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20 **UNITED STATES DISTRICT COURT**
21 **FOR THE DISTRICT OF NEVADA**

22 DATACLOUD TECHNOLOGIES, LLC,
23
24 Plaintiff,
25 v.
26 METRO FIBERNET, LLC,
27
28 Defendants.

Case No.

**COMPLAINT FOR PATENT
INFRINGEMENT**

Jury Trial Demanded

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff DataCloud Technologies, LLC (hereinafter, “Plaintiff” or “DataCloud”) files this Complaint for patent infringement against Defendant Metro Fibernet, LLC that does business under the name “Metronet” (hereinafter, “Defendant” or “Metronet”) alleging, based on its own knowledge as to itself and its own actions, and based on information and belief as to all other matters, as follows:

NATURE OF THE ACTION

1. This is a patent infringement action to stop Defendant’s infringement of the following United States Patents (collectively, the “Patents-in-Suit”) issued by the United States

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1 Patent and Trademark Office (“USPTO”), copies of which are attached hereto as **Exhibit A**,
 2 **Exhibit B, Exhibit C, and Exhibit D**, respectively:

	U.S. Patent No.	Title
3 A.	6,651,063	Data Organization And Management System And Method
4 B.	7,246,351	System And Method For Deploying And Implementing Software Applications Over A Distributed Network
5 C.	8,370,457	Network Communication Through A Virtual Domain
6 D.	8,762,498	Apparatus, System, And Method For Communicating To A Network Through A Virtual Domain

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 9
 10 2. Plaintiff seeks monetary damages and injunctive relief.

11 **PARTIES**

12 3. DataCloud is a limited liability company organized and existing under the laws of
 13 the State of Georgia and maintains its principal place of business at 44 Milton Avenue, Suite
 14 254, Alpharetta, Georgia, 30009 (Fulton County).

15 4. Based upon public information, Metronet is a corporation duly organized and
 16 existing under the laws of the state of Nevada since February 7, 2011.

17 5. Based upon public information, Metronet lists its Corporate Headquarters as 3701
 18 Communications Way, Evansville, Indiana, 47715 (Vanderburgh County).

19 6. Based upon public information, Metronet may be served through its registered
 20 agent, National Registered Agents, Inc., located at 334 North Senate Avenue, Indianapolis,
 21 Indiana, 46204 or at 701 South Carson Street, Suite 200, Carson City, Nevada, 89701.

22 **JURISDICTION AND VENUE**

23 7. Plaintiff repeats and re-alleges the allegations in the Paragraphs above as though
 24 fully set forth in their entirety.

25 8. This action arises under the Patent Laws of the United States, 35 U.S.C. § 1 et
 26 seq., including 35 U.S.C. §§ 271, 281, 283, 284, and 285. This Court has subject matter
 27 jurisdiction over this case for patent infringement under 28 U.S.C. §§ 1331 and 1338(a).

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1 15. Metronet was made aware of its infringement of the Patents-in-Suit by certain if
2 its products by way of a letter from counsel for DataCloud dated June 6, 2023.

3 **COUNT I: INFRINGEMENT OF U.S. PATENT NO. 6,651,063**

4 16. Plaintiff re-alleges and incorporates by reference each of the paragraphs above as
5 though fully set forth in their entirety.

6 17. U.S. Patent No. 6,651,063 (the “’063 patent”) was issued on November 18, 2003
7 after full and fair examination by the USPTO of Application No. 09/493,911 which was filed on
8 January 28, 2000. *See* Ex. A at A-1. A Certificate of Correction was issued on February 3,
9 2004. *See id.* at A-20.

10 18. The claims of the ’063 patent are not directed to an abstract idea and are not
11 limited to well-understood, routine, or conventional activity. Rather, the claimed inventions
12 include inventive components that improve networks and network systems by providing an
13 organization scheme to streamline the process for storage and retrieval of information through a
14 combination of automatic categorization and user influence.

15 19. The written description of the ’063 patent describes in technical detail each
16 limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how
17 the non-conventional and non-generic combination of claim limitations is patently distinct from
18 and improved upon what may have been considered conventional or generic in the art at the time
19 of the invention.

20 20. DataCloud owns all substantial rights, interest, and title in and to the ’063 patent,
21 including the sole and exclusive right to prosecute this action and enforce it against infringers
22 and to collect damages for all relevant times.

23 21. DataCloud or its predecessors-in-interest have satisfied all statutory obligations
24 required to collect pre-filing damages for the full period allowed by law for infringement of the
25 ’063 patent.

26 22. Based upon public information, Plaintiff is informed and believes that Defendant
27 has infringed one or more claims of the ’063 patent, either literally or under the doctrine of
28

1 equivalents, because it ships, distributes, makes, uses, imports, offers for sale, sells, and/or
2 advertises Defendant’s Metronet Android App.

3 23. Upon information and belief, the Metronet Android App meets each and every
4 step of at least Claim 4 of the ’063 Patent, either literally or equivalently.

5 24. Based upon public information, Defendant’s provision of the Metronet Android
6 App has infringed one or more claims of the ’063 Patent, including Claim 4 because it provides a
7 method for storing and controlled access of data in a repository by storing information in an
8 “information pack” (*e.g.*, uploading to servers/saving image files) to which is associated the
9 address of a data repository, a category identifier (*e.g.*, “data” directory), and a provider
10 identifier (Metronet). The information pack is sent to the specified data repository and stored
11 there in a location reserved for the specified category identifier that is specifically created for the
12 information pack (*e.g.*, file folder in the Metronet Android App is reserved for information), and
13 a custom category identifier (*e.g.*, custom category identifier can be the digital signature for
14 either of the Metronet Android App) is assigned to the information pack. The custom category
15 identifier is subsequently used to identify other information packs that should be stored in the
16 same location based on matching category identifiers (*e.g.*, valid Android APK files contain a
17 signature which allows to identify the author of the APK file, which allows verification that an
18 updated version comes from the same author).

19 25. Defendant’s aforesaid activities have been without authority and/or license from
20 Plaintiff.

21 26. Plaintiff is entitled to recover from Defendant the damages sustained by Plaintiff
22 as a result of Defendant’s wrongful acts in an amount subject to proof at trial, which, by law,
23 cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court
24 under 35 U.S.C. § 284.

25 **COUNT II: INFRINGEMENT OF U.S. PATENT NO. 7,246,351**

26 27. Plaintiff re-alleges and incorporates by reference each of the paragraphs above as
27 though fully set forth in their entirety.

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1 28. U.S. Patent No. 7,246,351 (the “’351 patent”) was issued on July 17, 2007 after
2 full and fair examination by the USPTO of Application No. 10/081,921 which was filed on
3 February 20, 2002. *See* Ex. B at B-1. A Certificate of Correction was issued on November 20,
4 2007. *See id.* at B-25.

5 29. The claims of the ’351 patent are not directed to an abstract idea and are not
6 limited to well-understood, routine, or conventional activity. Rather, the claimed inventions
7 include inventive components that improve networks and network systems by anonymizing
8 network activity for individual clients and groups of clients.

9 30. The written description of the ’351 patent describes in technical detail each
10 limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how
11 the non-conventional and non-generic combination of claim limitations is patently distinct from
12 and improved upon what may have been considered conventional or generic in the art at the time
13 of the invention.

14 31. DataCloud owns all substantial rights, interest, and title in and to the ’351 patent,
15 including the sole and exclusive right to prosecute this action and enforce it against infringers
16 and to collect damages for all relevant times.

17 32. DataCloud or its predecessors-in-interest have satisfied all statutory obligations
18 required to collect pre-filing damages for the full period allowed by law for infringement of the
19 ’351 patent.

20 33. Based upon public information, Plaintiff is informed and believes that Defendant
21 has infringed one or more claims of the ’351 patent, either literally or under the doctrine of
22 equivalents, because it ships, distributes, makes, uses, imports, offers for sale, sells, and/or
23 advertises its Metronet TV set top box to download and run streaming apps (“Metronet
24 TVBox”).

25 34. Upon information and belief, the Metronet TVBox meets each and every element
26 of at least Claim 1 of the ’351 patent, either literally or equivalently.

27 35. Based upon public information, the Metronet TVBox has infringed, and continues
28 to infringe, one or more claims of the ’351 patent, including Claim 1, because it provides a

1 system for deploying applications over a distributed network to an Internet-enabled device for
2 interacting with a server (*e.g.*, at www.metronet.com), the server being in communication with
3 the distributed network and having text files containing program logic, the system comprising: an
4 application assembler for storing on and running on the Internet-enabled device, the application
5 assembler for downloading one or more text files (*e.g.*, the text file is encrypted and transferred
6 in application data within the TLS session) from the server, retrieving the program logic from
7 each of the downloaded text files, and assembling the retrieved program logic into a functioning
8 application (*e.g.*, a website application) and running the functioning application on the Internet-
9 enabled device (*e.g.*, running the website application), wherein the functioning application
10 provides a graphical user interface for receiving and interpreting user inputs to the Internet-
11 enabled device (*e.g.*, Defendant provides a graphical user interface for receiving and interpreting
12 user inputs).

13 36. Defendant has had knowledge of its infringement of the '351 patent as early as its
14 receipt of a letter from DataCloud dated June 6, 2023.

15 37. Since at least its receipt of a letter from DataCloud dated June 6, 2023, Defendant
16 has also indirectly infringed and continues to indirectly infringe one or more claims of the '351
17 patent, including at least claims 1, by inducing others to directly infringe one or more claims of
18 the '351 patent. Defendant has induced and continues to induce its subsidiaries, partners,
19 affiliates, customers, and/or end-users, including Defendant's customers and potential customers,
20 to directly infringe, either literally or under the doctrine of equivalents, one or more claims of the
21 '351 patent by using Metronet TVBox. *See* Ex. E, Ex. F, Ex. G, Ex. H. Defendant has taken
22 active steps, directly or through contractual relationships with others, with the specific intent to
23 cause them to use Metronet TVBox in a manner that infringes one or more claims of the '351
24 patent, including, for example, claims 1. Such steps by Defendant include, among other things,
25 advising or directing personnel, contractors, or end-users to make or use Metronet TVBox in an
26 infringing manner; advertising and promoting the use of Metronet TVBox in an infringing
27 manner; or distributing instructions that guide users to use the Accused Products in an infringing
28 manner. Defendant is performing these steps, which constitute induced infringement, with the

1 knowledge of the '351 patent and with the knowledge that the induced acts constitute
2 infringement. Defendant is aware that the normal and customary use of Metronet TVBox by
3 others would infringe the '351 patent. Defendant's inducement is ongoing.

4 38. Since at least its receipt of a letter from DataCloud dated June 6, 2023, Defendant
5 has also indirectly infringed and continues to indirectly infringe by contributing to the
6 infringement of one or more claims of the '351 patent, including claims 1, by personnel,
7 contractors, customers, and/or other end users by encouraging them to use Metronet TVBox to
8 perform the steps of the patented process as described in one or more claims of the '351 patent.
9 *See* Ex. E, Ex. F, Ex. G, Ex. H. Metronet TVBox has special features that are specially designed
10 to be used in an infringing way and that have no substantial uses other than ones that infringe one
11 or more claims of the '351 patent, including, for example, the method recited in claim 1. The
12 special features constitute a material part of the claimed invention of one or more of the claims
13 of the '351 patent and are not staple articles of commerce suitable for substantial non-infringing
14 use. Defendant's contributory infringement is ongoing.

15 39. Despite knowledge of the '351 patent as early as its receipt of a letter from
16 DataCloud dated June 6, 2023, Defendant, based upon public information, continues to
17 encourage, instruct, enable, and otherwise cause its customers to use its products in a manner
18 which infringes one or more claims of the '351 patent. Based upon public information, the
19 provision of and sale of the Metronet TVBox is a source of revenue and a business focus for
20 Defendant. *See* Ex. E, Ex. F, Ex. G, Ex. H.

21 40. Based upon public information, Defendant specifically intends its customers to
22 use its products and services in such a way that infringes one or more claims of the '351 patent
23 by, at a minimum, providing and supporting its Metronet TVBox and instructing its customers on
24 how to use it in an infringing manner, at least through information available on Defendant's
25 website including information brochures, promotional material, and contact information. *See* Ex.
26 G, Ex. H. Defendant knew that its actions, including, but not limited to any of the
27 aforementioned products and services, would induce, have induced, and will continue to induce
28

1 infringement by its customers by continuing to sell, support, and instruct its customers on using
2 Metronet TVBox.

3 41. Defendant’s aforesaid activities have been without authority and/or license from
4 Plaintiff.

5 42. Defendant’s actions are at least objectively reckless as to the risk of infringing a
6 valid patent and this objective risk was either known or should have been known by Defendant.

7 43. Since at least the filing of the original complaint in this matter, Defendant’s direct
8 and indirect infringement of the ’351 patent has been and continues to be willful, intentional,
9 deliberate, or in conscious disregard of Plaintiff’s rights under the patent.

10 44. DataCloud has satisfied all statutory obligations required to collect pre-filing
11 damages for the full period allowed by law for infringement of the ’351 patent.

12 45. DataCloud has been damaged and continues to be damaged as a result of the
13 infringing conduct by Defendant alleged above. Thus, Defendant is liable to DataCloud in an
14 amount that compensates it for such infringement, which by law cannot be less than a reasonable
15 royalty, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

16 46. DataCloud has suffered and continues to suffer irreparable harm, through its loss
17 of market share and goodwill, for which there is no adequate remedy at law. DataCloud has and
18 will continue to suffer this harm by virtue of Defendant’s infringement of one or more claims of
19 the ’351 patent. Defendant’s actions have interfered with and will interfere with DataCloud’s
20 ability to license technology. The balance of hardships favors DataCloud’s ability to
21 commercialize its own ideas and technology. The public interest in allowing DataCloud to
22 enforce its right to exclude outweighs other public interests, which supports injunctive relief in
23 this case.

24 **COUNT III: INFRINGEMENT OF U.S. PATENT NO. 8,370,457**

25 47. Plaintiff re-alleges and incorporates by reference each of the paragraphs above as
26 though fully set forth in their entirety.

27 48. U.S. Patent No. 8,370,457 (the “457 patent”) was issued on February 5, 2013
28 after full and fair examination by the USPTO of Application No. 11/717,911 which was filed on

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1 March 13, 2007. *See* Ex. C at C-1. A Certificate of Correction was issued on March 18, 2014.
2 *See id.* at C-11.

3 49. The claims of the '457 patent are not directed to an abstract idea and are not
4 limited to well-understood, routine, or conventional activity. Rather, the claimed inventions
5 include inventive components that improve networks and network systems by anonymizing
6 network activity for individual clients and groups of clients.

7 50. The written description of the '457 patent describes in technical detail each
8 limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how
9 the non-conventional and non-generic combination of claim limitations is patently distinct from
10 and improved upon what may have been considered conventional or generic in the art at the time
11 of the invention.

12 51. DataCloud owns all substantial rights, interest, and title in and to the '457 patent,
13 including the sole and exclusive right to prosecute this action and enforce it against infringers
14 and to collect damages for all relevant times.

15 52. DataCloud or its predecessors-in-interest have satisfied all statutory obligations
16 required to collect pre-filing damages for the full period allowed by law for infringement of the
17 '457 patent.

18 53. Based upon public information, Plaintiff is informed and believes that Defendant
19 has infringed one or more claims of the '457 patent, either literally or under the doctrine of
20 equivalents, because it ships, distributes, makes, uses, imports, offers for sale, sells, and/or
21 advertises its Metronet CPE with Port forwarding.

22 54. Upon information and belief, Metronet CPE with Port forwarding. meets each and
23 every step of at least Claim 9 of the '457 patent, either literally or equivalently.

24 55. Based upon public information, Metronet CPE with Port forwarding. has
25 infringed one or more claims of the '457 patent, including Claim 9, through its advanced firewall
26 settings in Cloud Firewall because it establishes a forwarding internet protocol (IP) address
27 (translated IP address) for a pre-defined combination of a client IP address (*e.g.*, 10.10.XX.XX)
28 and a destination IP address (*e.g.*, 168.10.XX.XX), they identify, in a data request received from

1 the client IP address, the pre-defined combination, and in response to the identifying of the pre-
2 defined combination, forward (*e.g.*, from “Host A” to the NAT Router) the data request via (*e.g.*,
3 commands are configured to translate source addresses to the destination IP address for all
4 packets with IP destination addresses in the 168.10.XX.XX/24 subnet) the forwarding IP address
5 to the destination IP address (*e.g.*, on “Host B”).

6 56. Defendant’s aforesaid activities have been without authority and/or license from
7 Plaintiff.

8 57. Plaintiff is entitled to recover from Defendant the damages sustained by Plaintiff
9 as a result of Defendant’s wrongful acts in an amount subject to proof at trial, which, by law,
10 cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court
11 under 35 U.S.C. § 284.

12 **COUNT IV: INFRINGEMENT OF U.S. PATENT NO. 8,762,498**

13 58. Plaintiff re-alleges and incorporates by reference each of the paragraphs above as
14 though fully set forth in their entirety.

15 59. U.S. Patent No. 8,762,498 (the “’498 patent”) was issued on June 24, 2014, after
16 full and fair examination by the USPTO of Application No. 13/731,731 which was filed on
17 December 31, 2012. *See* Ex. D at D-1.

18 60. The claims of the ’498 patent are not directed to an abstract idea and are not
19 limited to well-understood, routine, or conventional activity. Rather, the claimed inventions
20 include inventive components that improve networks and network systems by anonymizing
21 network activity for individual clients and groups of clients.

22 61. The written description of the ’498 patent describes in technical detail each
23 limitation of the claims, allowing a skilled artisan to understand the scope of the claims and how
24 the non-conventional and non-generic combination of claim limitations is patently distinct from
25 and improved upon what may have been considered conventional or generic in the art at the time
26 of the invention.

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1 62. DataCloud owns all substantial rights, interest, and title in and to the '498 patent,
2 including the sole and exclusive right to prosecute this action and enforce it against infringers
3 and to collect damages for all relevant times.

4 63. DataCloud or its predecessors-in-interest have satisfied all statutory obligations
5 required to collect pre-filing damages for the full period allowed by law for infringement of the
6 '498 patent.

7 64. Based upon public information, Plaintiff is informed and believes that Defendant
8 has infringed one or more claims of the '498 patent, either literally or under the doctrine of
9 equivalents, because it ships, distributes, makes, uses, imports, offers for sale, sells, and/or
10 advertises Metronet websites using Transport Layer Security (TLS)/HTTPS and SNI. ("Metronet
11 TLS websites").

12 65. Upon information and belief, Metronet TLS websites meet each and every step of
13 at least Claim 1 of the '498 patent, either literally or equivalently.

14 66. Based upon public information, Metronet TLS websites have infringed one or
15 more claims of the '498 patent, including Claim 1, because it provides a method of determining,
16 by a controller device comprising a processor (*e.g.*, a router), a destination internet protocol (IP)
17 address from a plurality of categories for virtual names (*e.g.*, www.metronet.com,
18 www.metronetbusiness.com, www.metronetinc.com, *etc.*) based on a virtual namespace
19 destination address (*e.g.*, metronet.com, metronetbusiness.com, metronetinc.com, *etc.*) specified
20 by request data received from a device, wherein a category of the plurality of categories is
21 related to the virtual namespace destination address establishing a correlation between the
22 destination IP address and a forwarder IP address of a forwarder device; and instructing the
23 forwarder device to send the request data to the destination IP address. (*e.g.*, through a WWW
24 server and SNI Routing).

25 67. Defendant's aforesaid activities have been without authority and/or license from
26 Plaintiff.

27 68. Plaintiff is entitled to recover from Defendant the damages sustained by Plaintiff
28 as a result of Defendant's wrongful acts in an amount subject to proof at trial, which, by law,

1 cannot be less than a reasonable royalty, together with interest and costs as fixed by this Court
2 under 35 U.S.C. § 284.

3 **JURY DEMAND**

4 69. Plaintiff demands a trial by jury on all issues.

5 **PRAYER FOR RELIEF**

6 70. Plaintiff respectfully requests the following relief:

7 A. An adjudication that one or more claims of the Patents-in-Suit has been infringed,
8 either literally and/or under the doctrine of equivalents, by Defendant or all others acting in
9 concert therewith;

10 B. An adjudication that Defendant has induced infringement of one or more claims
11 of the '351 patent, either literally or under the doctrine of equivalents, by their parents,
12 subsidiaries, partners, affiliates, and end-users, including Defendant's personnel, customers,
13 potential customers, and/or other end users;

14 C. An adjudication that Defendant has contributed to the infringement of one or
15 more claims of the '351 patent, either literally or under the doctrine of equivalents, by their
16 parents, subsidiaries, partners, affiliates, and end-users, including Defendant's personnel,
17 customers, potential customers, and/or other end users;

18 D. A permanent injunction enjoining Defendant and its officers, directors, agents,
19 servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in
20 concert therewith from infringement of the '351 patent; or, in the alternative, an award of a
21 reasonable ongoing royalty for future infringement of the '351 patent by such entities;

22 E. An award of damages to be paid by Defendant adequate to compensate Plaintiff
23 Defendant's past infringement, including interest, costs, and disbursements as justified under 35
24 U.S.C. § 284 and, if necessary to adequately compensate Plaintiff for Defendant's infringement,
25 an accounting of all infringing sales including, but not limited to, those sales not presented at
26 trial;

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1 F. An adjudication that Defendant willfully infringed one or more claims of the '351
2 patent and that the Court award treble damages for the period of such willful infringement
3 pursuant to 35 U.S.C. § 284;

4 G. Pre-judgment and post-judgment interest on the damages caused by Defendants'
5 infringing activities and other conduct complained of herein;

6 H. That this Court declare this to be an exceptional case and award Plaintiff its
7 reasonable attorneys' fees and costs in accordance with 35 U.S.C. § 285; and,

8 I. Any further relief that this Court deems just and proper.

9 DATED this 11th day of September 2023.

10 PISANELLI BICE PLLC

11 By: /s/ Debra L. Spinelli

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19 *Attorneys for Plaintiff DataCloud Technologies, LLC*

20
21 **List of Exhibits**

- 22 A. U.S. Patent No. 6,651,063
- 23 B. U.S. Patent No. 7,246,351
- 24 C. U.S. Patent No. 8,370,457
- 25 D. U.S. Patent No. 8,762,498
- 26 E. Webpage: www.metronet.com
- 27 F. Webpage: www.metronetbusiness.com
- 28 G. Webpage: www.metronetbusiness.com/blog
- H. Webpage: www.metronetbusiness.com/industry-solutions

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