



5. One (1) certified copy of U.S. Patent Nos. 8,264,049, 8,264,044, 8,258,550, 8,258,547, 8,217,428, 8,258,552 and 8,030,689 included with the Complaint as Exhibits 1 through 7, respectively (Rule 210.12(a)(9)(i));
6. One (1) certified copy and four (4) additional copies, on CDs, of the U.S. Patent and Trademark Office prosecution histories for each of the asserted U.S. Patent Nos. 8,264,049, 8,264,044, 8,258,550, 8,258,547, 8,217,428, 8,258,552 and 8,030,689, included with the Complaint as Appendices A, C, E, G, I, K and M, respectively (Rule 210.12(c)(1));
7. One (1) certified copy of the Assignment Record for asserted U.S. Patent Nos. 8,264,049 and 8,264,044, included with the Complaint as Exhibit 8 (Rule 210.12(a)(9)(ii));
8. One (1) certified copy of the Assignment Record and one (1) certified copy of the Security Interest for asserted U.S. Patent Nos. 8,258,550, 8,258,547, 8,217,428, 8,258,552 and 8,030,689, included with the Complaint as Exhibit 9 (Rule 210.12(a)(9)(ii));
9. Four (4) copies, on CD, of each patent and applicable pages of each technical reference mentioned in the prosecution histories for each of the asserted U.S. Patent Nos. 8,264,049, 8,264,044, 8,258,550, 8,258,547, 8,217,428, 8,258,552 and 8,030,689 included with the Complaint as Appendices B, D, F, H, J, L and N, respectively (Rule 210.12(c)(2));
10. One set of articles relevant to the Complaint, included as Physical Exhibits 1 through 5, respectively (Rule 210.12(b));
11. A letter and certification pursuant to Commission Rules 201.6(b) and 210.5(d) requesting confidential treatment of information appearing in Confidential Exhibits 56 through 63 to Tela's Verified Complaint;
12. A Statement on the Public Interest with respect to the remedial orders Tela seeks against the proposed respondents pursuant to Commission Rule 210.8(b).

Please contact me if you have any questions or concerns, or if you require additional documents.

Respectfully submitted,

A handwritten signature in black ink, reading "Goutam Patnaik", is positioned above the printed name and title.

Goutam Patnaik
Counsel for Complainant
Tela Innovations, Inc.

Enclosure

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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:

Pepper Hamilton LLP represents Complainant Tela Innovations, Inc. ("Tela") in the matter of the above referenced Complaint being filed pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337.

Pursuant to Commission Rules 201.6(b) and 210.5(d), Tela respectfully requests confidential treatment of the information contained in Confidential Exhibits 56 through 63. The information contained in these exhibits qualifies as confidential information pursuant to 19 C.F.R. § 201.6 in that it discloses proprietary commercial information, proprietary commercial relationships, and/or proprietary business information that are not otherwise publicly available, and because the disclosure of such information would cause substantial harm to Tela, and would also impair the Commission's ability in the future to obtain such types of information in performance of its statutory function.

I certify that the proprietary confidential commercial information, proprietary commercial relationships, and/ or proprietary business information are not reasonably available to the public, and thus warrant confidential treatment.

Philadelphia

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

Pantech Wireless, LLC Ex. 2003 - Part 3

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Pepper Hamilton LLP
Attorneys at Law

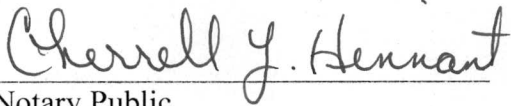
Honorable Lisa R. Barton
February 8, 2013
Page 2 of 2

Respectfully submitted,



Goutam Patnaik
Counsel for Complainant
Tela Innovations, Inc.

Subscribed and sworn before me



Notary Public

My commission expires: May 31, 2016



UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

In the Matter of)
)
)

CERTAIN INTEGRATED CIRCUIT DEVICES)
AND PRODUCTS CONTAINING THE SAME)
_____)

Investigation No.

337-TA-____

**COMPLAINANT TELA INNOVATIONS, INC.'S
STATEMENT OF THE PUBLIC INTEREST UNDER § 210.8(b)**

Pursuant to International Trade Commission (“Commission”) Rule § 210.8(b), Tela Innovations, Inc. (“Tela”) submits its Statement on the Public Interest, with respect to the limited exclusion and cease and desist orders it seeks against 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, Inc.; Pantech Co., Ltd.; and Pantech Wireless, Inc. (collectively, “Respondents”). The requested remedial orders will not have any adverse impact on the public interest.

**I. THE REQUESTED EXCLUSION ORDERS WILL HAVE NO ADVERSE
IMPACT ON THE PUBLIC INTEREST**

Tela has developed innovative design solutions for advanced integrated circuit (“IC”) manufacturing processes where lithography driven constraints require novel approaches to both digital circuit design and the physical implementation of these designs. Tela has, and continues to, create technology to address critical technical and economic challenges facing the semiconductor industry. Tela’s products, including cell libraries, layouts and software products, enable designers to achieve improved performance, area and power characteristics as semiconductor processes continue to scale. Tela has been ranked by *IEEE Spectrum* magazine

as being among the leaders of the semiconductor and electronics industry for the quality and potential impact of its patents. In the 2012 edition of its prestigious Patent Power list, the publication ranks Tela 11th in the “Semiconductor Manufacturing” category, placing the company alongside major suppliers such as Samsung (#1), SanDisk (#2), Broadcom (#4), Intel (#12) and Rambus (#13).

Tela has entered into substantial research and development agreements with the United States Department of Defense and other private entities having substantial operations based in the United States. Tela has made concerted efforts to deliver its patented technology and products to key semiconductor device makers, and has been the recipient of United States government contracts under which it has made significant contributions towards developing its technology for use by private semiconductor manufacturing companies as well as the United States government.

The Commission must balance any potentially adverse impact on the public interest against the public’s interest in protecting and enforcing intellectual property rights. *See Certain Inclined-Field Acceleration Tubes and Components Thereof*, Inv. No. 337-TA-67, Comm’n Op., 1980 ITC LEXIS 118, at *34-35 (Dec. 1980). Only if the negative impact on the public interest outweighs the damage to the patent holder’s rights and the public interest in enforcing intellectual property rights may the Commission deny the requested relief. *Id.* Here, the damage to the patent holder’s rights grossly outweighs any adverse impact on the public interest.

The public interest in protecting intellectual property rights, such as those obtained by Tela, is very strong. *Certain Broadband Processor Chips and Chipsets, Transmitter and Receiver (radio) Chips, Power Control Chips*, Inv. No. 337-TA-543, Comm’n. Op., 2007

LEXIS 621 at *240 (June 19, 2007). The public interest in enforcing intellectual property rights is born out of the desire to incentivize innovators, such as Tela, to disclose their technology in exchange for the statutory right to exclude others, and “[t]he importation of any infringing merchandise derogates from the statutory right, diminish[ing] the value of the intellectual property, and thus indirectly harm[ing] the public interest.” *Id.* at *219. As such, the Commission rarely denies relief on public interest grounds. *Id.* at *240. The few instances where the Commission found an adverse impact on the public interest that was significant enough to deny relief involve facts not present here, namely, “the exclusion order was denied because inadequate supply within the United States – by both the patentee and domestic licensees – meant that an exclusion order would deprive the public of products necessary for some important health or welfare need ...” *Spansion, Inc. v. ITC*, 629 F.3d 1331, 1360 (Fed. Cir. 2010).

In this case, the requested remedial orders are not contrary to the public interest because: (1) the accused devices are not necessary to the public health or welfare; (2) the Respondents could make the accused devices utilizing semiconductor devices that do not incorporate Tela’s intellectual property, but have, nevertheless, chosen to incorporate semiconductor devices that utilize Tela’s patented technology; and (3) Tela’s intellectual property is being appropriated to the severe detriment of Tela. There is, therefore, a strong public interest in protecting Tela’s intellectual property and no adverse impact on the public interest would outweigh this strong public interest.

A. How the articles potentially subject to the requested remedial orders are used in the United States.

Consumer electronics devices, such as smartphones and computer tablets, are at issue in this investigation. Respondents’ consumer electronics devices incorporate

semiconductor devices that infringe Tela's patented layout optimization technology. Prior to adopting Tela's intellectual property, the Respondents offered these same categories of consumer electronics devices with semiconductor devices that did not use Tela's patented layout optimization technology. Only a subset of the Respondents' consumer electronics products incorporates semiconductor devices that use Tela's proprietary technology.

B. Identify any public health, safety, or welfare concerns relating to the requested remedial orders.

The issuance of an exclusion order and cease and desist orders against the Respondents would have no material impact on the public health, safety or welfare in the United States. The accused products in this investigation are not medical devices, pharmaceuticals, or vaccines, nor are they otherwise health-related. Rather, smartphone and tablet computers are luxury devices that offer the convenience of combined functionality found in separate devices widely available from other sources. In addition, there are presently smartphone and tablet computers on the market made by Respondents that do not incorporate Tela's patented technology. In addition, Respondents' total estimated market share in the United States is less than 40% of the total market for smartphones and computer tablets.

C. Identify like or directly competitive articles that complainant, its licensees, or third parties make that could replace the subject articles if they were excluded.

Tela's patented technology is utilized in the ICs in the most recent generation of products offered by the named Respondents; however, Tela's technology was not utilized in previous generations of these same products. Therefore, Respondents and other manufacturers have the ability to supply directly competitive articles that do not utilize Tela's patented technology.

D. Indicate whether the complainant, its licensees, and/or third parties have the capacity to replace the volume of articles subject to the requested remedial orders in a commercially reasonable time in the United States.

The Respondents themselves have the capacity to quickly replace the volume of articles subject to the requested remedial orders by reverting back to their previous devices so that they are not improperly infringing Tela's patented technology. Alternatively, Tela has the ability to provide its patented layouts to entities responsible for supplying components to the named Respondents for use within a commercially reasonable timeframe.

E. State how the requested remedial orders would impact consumers.

It is unlikely that consumers would experience any impact if the requested remedial orders were obtained. Even if the exclusion order caused an increase in the price of smartphones and/or tablet computers – an unlikely event – a price increase alone is insufficient to warrant preclusion of a remedial order. *Certain Lens-Fitted Film Packages*, Inv. No. 337-TA-406, Comm'n. Op., 1999 ITC LEXIS 202 at *40 (June 28, 1999). Thus, any impact on the public interest by the exclusion of Respondents' infringing products would be minimal.

II. CONCLUSION

The accused devices are not necessary to any health or welfare need, and an adequate supply of substitute devices is available through Respondents themselves. As such, the strong public interest in protecting Tela's intellectual property rights outweighs any potential adverse impact on the public.

February 8, 2013



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**Counsel for Complainant
Tela Innovations, Inc.**

UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

Before The Honorable _____
Administrative Law Judge

In the Matter of	)	
	)	Investigation No. 337-TA-____
CERTAIN INTEGRATED CIRCUIT DEVICES	)	
AND PRODUCTS CONTAINING THE SAME	)	
	)	

VERIFIED COMPLAINT UNDER SECTION 337
OF THE TARIFF ACT OF 1930, AS AMENDED

COMPLAINANT:

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Country	Local Serial Number	Local Filing Date	Patent Number	Status
PCT	PCT/US2007/006207	3/8/2007	n/a	Lapsed
EPO	7752875	3/8/2007		Pending
EPO	11188136.3	11/7/2011		Pending
Japan	2008-558437	3/8/2007		Pending
Taiwan	96108275	3/9/2007	I362748	Issued
Taiwan	100138488	10/24/2011		Pending

56. In accordance with Commission Rule 210.12(a)(9)(v), Tela states that it is aware of no other foreign counterparts issued, filed, denied, abandoned, or withdrawn relating to the asserted '689 Patent.

IV. NON-TECHNICAL DESCRIPTION OF THE PATENTED TECHNOLOGY

57. Tela's patented technology relates to circuit design and the physical implementation of these designs. Modern, complex circuits are manufactured using a number of advanced techniques, including a process called photolithography. During the manufacturing process, circuit designs or "layouts" are printed onto a semiconductor wafer using photolithography. These layouts are made up of subcomponents called "cells," the collection of which are sometimes referred to as "libraries." The layouts contain circuit design features that enable a semiconductor chip to function according to the circuit designers' specifications. Currently, the wavelength of light used to print designs onto semiconductor wafers is much larger than the smallest features produced in the layout. This relative difference in size causes problems with the manufacturing process. Tela's improved circuit designs resolve some of these photolithography problems, as well as other related semiconductor manufacturing problems, while maintaining or improving the area density of commonly used circuit designs.

A. THE '049 PATENT – “Integrated circuit including cross-coupled transistors with two transistors of different type having gate electrodes formed by common gate level feature with shared diffusion regions on opposite sides of common gate level feature”

58. Tela's '049 Patent discloses an integrated circuit, method, and data storage device, each of which comprise conductive gate level features within adjacently positioned gate electrode feature channels. A first and second P-type metal-oxide-semiconductor (“PMOS”) transistor device and a first and second N-type metal-oxide-semiconductor (“NMOS”) transistor device form a cross-coupled transistor configuration that includes three gate level features.

B. THE '044 PATENT – “Integrated circuit including cross-coupled transistors having two complementary pairs of co-aligned gate electrodes with offset contacting structures positioned between transistors of different type”

59. Tela's '044 Patent discloses a semiconductor device and layout for a semiconductor device. A cell of the semiconductor device includes first and second PMOS transistors and first and second NMOS transistors, each with respective gate electrodes and conductive contacting structures. The first and second PMOS and NMOS transistors define a cross-coupled transistor configuration, and at least some of the conductive contacting structures are offset in a first direction.

C. THE '550 PATENT – “Semiconductor device including at least six transistor forming linear shapes including at least two transistor forming linear shapes having different extension distances beyond gate contact”

60. Tela's '550 Patent describes a semiconductor device, a computer readable medium having program instructions for a semiconductor device layout, and a method for creating the layouts for semiconductor devices. The layout of this invention also includes a gate electrode level layout with linear-shaped layout features. At least some of the linear-shaped features have a contact, wherein the linear-shaped features extends from the contact by an extension distance. There are at least two different extension distances.

D. THE '547 PATENT – “Semiconductor device with linearly restricted gate level region including two transistors of first type and two transistors of second type with offset gate contacts”

61. Tela's '547 Patent describes a restricted layout region of a semiconductor device. The layout comprises at least six linear shapes, some of which are for gate electrodes. The gate electrodes form both P transistors and N transistors. The gate electrodes have contacts, wherein at least two contacts of transistors of the same type are offset in a first direction.

E. THE '428 PATENT – “Integrated circuit including gate electrode level region including at least three linear-shaped conductive structures of equal length having aligned ends and positioned at equal pitch and forming multiple gate electrodes of transistors of different type”

62. Tela's '428 Patent discloses an integrated circuit, method, and layout for making an integrated circuit. The integrated circuit comprises a gate electrode level including a number of conductive features. The conductive features are arranged with specific relationships between adjacent features.

F. THE '552 PATENT – “Semiconductor device including at least six transistor forming linear shapes with at least two transistor forming linear shapes having offset ends”

63. Tela's '552 Patent describes an integrated circuit, method, and layout thereof. The integrated circuit comprises a gate electrode level including conductive features. Some of the conductive features form respective PMOS and/or NMOS transistor devices. The ends of some of the conductive features are offset in a first direction.

G. THE '689 PATENT – “Integrated circuit device and associated layout including separated diffusion regions of different type each having four gate electrodes with each of two complimentary gate electrode pairs formed from respective linear conductive segment”

64. Tela's '689 Patent describes an integrated circuit and layout of the same. The integrated circuit includes at least eight gate electrodes, some of the electrodes being formed from a single linear conductive segment. The gate electrodes form four transistors within each of

several active regions set within a semiconductor substrate. The active regions are separated from any other active region by a non-active region.

V. UNFAIR ACTS OF THE RESPONDENTS

65. On information and belief, Respondents are engaged in the importation, the sale for importation, and/or the sale within the United States after importation of certain integrated circuit devices and products containing the same including, without limitation, cellular telephones and computer tablets that infringe at least one of claims of the Asserted Patents.

A. INFRINGEMENT

(1) The '049 Patent

(a) HTC

66. On information and belief, Respondent HTC is engaged in the importation, the sale for importation, and/or the sale within the United States after importation of certain products containing integrated circuit devices that infringe at least claims 1-9, 12, and 16-23 of the '049 Patent.

67. Tela has obtained products containing integrated circuit devices that, on information and belief, HTC imported, sold for importation, and/or sold within the United States after importation, and that infringe, directly or indirectly, at least claims 1-11 and 20-23 of the '049 Patent.

68. Pursuant to Commission Rule 210.12(a)(9)(viii), Exhibit 11 includes a chart comparing claim 1 of the '049 Patent to HTC's One X (Physical Exhibit 1). Exhibit 11 shows that the One X is covered by at least claims 1-11 and 20-23 of the '049 Patent. Additionally, pursuant to Commission Rule 210.12(a)(9)(x), Exhibit 11 contains photographs of the One X. Lastly, Commission Rule 210.12(a)(9)(viii) requires that Complainant chart only "a representative involved article" of Respondent HTC that violates Section 337. Tela believes that

HTC devices in addition to the One X are covered by at least one of claims 1-11 and 20-23 of the '049 Patent and have been imported, sold for importation, or sold within the United States after importation by Respondent HTC.

(b) LG

69. On information and belief, Respondent LG is engaged in the importation, the sale for importation, and/or the sale within the United States after importation of certain products containing integrated circuit devices that infringe at least claims 1-11 and 20-23 of the '049 Patent.

70. Tela has obtained products containing integrated circuit devices that, on information and belief, LG imported, sold for importation, and/or sold within the United States after importation and that infringe, directly or indirectly, at least claims 1-11 and 20-23 of the '049 Patent.

71. Pursuant to Commission Rule 210.12(a)(9)(viii), Exhibit 12 includes a chart comparing claim 1 of the '049 Patent to LG's Spectrum 2 (Physical Exhibit 2). Exhibit 12 shows that the Spectrum 2 is covered by at least claims 1-11 and 20-23 of the '049 Patent. Additionally, pursuant to Commission Rule 210.12(a)(9)(x), Exhibit 12 contains photographs of the Spectrum 2. Lastly, Commission Rule 210.12(a)(9)(viii) requires that Complainant chart only "a representative involved article" of Respondent LG that violates Section 337. Tela believes that LG devices in addition to the Spectrum 2 are covered by at least one of claims 1-11 and 20-23 of the '049 Patent and have been imported, sold for importation, or sold within the United States after importation by Respondent LG.

80. Pursuant to Commission Rule 210.12(a)(9)(viii), Exhibit 15 includes a chart comparing claim 1 of the '049 Patent to Pantech's Flex (Physical Exhibit 5). Exhibit 15 shows that the Flex is covered by at least claims 1-11 and 20-23 of the '049 Patent. Additionally, pursuant to Commission Rule 210.12(a)(9)(x), Exhibit 15 contains photographs of the Flex. Lastly, Commission Rule 210.12(a)(9)(viii) requires that Complainant chart only "a representative involved article" of Respondent Pantech that violates Section 337. Tela believes that Pantech devices in addition to the Flex are covered by at least one of claims 1-11 and 20-23 of the '049 Patent and have been imported, sold for importation, or sold within the United States after importation by Respondent Pantech.

(2) The '044 Patent

(a) HTC

81. On information and belief, Respondent HTC is engaged in the importation, the sale for importation, and/or the sale within the United States after importation of certain products containing integrated circuit devices that infringe at least claims 1-5, 7, 8, 10-14, 17, 18, 21-25, 28, 29, 32-36, 39, and 40 of the '044 Patent.

82. Tela has obtained products containing integrated circuit devices that, on information and belief, HTC imported, sold for importation, and/or sold within the United States after importation, and that infringe, directly or indirectly, at least claims 1-5, 7, 8, 10-14, 17, 18, 21-25, 28, 29, 32-36, 39, and 40 of the '044 Patent.

83. Pursuant to Commission Rule 210.12(a)(9)(viii), Exhibit 16 includes a chart comparing claim 1 of the '044 Patent to HTC's One X (Physical Exhibit 1). Exhibit 16 shows that the One X is covered by at least claims 1-5, 7, 8, 10-14, 17, 18, 21-25, 28, 29, 32-36, 39, and 40 of the '044 Patent. Additionally, pursuant to Commission Rule 210.12(a)(9)(x),

Exhibit 16 contains photographs of the One X. Lastly, Commission Rule 210.12(a)(9)(viii) requires that Complainant chart only “a representative involved article” of Respondent HTC that violates Section 337. Tela believes that HTC devices in addition to the One X are covered by at least one of claims 1-5, 7, 8, 10-14, 17, 18, 21-25, 28, 29, 32-36, 39, and 40 of the '044 Patent and have been imported, sold for importation, or sold within the United States after importation by Respondent HTC.

(b) LG

84. On information and belief, Respondent LG is engaged in the importation, the sale for importation, and/or the sale within the United States after importation of certain products containing integrated circuit devices that infringe at least claims 1-5, 7, 8, 10-14, 17, 18, 21-25, 28, 29, 32-36, 39, and 40 of the '044 Patent.

85. Tela has obtained products containing integrated circuit devices that, on information and belief, LG imported, sold for importation, and/or sold within the United States after importation, and that infringe, directly or indirectly, at least claims 1-5, 7, 8, 10-14, 17, 18, 21-25, 28, 29, 32-36, 39, and 40 of the '044 Patent.

86. Pursuant to Commission Rule 210.12(a)(9)(viii), Exhibit 17 includes a chart comparing claim 1 of the '044 Patent to LG's Spectrum 2 (Physical Exhibit 2). Exhibit 17 shows that the Spectrum 2 is covered by at least claims 1-5, 7, 8, 10-14, 17, 18, 21-25, 28, 29, 32-36, 39, and 40 of the '044 Patent. Additionally, pursuant to Commission Rule 210.12(a)(9)(x), Exhibit 17 contains photographs of Spectrum 2. Lastly, Commission Rule 210.12(a)(9)(viii) requires that Complainant chart only “a representative involved article” of Respondent LG that violates Section 337. Tela believes that LG devices in addition to the Spectrum 2 are covered by at least one of claims 1-5, 7, 8, 10-14, 17, 18, 21-25, 28, 29, 32-36,

certain products containing integrated circuit devices that infringe at least claims 1-5, 7, 8, 10-14, 17, 18, 21-25, 28, 29, 32-36, 39, and 40 of the '044 Patent.

94. Tela has obtained products containing integrated circuit devices that, on information and belief, Pantech imported, sold for importation, and/or sold within the United States after importation, and that infringe, directly or indirectly, at least claims 1-5, 7, 8, 10-14, 17, 18, 21-25, 28, 29, 32-36, 39, and 40 of the '044 Patent.

95. Pursuant to Commission Rule 210.12(a)(9)(viii), Exhibit 20 includes a chart comparing claim 1 of the '044 Patent to Pantech's Flex (Physical Exhibit 5). Exhibit 20 shows that the Flex is covered by at least claims 1-5, 7, 8, 10-14, 17-18, 21-25, 28, 29, 32-36, 39, and 40 of the '044 Patent. Additionally, pursuant to Commission Rule 210.12(a)(9)(x), Exhibit 20 contains photographs of the Flex. Lastly, Commission Rule 210.12(a)(9)(viii) requires that Complainant chart only "a representative involved article" of Respondent Pantech that violates Section 337. Tela believes that Pantech devices in addition to the Flex are covered by at least one of claims 1-5, 7, 8, 10-14, 17, 18, 21-25, 28, 29, 32-36, 39, and 40 of the '044 Patent and have been imported, sold for importation, or sold within the United States after importation by Respondent Pantech.

(3) The '550 Patent

(a) HTC

96. On information and belief, Respondent HTC is engaged in the importation, the sale for importation, and/or the sale within the United States after importation of certain products containing integrated circuit devices that infringe at least claims 1-23, 26-31 and 38-46 of the '550 Patent.

97. Tela has obtained products containing integrated circuit devices that, on information and belief, HTC imported, sold for importation, and/or sold within the United States after importation, and that infringe, directly or indirectly, at least claims 1-23, 26-31 and 38-46 of the '550 Patent.

98. Pursuant to Commission Rule 210.12(a)(9)(viii), Exhibit 21 includes a chart comparing claim 1 of the '550 Patent to HTC's One X (Physical Exhibit 1). Exhibit 21 shows that the One X is covered by at least claims 1-23, 26-31 and 38-46 of the '550 Patent. Additionally, pursuant to Commission Rule 210.12(a)(9)(x), Exhibit 21 contains photographs of the One X. Lastly, Commission Rule 210.12(a)(9)(viii) requires that Complainant chart only "a representative involved article" of Respondent HTC that violates Section 337. Tela believes that HTC devices in addition to the One X are covered by at least one of claims 1-23, 26-31 and 38-46 of the '550 Patent and have been imported, sold for importation, or sold within the United States after importation by Respondent HTC.

(b) LG

99. On information and belief, Respondent LG is engaged in the importation, the sale for importation, and/or the sale within the United States after importation of certain products containing integrated circuit devices that infringe at least claims 1-23, 26-31 and 38-46 of the '550 Patent.

100. Tela has obtained products containing integrated circuit devices that, on information and belief, LG imported, sold for importation, and/or sold within the United States after importation, and that infringe, directly or indirectly, at least claims 1-23, 26-31 and 38-46 of the '550 Patent.

(e) Pantech

108. On information and belief, Respondent Pantech is engaged in the importation, the sale for importation, and/or the sale within the United States after importation of certain products containing integrated circuit devices that infringe at least claims 1-23, 26-31 and 38-46 of the '550 Patent.

109. Tela has obtained products containing integrated circuit devices that, on information and belief, Pantech imported, sold for importation, and/or sold within the United States after importation, and that infringe, directly or indirectly, at least claims 1-23, 26-31 and 38-46 of the '550 Patent.

110. Pursuant to Commission Rule 210.12(a)(9)(viii), Exhibit 25 includes a chart comparing claim 1 of the '550 Patent to Pantech's Flex (Physical Exhibit 5). Exhibit 25 shows that the Flex is covered by at least claims 1-23, 26-31 and 38-46 of the '550 Patent. Additionally, pursuant to Commission Rule 210.12(a)(9)(x), Exhibit 25 contains photographs of the Flex. Lastly, Commission Rule 210.12(a)(9)(viii) requires that Complainant chart only "a representative involved article" of Respondent Pantech that violates Section 337. Tela believes that Pantech devices in addition to the Flex are covered by at least one of claims 1-23, 26-31 and 38-46 of the '550 Patent and have been imported, sold for importation, or sold within the United States after importation by Respondent Pantech.

(4) The '547 Patent

(a) HTC

111. On information and belief, Respondent HTC is engaged in the importation, the sale for importation, and/or the sale within the United States after importation of

certain products containing integrated circuit devices that infringe at least claims 1-34 of the '547 Patent.

112. Tela has obtained products containing integrated circuit devices that, on information and belief, HTC imported, sold for importation, and/or sold within the United States after importation, and that infringe, directly or indirectly, at least claims 1-34 of the '547 Patent.

113. Pursuant to Commission Rule 210.12(a)(9)(viii), Exhibit 26 includes a chart comparing claim 1 of the '547 Patent to HTC's One X (Physical Exhibit 1). Exhibit 26 shows that the One X is covered by at least claims 1-34 of the '547 Patent. Additionally, pursuant to Commission Rule 210.12(a)(9)(x), Exhibit 26 contains photographs of the One X. Lastly, Commission Rule 210.12(a)(9)(viii) requires that Complainant chart only "a representative involved article" of Respondent HTC that violates Section 337. Tela believes that HTC devices in addition to the One X are covered by at least one of claims 1-34 of the '547 Patent and have been imported, sold for importation, or sold within the United States after importation by Respondent HTC.

(b) LG

114. On information and belief, Respondent LG is engaged in the importation, the sale for importation, and/or the sale within the United States after importation of certain products containing integrated circuit devices that infringe at least claims 1-34 of the '547 Patent.

115. Tela has obtained products containing integrated circuit devices that, on information and belief, LG imported, sold for importation, and/or sold within the United States after importation, and that infringe, directly or indirectly, at least claims 1-34 of the '547 Patent.

(e) Pantech

123. On information and belief, Respondent Pantech is engaged in the importation, the sale for importation, and/or the sale within the United States after importation of certain products containing integrated circuit devices that infringe at least claims 1-34 of the '547 Patent.

124. Tela has obtained products containing integrated circuit devices that, on information and belief, Pantech imported, sold for importation, and/or sold within the United States after importation, and that infringe, directly or indirectly, at least claims 1-34 of the '547 Patent.

125. Pursuant to Commission Rule 210.12(a)(9)(viii), Exhibit 30 includes a chart comparing claim 1 of the '547 Patent to Pantech's Flex (Physical Exhibit 5). Exhibit 30 shows that the Flex is covered by at least claims 1-34 of the '547 Patent. Additionally, pursuant to Commission Rule 210.12(a)(9)(x), Exhibit 30 contains photographs of Flex. Lastly, Commission Rule 210.12(a)(9)(viii) requires that Complainant chart only "a representative involved article" of Respondent Pantech that violates Section 337. Tela believes that Pantech devices in addition to the Flex are covered by at least one of claims 1-34 of the '547 Patent and have been imported, sold for importation, or sold within the United States after importation by Respondent Pantech.

(5) The '428 Patent

(a) HTC

126. On information and belief, Respondent HTC is engaged in the importation, the sale for importation, and/or the sale within the United States after importation of

certain products containing integrated circuit devices that infringe at least claims 1-13 of the '428 Patent.

127. Tela has obtained products containing integrated circuit devices that, on information and belief, HTC imported, sold for importation, and/or sold within the United States after importation, and that infringe, directly or indirectly, at least claims 1-13 of the '428 Patent.

128. Pursuant to Commission Rule 210.12(a)(9)(viii), Exhibit 31 includes a chart comparing claim 1 of the '428 Patent to HTC's One X (Physical Exhibit 1). Exhibit 31 shows that the One X is covered by at least claims 1-13 of the '428 Patent. Additionally, pursuant to Commission Rule 210.12(a)(9)(x), Exhibit 31 contains photographs of the One X. Lastly, Commission Rule 210.12(a)(9)(viii) requires that Complainant chart only "a representative involved article" of Respondent HTC that violates Section 337. Tela believes that HTC devices in addition to the One X are covered by at least one of claims 1-13 of the '428 Patent and have been imported, sold for importation, or sold within the United States after importation by Respondent HTC.

(b) LG

129. On information and belief, Respondent LG is engaged in the importation, the sale for importation, and/or the sale within the United States after importation of certain products containing integrated circuit devices that infringe at least claims 1-13 of the '428 Patent.

130. Tela has obtained products containing integrated circuit devices that, on information and belief, LG imported, sold for importation, and/or sold within the United States after importation, and that infringe, directly or indirectly, at least claims 1-13 of the '428 Patent.

(e) Pantech

138. On information and belief, Respondent Pantech is engaged in the importation, the sale for importation, and/or the sale within the United States after importation of certain products containing integrated circuit devices that infringe at least claims 1-13 of the '428 Patent.

139. Tela has obtained products containing integrated circuit devices that, on information and belief, Pantech imported, sold for importation, and/or sold within the United States after importation, and that infringe, directly or indirectly, at least claims 1-13 of the '428 Patent.

140. Pursuant to Commission Rule 210.12(a)(9)(viii), Exhibit 35 includes a chart comparing claim 1 of the '428 Patent to Pantech's Flex (Physical Exhibit 5). Exhibit 35 shows that the Flex is covered by at least claims 1-13 of the '428 Patent. Additionally, pursuant to Commission Rule 210.12(a)(9)(x), Exhibit 35 contains photographs of the Flex. Lastly, Commission Rule 210.12(a)(9)(viii) requires that Complainant chart only "a representative involved article" of Respondent Pantech that violates Section 337. Tela believes that Pantech devices in addition to the Flex are covered by at least one of claims 1-13 of the '428 Patent and have been imported, sold for importation, or sold within the United States after importation by Respondent Pantech.

(6) The '552 Patent

(a) HTC

141. On information and belief, Respondent HTC is engaged in the importation, the sale for importation, and/or the sale within the United States after importation of

certain products containing integrated circuit devices that infringe at least claims 1-5, 11, and 18-47 of the '552 Patent.

142. Tela has obtained products containing integrated circuit devices that, on information and belief, HTC imported, sold for importation, and/or sold within the United States after importation, and that infringe, directly or indirectly, at least claims 1-5, 11, and 18-47 of the '552 Patent.

143. Pursuant to Commission Rule 210.12(a)(9)(viii), Exhibit 36 includes a chart comparing claim 1 of the '552 Patent to HTC's One X (Physical Exhibit 1). Exhibit 36 shows that the One X is covered by at least claims 1-5, 11, and 18-47 of the '552 Patent. Additionally, pursuant to Commission Rule 210.12(a)(9)(x), Exhibit 36 contains photographs of the One X. Lastly, Commission Rule 210.12(a)(9)(viii) requires that Complainant chart only "a representative involved article" of Respondent HTC that violates Section 337. Tela believes that HTC devices in addition to the One X are covered by at least one of claims 1-5, 11, and 18-47 of the '552 Patent and have been imported, sold for importation, or sold within the United States after importation by Respondent HTC.

(b) LG

144. On information and belief, Respondent LG is engaged in the importation, the sale for importation, and/or the sale within the United States after importation of certain products containing integrated circuit devices that infringe at least claims 1-5, 11, and 18-47 of the '552 Patent.

145. Tela has obtained products containing integrated circuit devices that, on information and belief, LG imported, sold for importation, and/or sold within the United States

18–47 of the '552 Patent and have been imported, sold for importation, or sold within the United States after importation by Respondent Nokia.

(e) Pantech

153. On information and belief, Respondent Pantech is engaged in the importation, the sale for importation, and/or the sale within the United States after importation of certain products containing integrated circuit devices that infringe at least claims 1-5, 11, and 18–47 of the '552 Patent.

154. Tela has obtained products containing integrated circuit devices that, on information and belief, Pantech imported, sold for importation, and/or sold within the United States after importation, and that infringe, directly or indirectly, at least claims 1-5, 11, and 18–47 of the '552 Patent.

155. Pursuant to Commission Rule 210.12(a)(9)(viii), Exhibit 40 includes a chart comparing claim 1 of the '552 Patent to Pantech's Flex (Physical Exhibit 5). Exhibit 40 shows that the Flex is covered by at least claims 1-5, 11, and 18–47 of the '552 Patent. Additionally, pursuant to Commission Rule 210.12(a)(9)(x), Exhibit 40 contains photographs of the Flex. Lastly, Commission Rule 210.12(a)(9)(viii) requires that Complainant chart only "a representative involved article" of Respondent Pantech that violates Section 337. Tela believes that Pantech devices in addition to the Flex are covered by at least one of claims 1-5, 11, and 18–47 of the '552 Patent and have been imported, sold for importation, or sold within the United States after importation by Respondent Pantech.

(7) The '689 Patent

(a) HTC

156. On information and belief, Respondent HTC is engaged in the importation, the sale for importation, and/or the sale within the United States after importation of certain products containing integrated circuit devices that infringe at least claims 2-4, 29, and 33-46 of the '689 Patent.

157. Tela has obtained products containing integrated circuit devices that, on information and belief, HTC imported, sold for importation, and/or sold within the United States after importation, and that infringe, directly or indirectly, at least claims 2-4, 29, and 33-46 of the '689 Patent.

158. Pursuant to Commission Rule 210.12(a)(9)(viii), Exhibit 41 includes a chart comparing claim 2 of the '689 Patent to HTC's One X (Physical Exhibit 1). Exhibit 41 shows that the One X is covered by at least claims 2-4, 29, and 33-46 of the '689 Patent. Additionally, pursuant to Commission Rule 210.12(a)(9)(x), Exhibit 41 contains photographs of the One X. Lastly, Commission Rule 210.12(a)(9)(viii) requires that Complainant chart only "a representative involved article" of Respondent HTC that violates Section 337. Tela believes that HTC devices in addition to the One X are covered by at least one of claims 2-4, 29, and 33-46 of the '689 Patent and have been imported, sold for importation, or sold within the United States after importation by Respondent HTC.

(b) LG

159. On information and belief, Respondent LG is engaged in the importation, the sale for importation, and/or the sale within the United States after importation of certain products containing integrated circuit devices that infringe at least claims 2-4, 29, and 33-46 of the '689 Patent.

160. Tela has obtained products containing integrated circuit devices that, on information and belief, LG imported, sold for importation, and/or sold within the United States after importation, and that infringe, directly or indirectly, at least claims 2-4, 29, and 33-46 of the '689 Patent.

161. Pursuant to Commission Rule 210.12(a)(9)(viii), Exhibit 42 includes a chart comparing claim 2 of the '689 Patent to LG's Spectrum 2 (Physical Exhibit 2). Exhibit 42 shows that the Spectrum 2 is covered by at least claims 2-4, 29, and 33-46 of the '689 Patent. Additionally, pursuant to Commission Rule 210.12(a)(9)(x), Exhibit 42 contains photographs of the Spectrum 2. Lastly, Commission Rule 210.12(a)(9)(viii) requires that Complainant chart only "a representative involved article" of Respondent LG that violates Section 337. Tela believes that LG devices in addition to the Spectrum 2 are covered by at least one of claims 2-4, 29, and 33-46 of the '689 Patent and have been imported, sold for importation, or sold within the United States after importation by Respondent LG.

(c) Motorola

162. On information and belief, Respondent Motorola is engaged in the importation, the sale for importation, and/or the sale within the United States after importation of certain products containing integrated circuit devices that infringe at least claims 2-4, 29, and 33-46 of the '689 Patent.

163. Tela has obtained products containing integrated circuit devices that, on information and belief, Motorola imported, sold for importation, and/or sold within the United States after importation, and that infringe, directly or indirectly, at least claims 2-4, 29, and 33-46 of the '689 Patent.

Patent	Claims Practiced By Tela's Products
8,264,049	1-25
8,264,044	1-42
8,258,550	1-48
8,258,547	1-36
8,217,428	1-55
8,258,552	1-49
8,030,689	1-46

191. Pursuant to Commission Rule 210.12(a)(9)(ix), Exhibits 57-63 include charts that apply an exemplary claim of each Asserted Patent to a representative involved article of Tela's that practices that patent.

IX. RELIEF

WHEREFORE, by reason of the foregoing, Tela requests that the Commission:

A. Institute an investigation pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337, with respect to Respondents' violations of Section 337 based on the importation into the United States, the sale for importation into the United States, and/or the sale within the United States after importation of certain integrated circuit devices and products containing the same that infringe the Asserted Patents;

B. Schedule and conduct a hearing on permanent relief pursuant to 19 U.S.C. § 1337(d) and (f) of the Tariff Act of 1930, as amended;

C. Issue a Limited Exclusion Order specifically directed to each named Respondent, pursuant to 19 U.S.C. § 1337(d), excluding from entry into the United States articles that infringe the Asserted Patents;

D. Issue a cease and desist order pursuant to 19 U.S.C. § 1337(f) prohibiting each domestic Respondent from engaging in the unlawful importation and/or the sale within the United States after importation of certain integrated circuits and products containing the same that infringe the Asserted Patents; and

E. Impose a bond upon Respondents who continue to import infringing articles during the 60-day-Presidential review period per 19 U.S.C. § 1337(j); and issue such other and further relief as the Commission deems just and proper under the law, based upon the facts determined by the investigation and the authority of the Commission.

February 8, 2013

Respectfully submitted,



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Tela Innovations, Inc.**

EXHIBIT 16

Document Filing Report

Documents Filed Report On or Before 12/22/2022 for Investigation Number 337-873 in phase(s)

Generated on: 12/22/2022 1:58 PM

Doc ID	Inv Num -	Sec	F	Official Receive	Doc Type	Document Title	Filed By	Firm/Organization	Filed On Behalf
503296	337-873 Violation Pub	S	02/08/2013		Complaint	CBI 13-148 Complaint, Public Exhibits, and Appendices A, B, C, E, G, I, K, and M	Goutam Patnaik	Pepper Hamilton	Tela Innovations, Inc.
503297	337-873 Violation Con	S	02/08/2013		Complaint	CBI 13-148 Confidential Exhibits	Goutam Patnaik	Pepper Hamilton	Tela Innovations, Inc.
503336	337-873 Violation Pub	E	02/08/2013		Notice	Receipt of Complaint; Solicitation of Comments Relating to the Public Interest	Lisa R. Barton	USITC	Office of the Secretary
503374	337-873 Violation Pub	S	02/08/2013		Complaint	CBI 13-148 Appendix D	Goutam Patnaik	Pepper Hamilton	Tele Innovations, Inc.
503375	337-873 Violation Pub	S	02/08/2013		Complaint	CBI 13-148 Appendix F	Goutam Patnaik	Pepper Hamilton	Tele Innovations, Inc.
503376	337-873 Violation Pub	S	02/08/2013		Complaint	CBI 13-148 Appendices H and J	Goutam Patnaik	Pepper Hamilton	Tele Innovations, Inc.
503486	337-873 Violation Pub	S	02/08/2013		Complaint	CBI 13-148 Appendix L	Goutam Patnaik	Pepper Hamilton	Tele Innovations, Inc.
503487	337-873 Violation Pub	S	02/08/2013		Complaint	CBI 13-148 Appendix N	Goutam Patnaik	Pepper Hamilton	Tele Innovations, Inc.
503965	337-873 Violation Pub	E	02/15/2013		Notice	78 FR 10635 F.R. Notice of Receipt of Complaint; Solicitation of Comments Relating to the Public Interest	Lisa R. Barton	USITC	Office of the Secretary
504663	337-873 Violation Pub	E	02/22/2013		Comments/Response to Comments	Nokia Corporation and Nokia Inc. Statements on the Public Interest	Jeffrey M. Telep	King and Spalding	Nokia Corporation and Nokia Inc.
504666	337-873 Violation Pub	E	02/22/2013		Comments/Response to Comments	HTC Corp. and HTC America, Inc's Response to Request for Public Interest Comments	Stephen R. Smith	Cooley LLP	HTC Corporation and HTC America, Inc.
504907	337-873 Violation Pub	E	02/27/2013		Comments/Response to Comments	Complainant Tela Innovations, Inc. Reply to Proposed Respondents HTC and Nokia Statements on the Public Interest	Goutam Patnaik	Pepper Hamilton	Tela Innovations, Inc.

** indicates that a document has not yet been received or is currently in review.

IPR2023-01267, -01268, -01269,
-01270, -01272, -01273
Pantech Wireless, LLC Ex. 2003 - Part 3

Documents Filed Report On or Before 12/22/2022 for Investigation Number 337-873 in phase(s)

Generated on: 12/22/2022 1:58 PM

Doc ID	Inv Num -	Sec	F	Official Receive	Doc Type	Document Title	Filed By	Firm/Organization	Filed On Behalf
505059	337-873 Violation Pub		E	02/28/2013	Complaint	2013-02-28 Letter from G. Patnaik to Acting Secretary Barton Clarifying Asserted Claims and Indirect Infringement Allegations in Complaint	Goutam Patnaik	Pepper Hamilton	Tela Innovations, Inc.
505578	337-873 Violation Pub		S	03/12/2013	Notice	Notice of Institution of Investigation	Lisa R. Barton	USITC	Office of the Secretary
505619	337-873 Violation Pub		S	03/12/2013	Notice	Assignment of Administrative Law Judge Rogers	Charles E. Bullock	USITC	Chief Administrative Law Judge
505698	337-873 Violation Pub		S	03/13/2013	Notice	Re-Assignment to Administrative Law Judge Gildea	Charles E. Bullock	USITC	Chief Administrative Law Judge
505873	337-873 Violation Pub		E	03/15/2013	Notice	78 FR 16533 F.R. Notice of Institution of Investigation	Lisa R. Barton	USITC	Office of the Secretary
505904	337-873 Violation Pub		S	03/18/2013	Order	1 Protective Order	E. James Gildea	USITC	Administrative Law Judge
505932	337-873 Violation Pub		E	03/18/2013	Notice of Appearance	Notice of Appearance of King and Spalding LLP on Behalf of Nokia Corporation and Nokia Inc. and Designation of Jeffrey M. Telep as Lead Attorney	Jeffrey M. Telep	King and Spalding	Nokia Corporation and Nokia Inc.
505933	337-873 Violation Pub		E	03/18/2013	PO Subscription	Agreement to be Bound by the Protective Order of Jeffrey Telep, Taryn Williams, Jeffrey Seddon, and Carol Brewer	Jeffrey M. Telep	King and Spalding	Nokia Corporation and Nokia Inc.
505936	337-873 Violation Pub		E	03/18/2013	Request for Confidential Materials	Request for Confidential Materials by King & Spalding LLP on Behalf of Nokia Corporation and Nokia, Inc.	Jeffrey M. Telep	King and Spalding	Nokia Corporation and Nokia Inc.
505944	337-873 Violation Pub		E	03/18/2013	Notice of Appearance	Notice of Appearance of Steptoe & Johnson LLP on Behalf of LG Electronics, Inc., LG Electronics U.S.A., Inc., and LG Electronics MobileComm U.S.A., Inc. and Designation of Jamie Beaber as Lead Attorney	Jamie B. Beaber	Steptoe & Johnson LLP	LG Electronics, Inc., LG Electronics U.S.A., Inc., and LG Electronics MobileComm U.S.A., Inc.

** indicates that a document has not yet been received or is currently in review.

IPR2023-01267, -01268, -01269,

-01270, -01272, -01273

Pantech Wireless, LLC Ex. 2003 - Part 3

Page 34 of 50

Documents Filed Report On or Before 12/22/2022 for Investigation Number 337-873 in phase(s)

Generated on: 12/22/2022 1:58 PM

Doc ID	Inv Num -	Sec	F	Official Receive	Doc Type	Document Title	Filed By	Firm/Organization	Filed On Behalf
539815	337-873 Violation Pub		S	08/08/2014	Order	873-073 70 Granting Unopposed Motion for Stay of Procedural Schedule Pending Resolution of Motion to Terminate; and Ordering Shortened Response Time for Motion to Terminate	E. James Gildea	USITC	Administrative Law Judge
541078	337-873 Violation Pub		S	08/28/2014	Notice	Commission Determination Not to Review an Initial Determination Granting an Unopposed Motion to Terminate the Investigation as to Remaining Respondents; Termination of Investigation	Lisa R. Barton	USITC	Office of the Secretary
541231	337-873 Violation Pub		S	09/02/2014	Voting Sheet	GC-14-167	Lisa R. Barton	USITC	Office of the Secretary
541917	337-873 Violation Pub		E	09/12/2014	Notice	79 FR 52750 F.R. Notice of Determination Not to Review an Initial Determination	Lisa R. Barton	USITC	Office of the Secretary
589769	337-873 Violation Pub		S	09/02/2016	Memorandum	CO86-OO-003 Rescinded Recusal	Rhonda K. Schmidlein	USITC	Office of the Commissioner

** indicates that a document has not yet been received or is currently in review.

EXHIBIT 17

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

TYLER DIVISION

**AZURE NETWORKS, LLC and
TRI-COUNTY EXCELSIOR FOUNDATION,**

Plaintiffs,

V.

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

Defendants.

§ § § § § § § § § § § § § § § §

Civil Action No. 6:12-cv-747

JURY TRIAL DEMANDED

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

This is an action for patent infringement in which Plaintiffs Azure Networks, LLC (“Azure”) and Tri-County Excelsior Foundation (“TCEF”) complain against Defendants LG Electronics MobileComm U.S.A, Inc., LG Electronics U.S.A., Inc., and LG Electronics Inc. (collectively “LG”), as follows:

PARTIES

1. Plaintiff Azure is a Texas limited liability company having its principal place of business in Longview, Texas.
2. Plaintiff TCEF is a Texas non-profit corporation intended to qualify as an entity exempt from income tax as an organization described in Internal Revenue Code section 501(c)(3) and as a supporting organization described in Internal Revenue Code section 509(a)(3)(B)(i) (a “Type 1 Supporting Organization”) to Casa of Harrison County, a Texas non-

profit corporation exempt from income tax under section 501(c)(3) of the Internal Revenue Code, having its principal place of business in Marshall, Texas.

3. Plaintiff TCEF is the owner by assignment of United States Patent No. 7,756,129 (“the ‘129 Patent”) entitled “Personal Area Network with Automatic Attachment and Detachment.” The ‘129 Patent was duly and legally issued on July 13, 2010. A true and correct copy of the ‘129 Patent is attached as Exhibit A.

4. Plaintiff Azure is the exclusive licensee of the ‘129 Patent, having an exclusive, worldwide, transferable, retroactive and prospective license (“the License”) under the ‘129 Patent, with the right to sublicense others, to (i) make, have made, use, sell, offer to sell, import and lease any products, (ii) use and perform any method, process, and/or services, and (iii) otherwise practice any invention in any manner, such that Azure has the full right to enforce and/or sublicense the ‘129 Patent without any restriction, subject to certain encumbrances. Azure further has the exclusive right under the License to maintain, enforce, or defend the ‘129 Patent, including without limitation pursuing and collecting damages, royalties, and other payments and obtaining injunctive relief and other remedies for past, current and future infringement of the ‘129 Patent and pursuing and entering into any settlement related to a claim of infringement.

5. On information and belief, Defendant LG Electronics MobileComm U.S.A, Inc. is a California corporation having its principal place of business in San Diego, California.

6. On information and belief, Defendant LG Electronics U.S.A., Inc. is a Delaware corporation having its principal place of business in Englewood Cliffs, New Jersey.

7. On information and belief, Defendant LG Electronics Inc. is a Korean corporation having its principal place of business in Seoul, Korea.

8. On information and belief, Defendants LG Electronics MobileComm U.S.A., Inc. and LG Electronics U.S.A., Inc. are each a subsidiary of Defendant LG Electronics, Inc.

JURISDICTION AND VENUE

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

10. On information and belief, each Defendant, directly or through intermediaries, has transacted business in this district and has committed acts of patent infringement in this district. Thus, venue is proper in this district under 28 U.S.C. §§ 1391(c) and 1400(b).

11. On information and belief, each Defendant has conducted and does conduct substantial business in this forum, directly or through intermediaries, such substantial business including but not limited to: (i) at least a portion of the infringements alleged herein; (ii) purposefully and voluntarily placing one or more infringing products into the stream of commerce with the expectation that they will be purchased by consumers in this forum; and/or (iii) regularly doing or soliciting business, engaging in other persistent courses of conduct, or deriving substantial revenue from goods and services provided to individuals in Texas and in this judicial district. Thus, each Defendant is subject to this Court's specific and general personal jurisdiction pursuant to due process and the Texas Long Arm Statute.

COUNT I DIRECT INFRINGEMENT OF U.S. PATENT NO. 7,756,129

12. On information and belief, LG has been and now is directly infringing the '129 Patent in the State of Texas, in this judicial district, and elsewhere in the United States. LG's direct infringements include, without limitation, making, using, offering for sale, and/or selling within the United States, and/or importing into the United States, at least products and systems

incorporating Bluetooth High Speed (HS) wireless technology and/or products and systems incorporating Bluetooth wireless technology in combination with WiFi technology, such as WiFi Direct, including without limitation the Intuition, which infringe one or more claims of the '129 Patent. LG is thus liable for direct infringement of the '129 Patent pursuant to 35 U.S.C. § 271(a).

13. At least by filing and serving this Original Complaint for Patent Infringement, Plaintiffs have given LG written notice of the infringement.

14. As a result of LG's infringement of the '129 Patent, Plaintiffs have suffered monetary damages that are adequate to compensate them for the infringement under 35 U.S.C. § 284, but in no event less than a reasonable royalty.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs request that this Court enter:

- A. A judgment in favor of Plaintiffs that LG has directly infringed the '129 Patent;
- B. A judgment and order requiring LG to pay Plaintiffs their damages, costs, expenses, prejudgment and post-judgment interest, and post-judgment royalties for LG's direct infringement of the '129 Patent as provided under 35 U.S.C. § 284; and
- C. Any and all other relief to which the Court may deem Plaintiffs entitled.

DEMAND FOR JURY TRIAL

Plaintiffs, under Federal Rule of Civil Procedure 38, request a trial by jury of any issues so triable by right.

Respectfully submitted,



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***Counsel for Plaintiffs Azure Networks, LLC
and Tri-County Excelsior Foundation***

EXHIBIT 18

6:12cv252, Azure Networks LLC Et Al V. Mediatek Inc.

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

This case was retrieved on 12/22/2022

Header

Case Number: 6:12cv252

Date Filed: 04/06/2012

Assigned To: Judge Michael H. Schneider

Referred To: Magistrate Judge John D. Love

Nature of Suit: Patent (830)

Cause: Patent Infringement

Lead Docket: None

Other Docket: None

Jurisdiction: Federal Question

Class Code: Closed

Closed: 06/10/2013

Statute: 35:271

Jury Demand: Defendant

Demand Amount: \$0

NOS Description: Patent

Participants

Litigants

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Plaintiff

Attorneys

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IP R2023-01267, -01268, -01269,

-01270, -01272, -01273

Pantech Wireless, LLC Ex. 2003 - Part 3

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6:12cv252, Azure Networks Llc Et Al V. Mediatek Inc.

Litigants

Sony Corporation
Consolidated Civil Action 6:12cv746 |
[Terminated: 05/29/2013]
Consol Defendant

Sony Electronics Inc.
Consolidated Civil Action 6:12cv746 |
[Terminated: 05/29/2013]
Consol Defendant

LG Electronics Mobilecomm U.S.A., Inc.
Consolidated Civil Action 6:12cv747 |
[Terminated: 05/29/2013]
Consol Defendant

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-01270, -01272, -01273

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6:12cv252, Azure Networks Llc Et Al V. Mediatek Inc.

Litigants

LG Electronics U.S.A., Inc.

Consolidated Civil Action 6:12cv747 |

[Terminated: 05/29/2013]

Consol Defendant

LG Electronics Inc.

Consolidated Civil Action 6:12cv747 |

[Terminated: 05/29/2013]

Consol Defendant

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6:12cv252, Azure Networks Llc Et Al V. Mediatek Inc.

Litigants

Lenovo (United States) Inc.
Consolidated Civil Action 6:12cv748 |
[Terminated: 05/31/2013]
Consol Defendant

HTC America, Inc.
Consolidated Civil Action 6:12cv749 |
[Terminated: 05/29/2013]
Consol Defendant

HTC Corporation
Consolidated Civil Action 6:12cv749 |

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Pantech Wireless, LLC Ex. 2003 - Part 3

6:12cv252, Azure Networks Llc Et Al V. Mediatek Inc.

Litigants

[Terminated: 05/29/2013]
Consol Defendant

Vizio, Inc.
Consolidated Civil Action 6:12cv750 |
[Terminated: 06/10/2013]
Consol Defendant

Acer America Corporation
Consolidated Civil Action 6:12cv751 |
[Terminated: 05/31/2013]
Consol Defendant

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Pantech Wireless, LLC Ex. 2003 - Part 3

6:12cv252, Azure Networks Llc Et Al V. Mediatek Inc.

#	Date	Proceeding Text	Source
		counterclaims asserted by and between Plaintiffs and Defendant VIZIO Inc in this action are hereby DISMISSED WITHOUT PREJUDICE. Plaintiffs and VIZIO will each bear their own costs, expenses and legal fees. Signed by Judge Michael H. Schneider on 06/10/13. (mll,) (Entered: 06/11/2013)	
196	06/10/2013	FINAL JUDGMENT that the parties take nothing and that all pending motions are DENIED AS MOOT. All costs are to be borne by the party that incurred them. All claims, counterclaims, and third-party claims in the instant suit are DISMISSED in their entirety. The Clerk of the Court is directed to close this case. Signed by Judge Michael H. Schneider on 06/10/13. (mll,) (Entered: 06/11/2013)	

Patents

Number	Title	Issued	Class	Subclass
7,756,129	Personal area network with automatic attachment and detachment	07/13/2010	370	389

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EXHIBIT 25

International Terms of Business

September 2018

A. General Terms

Introduction

Mayer Brown is a global services provider comprising associated legal practices that are separate entities, including Mayer Brown LLP (Illinois, USA), Mayer Brown International LLP (England), Mayer Brown (a Hong Kong partnership) and Tauil & Chequer Advogados (a Brazilian law partnership) (collectively the “**Mayer Brown Practices**”) and non-legal service providers, which provide consultancy services (the “**Mayer Brown Consultancies**”). The Mayer Brown Practices and Mayer Brown Consultancies are established in various jurisdictions and may be a legal person or a partnership. Details of the individual Mayer Brown Practices and Mayer Brown Consultancies can be found in the [Legal Notices](#) section of our website.

These international terms (the “**International Terms**”) are the general terms that govern the relationship between each or any Mayer Brown Practice and you. Additional terms may apply to the services provided by specific Mayer Brown Practices in a Particular Matter (as defined below). In these International Terms, “**we**” or “**us**” means the Mayer Brown Practice providing you with services in any specific matter and “**you**” means the person or entity to whom we provide our services.

When you instruct or engage any Mayer Brown Practice on a new matter (“**Particular Matter**”), we will normally confirm your instructions or engagement in writing (an “**Engagement Letter**”). These International Terms and the Engagement Letter (which may include the additional terms relating to a Particular Matter), if any, together form the contract (the “**Engagement Contract**”) between you and the Mayer Brown Practice specified in the Engagement Letter (the “**Principal Mayer Brown Practice**”). The Principal Mayer Brown Practice may, as agent on your behalf, engage another Mayer Brown Practice to work alongside it on a Particular Matter, if appropriate.

You are only a client of a Mayer Brown Practice in a Particular Matter if that Mayer Brown Practice is providing services to you in such Particular Matter, and no Mayer Brown Practice will have liability in Particular Matters where it is not providing services.

Each Mayer Brown Practice will apply the applicable local professional conduct rules in the Particular Matter for which it is engaged.

A.1 Our services

A.1.1 Scope of our services

The scope of our services in a Particular Matter will be limited to those described in the related Engagement Letter and to any additional tasks in such Particular Matter that we accept in writing.

We will not advise on the tax or insurance implications (including coverage) of any Particular Matter or course of action in any Particular Matter or provide notices to insurers or re-insurers unless (and then only to the extent) agreed in writing.

Our services in a transaction are limited to advising on legal issues arising in the negotiation, documentation and closing of the transaction and do not include giving you financial or business advice as to the merits of the transaction.

A.1.2 Completion of a Particular Matter

Upon completion of our work on a Particular Matter, we will not update you on legal developments related to such Particular Matter unless we have agreed to do so in our Engagement Letter.

A.1.3 Authority to instruct us and receive advice

Where our client is an entity, we will assume that any of its personnel who gives instructions to us has authority to do so and to receive advice on behalf of the entity, unless you tell us otherwise in writing.

A.1.4 Joint ventures, partnerships, trade associations, etc.

If you are a trade association, partnership, joint venture or similar joint entity only that entity will be our client and, unless otherwise agreed in writing, we will only represent it and not its individual members, venturers or partners.

A.1.5 Affiliates

We only represent the entity named in the Engagement Letter and not its stockholders or other Affiliates (as defined in paragraph A.18 (*Definitions*)) and therefore we are able to represent another client with interests adverse to your stockholders or other Affiliates without obtaining consent from you. Even if you choose to give us confidential information about any Affiliate, this will not of itself create a lawyer-client relationship between the Affiliate and any Mayer Brown Practice.

A.2 Charges

A.2.1 Your agreement to pay

You will pay the fees and other charges billed by the Principal Mayer Brown Practice and, where appropriate, any other Mayer Brown Practice. Unless otherwise agreed in writing, you are required to pay such fees and charges whether or not a Particular Matter proceeds to closing or is otherwise concluded in the ordinary course.

A.2.2 Professional fees

Unless otherwise agreed in writing, our fees will be based principally on the time we spend on your matter. From time to time, we review our hourly rates and we will notify you in writing of any increase in rates that (unless otherwise agreed) will be applicable to the Particular Matter. Subject to paragraph B.1.4 (*Contract lawyers or paraprofessionals*) (in the case of the US offices), if contract lawyers or paraprofessionals are assigned to work on any Particular Matter, whether or not they are employed through an independent agency, the Mayer Brown Practice will charge you hourly rates based upon its then hourly rates for Mayer Brown lawyers and paraprofessionals with similar experience and qualifications.

After consultation, our fees may additionally take account of other factors including the complexity or urgency of the matter, the specialized knowledge and skill required and, if appropriate, the value of the property or subject matter involved and overall outcome.

Applicable sales or service taxes will be added to your bill where appropriate.

Without limiting any other provision in this paragraph A.2.2, you will pay us at our hourly rates (as adjusted from time to time) for activities incidental to our representation of you, whether during or after the termination of the lawyer-client relationship. This includes, but is not limited to, our time spent responding to subpoenas, searching for and producing documents, preparing for testimony and testifying, and otherwise dealing with your requests or third party claims or actions relating to a matter we are handling or have handled for you. You will also pay or reimburse us for all reasonable expenses and other charges in connection with such incidental activities, including, but not limited to, the fees of outside counsel that we retain.

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