



David Hoffman
Principal
hoffman@fr.com
T: 512 226 8154

Fish & Richardson P.C.
111 Congress Avenue
Suite 2000
Austin, TX 78701
T: 512 472 5070
F: 512 320 8935

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VIA ELECTRONIC MAIL

Alfred R. Fabricant
Peter Lambrianakos
Vincent J. Rubino, III
FABRICANT LLP
411 Theodore Fremd Avenue
Suite 206 South
Rye, NY 10580

Justin Kurt Truelove
TRUELOVE LAW FIRM, PLLC
100 West Houston
Marshall, TX 75670

Re: *Valtrus Innovations Ltd., et al. v. FedEx Corporation et al.*
Case No. 2:25-cv-00516-JRG, in the U.S. District Court for the Eastern District of Texas,
Marshall Division

Dear Counsel,

I write in connection with *Valtrus v. FedEx Corporation et al.*, and particularly, Valtrus's assertions regarding U.S. Patent No. 7,904,686. In its complaint, Valtrus accuses the Defendants of infringing the '686 patent because each purportedly "has used Apache Hadoop." As an initial point, neither of the Defendants have ever used Apache Hadoop. However, to be complete, we also conducted an investigation of all of the subsidiaries of FedEx Corp. and determined that a FedEx subsidiary's vendor's product that operated with Apache Hadoop was dropped entirely on Dec 31, 2020. We are willing to seek a sworn declaration to this effect if you would like one. No FedEx company could even be alleged to have infringed with Apache Hadoop after Dec 31, 2020.

As part of our investigation, we investigated the supposed FedEx employees listed in the complaint, and these "resumes" appear to be highly questionable and raise serious questions about the reasonableness of your pre-suit investigation that relies on non-verified information from a public social database. FedEx has done a diligent search and cannot locate records for the various names referenced in the Valtrus complaint. Specifically, there are no records in the employee database of any FedEx branded company of the following names as current or former employees in the listed locations: "Deepak N." of Dallas Texas, allegedly working at FedEx from August 2022 – Present; Billy Lin of SF Bay Area (though puts Tennessee as work location), allegedly

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working at FedEx from Oct 2020 – Present; Riley Hodge of Virginia Beach (though puts Memphis as work location), allegedly working at FedEx from April 2023 – Present; Latangi Amitabh of Memphis TN, allegedly working at FedEx from October 2022 – Present; and Anuradha Modali (no location listed), allegedly working at FedEx from July 2019 – August 2021. There are also no login accounts to FedEx systems for any of these supposed people. Indeed, some of the entries are suspicious to say the least. For example, if you run a Google search for the name “Latangi Amitabh,” the only hit is this lawsuit. This person – who you assert is a senior data engineer – appears nowhere on the internet except this suit. The snippet in the complaint for “Anuradha Modali” lists her purported duties at FedEx as including “translating customer requirement with HeathCare data,” which makes little sense, as FedEx is not in the healthcare business. As you know, these resume databases used by Valtrus do not require validation of any descriptions in its systems, and concerningly, the LinkedIn entries no longer appear to be accessible.

Given these facts and given the clear lack of any evidence of any use of the accused HDFS features in the complaint, Defendants request that Valtrus dismiss its assertions regarding the '686 patent before they are forced to further expend resources on the flawed and somewhat dubious assertions in the complaint. Further, in view of the apparently false nature of these resumes, FedEx does reserve the right to further probe them and the reasonableness of the pre-suit investigation if the '686 patent remains in this case.

I am happy to jump on the phone to the discuss these matters further.

Thanks,



David Hoffman