

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

Solocron Media, LLC

Plaintiff,

v.

**Verizon Communications Inc., Cellco
Partnership d.b.a. Verizon Wireless,
AT&T Inc.,
AT&T Mobility LLC,
Sprint Corporation,
Sprint Communications Company L.P.,
Sprint Solutions Inc., and
T-Mobile USA, Inc.**

Defendants.

Case No.: 2:13-cv-1059

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

Solocron Media, LLC (“Solocron” or “plaintiff”) hereby alleges for its Complaint for patent infringement against defendants Verizon Communications Inc. and Cellco Partnership d.b.a. Verizon Wireless (collectively, “Verizon”); AT&T Inc. and AT&T Mobility LLC (collectively, “AT&T”); Sprint Corporation (formerly known as Sprint Nextel Corporation), Sprint Communications Company L.P., and Sprint Solutions Inc. (collectively, “Sprint”); and T-Mobile USA, Inc. (“T-Mobile”) on personal knowledge as to its own actions and on information and belief as to the actions of others, as follows:

THE NATURE OF THE ACTION

1. This is a patent infringement action to end Verizon’s AT&T’s, Sprint’s, and T-Mobile’s (collectively, “Defendants”) unauthorized and infringing manufacture, use, sale,

offering for sale, and/or importation of products and methods incorporating Plaintiff Solocron's patented inventions.

2. Plaintiff Solocron holds all substantial rights and interest in the Patents-in-Suit described below, including the exclusive right to sue Defendants for infringement and recover damages.

3. Defendants make, use, sell, offer for sale, and import infringing products and provide infringing services in violation of the Patents-in-Suit. Plaintiff Solocron seeks injunctive relief to prevent Defendants from continuing to infringe Solocron's patent rights. Plaintiff Solocron further seeks monetary damages and prejudgment interest for defendants' past infringement of the Patents-in-Suit.

4. This is an exceptional case, and Solocron requests damages, enhanced damages, attorneys' fees, costs, and expenses.

THE PARTIES

5. Plaintiff Solocron is a Texas corporation with its principal place of business at 625 Chase Drive, Suite 200, Tyler, Texas 75701.

6. On information and belief, defendant Verizon Communications Inc. is a corporation existing and organized under the laws of Delaware and has its principal place of business at 140 West Street, 29th Floor, New York, NY 10007. Verizon Communications Inc. is registered to do business in Texas, is doing business in the Eastern District of Texas, and can be served through its registered agent for service, C T Corporation System, located at 350 North St. Paul St., Ste. 2900, Dallas, Texas 75201.

7. On information and belief, defendant Cellco Partnerships d.b.a. Verizon Wireless is a general partnership existing and organized under the laws of Delaware, is doing business as

Verizon Wireless, and has its principal place of business at One Verizon Way, Basking Ridge, New Jersey 07920. Cellco Partnerships d.b.a. Verizon Wireless is doing business in the Eastern District of Texas and can be served through its registered agent for service, the Corporation Trust Company, located at Corporation Trust Center 1209 Orange St., Wilmington, New Castle, DE 19801.

8. On information and belief, defendant AT&T Inc. is a corporation existing and organized under the laws of Delaware and has its principal place of business in Texas at 208 S. Akard St., Dallas, TX 75202. AT&T Inc. is registered to do business in Texas, is doing business in the Eastern District of Texas, and can be served through its registered agent for service, C T Corporation System, located at 350 North St. Paul St., Ste. 2900, Dallas, Texas 75201.

9. On information and belief, defendant AT&T Mobility LLC is a corporation existing and organized under the laws of Delaware and has its principal place of business at 5565 Glenridge Connector, Atlanta, GA 30349. AT&T Mobility LLC is registered to do business in Texas, is doing business in the Eastern District of Texas, and can be served through its registered agent for service, C T Corporation System, located at 350 North St. Paul St., Ste. 2900, Dallas, Texas 75201.

10. On information and belief, defendant Sprint Corporation was formerly known as Sprint Nextel Corporation, is a corporation existing and organized under the laws of Delaware, and has its principal place of business at 6200 Sprint Parkway, Overland Park, KS 66251. Sprint Corporation is doing business in the Eastern District of Texas, and can be served through its registered agent for service, the Corporation Service Company, located at 2711 Centerville Rd., Ste. 400 Wilmington, New Castle, DE 19808.

11. On information and belief, defendant Sprint Communications Company L.P. is a limited partnership existing and organized under the laws of Delaware and has its principal place of business at 8140 Ward Parkway, Kansas City, MO 64114. Sprint Communications Company L.P. is registered to do business in Texas, is doing business in the Eastern District of Texas, and can be served through its registered agent for service, The Prentice-Hall Corporation System, located at 211 E. 7th Street, Suite 620, Austin, Texas 78701.

12. On information and belief, defendant Sprint Solutions Inc. is a corporation existing and organized under the laws of Delaware and has its principal place of business at 701 Brazos St., Ste. 1050, Austin, Texas 78701. Sprint Solutions Inc. is registered to do business in Texas, is doing business in the Eastern District of Texas, and can be served through its registered agent for service, the Corporation Service Company, located at 211 E. 7th Street, Suite 620, Austin, Texas 78701.

13. On information and belief, defendant T-Mobile USA, Inc. is a corporation existing and organized under the laws of Delaware and has its principal place of business at 12920 SE 38th Street, Bellevue, WA 98006. T-Mobile USA, Inc. is registered to do business in Texas, is doing business in the Eastern District of Texas, and can be served through its registered agent for service, the Corporation Service Company, located at 211 E. 7th Street, Suite 620, Austin, Texas 78701.

JURISDICTION AND VENUE

14. This action for patent infringement arises under the patent laws of the United States, Title 35 of the United States Code.

15. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

16. Founded in 2011, Plaintiff Solocron is registered to do business in Texas and is doing business in the Eastern District of Texas. Solocron's flagship product, Loopdoodle, which is one embodiment of the inventions in the Patents-in-Suit, was substantially developed in Tyler, Texas, and is currently offered for sale in Tyler, Texas. Solocron continues to conduct research and development activities in Tyler, Texas. Solocron stores documents, including documents pertaining to this litigation, the Patents-in-Suit, corporate formation, email servers, and Loopdoodle in Tyler, Texas. Solocron currently employs five (5) employees in its Tyler, Texas office, including its general manager, Joshua Ebright, who is a full-time Tyler resident.

17. This Court has general and specific personal jurisdiction over defendant Verizon Communications Inc. Verizon Communications Inc. is registered to do business in Texas, and has identified CT Corporation System, 350 N. St. Paul St., Ste. 2900, Dallas, Texas 75201-4234 as its registered agent. Verizon Communications Inc. has substantial contacts with the forum as a consequence of conducting substantial business in the State of Texas and within this district. Verizon Communications Inc. is the parent corporation of Cellco Partnerships d.b.a. Verizon Wireless, a wholly-owned subsidiary, which is also doing business in Texas. On information and belief, Verizon Communications Inc., individually or through joint and concerted action through its operating subsidiaries: maintains retail store locations within Texas and this district; transacts business in Texas and/or in this district, including through the retail locations maintained within Texas and this district; offers for sale, sells, and advertises its products and services utilizing the claimed systems and methods with and for customers residing in Texas, including within this district; and provides products and services, including mobile device products and services, directly to consumers in Texas, including within this district. As detailed

below, Verizon Communications Inc. has committed and continues to commit acts of patent infringement in Texas and this district.

18. This Court has general and specific personal jurisdiction over defendant Cellco Partnerships d.b.a. Verizon Wireless. Cellco Partnerships d.b.a. Verizon Wireless has substantial contacts with the forum as a consequence of conducting substantial business in the State of Texas and within this district. Cellco Partnerships d.b.a. Verizon Wireless is a wholly-owned subsidiary of Verizon Communications Inc. On information and belief, Cellco Partnerships d.b.a. Verizon Wireless, individually or through joint and concerted action with its parent corporation, Verizon Communications Inc.: maintains retail store locations within Texas and this district; transacts business in Texas and/or in this district, including through the retail store locations maintained within Texas and this district; offers for sale, sells, and advertises its products and services utilizing the claimed systems and methods with and for customers residing in Texas, including within this district; and provides products and services, including mobile device products and services, directly to consumers in Texas, including within this district. As further detailed below, Cellco Partnerships d.b.a. Verizon Wireless has committed and continues to commit acts of patent infringement in Texas and this district.

19. This Court has general and specific personal jurisdiction over defendant AT&T Inc. AT&T Inc. is registered to do business in Texas, and has identified CT Corporation System, 350 N. St. Paul St., Ste. 2900, Dallas, Texas 75201-4234 as its registered agent. AT&T Inc. has substantial contacts with the forum as a consequence of conducting substantial business in the State of Texas and within this district. AT&T Inc. is the parent corporation of AT&T Mobility LLC, a wholly-owned subsidiary, which is also registered to do business in Texas. On information and belief, AT&T Inc., individually or through joint and concerted action through its

operating subsidiaries: maintains retail store locations within Texas and this district; transacts business in Texas and/or in this district, including through the retail locations maintained within Texas and this district; offers for sale, sells, and advertises its products and services utilizing the claimed systems and methods with and for customers residing in Texas, including within this district; and provides products and services, including mobile device products and services, directly to consumers in Texas, including within this district. As detailed below, AT&T Inc. has committed and continues to commit acts of patent infringement in Texas and this district.

20. This Court has general and specific personal jurisdiction over AT&T Mobility LLC. AT&T Mobility LLC is registered to do business in Texas, and has identified CT Corporation System, 350 N. St. Paul St., Ste. 2900, Dallas, Texas 75201-4234 as its registered agent. AT&T Mobility LLC has substantial contacts with the forum as a consequence of conducting substantial business in the State of Texas and within this district. AT&T Mobility LLC is a wholly-owned subsidiary of AT&T Inc. On information and belief, AT&T Mobility LLC, individually or through joint and concerted action with its parent corporation, AT&T Inc.: maintains retail store locations within Texas and this district; transacts business in Texas and/or in this district, including through the retail store locations maintained within Texas and this district; offers for sale, sells, and advertises its products and services utilizing the claimed systems and methods with and for customers residing in Texas, including within this district; and provides products and services, including mobile device products and services, directly to consumers in Texas, including within this district. As further detailed below, AT&T Mobility LLC has committed and continues to commit acts of patent infringement in Texas and this district.

21. This Court has general and specific personal jurisdiction over defendant Sprint Corporation, formerly known as Sprint Nextel Corporation. Sprint Corporation has substantial contacts with the forum as a consequence of conducting substantial business in the State of Texas and within this district. Sprint Corporation is the parent corporation of Defendants Sprint Communications Company L.P. and Sprint Solutions Inc., subsidiaries doing and registered to do business in Texas. On information and belief, Sprint Corporation, individually or through joint and concerted action through its operating subsidiaries: maintains retail store locations within Texas and this district; transacts business in Texas and/or in this district, including through the retail locations maintained within Texas and this district; offers for sale, sells, and advertises its products and services utilizing the claimed systems and methods with and for customers residing in Texas, including within this district; and provides products and services, including mobile device products and services, directly to consumers in Texas, including within this district. As detailed below, Sprint Corporation has committed and continues to commit acts of patent infringement in Texas and this district.

22. This Court has general and specific personal jurisdiction over Sprint Communications Company L.P. Sprint Communications Company L.P. is registered to do business in Texas, and has identified The Prentice-Hall Corporation System, located at 211 E. 7th Street, Suite 620, Austin, Texas 78701 as its registered agent. Sprint Communications Company L.P. has substantial contacts with the forum as a consequence of conducting substantial business in the State of Texas and within this district. Sprint Communications Company L.P. is a wholly-owned subsidiary of Sprint Corporation. On information and belief, Sprint Communications Company L.P., individually or through joint and concerted action with its parent corporation, Sprint Corporation: maintains retail store locations within Texas and this district; transacts

business in Texas and/or in this district, including through the retail store locations maintained within Texas and this district; offers for sale, sells, and advertises its products and services utilizing the claimed systems and methods with and for customers residing in Texas, including within this district; and provides products and services, including mobile device products and services, directly to consumers in Texas, including within this district. As further detailed below, Sprint Communications Company L.P. has committed and continues to commit acts of patent infringement in Texas and this district.

23. This Court has general and specific personal jurisdiction over Sprint Solutions Inc. Sprint Solutions Inc. is registered to do business in Texas, and has identified the Corporation Service Company, located at 211 E. 7th Street, Suite 620, Austin, Texas 78701 as its registered agent. Sprint Solutions Inc. has substantial contacts with the forum as a consequence of conducting substantial business in the State of Texas and within this district. Sprint Solutions Inc. is a wholly-owned subsidiary of Sprint Corporation. On information and belief, Sprint Solutions Inc., individually or through joint and concerted action with its parent corporation, Sprint Corporation: maintains retail store locations within Texas and this district; transacts business in Texas and/or in this district, including through the retail store locations maintained within Texas and this district; offers for sale, sells, and advertises its products and services utilizing the claimed systems and methods with and for customers residing in Texas, including within this district; and provides products and services, including mobile device products and services, directly to consumers in Texas, including within this district. As further detailed below, Sprint Solutions Inc. has committed and continues to commit acts of patent infringement in Texas and this district.

24. This Court has general and specific personal jurisdiction over defendant T-Mobile USA, Inc. T-Mobile USA, Inc. is registered to do business in Texas, and has identified the Corporation Service Company, located at 211 E. 7th Street, Suite 620, Austin, Texas 78701 as its registered agent. T-Mobile USA, Inc. has substantial contacts with the forum as a consequence of conducting substantial business in the State of Texas and within this district. On information and belief, T-Mobile USA, Inc., individually or through joint and concerted action through its operating subsidiaries: maintains retail store locations within Texas and this district; transacts business in Texas and/or in this district, including through the retail locations maintained within Texas and this district; offers for sale, sells, and advertises its products and services utilizing the claimed systems and methods with and for customers residing in Texas, including within this district; and provides products and services, including mobile device products and services, directly to consumers in Texas, including within this district. As detailed below, T-Mobile USA, Inc. has committed and continues to commit acts of patent infringement in Texas and this district.

25. Venue is proper in this district under 28 U.S.C. §§ 1391(b) and (c), and 1400(b) because a substantial part of the events giving rise to the claims against Defendants occurred and are occurring in this district, and/or because Defendants have regular and established practices of business in this district and have committed and are committing acts of infringement in this district.

JOINDER

26. Joinder is proper under 35 U.S.C. § 299 because questions of fact common to all Defendants will arise in the action. As detailed below, Solocron alleges patent infringement by Defendants in connection with (among other things) their making, using, selling, and/or offering to sell systems, and their practice of methods, for delivery of Mobile Messaging Service

(“MMS”) messages to their mobile phone subscribers. The exchange of information between an MMS client device (such as a mobile phone) and one or more Mobile Messaging Service Centers (“MMSCs”) for the purpose of determining whether, based on the capabilities of the client device, to modify the content of an MMS message so that it is appropriate to the capabilities of the client device, is defined in large part by common standards. These standards include, *e.g.*, MMS 1.2 Conformance Document OMA-MMS-CONF-v1_2-20050301-A, and MMS 1.3 Conformance Document OMA-TS-MMS-CONF-V1_3-20110913-A. The operation of Defendants’ hardware and software in accordance with these standards constitutes important evidence of infringement of Solocron’s Patents, and presents significant questions of fact common to all Defendants.

27. Joinder is further proper because some of Defendants’ infringement arises out of the same transaction, occurrence, or series of transactions or occurrences relating to the making, using, importing into the United States, offering for sale, or selling of the same accused product or process, for example in the case in which a customer of one Defendant transmits an MMS message to the customer of another Defendant, such that the messaging systems of one Defendant receives such a message from the messaging systems of another Defendant.

THE ASSERTED PATENTS

28. On December 17, 2002, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 6,496,692 B1 (“the ’692 Patent”), entitled “Methods and Apparatuses for Programming User-Defined Information Into Electronic Devices,” to Michael E. Shanahan. A copy of the ’692 Patent is attached to the Complaint as Exhibit A.

29. The '692 Patent is directed to methods for programming customized information such as user-selected audio, video, or Internet information into a programmable device including devices such as wireless telephones and personal digital assistants.

30. On August 14, 2007, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 7,257,395 B2 ("the '395 Patent"), entitled "Methods and Apparatuses for Programming User-Defined Information Into Electronic Devices," to Michael E. Shanahan. A copy of the '395 Patent is attached to the Complaint as Exhibit B.

31. The '395 Patent is directed to systems for programming customized information such as user-selected audio, video, or Internet information into a programmable device including devices such as wireless telephones and personal digital assistants.

32. On November 13, 2007, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 7,295,864 B2 ("the '864 Patent"), entitled "Methods and Apparatuses for Programming User-Defined Information Into Electronic Devices," to Michael E. Shanahan. A copy of the '864 Patent is attached to the Complaint as Exhibit C.

33. The '864 Patent is directed to systems and methods for programming customized information such as user-selected audio, video, or Internet information into a programmable device including devices such as wireless telephones and personal digital assistants.

34. On January 15, 2008, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 7,319,866 B2 ("the '866 Patent"), entitled "Methods and Apparatuses for Programming User-Defined Information Into Electronic Devices," to Michael E. Shanahan. A copy of the '866 Patent is attached to the Complaint as Exhibit D.

35. The '866 Patent is directed to systems for programming customized information such as user-selected audio, video, or Internet information into a programmable device including devices such as wireless telephones and personal digital assistants.

36. On June 22, 2010, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 7,742,759 B2 ("the '759 Patent"), entitled "Methods and Apparatuses for Programming User-Defined Information Into Electronic Devices," to Michael E. Shanahan. A copy of the '759 Patent is attached to the Complaint as Exhibit E.

37. The '759 Patent is directed to systems and methods for programming customized information such as user-selected audio, video, or Internet information into a programmable device including devices such as wireless telephones and personal digital assistants.

38. On August 21, 2012, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 8,249,572 B2 ("the '572 Patent"), entitled "Methods and Apparatuses for Programming User-Defined Information Into Electronic Devices," to Michael E. Shanahan. A copy of the '572 Patent is attached to the Complaint as Exhibit F.

39. The '572 Patent is directed to methods for programming customized information such as user-selected audio, video, or Internet information into a programmable device including devices such as wireless telephones and personal digital assistants.

40. On November 26, 2013, the United States Patent and Trademark Office duly and legally issued U.S. Patent No. 8,594,651 B2 ("the '651 Patent"), entitled "Methods and Apparatuses for Programming User-Defined Information Into Electronic Devices," to Michael E. Shanahan. A copy of the '651 Patent is attached to the Complaint as Exhibit G.

41. The '651 Patent is directed to systems and methods for programming customized information such as user-selected audio, video, or Internet information into a programmable device including devices such as wireless telephones and personal digital assistants.

42. Solocron is the owner by assignment of all rights, title, and interest to and in the '692, '395, '864, '866, '759, '572, and '651 Patents (collectively, the "Asserted Patents").

BACKGROUND ON THE ACCUSED TECHNOLOGIES: RINGTONES

43. Defendants provide to their customers, including customers in this district, ringtone products and services including ringtone stores. Defendants' ringtone stores provide the ability for Defendants' customers to connect over a network, such as from a personal computer or mobile phone over the Internet and/or a cellular network, to an interactive store displaying a variety of audio files that Defendants' customers can browse through and purchase from. These audio files can be received by Defendants' customers, and programmed into their mobile phones, for use as audio notifications of incoming telephone calls.

44. For example, Verizon provides ringtone stores including but not limited to the Verizon Media Store.

45. For example, AT&T provides ringtone stores including but not limited to the AppCenter and "Shop Music" ringtone stores.

46. For example, Sprint provides ringtone stores including but not limited to the "Sprint Music Plus" store.

47. For example, T-Mobile provides ringtone stores including but not limited to the "Megatones," "HiFi Ringtones," and "Callertunes" stores.

BACKGROUND ON THE ACCUSED TECHNOLOGIES:

MOBILE MESSAGING SERVICE (“MMS”)

48. Defendants also provide to their customers, including customers in this district, Mobile Messaging Service (or “MMS”) services. Defendants’ MMS services allow Defendants’ customers to, for example, send text, picture, video, and/or audio messages from the customer’s mobile device to another mobile device provided by the same or a different Defendant. Defendants’ MMS services also include, for example, the ability to modify the content of an MMS message so that it is appropriate to the capabilities of, for example, a customer’s MMS client device (such as a mobile phone) using one or more Mobile Messaging Service Centers (“MMSCs”) and associated hardware and software that exchange information with the MMS client device.

COUNT I AGAINST VERIZON:

INFRINGEMENT OF U.S. PATENT NO. 6,496,692

49. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein.

50. On information and belief, Verizon has and continues to infringe one or more claims of the ’692 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by performing in the United States and without authority every step of the patented invention by using products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as ringtone products and services, and hardware and software components of servers and other network infrastructure that enable and/or make use of these products and services.

51. Solocron has suffered damages as a result of Verizon's infringement of the '692 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting Verizon, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the '692 Patent.

COUNT II AGAINST VERIZON:

INFRINGEMENT OF U.S. PATENT NO. 7,257,395

52. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein.

53. On information and belief, Verizon has and continues to infringe one or more claims of the '395 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, selling, and/or offering to sell in the United States and without authority products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as ringtone products and services, and servers and other network infrastructure that enable and/or make use of these products and services.

54. Solocron has suffered damages as a result of Verizon's infringement of the '395 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting Verizon, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the '395 Patent.

COUNT III AGAINST VERIZON:

INFRINGEMENT OF U.S. PATENT NO. 7,295,864

55. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein.

56. On information and belief, Verizon has and continues to infringe one or more claims of the '864 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, selling, and/or offering to sell in the United States and without authority, and by performing in the United States and without authority every step of the patented invention by using, products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as ringtone products and services and websites, servers, and other network infrastructure that enable and/or make use of these products and services.

57. Solocron has suffered damages as a result of Verizon's infringement of the '864 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting Verizon, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the '864 Patent.

COUNT IV AGAINST VERIZON:

INFRINGEMENT OF U.S. PATENT NO. 7,319,866

58. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein.

59. On information and belief, Verizon has and continues to infringe one or more claims of the '866 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, selling, and/or offering to sell in the United States and without authority products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as ringtone products and services, and servers and other network infrastructure that enable and/or make use of these products and services.

60. Solocron has suffered damages as a result of Verizon's infringement of the '866 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting Verizon, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the '866 Patent.

COUNT V AGAINST VERIZON:

INFRINGEMENT OF U.S. PATENT NO. 7,742,759

61. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein.

62. On information and belief, Verizon has and continues to infringe one or more claims of the '759 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, selling, and/or offering to sell in the United States and without authority, and by performing in the United States and without authority every step of the patented invention by using, products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as Multimedia Messaging Service ("MMS") services, ringtone products and services, and servers and other network infrastructure (such as a Multimedia Messaging Service Center or "MMSC") that enable and/or make use of these products and services.

63. Solocron has suffered damages as a result of Verizon's infringement of the '759 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting Verizon, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the '759 Patent.

COUNT VI AGAINST VERIZON:

INFRINGEMENT OF U.S. PATENT NO. 8,249,572

64. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein

65. On information and belief, Verizon has and continues to infringe one or more claims of the '572 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by performing in the United States and without authority every step of the patented invention by using products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as ringtone products and services, and servers and other network infrastructure that enable and/or make use of these products and services.

66. Solocron has suffered damages as a result of Verizon's infringement of the '572 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting Verizon, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the '572 Patent.

COUNT VII AGAINST VERIZON:

INFRINGEMENT OF U.S. PATENT NO. 8,594,651

67. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein.

68. On information and belief, Verizon has and continues to infringe one or more claims of the '651 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, selling, and/or offering to sell in the United States and without authority, and by performing in the United States and without authority every step of the

patented invention by using, products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as Multimedia Messaging Service (“MMS”) services, ringtone products and services, and servers and other network infrastructure (such as a Multimedia Messaging Service Center or “MMSC”) that enable and/or make use of these products and services.

69. Solocron has suffered damages as a result of Verizon’s infringement of the ’651 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting Verizon, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the ’651 Patent.

COUNT I AGAINST AT&T:

INFRINGEMENT OF U.S. PATENT NO. 6,496,692

70. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein.

71. On information and belief, AT&T has and continues to infringe one or more claims of the ’692 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by performing in the United States and without authority every step of the patented invention by using products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as ringtone products and services, and hardware and software components of servers and other network infrastructure that enable and/or make use of these products and services.

72. Solocron has suffered damages as a result of AT&T's infringement of the '692 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting AT&T, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the '692 Patent.

COUNT II AGAINST AT&T:

INFRINGEMENT OF U.S. PATENT NO. 7,257,395

73. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein.

74. On information and belief, AT&T has and continues to infringe one or more claims of the '395 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, selling, and/or offering to sell in the United States and without authority products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as ringtone products and services, and servers and other network infrastructure that enable and/or make use of these products and services.

75. Solocron has suffered damages as a result of AT&T's infringement of the '395 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting AT&T, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the '395 Patent.

COUNT III AGAINST AT&T:

INFRINGEMENT OF U.S. PATENT NO. 7,295,864

76. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein.

77. On information and belief, AT&T has and continues to infringe one or more claims of the '864 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, selling, and/or offering to sell in the United States and without authority, and by performing in the United States and without authority every step of the patented invention by using, products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as ringtone products and services and websites, servers, and other network infrastructure that enable and/or make use of these products and services.

78. Solocron has suffered damages as a result of AT&T's infringement of the '864 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting AT&T, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the '864 Patent.

COUNT IV AGAINST AT&T:

INFRINGEMENT OF U.S. PATENT NO. 7,319,866

79. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein.

80. On information and belief, AT&T has and continues to infringe one or more claims of the '866 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, selling, and/or offering to sell in the United States and without authority products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as ringtone products and services, and servers and other network infrastructure that enable and/or make use of these products and services.

81. Solocron has suffered damages as a result of AT&T's infringement of the '866 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting AT&T, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the '866 Patent.

COUNT V AGAINST AT&T:

INFRINGEMENT OF U.S. PATENT NO. 7,742,759

82. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein.

83. On information and belief, AT&T has and continues to infringe one or more claims of the '759 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, selling, and/or offering to sell in the United States and without authority, and by performing in the United States and without authority every step of the patented invention by using products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as Multimedia Messaging Service ("MMS") services, ringtone products and services, and servers and other network infrastructure (such as a Multimedia Messaging Service Center or "MMSC") that enable and/or make use of these products and services.

84. Solocron has suffered damages as a result of AT&T's infringement of the '759 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting AT&T, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the '759 Patent.

COUNT VI AGAINST AT&T:

INFRINGEMENT OF U.S. PATENT NO. 8,249,572

85. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein

86. On information and belief, AT&T has and continues to infringe one or more claims of the '572 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by performing in the United States and without authority every step of the patented invention by using, products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as ringtone products and services, and servers and other network infrastructure that enable and/or make use of these products and services.

87. Solocron has suffered damages as a result of AT&T's infringement of the '572 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting AT&T, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the '572 Patent.

COUNT VII AGAINST AT&T:

INFRINGEMENT OF U.S. PATENT NO. 8,594,651

88. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein.

89. On information and belief, AT&T has and continues to infringe one or more claims of the '651 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, selling, and/or offering to sell in the United States and without authority, and by performing in the United States and without authority every step of the

patented invention by using, products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as Multimedia Messaging Service (“MMS”) services, ringtone products and services, and servers and other network infrastructure (such as a Multimedia Messaging Service Center or “MMSC”) that enable and/or make use of these products and services.

90. Solocron has suffered damages as a result of AT&T’s infringement of the ’651 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting AT&T, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the ’651 Patent.

COUNT I AGAINST SPRINT:

INFRINGEMENT OF U.S. PATENT NO. 6,496,692

91. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein.

92. On information and belief, Sprint has and continues to infringe one or more claims of the ’692 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by performing in the United States and without authority every step of the patented invention by using products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as ringtone products and services, and hardware and software components of servers and other network infrastructure that enable and/or make use of these products and services.

93. Solocron has suffered damages as a result of Sprint's infringement of the '692 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting Sprint, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the '692 Patent.

COUNT II AGAINST SPRINT:

INFRINGEMENT OF U.S. PATENT NO. 7,257,395

94. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein.

95. On information and belief, Sprint has and continues to infringe one or more claims of the '395 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, selling, and/or offering to sell in the United States and without authority products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as ringtone products and services, and servers and other network infrastructure that enable and/or make use of these products and services.

96. Solocron has suffered damages as a result of Sprint's infringement of the '395 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting Sprint, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the '395 Patent.

COUNT III AGAINST SPRINT:

INFRINGEMENT OF U.S. PATENT NO. 7,295,864

97. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein.

98. On information and belief, Sprint has and continues to infringe one or more claims of the '864 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, selling, and/or offering to sell in the United States and without authority, and by performing in the United States and without authority every step of the patented invention by using products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as ringtone products and services and websites, servers, and other network infrastructure that enable and/or make use of these products and services.

99. Solocron has suffered damages as a result of Sprint's infringement of the '864 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting Sprint, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the '864 Patent.

COUNT IV AGAINST SPRINT:

INFRINGEMENT OF U.S. PATENT NO. 7,319,866

100. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein.

101. On information and belief, Sprint has and continues to infringe one or more claims of the '866 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, selling, and/or offering to sell in the United States and without authority products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as ringtone products and services, and servers and other network infrastructure that enable and/or make use of these products and services.

102. Solocron has suffered damages as a result of Sprint's infringement of the '866 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting Sprint, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the '866 Patent.

COUNT V AGAINST SPRINT:

INFRINGEMENT OF U.S. PATENT NO. 7,742,759

103. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein.

104. On information and belief, Sprint has and continues to infringe one or more claims of the '759 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, selling, and/or offering to sell in the United States and without authority, and by performing in the United States and without authority every step of the patented invention by using products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as Multimedia Messaging Service ("MMS") services, ringtone products and services, and servers and other network infrastructure (such as a Multimedia Messaging Service Center or "MMSC") that enable and/or make use of these products and services.

105. Solocron has suffered damages as a result of Sprint's infringement of the '759 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting Sprint, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the '759 Patent.

COUNT VI AGAINST SPRINT:

INFRINGEMENT OF U.S. PATENT NO. 8,249,572

106. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein

107. On information and belief, Sprint has and continues to infringe one or more claims of the '572 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by performing in the United States and without authority every step of the patented invention by using products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as ringtone products and services, and servers and other network infrastructure that enable and/or make use of these products and services.

108. Solocron has suffered damages as a result of Sprint's infringement of the '572 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting Sprint, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the '572 Patent.

COUNT VII AGAINST SPRINT:

INFRINGEMENT OF U.S. PATENT NO. 8,594,651

109. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein.

110. On information and belief, Sprint has and continues to infringe one or more claims of the '651 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, selling, and/or offering to sell in the United States and without authority, and by performing in the United States and without authority every step of the

patented invention by using products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as Multimedia Messaging Service (“MMS”) services, ringtone products and services, and servers and other network infrastructure (such as a Multimedia Messaging Service Center or “MMSC”) that enable and/or make use of these products and services.

111. Solocron has suffered damages as a result of Sprint’s infringement of the ’651 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting Sprint, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the ’651 Patent.

COUNT I AGAINST T-MOBILE:

INFRINGEMENT OF U.S. PATENT NO. 6,496,692

112. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein.

113. On information and belief, T-Mobile has and continues to infringe one or more claims of the ’692 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by performing in the United States and without authority every step of the patented invention by using products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as ringtone products and services, and hardware and software components of servers and other network infrastructure that enable and/or make use of these products and services.

114. Solocron has suffered damages as a result of T-Mobile's infringement of the '692 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting T-Mobile, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the '692 Patent.

COUNT II AGAINST T-MOBILE:

INFRINGEMENT OF U.S. PATENT NO. 7,257,395

115. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein.

116. On information and belief, T-Mobile has and continues to infringe one or more claims of the '395 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, selling, and/or offering to sell in the United States and without authority products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as ringtone products and services, and servers and other network infrastructure that enable and/or make use of these products and services.

117. Solocron has suffered damages as a result of T-Mobile's infringement of the '395 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting T-Mobile, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the '395 Patent.

COUNT III AGAINST T-MOBILE:

INFRINGEMENT OF U.S. PATENT NO. 7,295,864

118. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein.

119. On information and belief, T-Mobile has and continues to infringe one or more claims of the '864 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, selling, and/or offering to sell in the United States and without authority, and by performing in the United States and without authority every step of the patented invention by using products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as ringtone products and services and websites, servers, and other network infrastructure that enable and/or make use of these products and services.

120. Solocron has suffered damages as a result of T-Mobile's infringement of the '864 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting T-Mobile, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the '864 Patent.

COUNT IV AGAINST T-MOBILE:

INFRINGEMENT OF U.S. PATENT NO. 7,319,866

121. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein.

122. On information and belief, T-Mobile has and continues to infringe one or more claims of the '866 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, selling, and/or offering to sell in the United States and without authority products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as ringtone products and services, and servers and other network infrastructure that enable and/or make use of these products and services.

123. Solocron has suffered damages as a result of T-Mobile's infringement of the '866 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting T-Mobile, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the '866 Patent.

COUNT V AGAINST T-MOBILE:

INFRINGEMENT OF U.S. PATENT NO. 7,742,759

124. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein.

125. On information and belief, T-Mobile has and continues to infringe one or more claims of the '759 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, selling, and/or offering to sell in the United States and without authority, and by performing in the United States and without authority every step of the patented invention by using products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as Multimedia Messaging Service ("MMS") services, ringtone products and services, and servers and other network infrastructure (such as a Multimedia Messaging Service Center or "MMSC") that enable and/or make use of these products and services.

126. Solocron has suffered damages as a result of T-Mobile's infringement of the '759 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting T-Mobile, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the '759 Patent.

COUNT VI AGAINST T-MOBILE:

INFRINGEMENT OF U.S. PATENT NO. 8,249,572

127. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein

128. On information and belief, T-Mobile has and continues to infringe one or more claims of the '572 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by performing in the United States and without authority every step of the patented invention by using products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as ringtone products and services, and servers and other network infrastructure that enable and/or make use of these products and services.

129. Solocron has suffered damages as a result of T-Mobile's infringement of the '572 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting T-Mobile, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the '572 Patent.

COUNT VII AGAINST T-MOBILE:

INFRINGEMENT OF U.S. PATENT NO. 8,594,651

130. Solocron incorporates and realleges paragraphs 1 – 48 above as if fully set forth herein.

131. On information and belief, T-Mobile has and continues to infringe one or more claims of the '651 Patent pursuant to 35 U.S.C. § 271(a), literally or under the doctrine of equivalents, by making, using, selling, and/or offering to sell in the United States and without authority, and by performing in the United States and without authority every step of the

patented invention by using products, devices, systems, and/or components of systems that embody the patented invention, including (but not limited to), for example, mobile device products and services such as Multimedia Messaging Service (“MMS”) services, ringtone products and services, and servers and other network infrastructure (such as a Multimedia Messaging Service Center or “MMSC”) that enable and/or make use of these products and services.

132. Solocron has suffered damages as a result of T-Mobile’s infringement of the ’651 Patent. In addition, Solocron will continue to suffer severe and irreparable harm unless this Court issues a permanent injunction prohibiting T-Mobile, its agents, servants, employees, representatives, and all others acting in active concert therewith from infringing the ’651 Patent.

PRAYER FOR RELIEF

For the above reasons, Solocron respectfully requests that this Court grant the following relief in favor of Solocron and against Verizon:

- (a) A judgment in favor of Solocron that Verizon has infringed (either literally or under the doctrine of equivalents) one or more claims of the Asserted Patents;
- (b) A permanent injunction enjoining Verizon and its officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert or participation with Verizon, from infringing the Asserted Patents;
- (c) A judgment and order requiring Verizon to pay Solocron its damages, costs, expenses, and pre-judgment and post-judgment interest for Verizon’s infringement of the Asserted Patents;
- (d) A judgment and order finding that this is an exceptional case within the meaning

of 35 U.S.C. § 285 and awarding Solocron its reasonable attorney fees; and

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

For the above reasons, Solocron respectfully requests that this Court grant the following relief in favor of Solocron and against AT&T:

- (f) A judgment in favor of Solocron that AT&T has infringed (either literally or under the doctrine of equivalents) one or more claims of the Asserted Patents;
- (g) A permanent injunction enjoining AT&T and its officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert or participation with AT&T, from infringing the Asserted Patents;
- (h) A judgment and order requiring AT&T to pay Solocron its damages, costs, expenses, and pre-judgment and post-judgment interest for AT&T's infringement of the Asserted Patents;
- (i) A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding Solocron its reasonable attorney fees; and
- (j) Any and all such other relief as the Court deems just and proper.

For the above reasons, Solocron respectfully requests that this Court grant the following relief in favor of Solocron and against Sprint:

- (k) A judgment in favor of Solocron that Sprint has infringed (either literally or under the doctrine of equivalents) one or more claims of the Asserted Patents;
- (l) A permanent injunction enjoining Sprint and its officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert or participation with Sprint, from infringing the

Asserted Patents;

- (m) A judgment and order requiring Sprint to pay Solocron its damages, costs, expenses, and pre-judgment and post-judgment interest for Sprint's infringement of the Asserted Patents;
- (n) A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding Solocron its reasonable attorney fees; and
- (o) Any and all such other relief as the Court deems just and proper.

For the above reasons, Solocron respectfully requests that this Court grant the following relief in favor of Solocron and against T-Mobile:

- (p) A judgment in favor of Solocron that T-Mobile has infringed (either literally or under the doctrine of equivalents) one or more claims of the Asserted Patents;
- (q) A permanent injunction enjoining T-Mobile and its officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert or participation with T-Mobile, from infringing the Asserted Patents;
- (r) A judgment and order requiring T-Mobile to pay Solocron its damages, costs, expenses, and pre-judgment and post-judgment interest for T-Mobile's infringement of the Asserted Patents;
- (s) A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding Solocron its reasonable attorney fees; and
- (t) Any and all such other relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff Solocron demands a trial by jury of this action.

Dated: December 6, 2013

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