

1 DEVLIN LAW FIRM LLC
2 Alex Chan (SBN 278805)
3 achan@devlinlawfirm.com
4 16219 Flamstead Drive
5 Hacienda Heights, CA 91745
6 Telephone: (302) 449-9010

7 DEVLIN LAW FIRM LLC
8 Timothy Devlin (*pro hac vice* to be filed)
9 tdevlin@devlinlawfirm.com
10 Patrick R. Delaney (*pro hac vice* to be filed)
11 pdelaney@devlinlawfirm.com
12 Mariam Clayton (*pro hac vice* to be filed)
13 mclayton@devlinlawfirm.com
14 1526 Gilpin Avenue
15 Wilmington, Delaware 19806
16 Telephone: (302) 449-9010
17 Facsimile: (302) 353-4251

18 *Attorneys for Plaintiff*
19 *Onscreen Dynamics, LLC*

20 UNITED STATES DISTRICT COURT
21 FOR THE CENTRAL DISTRICT OF CALIFORNIA
22 WESTERN DIVISION

23 ONSCREEN DYNAMICS, LLC,

24 Plaintiff,

25 v.

26 VOLVO CAR USA, LLC,

27 Defendant.

28 Case No.: 2:22-cv-3170

**COMPLAINT FOR PATENT
INFRINGEMENT**

1 Plaintiff Onscreen Dynamics, LLC (“Onscreen” or “Plaintiff”), for its Complaint against
2 Defendant Volvo Car USA, LLC. (“Volvo” or “Defendant”), alleges the following:

3 **NATURE OF THE ACTION**

4 1. This is an action for patent infringement arising under the Patent Laws of the
5 United States, 35 U.S.C. § 1 *et seq.*

6 **THE PARTIES**

7 2. Plaintiff is a limited liability company organized under the laws of the State of
8 Delaware with a place of business at 717 N. Union Street, Wilmington, DE, 19805.

9 3. Upon information and belief Volvo is a corporation organized and existing under
10 the laws of Delaware, with a principal place of business located at 1 Volvo Drive, Rockleigh, NJ
11 07647. Upon information and belief, Volvo sells and offers to sell products and services
12 throughout the United States, including in this judicial district, and introduces products and
13 services into the stream of commerce and that incorporate infringing technology knowing that
14 they would be sold in this judicial district and elsewhere in the United States.

15 **JURISDICTION AND VENUE**

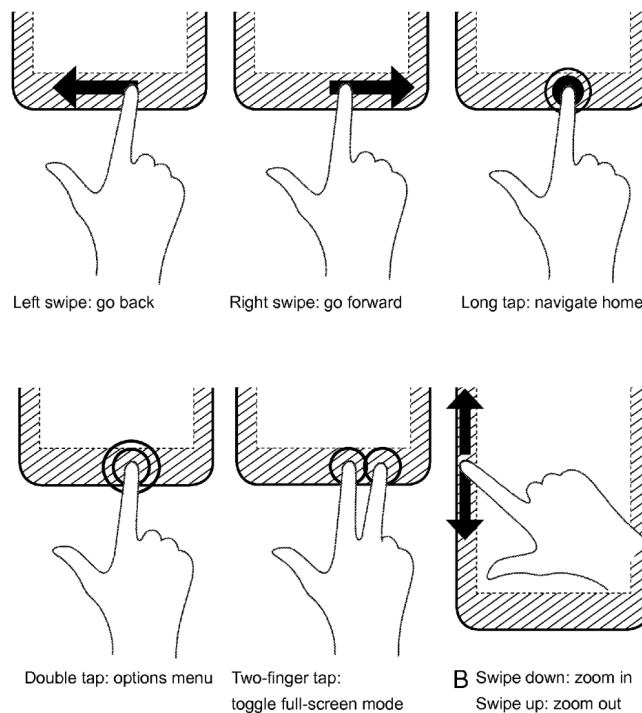
16 4. This is an action for patent infringement arising under the Patent Laws of the
17 United States, Title 35 of the United States Code.

18 5. Venue is proper in this judicial district pursuant to 28 U.S.C. §1400(b). Volvo
19 maintains an established place of business in the state of California and the Central District of
20 California, specifically including Volvo-owned facilities at 700 Via Alondra, Camarillo, CA
21 93012 in this District.

22 6. This Court has personal jurisdiction over Defendant under the laws of California,
23 due at least to its substantial business in California and in this judicial district, directly or through
24 intermediaries, including: (i) at least a portion of the infringements alleged herein; and (ii)
25 regularly doing or soliciting business, engaging in other persistent courses of conduct and/or
26 deriving substantial revenue from goods and services provided to individuals in the State of
27 California.

1 touch-based inputs from a user of the electric device, and a secondary touchscreen display area
2 which can be called a ‘virtual bezel,’ since it may be used to prevent any unintended touch of a
3 user’s hand with the touchscreen display, avoiding an unexpected interaction.” (’917 patent, Ex.
4 A at 2:6-15.)

5 15. The inventions of the ’917 patent resolve technical problems related to how to
6 prevent unintended registering of touching of a touchscreen electronic display, and thereby avoid
7 unintended actions. Those problems also included placing components and controls, for example
8 a camera, a speaker, or sensors to avoid obstruction of the content on the touchscreen display.
9 Those problems further included increasing or maximizing display area while providing
10 functionality of a physical bezel. *See, e.g.*, ’917 patent at 1:21–59.



24 Figure 10

25
26 16. In order to improve maximum possible touchscreen display area that could be
27 available to the user for viewing display content and for interaction the electronic device, the
28 ’917 describes devices and methods for a virtual bezel. For example, the ’917 patent describes

1 an electronic device with a touchscreen display comprising an active touchscreen region and a
2 virtual bezel area. Wherein the active touchscreen region functions to process a first set of
3 touch-based inputs from a user of the electronic device according to a first mode of operation,
4 and the virtual bezel area function to process a second set of touch-based inputs from a user of
5 the electronic device according to a second mode of operation. ('917 patent, Ex. A at Abstract.)

6 17. Among the specific technological improvements to devices and methods for
7 electronic devices with a touchscreen display, the '917 patent describes systems and methods
8 that provide touchscreen display having a virtual bezel for electronic devices. ('917 patent, Ex.
9 A at 1:14-17.)

10 18. The claimed elements and claimed combinations of the '917 patent describes
11 devices, systems, and methods that provide a touchscreen display having a virtual bezel for
12 electronic devices that were not well-understood, routine, and conventional to a skilled artisan in
13 the relevant field.

14 **THE 9,645,663 PATENT**

15 19. On May 9, 2017, U.S. Patent No. 9,645,663 ("the '663 patent"), entitled
16 "Electronic Display with a Virtual Bezel," was duly and legally issued by the United States
17 Patent and Trademark Office.

18 20. Plaintiff is the assignee and owner of the right, title and interest in and to the '663
19 patent, including the right to assert all causes of action arising under said patents and the right to
20 any remedies for infringement of them.

21 21. The '663 patent is valid and enforceable. A true and correct copy of the '663
22 patent is attached hereto as Exhibit B.

23 22. The '663 patent includes 18 claims. ('663 patent, Ex. B. at 9:55-12:45.)

24 23. The '663 patent describes devices, systems, and methods for providing a
25 touchscreen display having a virtual bezel for electronic devices. ('663 patent, Ex. B. at 1:15-
26 20.) As the '663 patent describes the inventions of the '663 patent resolve technical problems
27 related to how to prevent unintended registering of touching of a touchscreen electronic display,
28 and thereby avoiding unintended actions. Those problem also included placing components and

1 controls, for example a camera, a speaker, or sensors to avoid obstruction of the content on the
 2 touchscreen display. Those problems further included increasing or maximizing display area
 3 while providing functionality of a physical bezel. *See, e.g.*, '663 patent at 1:21-59.

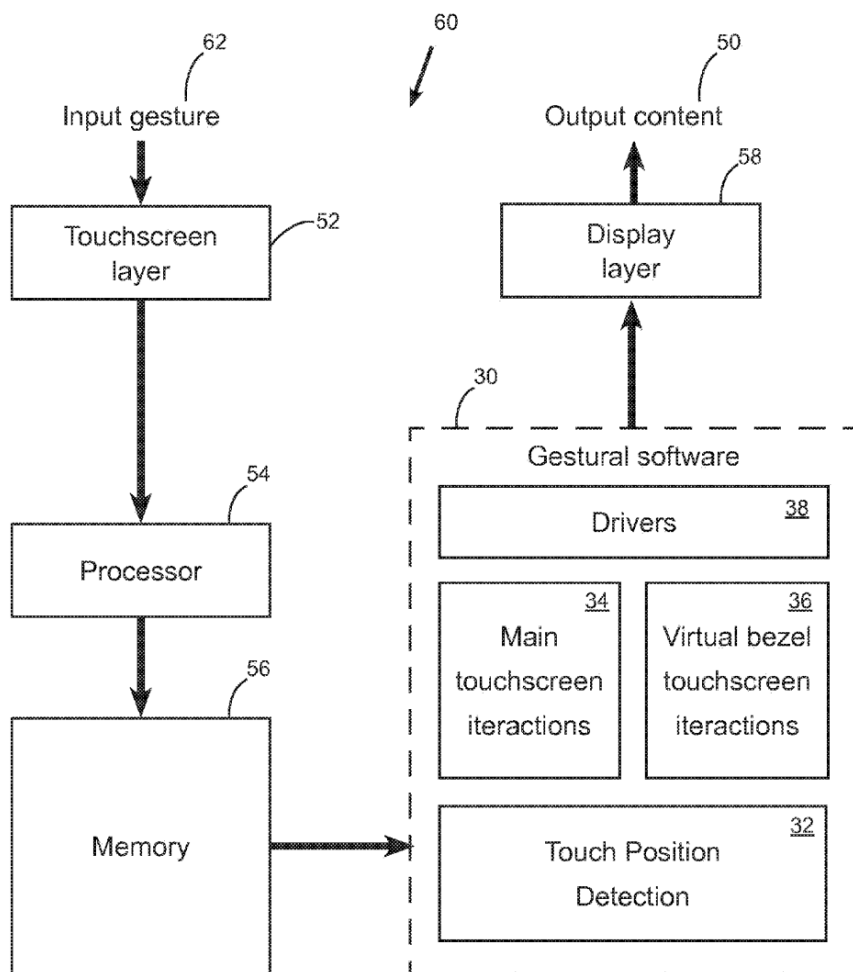


Figure 4

24. Among the specific technology improvements to devices utilizing the vertical
 bezels, the '633 patent describes an active touchscreen region of the display screen having a first
 set of touch-based inputs from the user of the electronic device and a virtual bezel region along
 one or more edges of the display screen and adjacent to the active screen region, the virtual bezel

1 region having a touchscreen layer with a second mode of response to a second set of touch-based
2 inputs from the user of the electronic device. ('663 patent, Ex. B at 9:55-10:15.)

3 25. The claimed elements and claimed combinations of the '663 patent were not well-
4 understood, routine, and conventional to a skilled artisan in the relevant field.

5 **ONSCREEN'S CLAIMS ARE PATENT ELIGIBLE**

6 26. The claims in both of the asserted patents are directed to patent eligible subject
7 matter.

8 27. The asserted patents are directed to providing to a display screen having a virtual
9 bezel area and an active touchscreen region, both of which display portions of content but have
10 different modes of response to certain touch-based inputs. Moreover, the prior art includes touch
11 screen displays, yet the claims of the asserted patents were deemed novel and non-obvious,
12 demonstrating (among other reasons) the non-conventionality of the technology described and
13 claimed in the asserted patents.

14 28. The technological improvements described and claimed in the asserted patents
15 were not conventional or generic at the time of their invention, but rather required novel and non-
16 obvious solutions to problems and shortcomings in the art at the time. *See, e.g., '917 patent at*
17 *1:21-9:41. See also, e.g., '663 patent, Ex. B at 1:21-9:41.*

18 29. The inventions claimed in the asserted patents cover more than just the
19 performance of well-understood, routine or conventional activities known in the art. *See, e.g.,*
20 *'917 patent at 1:21-9:41.* For example, claim 1 of the '917 patent is directed to a display screen
21 having a virtual bezel area and an active touchscreen region, both of which display portions of
22 content but have different modes of response to certain touch-based inputs. *See also, e.g., '663*
23 *patent, Ex. B at 1:21-9:41.*

24 30. The asserted patents claim inventions that provide technological solutions to
25 technological problems. The written description of the asserted patents describes in technical
26 detail each of the elements of the claims, including a display screen having a virtual bezel area
27 and an active touchscreen region, both of which display portions of content but have different
28 modes of response to certain touch-based inputs.

1 31. Each of the claims of the asserted patents capture the improvements described and
2 illustrated in the specification. For example, claim 1 of the '917 patent is directed to a display
3 screen having a virtual bezel area and an active touchscreen region, both of which display portions
4 of content but have different modes of response to certain touch-based inputs. For further
5 example, claim 1 of the '663 patent is directed to a display screen having a virtual bezel region
6 and an active touchscreen region, both of which display portions of content but have different
7 modes of response to certain touch-based inputs.

8 32. The written description describes each of the elements such that persons of ordinary
9 skill in the art understand what the claims and their elements cover and how the non-conventional
10 and non-generic combination of claim elements differ markedly from, and improved upon, the
11 art. *See, e.g.*, '917 patent at 1:21-9:41. For example, claim 1 of the '917 patent is directed to a
12 display screen having a virtual bezel area and an active touchscreen region, both of which
13 display portions of content but have different modes of response to certain touch-based inputs.
14 *See also, e.g.*, '663 patent at 1:21-9:41.

15 33. Technology leaders including Microsoft Technology Licensing LLC, Amazon
16 Technologies, Inc., Samsung Electronics Co., Ltd., and the USPTO have cited the '917 patent as
17 a reference over 20 times. *See* <https://patents.google.com/patent/US9395917B2/en> (last accessed
18 April 13, 2021); *see also*, <https://patents.google.com/patent/US9645663B2/en> (last accessed
19 April 13, 2021); 37 CFR 1.104, Nature of Examination (“the examiner must cite the best
20 references at his or her command.”)

21 34. Viewed in light of the specification of the asserted patents, the claims are not
22 directed to basic tools of scientific and technological work, nor are they directed to a fundamental
23 economic practice. *See, e.g.*, '917 patent at 1:21-12:21. For example, claim 1 of the '917 patent
24 is directed to a display screen having a virtual bezel area and an active touchscreen region, both
25 of which display portions of content but have different modes of response to certain touch-based
26 inputs. For further example, claim 1 of the '663 patent is directed to a display screen having a
27 virtual bezel region and an active touchscreen region, both of which display portions of content
28

1 but have different modes of response to certain touch-based inputs. *See, e.g.*, '663 patent at
2 1:21-12:44.

3 35. The claims of the asserted patents are not directed to the use of an abstract
4 mathematical formula. *See, e.g.*, '917 patent at 1:21-12:21. For example, claim 1 of the '917
5 patent is directed to a display screen having a virtual bezel area and an active touchscreen region,
6 both of which display portions of content but have different modes of response to certain touch-
7 based inputs. For further example, claim 1 of the '663 patent is directed to a display screen
8 having a virtual bezel region and an active touchscreen region, both of which display portions of
9 content but have different modes of response to certain touch-based inputs. *See, e.g.*, '663 patent
10 at 1:21-12:44.

11 36. The claims of the asserted patents are not directed to the use of a general-purpose
12 computer. *See, e.g.*, '917 patent at 1:21-12:21. For example, claim 1 of the '917 patent is directed
13 to a display screen having a virtual bezel area and an active touchscreen region, both of which
14 display portions of content but have different modes of response to certain touch-based inputs.
15 For further example, claim 1 of the '663 patent is directed to a display screen having a virtual bezel
16 region and an active touchscreen region, both of which display portions of content but have
17 different modes of response to certain touch-based inputs. *See, e.g.*, '663 patent at 1:21-12:44.

18 37. The claims of the asserted patents are not directed to implementation of a
19 mathematical formula. *See, e.g.*, '917 patent at col. 1:21-12:21. For example, claim 1 of the
20 '917 patent is directed to a display screen having a virtual bezel area and an active touchscreen
21 region, both of which display portions of content but have different modes of response to certain
22 touch-based inputs. For further example, claim 1 of the '663 patent is directed to a display screen
23 having a virtual bezel region and an active touchscreen region, both of which display portions of
24 content but have different modes of response to certain touch-based inputs. *See, e.g.*, '663 patent
25 at 1:21-12:44.

26 38. The claims of the asserted patents are not directed to generalized steps to be
27 performed on a computer using conventional activity. *See, e.g.*, '917 patent at 1:21-12:21. For
28 example, claim 1 of the '917 patent is directed to a display screen having a virtual bezel area and

1 an active touchscreen region, both of which display portions of content but have different modes
2 of response to certain touch-based inputs. For further example, claim 1 of the '663 patent is
3 directed to a display screen having a virtual bezel region and an active touchscreen region, both
4 of which display portions of content but have different modes of response to certain touch-based
5 inputs. *See, e.g.*, '663 patent at 1:21-12:44.

6 39. The claims of the asserted patents are not directed to a method of organizing
7 human activity or to a fundamental economic practice long prevalent in our system of commerce.
8 *See, e.g.*, '917 patent at 1:21-12:21. For example, claim 1 of the '917 patent is directed to a
9 display screen having a virtual bezel area and an active touchscreen region, both of which
10 display portions of content but have different modes of response to certain touch-based inputs.

11 40. The claims of the asserted patents do not take a well-known or established
12 business method or process and apply it to, or using, a general-purpose computer. *See, e.g.*, '917
13 patent at 1:21-12:21. For example, claim 1 of the '917 patent is directed to a display screen
14 having a virtual bezel area and an active touchscreen region, both of which display portions of
15 content but have different modes of response to certain touch-based inputs. For further example,
16 claim 1 of the '663 patent is directed to a display screen having a virtual bezel region and an
17 active touchscreen region, both of which display portions of content but have different modes of
18 response to certain touch-based inputs. *See, e.g.*, '663 patent at 1:21-12:44.

19 41. The claims of the asserted patent do not preempt the field of their inventions or
20 preclude the use of other methods and systems because the claims recite specific elements that
21 include more than the performance of well-understood, routine, and conventional activities
22 previously known to the art. *See, e.g.*, '917 patent at 1:21-12:21. For example, claim 1 of the
23 '917 patent is directed to a display screen having a virtual bezel area and an active touchscreen
24 region, both of which display portions of content but have different modes of response to certain
25 touch-based inputs. For further example, claim 1 of the '663 patent is directed to a display
26 screen having a virtual bezel region and an active touchscreen region, both of which display
27 portions of content but have different modes of response to certain touch-based inputs. *See, e.g.*,
28 '663 patent at 1:21-12:44.

1 42. The technologies claimed in the asserted patents do not preempt all ways of using
2 location tracking system technology or sensor system technology, nor preempt the use of any
3 well-known location tracking technology or sensor system technology, nor preempt any other
4 well-known or prior art technology.

5 43. The asserted patent claims are not directed to any “method of organizing human
6 activity,” “fundamental economic practice long prevalent in our system of commerce,” nor “a
7 building block of the modern economy.”
8

9 44. The patents in suit do not take a well-known or established business method or
10 process and apply it to a general-purpose computer. Instead, the specific systems and processes
11 described in the asserted patents have no direct corollary to a process that predates the advent of
12 the Internet.

13 45. The asserted patent claims in both patents in suit are directed toward solutions
14 rooted in computer technology and directed to technologies, unique to computers and sensor
15 technology systems, to overcome problems specifically arising in the realm of computerized
16 location tracking and sensor system technologies.
17

18 46. The asserted patent claims are not directed at a mere mathematical relationship or
19 formula.

20 47. The asserted patent claims cannot be performed by a human, in the human mind,
21 or by pen and paper.

22 48. Accordingly, each claim of the patents in suit recites a combination of elements
23 sufficient to ensure that each claim, in practice, amounts to significantly more than a claim to an
24 ineligible concept.
25

26 **ONSCREEN’S PATENT LITIGATION HISTORY**

27 49. The ’917 and/or ’633 patents were previously subject to federal court litigation in
28 Onscreen Dynamics, LLC v. Pioneer POS Solutions, Inc. CDCA-2-21-cv-03181 (terminated in

1 December 20, 2021); Onscreen Dynamics, LLC v. Mercedes-Benz USA LLC, CDCA-2-21-cv-
2 06734 (terminated in December 1, 2021); Onscreen Dynamics, LLC v. Volvo Car USA, LLC,
3 CDCA-2-21-cv-06739 (terminated in November 24, 2021); Onscreen Dynamics, LLC v. BMW
4 of North America, LLC, CDCA-2-21-cv-06796 (terminated in November 15, 2021); Onscreen
5 Dynamics LLC v. Tesla, Inv. f/k/a Tesla Motors, Inc., CDCA-2-21-cv-06797 (terminated in
6 November 12, 2021); Onscreen Dynamics LLC v. Partner Tech USA, Inc., CDCA-8-21-cv-
7 00686 (terminated in August 5, 2021); Onscreen Dynamics LLC v. LG Electronics, Inc. et al,
8 EDTX-4-18-cv-00267 (terminated in November 20, 2018); Onscreen Dynamics LLC v.
9 Samsung Electronics Co., Ltd. et al, EDTX-4-18-cv-00268 (terminated on November 19, 2018);
10 Onscreen Dynamics LLC v. ASUSTek Computer Inc. et al, NDCA-4-20-cv-05553 (terminated
11 on January 22, 2021); Onscreen Dynamics LLC v. Sharp Corporation et al, NDCA-4-20-cv-
12 05555 (terminated on March 23, 2021); Onscreen Dynamics LLC v. Elo Touch Solutions, Inc.,
13 NDCA-4-20-cv-06322 (terminated on December 7, 2020); Onscreen Dynamics LLC v.
14 EMBROSS North America, Ltd., WDTX-6-20-cv-00874 (terminated on December 28, 2020);
15 Onscreen Dynamics LLC v. Getac Technology Corporation, WDTX-6-20-cv00875 (terminated
16 on April 14, 2022); Onscreen Dynamics LLC v. Avis Budget Group, Inc., WDTX-6-22-cv-
17 00222; and Onscreen Dynamics LLC v. Hertz Vehicles, LLC, WDTX-6-33-cv-00231.

18 **PRE-SUIT COMMUNICATIONS BETWEEN THE PARTIES**

19 50. On August 19, 2021 Onscreen Dynamics, LLC filed a complaint against Volvo
20 Car USA, LLC. Volvo has actual knowledge of Plaintiff's patent rights, Volvo Car USA, LLC
21 has continued to commit acts of infringement and have failed to cease their infringing activities.

22 **COUNT I – INFRINGEMENT OF U.S. PATENT NO. 9,395,917**

23 51. The allegations set forth in the foregoing paragraphs 1 through 50 are
24 incorporated into this First Claim for Relief.

25 52. Upon information and belief, Defendant has and continues to directly infringe at
26 least claims 1-3 of the '917 patent under 35 U.S.C. § 271(a) by making, using, selling, importing
27 and/or providing and causing to be used vehicles with electronic devices having touchscreen
28

1 capabilities, including the use of a virtual bezel (the “Accused Instrumentalities”), as set forth in
2 detail in the attached preliminary and exemplary claim charts provided in Exhibit C.

3 53. The Accused Instrumentalities identified in Exhibit C are examples that were
4 identified based on publicly available information. Plaintiff reserves its right to identify
5 additional infringing activities, products, and services, including, for example, on the basis of
6 information obtained during discovery and as Defendant introduces new infringing devices
7 through the end of trial.
8

9 54. The Accused Instrumentalities include a display screen having a virtual bezel
10 suitable for use as part of an electronic device where the display screen includes: (a) a virtual
11 bezel area, having a touchscreen layer with a first mode of response to a first set of touch-based
12 inputs from a user of the display screen, the virtual bezel area functioning to display a first
13 portion of content on the display screen; (b) an active touchscreen region substantially disposed
14 within the virtual bezel area, the active touchscreen region having a touchscreen layer with a
15 second mode of response to the first set of touch-based inputs from the user of the display screen,
16 the active touchscreen region functioning to display a second portion of the content on the
17 display screen; and (c) a gestural software application in communication with the display screen
18 having a virtual bezel, the gestural software application functioning to produce the first mode of
19 response in the virtual bezel area, wherein the first mode of response is configured to selectively
20 interpret touch-based inputs as intentional user input intended to affect the display of the second
21 portion of the content on the active touchscreen region. *See* attached claim chart for the '917
22 patent, Exhibit C.
23
24

25 55. On information and belief, these Accused Instrumentalities are used marketed,
26 provided to, and/or used by or for each of Defendant’s partners, clients, customers, and end users
27 across the country and in this District.
28

1 62. Upon information and belief, Defendant has and continues to directly infringe at
2 least claims 1-2 of the '663 patent under 35 U.S.C. § 271(a) by making, using, selling, importing
3 and/or providing and causing to be used vehicles with electronic devices having touchscreen
4 capabilities, including the use of a virtual bezel (the "Accused Instrumentalities"), as set forth in
5 detail in the attached preliminary and exemplary claim charts provided in Exhibit D.

6 63. The Accused Instrumentalities identified in Exhibit D are examples that were
7 identified based on publicly available information. Plaintiff reserves its right to identify
8 additional infringing activities, products, and services, including, for example, on the basis of
9 information obtained during discovery and as Defendant introduces new infringing devices
10 through the end of trial.

11 64. The Accused Instrumentalities include electronic devices having a display system,
12 the display system including: (a) an active touchscreen region having a touchscreen layer with a
13 first mode of response to touch-based inputs from a user of the electronic device, the active
14 touchscreen region configured to display a first portion of the content on the virtual bezel display
15 screen; (b) a virtual bezel region along one or more edges of the display screen and adjacent to
16 the active touchscreen region, the virtual bezel region having a touchscreen layer with a second
17 mode of response to touch-based inputs from a user of the electronic device, the virtual bezel
18 region configured to display a second portion of content on the display screen; and (c) non-
19 transitory memory storing a gestural software application in communication with the display
20 screen; wherein the second mode of response is configured to selectively interpret touch-based
21 inputs as intentional user input intended to affect the display of the first portion of the content on
22 the active touchscreen region of the display screen. *See* attached claim chart for the '663 patent,
23 Exhibit D.

24 65. On information and belief, these Accused Instrumentalities are used marketed,
25 provided to, and/or used by or for each of Defendant's partners, clients, customers, and end users
26 across the country and in this District.

27 66. Upon information and belief, since Volvo had knowledge of the '663 patent,
28 Volvo has induced and continues to induce others to infringe at least claims 1-2 of the '663

1 patent under 35 U.S.C. § 271(b) by, among other things, and with specific intent or willful
2 blindness, actively aiding and abetting others to infringe, including but not limited to Volvo's
3 partners and customers, whose use of the Accused Instrumentalities constitutes direct
4 infringement of at least claims 1-2 of the '663 patent.

5 67. In particular, Volvo's actions that aid and abet others such as their partners and
6 customers to infringe include distributing the Accused Instrumentalities and providing materials
7 and/or services related to the Accused Instrumentalities. On information and belief, Volvo has
8 engaged in such actions with specific intent to cause infringement or with willful blindness to the
9 resulting infringement because the Volvo has had actual knowledge of the '663 patent and that
10 its acts were inducing infringement of the '663 patent since Volvo has had knowledge of the
11 '663 patent.
12

13 68. Upon information and belief, since Volvo had knowledge of the '663 patent,
14 Defendant is liable as a contributory infringer of the '663 patent under 35 U.S.C. § 271(c) by
15 offering to sell, selling and importing into the United States electronic device with the display
16 screen technology including the Accused Instrumentalities especially made or adapted for use in
17 an infringement of the '663 patent. The Accused Instrumentalities are material components for
18 use in practicing the '663 patent and are specifically made and are not a staple article of
19 commerce suitable for substantial non-infringing use.
20

21 69. On information and belief, since Volvo had knowledge of the '663 patent,
22 Volvo's infringement has been and continues to be willful.
23

24 70. Plaintiff has been harmed by Defendant's infringing activities regarding the '663
25 patent.
26

JURY DEMAND

27 Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff demands a trial by
28 jury on all issues triable as such.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff demands judgment for itself and against Defendant as follows:

A. An adjudication that Defendant has infringed the '917 patent and the '663 patent;

B. An award of damages to be paid by Defendant adequate to compensate Plaintiff for Defendant's past infringement of the '917 patent and the '663 patent, and any continuing or future infringement through the date such judgment is entered, including interest, costs, expenses and an accounting of all infringing acts including, but not limited to, those acts not presented at trial;

C. A declaration that this case is exceptional under 35 U.S.C. § 285, and an award of Plaintiff's reasonable attorneys' fees; and

D. An award to Plaintiff of such further relief at law or in equity as the Court deems just and proper.

Dated: May 10, 2022

Respectfully submitted,

DEVLIN LAW FIRM LLC

/s/ Alex Chan

Alex Chan (SBN 278805)
achan@devlinlawfirm.com
16219 Flamstead Drive
Hacienda Heights, CA 91745
Telephone: (302) 449-9010

Timothy Devlin (*pro hac vice* to be filed)
tdevlin@devlinlawfirm.com
Patrick Delaney (*pro hac vice* to be filed)
pdelaney@devlinlawfirm.com
Mariam Clayton (*pro hac vice* to be filed)
mclayton@devlinlawfirm.com
1526 Gilpin Avenue
Wilmington, Delaware 19806
Telephone: (302) 449-9010
Facsimile: (302) 353-4251

Attorneys for Plaintiff
Onscreen Dynamics, LLC