Fax: 415-397-7188 Email:Rwong@keker.Com

Rylee Olm
ATTORNEY TO BE NOTICED
Keker, Van, Nest & Peters LLP - San Francisco
633 Battery Street
San Francisco, CA 94111
USA

IPR2023-01267, -01268, -01269,
-01270, -01272, -01273

Pantech Wireless, LLC Ex. 2003 - Part 2

4:19cv249, Jenam Tech, LLC V. Lg Electronics, Inc., Lg Electronics U.S.A., Inc.

Litigants**Attorneys**

415-391-5400 Fax: 415-397-7188 Email:Rolm@keker.Com

Saqib Javaid Siddiqui
 ATTORNEY TO BE NOTICED
 Mayer Brown, LLP - DC
 1999 K Street, Nw
 Washington, DC 20006-1101
 USA
 202.263.3167 Fax: 202.263.5367
 Email:Ssiddiqui@mayerbrown.Com

Shayne Henry
 ATTORNEY TO BE NOTICED
 [Terminated: 03/23/2020]
 Kecker, Van, Nest & Peters LLP - San Francisco
 633 Battery Street
 San Francisco, CA 94111
 USA
 415-391-5400 Fax: 415-397-7188 Email:Shenry@keker.Com

Tiffany A Miller
 ATTORNEY TO BE NOTICED
 Mayer Brown, LLP - DC
 1999 K Street, Nw
 Washington, DC 20006-1101
 USA
 202/263-3000 Fax: 202/263-3300
 Email:Tmiller@mayerbrown.Com

Proceedings

#	Date	Proceeding Text	Source
1	04/03/2019	COMPLAINT FOR PATENT INFRINGEMENT against All Defendants (Filing fee \$ 400 receipt number 0540-7209631.), filed by Jenam Tech, LLC. (Attachments: # 1 Exhibit Exhibit A, # 2 Exhibit Exhibit B, # 3 Exhibit Exhibit C, # 4 Exhibit Exhibit D, # 5 Civil Cover Sheet Civil Cover Sheet)(Toler, Jeffrey) (Entered: 04/03/2019)	
2	04/03/2019	CORPORATE DISCLOSURE STATEMENT filed by Jenam Tech, LLC (Toler, Jeffrey) (Entered: 04/03/2019)	
3	04/03/2019	Notice of Filing of Patent/Trademark Form (AO 120). AO 120 mailed to the Director of the U.S. Patent and Trademark Office. (Toler, Jeffrey) (Entered: 04/03/2019)	
4	04/03/2019	NOTICE of Attorney Appearance by Jeffrey G Toler on behalf of Jenam Tech, LLC (Toler, Jeffrey) (Entered: 04/03/2019)	
5	04/03/2019	NOTICE of Attorney Appearance by Benjamin R Johnson on behalf of Jenam Tech, LLC (Johnson, Benjamin) (Entered: 04/03/2019)	
6	04/03/2019	SUMMONS Issued as to LG ELECTRONICS, INC.. (baf,) (Entered: 04/03/2019)	
7	04/03/2019	SUMMONS Issued as to LG ELECTRONICS MOBILECOMM U.S.A., INC.. (baf,) (Entered: 04/03/2019)	
	04/03/2019	Case ASSIGNED to District Judge Amos L. Mazzant, III and REFERRED to Magistrate Judge Kimberly C Priest Johnson. (baf,) (Entered: 04/03/2019)	
	04/03/2019	In accordance with the provisions of 28 USC Section 636(c), you	

IPR2023-01267, -01268, -01269,

-01270, -01272, -01273

Pantech Wireless, LLC Ex. 2003 - Part 2

Page 27 of 50

4:19cv249, Jenam Tech, Llc V. Lg Electronics, Inc., Lg Electronics U.S.A., Inc.

Patents

Number	Title	Issued	Class	Subclass
9,923,995	Methods, systems, and computer program products for sharing information for detecting an idle TCP connection	03/20/2018	1	1
9,923,996	Methods, systems, and computer program products for sharing information for detecting an idle TCP connection	03/20/2018	1	1

Copyright © LexisNexis CourtLink, Inc. All Rights Reserved.

*** THIS DATA IS FOR INFORMATIONAL PURPOSES ONLY ***

End of Document

EXHIBIT 13

1 Jill F. Kopeikin (State Bar No. 160792)
2 Valerie M. Wagner (State Bar No. 173146)
3 GCA LAW PARTNERS LLP
4 2570 W. El Camino Real, Suite 400
5 Mountain View, CA 94040
6 Telephone: (650) 428-3900
7 Fax: (650) 428-3901
8 jkopeikin@gcalaw.com
9 vwagner@gcalaw.com

10 (Additional Counsel Identified On Signature Page)
11 Attorneys for Plaintiff CYWEE GROUP LTD.

12 **IN THE UNITED STATES DISTRICT COURT**
13 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

14 CYWEE GROUP LTD.,
15 *Plaintiff,*

16 LG ELECTRONICS, INC.,
17 LG ELECTRONICS U.S.A., INC.,
18 AND LG ELECTRONICS
19 MOBILECOMM U.S.A., INC.,
20 *Defendants.*

21 CASE NO. '17CV1102 GPC RBB

22 CYWEE'S ORIGINAL COMPLAINT
23 FOR PATENT INFRINGEMENT

24 DEMAND FOR JURY TRIAL
25
26
27
28

1. Plaintiff CyWee Group Ltd. (“Plaintiff” or “CyWee”) by and through its undersigned counsel, files this Original Complaint against Defendants LG Electronics, Inc., LG Electronics U.S.A., Inc. and LG Electronics MobileComm U.S.A., Inc. (“Defendants” or “LG”) as follows:

THE PARTIES

2. CyWee is a corporation existing under the laws of the British Virgin Islands with a principal place of business at 3F, No.28, Lane 128, Jing Ye 1st Road, Taipei, Taiwan 10462.

3. CyWee is a world-leading technology company that focuses on building products and providing services for consumers and businesses. CyWee has one of the most significant patent portfolios in the industry, and is a market leader in its core development areas of motion processing, wireless high definition video delivery, and facial tracking technology.

4. On information and belief, Defendant LG Electronics, Inc. (“LGE”) is a company incorporated in South Korea located at LG Twin Tower, 128 Yeoui-daero, Yeongdeungpo-gu, Seoul, 150-721, South Korea.

5. On information and belief, Defendant LG Electronics U.S.A., Inc. (“LGEUSA”) is a Delaware corporation with its principal place of business at 920 Sylvan Avenue, Englewood Cliffs, New Jersey 07632. On information and belief, LGEUSA is a wholly owned subsidiary of LGE. *See Innovative Display Techs. LLC v. LG Elecs., Inc., et al.*, Case No. 2:16-cv-00932-JRG, Dkt. No. 22 (E.D. Tex. Nov. 1, 2016). On information and belief, LGEUSA may be served via its registered agent for service of process: Lawyers Incorporating Service, 2710 Gateway Oaks Drive, Suite 150N, Sacramento CA 95833.

6. On information and belief, Defendant LG Electronics MobileComm U.S.A., Inc. (“LGEMU”) is a California corporation with its principal place of business at 10101 Old Grove Road, San Diego, California 92131. On information

BACKGROUND

18. ITRI is a Taiwanese government and industry funded research and development center. In 2007, CyWee, which was started at ITRI, was formed. Its goal was to provide innovative motion-sensing technologies, such as those claimed in the patents-in-suit. Dr. Shun-Nan Liu and Chin-Lung Li, two of the inventors of the Patents, came to CyWee from ITRI. The third inventor, Zhou “Joe” Ye joined CyWee as its President and CEO from private industry.

19. The inventors, Zhou Ye, Chin-Lung Li, and Shun-Nan Liou conceived of the claims of the patents-in-suit—U.S. Patent No. 8,441,438 (the “’438 Patent”) and U.S. Patent No. 8,552,978 (the “’978 Patent”)—at CyWee Group Ltd., located at 3F, No. 28, Lane 128, Jing Ye Road, Taipei.

20. Several claims of the patents-in-suit are entitled to a priority date of at least January 6, 2010 based on U.S. Provisional Application Serial No. 61/292,558, filed January 6, 2010 (“Provisional Application”).

21. Before May 22, 2009, CyWee began working on the “JIL Game Phone Project” or “JIL Phone.” Before July 29, 2009, CyWee developed a solution for the JIL Phone that practiced several claims of the ’438 Patent. Those claims were diligently and constructively reduced to practice thereafter through the filing of the Provisional Application, and were diligently and actually reduced to practice as discussed below. Accordingly, CyWee is entitled to a priority date of at least July 29, 2009 for several claims of the ’438 Patent.

22. The JIL Phone was reduced to practice by at least September 25, 2009. The JIL Phone practiced several claims of both patents-in-suit. Accordingly, CyWee is entitled to a priority date of at least September 25, 2009 for several claims of the patents-in-suit.

PATENT INFRINGEMENT OF U.S. PATENT NO. 8,441,438

23. Plaintiff repeats and re-alleges each and every allegation of paragraphs 1-22 as though fully set forth herein.

24. The '438 Patent, titled "3D Pointing Device and Method for Compensating Movement Thereof," was duly and legally issued by the United States Patent and Trademark Office on May 14, 2013 to CyWee Group Limited, as assignee of named inventors Zhou Ye, Chin-Lung Li, and Shun-Nan Liou.

25. CyWee is the owner of all right, title, and interest in and to the '438 Patent with full right to bring suit to enforce the patent, including the right to recover for past infringement damages.

26. Each and every claim of the '438 Patent is valid and enforceable and each enjoys a statutory presumption of validity separate, apart, and in addition to the statutory presumption of validity enjoyed by every other of its claims. 35 U.S.C. § 282.

27. CyWee is informed and believes, and thereupon alleges, that LG has been, and is currently directly or indirectly infringing one or more claims of the '438 Patent in violation of 35 U.S.C. § 271, including as stated below.

28. CyWee is informed and believes, and thereupon alleges, that LG has directly infringed, literally and/or under the doctrine of equivalents, and will continue to directly infringe claims of the '438 Patent by making, using, selling, offering to sell, and/or importing into the United States products that embody or practice the apparatus and/or method covered by one or more claims of the '438 Patent, including but not limited to Defendants' devices such as LG V20, LG Stylo 3, LG Stylo 3 Plus, LG G5, LG G6, LG X Mach, LG X Venture, LG X Power 2, and LG X Cam (collectively referred to as "'438 Accused Products").

29. CyWee adopts, and incorporates by reference, as if fully stated herein, the attached claim chart for claim 14 of the '438 Patent, which is attached hereto as

Exhibit A. The claim chart describes and demonstrates how LG infringes the '438 Patent. In addition, CyWee alleges that LG infringes one or more additional claims of the '438 Patent in a similar manner.

30. Defendants' acts of infringement have caused and will continue to cause substantial and irreparable damage to CyWee.

31. As a result of Defendants' infringement of the '438 Patent, CyWee has been damaged. CyWee is, therefore, entitled to such damages pursuant to 35 U.S.C. § 284 in an amount that presently cannot be pled but that will be determined at trial.

32. The LG V20 includes a display screen.

33. The LG V20 includes a housing.

34. The LG V20 includes a 3-axis accelerometer.

35. The LG V20 includes a 3-axis gyroscope.

36. The LG V20 includes at least one printed circuit board ("PCB").

37. The LG V20 includes a 3-axis accelerometer attached to a PCB.

38. The LG V20 includes a 3-axis gyroscope attached to a PCB.

39. The LG V20 includes a 3-axis accelerometer that is capable of measuring accelerations.

40. The LG V20 includes a 3-axis gyroscope that is capable of measuring rotation rates.

41. The LG V20 includes a 3-axis accelerometer that is capable of measuring accelerations using a "Sensor Coordinate System" as described in the Android developer library. *See* https://developer.android.com/guide/topics/sensors/sensors_overview.html#sensors-coords (describing "Sensor Coordinate System").

42. The LG V20 includes a 3-axis gyroscope that is capable of measuring rotation rates using a "Sensor Coordinate System."

43. The LG V20 includes a processor that is capable of processing data

1 associated with measurement from a 3-axis accelerometer.

2 44. The LG V20 includes a processor that is capable of processing data
3 associated with measurement from a 3-axis gyroscope.

4 45. The LG V20 runs an Android operating system.

5 46. The Android operating system that runs on the LG V20 uses the
6 measurement from a 3-axis accelerometer included in the device.

7 47. The Android operating system that runs on the LG V20 uses the
8 measurement from a 3-axis gyroscope included in the device.

9 48. The Android operating system that runs on the LG V20 uses the
10 measurement from a 3-axis accelerometer and the measurement from a 3-axis
11 gyroscope to calculate an attitude of the device.

12 49. The LG Stylo 3 includes a display screen.

13 50. The LG Stylo 3 includes a housing.

14 51. The LG Stylo 3 includes a 3-axis accelerometer.

15 52. The LG Stylo 3 includes a 3-axis gyroscope.

16 53. The LG Stylo 3 includes at least one printed circuit board (“PCB”).

17 54. The LG Stylo 3 includes a 3-axis accelerometer attached to a PCB.

18 55. The LG Stylo 3 includes a 3-axis gyroscope attached to a PCB.

19 56. The LG Stylo 3 includes a 3-axis accelerometer that is capable of
20 measuring accelerations.

21 57. The LG Stylo 3 includes a 3-axis gyroscope that is capable of
22 measuring rotation rates.

23 58. The LG Stylo 3 includes a 3-axis accelerometer that is capable of
24 measuring accelerations using a “Sensor Coordinate System” as described in the

25 Android developer library. *See*

26 [https://developer.android.com/guide/topics/sensors/sensors_overview.html#sensors-](https://developer.android.com/guide/topics/sensors/sensors_overview.html#sensors-coords)
27 [coords](https://developer.android.com/guide/topics/sensors/sensors_overview.html#sensors-coords) (describing “Sensor Coordinate System”).

1 59. The LG Stylo 3 includes a 3-axis gyroscope that is capable of
2 measuring rotation rates using a “Sensor Coordinate System.”

3 60. The LG Stylo 3 includes a processor that is capable of processing data
4 associated with measurement from a 3-axis accelerometer.

5 61. The LG Stylo 3 includes a processor that is capable of processing data
6 associated with measurement from a 3-axis gyroscope.

7 62. The LG Stylo 3 runs an Android operating system.

8 63. The Android operating system that runs on the LG Stylo 3 uses the
9 measurement from a 3-axis accelerometer included in the device.

10 64. The Android operating system that runs on the LG Stylo 3 uses the
11 measurement from a 3-axis gyroscope included in the device.

12 65. The Android operating system that runs on the LG Stylo 3 uses the
13 measurement from a 3-axis accelerometer and the measurement from a 3-axis
14 gyroscope to calculate an attitude of the device.

15 66. The LG Stylo 3 Plus includes a display screen.

16 67. The LG Stylo 3 Plus includes a housing.

17 68. The LG Stylo 3 Plus includes a 3-axis accelerometer.

18 69. The LG Stylo 3 Plus includes a 3-axis gyroscope.

19 70. The LG Stylo 3 Plus includes at least one printed circuit board (“PCB”).

20 71. The LG Stylo 3 Plus includes a 3-axis accelerometer attached to a PCB.

21 72. The LG Stylo 3 Plus includes a 3-axis gyroscope attached to a PCB.

22 73. The LG Stylo 3 Plus includes a 3-axis accelerometer that is capable of
23 measuring accelerations.

24 74. The LG Stylo 3 Plus includes a 3-axis gyroscope that is capable of
25 measuring rotation rates.

26 75. The LG Stylo 3 Plus includes a 3-axis accelerometer that is capable of
27 measuring accelerations using a “Sensor Coordinate System” as described in the
28

1 181. The LG X Cam runs an Android operating system.

2 182. The Android operating system that runs on the LG X Cam uses the
3 measurement from a 3-axis accelerometer included in the device.

4 183. The Android operating system that runs on the LG X Cam uses the
5 measurement from a 3-axis gyroscope included in the device.

6 184. The Android operating system that runs on the LG X Cam uses the
7 measurement from a 3-axis accelerometer and the measurement from a 3-axis
8 gyroscope to calculate an attitude of the device.

9 **PATENT INFRINGEMENT OF U.S. PATENT NO. 8,552,978**

10 185. Plaintiff repeats and re-alleges each and every allegation of paragraphs
11 1-184 as though fully set forth herein.

12 186. The '978 Patent, titled "3D Pointing Device and Method for
13 Compensating Rotations of the 3D Pointing Device Thereof," was duly and legally
14 issued by the United States Patent and Trademark Office on October 8, 2013 to
15 CyWee Group Limited, as assignee of named inventors Zhou Ye, Chin-Lung Li, and
16 Shun-Nan Liou.

17 187. CyWee is the owner of all right, title, and interest in and to the '978
18 Patent with full right to bring suit to enforce the patent, including the right to recover
19 for past infringement damages.

20 188. Each and every claim of the '978 Patent is valid and enforceable and
21 each enjoys a statutory presumption of validity separate, apart, and in addition to the
22 statutory presumption of validity enjoyed by every other of its claims. 35 U.S.C. §
23 282.

24 189. CyWee is informed and believes, and thereupon alleges, that LG has
25 been, and is currently directly and/or indirectly infringing one or more claims of the
26 '978 Patent in violation of 35 U.S.C. § 271, including as stated below.

27

28

1 190. CyWee is informed and believes, and thereupon alleges, that LG has
2 directly infringed, literally and/or under the doctrine of equivalents, and will
3 continue to directly infringe claims of the '978 Patent by making, using, selling,
4 offering to sell, and/or importing into the United States products that embody or
5 practice the apparatus and/or method covered by one or more claims of the '978
6 Patent, including but not limited to Defendants' devices such as LG V20, LG Stylo
7 3, LG Stylo 3 Plus, LG G5, LG G6, LG X mach, LG X venture, LG X power 2, and
8 LG X cam (collectively referred to as "'978 Accused Products").

9 191. CyWee adopts, and incorporates by reference, as if fully stated herein,
10 the attached claim chart for claim 10 of the '978 Patent, which is attached hereto as
11 Exhibit B. The claim chart describes and demonstrates how LG infringes the '978
12 Patent. In addition, CyWee alleges that LG infringes one or more additional claims
13 of the '978 Patent in a similar manner.

14 192. Defendants' acts of infringement have caused and will continue to
15 cause substantial and irreparable damage to CyWee.

16 193. As a result of Defendants' infringement of the '978 Patent, CyWee has
17 been damaged. CyWee is, therefore, entitled to such damages pursuant to 35 U.S.C.
18 § 284 in an amount that presently cannot be pled but that will be determined at trial.

19 194. The LG V20 includes a 3-axis geomagnetic sensor.

20 195. The LG V20 includes a 3-axis geomagnetic sensor that is capable of
21 measuring a geomagnetic field.

22 196. The LG V20 includes a 3-axis geomagnetic field sensor to measure a
23 geomagnetic field using a "Sensor Coordinate System." See
24 [https://developer.android.com/guide/topics/sensors/sensors_overview.html#sensors-](https://developer.android.com/guide/topics/sensors/sensors_overview.html#sensors-coords)
25 [coords](https://developer.android.com/guide/topics/sensors/sensors_overview.html#sensors-coords) (describing "Sensor Coordinate System").

26 197. The Android operating system that runs on the LG V20 uses the
27 measurement from a 3-axis geomagnetic sensor included in the device.

1 198. The Android operating system that runs on the LG V20 uses the
2 measurement from a 3-axis accelerometer, the measurement from a 3-axis
3 geomagnetic field sensor, and the measurement from a 3-axis gyroscope to calculate
4 an attitude of the device.

5 199. The Android operating system that runs on the LG V20 uses the
6 measurement from a 3-axis accelerometer, the measurement from a 3-axis
7 geomagnetic field sensor, and the measurement from a 3-axis gyroscope to calculate
8 an attitude of the device that can be represented by an azimuth angle, a pitch angle,
9 and a roll angle.

10 200. The LG V20 has the ability to directly control apps by moving or
11 rotating the device (for example, racing game apps).

12 201. The LG V20 has the ability to run apps that can provide information
13 based on the direction your device is facing, such as a map or navigation app.

14 202. The LG V20 includes a 3-axis geomagnetic sensor.

15 203. The LG V20 includes a 3-axis geomagnetic sensor that is capable of
16 measuring a geomagnetic field.

17 204. The LG Stylo 3 includes a 3-axis geomagnetic sensor.

18 205. The LG Stylo 3 includes a 3-axis geomagnetic sensor that is capable of
19 measuring a geomagnetic field.

20 206. The LG Stylo 3 includes a 3-axis geomagnetic field sensor to measure a
21 geomagnetic field using a “Sensor Coordinate System.” See
22 [https://developer.android.com/guide/topics/sensors/sensors_overview.html#sensors-](https://developer.android.com/guide/topics/sensors/sensors_overview.html#sensors-coords)
23 [coords](https://developer.android.com/guide/topics/sensors/sensors_overview.html#sensors-coords) (describing “Sensor Coordinate System”).

24 207. The Android operating system that runs on the LG Stylo 3 uses the
25 measurement from a 3-axis geomagnetic sensor included in the device.

26 208. The Android operating system that runs on the LG Stylo 3 uses the
27 measurement from a 3-axis accelerometer, the measurement from a 3-axis
28

1 geomagnetic field sensor, and the measurement from a 3-axis gyroscope to calculate
2 an attitude of the device.

3 209. The Android operating system that runs on the LG Stylo 3 uses the
4 measurement from a 3-axis accelerometer, the measurement from a 3-axis
5 geomagnetic field sensor, and the measurement from a 3-axis gyroscope to calculate
6 an attitude of the device that can be represented by an azimuth angle, a pitch angle,
7 and a roll angle.

8 210. The LG Stylo 3 has the ability to directly control apps by moving or
9 rotating the device (for example, racing game apps).

10 211. The LG Stylo 3 has the ability to run apps that can provide information
11 based on the direction your device is facing, such as a map or navigation app.

12 212. The LG Stylo 3 includes a 3-axis geomagnetic sensor.

13 213. The LG Stylo 3 includes a 3-axis geomagnetic sensor that is capable of
14 measuring a geomagnetic field.

15 214. The LG Stylo 3 Plus includes a 3-axis geomagnetic sensor.

16 215. The LG Stylo 3 Plus includes a 3-axis geomagnetic sensor that is
17 capable of measuring a geomagnetic field.

18 216. The LG Stylo 3 Plus includes a 3-axis geomagnetic field sensor to
19 measure a geomagnetic field using a "Sensor Coordinate System." See
20 [https://developer.android.com/guide/topics/sensors/sensors_overview.html#sensors-](https://developer.android.com/guide/topics/sensors/sensors_overview.html#sensors-coords)
21 [coords](https://developer.android.com/guide/topics/sensors/sensors_overview.html#sensors-coords) (describing "Sensor Coordinate System").

22 217. The Android operating system that runs on the LG Stylo 3 Plus uses the
23 measurement from a 3-axis geomagnetic sensor included in the device.

24 218. The Android operating system that runs on the LG Stylo 3 Plus uses the
25 measurement from a 3-axis accelerometer, the measurement from a 3-axis
26 geomagnetic field sensor, and the measurement from a 3-axis gyroscope to calculate
27 an attitude of the device.

2 283. The LG X Cam includes a 3-axis geomagnetic sensor that is capable of
3 measuring a geomagnetic field.

4 PRAYER FOR RELIEF

5 WHEREFORE, Plaintiff prays for entry of judgment against Defendants as
6 follows:

7 A. A judgment that Defendants have infringed and continue to infringe the
8 '438 Patent and '978 Patent, directly and/or indirectly by way of inducing
9 infringement of such patents as alleged herein;

B. That Defendants provide to CyWee an accounting of all gains, profits and advantages derived by Defendants' infringement of the '978 Patent and '438 Patent, and that CyWee be awarded damages adequate to compensate them for the wrongful infringement by Defendants, including treble damages for willful infringement, in accordance with 35 U.S.C. § 284;

15 C. That CyWee be awarded any other supplemental damages and interest
16 on all damages, including, but not limited to, attorney fees available under 35 U.S.C.
17 § 285;

18 D. That the Court permanently enjoin Defendants and all those in privity
19 with Defendants from making, having made, selling, offering for sale, distributing
20 and/or using products that infringe the '978 Patent and/or the '438 Patent, including
21 the '978 Accused Products and/or '438 Accused Products, in the United States; and

22 E. That CyWee be awarded such other and further relief and all remedies
23 available at law.

24 DEMAND FOR JURY TRIAL

Pursuant to Federal Rule of Civil Procedure 38(b), CyWee hereby demands a trial by jury on all issues triable to a jury.

1 Dated: May 31, 2017

Respectfully submitted,

/s/ Jill Kopeikin

2 Jill F. Kopeikin (State Bar No. 160792)

3 jkopeikin@gcalaw.com

4 Valerie M. Wagner (State Bar No. 173146)

vwagner@gcalaw.com

5 GCA LAW PARTNERS LLP

2570 W. El Camino Real, Suite 400

6 Mountain View, CA 94040

7 Telephone: (650) 482-3900

8 Fax: (650) 428-3901

9 Michael W. Shore (*pro hac vice* to be filed)

mshore@shorechan.com

10 Alfonso G. Chan (*pro hac vice* to be filed)

11 achan@shorechan.com

12 Ari Rafilson (*pro hac vice* to be filed)

arafilson@shorechan.com

13 Christopher L. Evans (*pro hac vice* to be
14 filed)

cevans@shorechan.com

15 Paul T. Beeler (*pro hac vice* to be filed)

pbeeler@shorechan.com

16 SHORE CHAN DEPUMPO LLP

17 901 Main Street, Suite 3300

Dallas, California 75202

18 Telephone: (214) 593-9110

19 Facsimile: (214) 593-9111

20 **COUNSEL FOR PLAINTIFF CYWEE**
21 **GROUP LTD.**

EXHIBIT 14

3:17cv1102, Cywee Group Ltd. V. Lg Electronics, Inc. Et Al

US District Court Docket
United States District Court, California Southern
(San Diego)

This case was retrieved on **12/22/2022**

Header

Case Number: 3:17cv1102

Date Filed: 05/31/2017

Assigned To: Judge Roger T. Benitez

Referred To: Magistrate Judge Michael S. Berg

Nature of Suit: Patent (830)

Cause: Patent Infringement

Lead Docket: None

Other Docket: 3:17cv02130

Jurisdiction: Federal Question

Class Code: Open

Statute: 35:0271

Jury Demand: Plaintiff

Demand Amount: \$0

NOS Description: Patent

Participants

Litigants

Cywee Group Ltd.
Plaintiff

Attorneys

Alfonso Garcia Chan
LEAD ATTORNEY;PRO HAC VICE;ATTORNEY TO BE
NOTICED
[Terminated: 09/30/2022]
McKool Smith, P.C.
300 Crescent Court Suite 1500
Dallas, TX 75201
USA
214-978-4022 Email:Achan@mckoolsmith.Com

Ari Benjamin Rafilson
LEAD ATTORNEY;PRO HAC VICE;ATTORNEY TO BE
NOTICED
[Terminated: 09/30/2022]
McKool Smith, PC
300 Crescent Court Suite 1500
Dallas, TX 75201
USA
214-978-4201 Fax: 214-978-4044
Email:Arafilson@mckoolsmith.Com

Christopher L Evans
LEAD ATTORNEY;PRO HAC VICE
[Terminated: 11/14/2019]

7260 E Geddes Pl United Sta
Centennial, CO 80112
USA

(214) 394-6779 Email:Evans138@gmail.Com

-01267, -01268, -01269,
-01270, -01272, -01273

Pantech Wireless, LLC Ex. 2003 - Part 2

Page 44 of 50

3:17cv1102, Cywee Group Ltd. V. Lg Electronics, Inc. Et Al

Litigants

Attorneys

LG Electronics, Inc.
Defendant

Jill Fawn Kopeikin
LEAD ATTORNEY; ATTORNEY TO BE NOTICED
[Terminated: 08/29/2017]
GCA Law Partners LLP
2570 W. El Camino Real Suite 400
Mountain View, CA 94040
USA
650-428-3900 Fax: 650-428-3901
Email: Jkopeikin@gcalaw.Com

Kent M. Walker
LEAD ATTORNEY; ATTORNEY TO BE NOTICED
Lewis Kohn Walker LLP
17085 Via Del Campo
San Diego, CA 92127
USA
858-436-1333 Fax: 858-436-1349
Email: Kwalker@lewiskohn.Com

Michael Wayne Shore
LEAD ATTORNEY; PRO HAC VICE; ATTORNEY TO BE NOTICED
Shore Chan LLP
901 Main Street Suite 3300
Dallas, TX 75202
USA
214-593-9140 Fax: 214-593-9111
Email: Mshore@shorefirm.Com

Paul T. Beeler
LEAD ATTORNEY; PRO HAC VICE; ATTORNEY TO BE NOTICED
[Terminated: 09/30/2022]
Shore Chan DePumpo LLP
901 Main Street Suite 3300
Dallas, TX 75202
USA
214-593-9110 Fax: 214-593-9111
Email: Pbeeler@shorechan.Com

William David Ellerman
LEAD ATTORNEY; PRO HAC VICE; ATTORNEY TO BE NOTICED
[Terminated: 09/30/2022]
McKool Smith PC
300 Crescent Court Suite 1500
Dallas, TX 75201
USA
214-978-4000 Email: Wellerman@mckoolsmith.Com

Andrew V Devkar
LEAD ATTORNEY; ATTORNEY TO BE NOTICED
Morgan Lewis & Bockius LLP
2049 Century Park East Suite 700
Los Angeles, CA 90067-3109
USA
310-907-1000 Fax: 310-907-1001
Email: Andrew.Devkar@morganlewis.Com

IPR2023-01267, -01268, -01269,
-01270, -01272, -01273

Pantech Wireless, LLC Ex. 2003 - Part 2

3:17cv1102, Cywee Group Ltd. V. Lg Electronics, Inc. Et Al

Litigants

Attorneys

Jamie B. Beaber
LEAD ATTORNEY;PRO HAC VICE;ATTORNEY TO BE
NOTICED
[Terminated: 01/25/2018]
Mayer Brown LLP
1999 K Street, N.W.
Washington, DC 20006
USA
(202) 263-3000 Fax: (202) 263-3300
Email:Jbeaber@mayerbrown.Com

Juan Carlos Castaneda
LEAD ATTORNEY;ATTORNEY TO BE NOTICED
Castaneda Heidelman LLP
125 South Highway 101 Suite 1021
Solana Beach, CA 92075
USA
858-431-9205 Email:Juan@castanedaheidelman.Com

Kfir Levy
LEAD ATTORNEY;ATTORNEY TO BE NOTICED
[Terminated: 01/25/2018]
Mayer Brown LLP
1999 K Street Nw
Washington, DC 20006
USA
(202) 263-3000 Fax: (202) 263-3300
Email:Klevy@mayerbrown.Com

Tiffany A. Miller
LEAD ATTORNEY;PRO HAC VICE;ATTORNEY TO BE
NOTICED
[Terminated: 01/25/2018]
Mayer Brown LLP
1999 K Street Northwest
Washington, DC 20006
USA
202-263-3121 Email:Tmiller@mayerbrown.Com

William J. Barrow
LEAD ATTORNEY;ATTORNEY TO BE NOTICED
[Terminated: 01/25/2018]
Mayer Brown LLP
1999 K Street Northwest
Washington, DC 20006
USA
202-263-3000 Email:Wbarrow@mayerbrown.Com

Corey Ray Houmand
ATTORNEY TO BE NOTICED
Morgan Lewis & Bockius
1400 Page Mill Road
Palo Alto, CA 94304
USA
650-843-4000 Fax: 650-843-4001
Email:Corey.Houmand@morganlewis.Com

Michael A. Molano
ATTORNEY TO BE NOTICED
[Terminated: 01/25/2018]
IPR 2023-01267, -01268, -01269,
-01270, -01272, -01273

Pantech Wireless, LLC Ex. 2003 - Part 2

3:17cv1102, Cywee Group Ltd. V. Lg Electronics, Inc. Et Al

Litigants

LG Electronics U.S.A., Inc.
Defendant

Attorneys

[Terminated: 01/25/2018]
Mayer Brown LLP
Two Palo Alto Square 3000 El Camino Real Suite 300
Palo Alto, CA 94306
USA
(650)331-2035 Fax: (650)331-2060
Email:Mmolano@mayerbrown.Com
Andrew V Devkar
LEAD ATTORNEY;ATTORNEY TO BE NOTICED
Morgan Lewis & Bockius LLP
2049 Century Park East Suite 700
Los Angeles, CA 90067-3109
USA
310-907-1000 Fax: 310-907-1001
Email:Andrew.Devkar@morganlewis.Com

Jamie B. Beaber
LEAD ATTORNEY;PRO HAC VICE;ATTORNEY TO BE
NOTICED
[Terminated: 01/25/2018]
Mayer Brown LLP
1999 K Street, N.W.
Washington, DC 20006
USA
(202) 263-3000 Fax: (202) 263-3300
Email:Jbeaber@mayerbrown.Com

Juan Carlos Castaneda
LEAD ATTORNEY;ATTORNEY TO BE NOTICED
Castaneda Heidelberg LLP
125 South Highway 101 Suite 1021
Solana Beach, CA 92075
USA
858-431-9205 Email:Juan@castanedaheidelberg.Com

Kfir Levy
LEAD ATTORNEY;ATTORNEY TO BE NOTICED
[Terminated: 01/25/2018]
Mayer Brown LLP
1999 K Street Nw
Washington, DC 20006
USA
(202) 263-3000 Fax: (202) 263-3300
Email:Klevy@mayerbrown.Com

Tiffany A. Miller
LEAD ATTORNEY;PRO HAC VICE;ATTORNEY TO BE
NOTICED
[Terminated: 01/25/2018]
Mayer Brown LLP
1999 K Street Northwest
Washington, DC 20006
USA
202-263-3121 Email:Tmiller@mayerbrown.Com

William J. Barrow
LEAD ATTORNEY;ATTORNEY TO BE NOTICED
[Terminated: 01/25/2018]
Mayer Brown LLP IPR2023-01267, -01268, -01269,
-01270, -01272, -01273
Pantech Wireless, LLC Ex. 2003 - Part 2

3:17cv1102, Cywee Group Ltd. V. Lg Electronics, Inc. Et Al

#	Date	Proceeding Text	Source
94	01/23/2019	ORDER granting 93 Motion to Stay. [Doc. 93] Case stayed until final resolution, including any appeal, of IPR Proceedings on the patents-in-suit. Signed by Judge Roger T. Benitez on 1/22/2019. (anh) (Entered: 01/23/2019)	
95	03/19/2019	Minute Order issued by the Honorable Roger T. Benitez: The Court hereby vacates the Claims Construction Hearing date of 3/21/2019.(no document attached) (gxr) (Entered: 03/19/2019)	
96	11/06/2019	NOTICE of Motion and Unopposed Motion for Withdrawal of Counsel by Cywee Group Ltd. (Attachments: # 1 Memo of Points and Authorities, # 2 Declaration of Ari Rafilson)(Rafilson, Ari) (mme). Modified on 11/15/2019 to change event type to motion (mme). (Entered: 11/06/2019)	
97	11/14/2019	ORDER granting 96 Motion to Withdraw. Attorney Christopher L. Evans terminated. Signed by Judge Roger T. Benitez on 11/14/2019. (mme) (Entered: 11/15/2019)	
98	05/20/2021	NOTICE of Hearing: Telephonic Status Hearing set for 6/2/2021 03:00 PM in Courtroom 5A before Judge Roger T. Benitez. All parties are to connect telephonically using the following information: (866)434-5269; ACCESS CODE: 5877929. All parties will mute their telephones until their case number is called. The parties are directed to file a joint status report not to exceed five pages summarizing the current status of the case one week prior to the date of the Status Conference. (no document attached) (gxr) (Entered: 05/20/2021)	
99	05/24/2021	STATUS REPORT by Cywee Group Ltd.. (Rafilson, Ari) (mme). (Entered: 05/24/2021)	
100	05/25/2021	Minute Order issued by the Honorable Roger T. Benitez: Having received the parties joint status report in this case, the Court vacates the Status Conference set for June 2, 2021. The parties are requested to file another joint status report 90 days from this date, or within 10 days of the conclusion of any pending appeals in this matter, whichever is sooner.(no document attached) (gxr) (Entered: 05/25/2021)	
101	08/23/2021	STATUS REPORT by Cywee Group Ltd.. (Rafilson, Ari) (jpp). (Entered: 08/23/2021)	
102	07/29/2022	MOTION to Withdraw as Attorney Alfonso Chan, Ari Rafilson, William Ellerman and Paul Beeler by Cywee Group Ltd.. (Attachments: # 1 Memo of Points and Authorities, # 2 Declaration of Ari Rafilson)(Rafilson, Ari) (ddf). (Entered: 07/29/2022)	
103	09/30/2022	ORDER Granting Motion To Withdraw As Counsel [ECF No. 102]. Signed by Judge Roger T. Benitez on 9/30/2022. (ddf) (Entered: 09/30/2022)	

Patents

Number	Title	Issued	Class	Subclass
8,441,438	3D pointing device and method for compensating movement thereof	05/14/2013	345	156
8,552,978	3D pointing device and method for compensating rotations of the 3D pointing device thereof	10/08/2013	345	157

Copyright © LexisNexis CourtLink, Inc. All Rights Reserved.

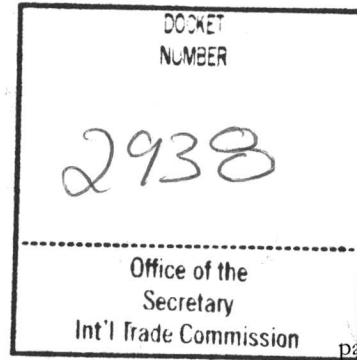
*** THIS DATA IS FOR INFORMATIONAL PURPOSES ONLY ***

End of Document

EXHIBIT 15

CBI 13-148**Pepper Hamilton LLP**
Attorneys at Law

Hamilton Square
600 Fourteenth Street, N.W.
Washington, DC 20005-2004
202.220.1200
Fax 202.220.1665



Goutam Patnaik
202.220.1237
patnaikg@pepperlaw.com

February 8, 2013

VIA HAND DELIVERY & EDIS

The Honorable Lisa R. Barton
Acting Secretary to the Commission
U.S. International Trade Commission
500 E Street, S.W.
Washington, D.C. 20436

Re: *Complaint of Tela Innovations, Inc. Concerning Certain Integrated Circuit Devices and Products Containing the Same*

Dear Acting Secretary Barton:

Enclosed for filing on behalf of Tela Innovations, Inc. ("Tela"), please find the following documents in support of Tela's request that the Commission commence an Investigation pursuant to Section 337 of the Tariff Act of 1930, as amended. Pursuant to the Commission Rules of Practice and Procedure, a request for confidential treatment of Confidential Exhibits 56 through 63 is included with this submission. Tela submits the following:

1. An original and eight (8) copies of Tela's verified Complaint (Rule 210.8 (a)(1)(i));
2. One (1) copy, on CD, of accompanying Non-Confidential Exhibits 1 through 55 to the Complaint and one (1) copy, on CD, of Confidential Exhibits 56 through 63, segregated from the non-confidential exhibits (Rules 201.6(c) and 210.8(a)(1)(i));
3. Ten (10) additional copies of the Complaint and accompanying Exhibits, both non-confidential and confidential (on separate CDs), for service upon the proposed respondents: HTC Corporation, HTC America, Inc., LG Electronics, Inc., LG Electronics U.S.A., Inc., LG Electronics MobileComm U.S.A., Inc., Motorola Mobility LLC, Nokia Corporation (Nokia Oyi), Nokia, Inc., Pantech Co., Ltd., Pantech Wireless, Inc. (Rules 201.6(c) and 210.8(a)(1)(iii));
4. Three (3) additional copies of the Complaint for service upon the embassies of Taiwan, South Korea, and Finland (Rules 210.8(a)(1)(iv) and 210.11(a)(2)(ii));

Philadelphia

Boston

Washington, D.C.

Detroit

New York

Pittsburgh

Berwyn

Harrisburg

Orange County

Princeton

www.pepperlaw.com

IPR2023-01267, -01268, -01269,
-01270, -01272, -01273

Pantech Wireless, LLC Ex. 2003 - Part 2

Page 50 of 50