

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

EIREOG INNOVATIONS LTD.,

Plaintiff,

v.

ACER INCORPORATED,

Defendant.

Case No. 2:24-cv-449

JURY TRIAL DEMANDED

**COMPLAINT FOR PATENT INFRINGEMENT
AGAINST ACER INCORPORATED**

This is an action for patent infringement arising under the Patent Laws of the United States of America, 35 U.S.C. § 1 *et seq.*, in which Plaintiff Eireog Innovations Limited (“Plaintiff” or “Eireog”) makes the following allegations against Defendant Acer Incorporated (“Defendant” or “Acer”):

INTRODUCTION

1. This complaint arises from Acer’s unlawful infringement of the following United States patents owned by Plaintiff, which relate to improvements in processing devices and systems: United States Patent Nos. 9,436,626 (“the ’626 Patent”), 9,442,870 (“the ’870 Patent”), and 9,335,805 (“the ’805 Patent”) (collectively, the “Asserted Patents”).

PARTIES

2. Plaintiff Eireog Innovations Limited is a private company limited by shares organized and existing under the laws of Ireland, with its principal place of business at The Hyde Building, Suite 23, The Park, Carrickmines, Dublin 18, Ireland. Eireog is the sole owner by

assignment of all rights, title, and interest in the Asserted Patents, including the right to recover damages for past, present, and future infringement.

3. Defendant Acer Incorporated is a foreign company organized and existing under the laws of Taiwan, with its headquarters at 1F, 88, Sec. 1. Xintai 5th Road, Xizhi, New Taipei City 221, Taiwan. Acer does business in Texas and in the Eastern District of Texas, directly or through intermediaries, such as its wholly-owned subsidiaries. Acer is responsible for importing, making, marketing, distributing, offering for sale, and/or selling Acer-branded laptops and desktops in the United States (directly or through its wholly-owned subsidiaries), including in this District.

4. Acer induces its subsidiaries, affiliates, retail partners, and customers in the making, using, selling, offering for sale, and/or importing throughout the United States, including within this District, infringing products (such as Acer-branded laptops and desktops) and placing such products into the stream of commerce via established distribution channels knowing or understanding that such products would be sold and used in the United States, including in the Eastern District of Texas. Acer purposefully directs the Accused Products into established distribution channels within this District and the U.S. nationally. For example, Acer sells and offers to sell the Accused Products through its website, Acer.com, which may be accessed throughout the United States, the State of Texas, and this District. Additionally, Acer has authorized sellers and sales representatives that offer for sale and sell the Accused Products throughout the State of Texas and to consumers throughout this District, such as: Best Buy, 422 West Loop 281, Suite 100, Longview, Texas 75605; Costco Wholesale, 3650 West University Drive, McKinney, Texas 75071; Office Depot, 422 West Loop 281, Suite 300, Longview, Texas 75605; Target, 3092 North

Eastman Road, Suite 100, Longview, Texas 75605; and Wal-Mart, 1701 East End Boulevard North, Marshall, Texas 75670.

5. Acer maintains a corporate presence in the United States via at least its wholly-owned subsidiaries, including but not limited to Acer Service Corporation, Acer American Holdings Corp., and Acer America Corporation. Ex. 1 (2022 Annual Report) at 170, 171. Acer, alone and through its U.S.-based subsidiaries (such as Acer US and Acer Tech.), places such infringing products into the stream of commerce via established distribution channels knowing or understanding that such products would be sold and used in the United States, including in the Eastern District of Texas. Acer has derived substantial revenue from infringing acts in the United States, including from the sale and use of infringing products. *See* Ex. 1 at 96 (showing revenues for “U.S.A.”).

JURISDICTION AND VENUE

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

7. This Court has personal jurisdiction over Acer in this action because Acer has committed acts within Texas (and this District) giving rise to this action and has established minimum contacts with this forum such that the exercise of jurisdiction over Acer would not offend traditional notions of fair play and substantial justice. Acer, directly and/or through subsidiaries or intermediaries, has committed and continues to commit acts of infringement in this District by, among other things, making, using, importing, offering to sell, and/or selling products that infringe the Asserted Patents. In addition, Acer has not contested the Court’s exercise of personal

jurisdiction over Acer in prior actions. *See, e.g., Atlas Glob. Techs. LLC v. Acer Inc.*, Dkt. No. 27 at ¶ 14 (E.D. Tex. Mar. 6, 2023).

8. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400(b). Acer, directly and/or through subsidiaries or intermediaries, has transacted business in this District and has committed acts of direct infringement in this District by, among other things, making, using, offering to sell, selling, and importing products that infringe the Asserted Patents. Venue is also proper as to Acer because it is a foreign corporation organized under the laws of Taiwan and suits against foreign entities are proper in any judicial district. *See* 28 U.S.C. § 1391(c)(3); *In re HTC Corp.*, 889 F.3d 1349 (Fed. Cir. 2018). In addition, Acer has not contested this District as a proper venue in prior actions. *See, e.g., Atlas Glob. Techs. LLC v. Acer Inc.*, Dkt. No. 27 at ¶ 22 (E.D. Tex. Mar. 6, 2023).

COUNT I

INFRINGEMENT OF U.S. PATENT NO. 9,436,626

9. Plaintiff realleges and incorporates by reference the foregoing paragraphs as if fully set forth herein.

10. Plaintiff owns by assignment all rights, title, and interest, including the right to recover damages for past, present, and future infringement, in U.S. Patent No. 9,436,626, titled “Processor interrupt interface with interrupt partitioning and virtualization enhancements.” The ’626 Patent was duly and legally issued by the United States Patent and Trademark Office on September 6, 2016. The ’626 Patent is valid and enforceable. A true and correct copy of the ’626 Patent is attached hereto as Exhibit 2.

11. Acer makes, uses, offers for sale, sells, and/or imports certain products, including without limitation Acer’s products using Intel-based CPUs (Haswell-based architecture and

newer) (including but not limited to Aspire All-in-One Desktops (C22, C24, C27), Aspire TC Desktops, Chromebox Tower Desktops, Nitro 50 Desktop, Predator Orion Gaming Desktops (3000, 5000, 7000), Veriton K8 Workstation PCs, Chromebook Laptops, Aspire Laptops, Nitro Laptops) and AMD Zen-based CPUs (including but not limited to Aspire C24 All-in-One Desktops (C24-1300-UR31, C24-1300-UR32), Nitro 70 Gaming Desktop (N70-130-UR13), Chromebook Laptops, Aspire Laptops, TravelMate Laptops, Nitro Laptops, Swift Edge Laptops, Swift Go Laptops, Swift X Laptops) (the “Accused Products”), that directly infringe, literally and/or under the doctrine of equivalents, one or more claims of the ’626 Patent. Identification of the accused products will be provided in Plaintiff’s infringement contentions pursuant to the Court’s scheduling order.

12. The Accused Products satisfy all claim limitations of one or more claims of the ’626 Patent. A claim chart comparing exemplary independent claim 1 of the ’626 Patent to representative Accused Products is attached as Exhibits 3 and 4.

13. By making, using, offering for sale, selling and/or importing into the United States the Accused Products, Acer has injured Plaintiff and is liable for infringement of the ’626 Patent pursuant to 35 U.S.C. § 271(a).

14. Acer also knowingly and intentionally induces infringement of one or more claims of the ’626 Patent in violation of 35 U.S.C. § 271(b). At least as of the filing and service of this complaint, Acer has knowledge of the ’626 Patent and the infringing nature of the Accused Products through, for example, the ’626 Patent claim charts served therewith. Despite this knowledge of the ’626 Patent, Acer continues to actively encourage and instruct its customers and end users (for example, through user manuals and online instruction materials on its website and materials cited in Exhibits 3 and 4) to use the Accused Products in ways that directly infringe

the '626 Patent. For example, Acer advertises the benefits of Intel Core and AMD Ryzen processors and their impact on Acer's products, such as the accused Swift, Nitro, and Aspire Laptops, among others. See <https://www.acer.com/us-en/laptops/aspire/aspire-intel>; <https://www.acer.com/us-en/laptops/aspire/aspire-3-intel>; <https://www.acer.com/us-en/amd-ryzen-series-laptops>; and <https://www.acer.com/us-en/laptops/aspire/aspire-amd>. Further, Acer provides customers with instructions and user manuals detailing how to setup, configure, and utilize the Accused Products to utilize the infringing functionality. See, e.g., https://global-download.acer.com/GDFiles/Document/User%20Manual/User%20Manual_Acer_1.0_A_A.pdf?acerid=638300975371438680&Step1=&Step2=&Step3=NITRO%20ANV15-41&OS=ALL&LC=en&BC=ACER&SC=PA_6 and https://global-download.acer.com/GDFiles/Document/User%20Manual/User%20Manual_Acer_1.0_A_A.pdf?acerid=638236073410415425&Step1=&Step2=&Step3=SFX16-61G&OS=ALL&LC=en&BC=ACER&SC=PA_6. Acer provides these instructions, user manuals, and other materials knowing and intending (or with willful blindness to the fact) that its customers and end users will commit these infringing acts. Acer also continues to make, use, offer for sale, sell, and/or import the Accused Products, despite its knowledge of the '626 Patent, thereby specifically intending for and inducing its customers to infringe the '626 Patent through the customers' normal and customary use of the Accused Products.

15. Acer has also infringed, and continues to infringe, one or more claims of the '626 Patent by selling, offering for sale, or importing into the United States, the Accused Products, knowing that the Accused Products constitute a material part of the inventions claimed in the '626 Patent, are especially made or adapted to infringe the '626 Patent, and are not staple articles or commodities of commerce suitable for non-infringing use. At least as of the filing and service of

this complaint, Acer has knowledge of the '626 Patent and the infringing nature of the Accused Products through, for example, the '626 Patent claim chart served therewith. Acer has been, and currently is, contributorily infringing the '626 Patent in violation of 35 U.S.C. §§ 271(c) and/or (f). For example, the accused processor interrupt management features constitute a material part of the inventions claimed in the '626 Patent, are especially made or adapted to infringe the '626 Patent, and are not staple articles or commodities of commerce suitable for non-infringing use, as demonstrated by the evidence in Exhibits 3 and 4.

16. On information and belief, Plaintiff (including its predecessors and any licensees) complied with 35 U.S.C. § 287 during the relevant time period because Plaintiff, any predecessor assignees to the '626 Patent, and any licensees did not make, offer for sale, or sell products that practice(d) the '626 Patent during the relevant time period or were not required to mark during the relevant time period.

17. As a result of Acer's direct infringement of the '626 Patent, Plaintiff is entitled to monetary damages (past, present, and future) in an amount adequate to compensate for Acer's infringement, but in no event less than a reasonable royalty for the use made of the invention by Acer, together with interest and costs as fixed by the Court.

18. As a result of Acer's indirect infringement of the '626 Patent, Plaintiff is entitled to monetary damages (present and future) in an amount adequate to compensate for Acer's infringement, but in no event less than a reasonable royalty for the use made of the invention by Acer, together with interest and costs as fixed by the Court, accruing as of the time Acer obtained knowledge of the '626 Patent.

COUNT II

INFRINGEMENT OF U.S. PATENT NO. 9,442,870

19. Plaintiff realleges and incorporates by reference the foregoing paragraphs as if fully set forth herein.

20. Plaintiff owns by assignment all rights, title, and interest, including the right to recover damages for past, present, and future infringement, in U.S. Patent No. 9,442,870, titled “Interrupt priority management using partition-based priority blocking processor registers.” The ’870 Patent was duly and legally issued by the United States Patent and Trademark Office on September 13, 2016. The ’870 Patent is valid and enforceable. A true and correct copy of the ’870 Patent is attached hereto as Exhibit 5.

21. Acer makes, uses, offers for sale, sells, and/or imports certain products, including without limitation Acer’s products using Intel-based CPUs (Haswell-based architecture and newer) (including but not limited to Aspire All-in-One Desktops (C22, C24, C27), Aspire TC Desktops, Chromebox Tower Desktops, Nitro 50 Desktop, Predator Orion Gaming Desktops (3000, 5000, 7000), Veriton K8 Workstation PCs, Chromebook Laptops, Aspire Laptops, Nitro Laptops) and AMD Zen-based CPUs (including but not limited to Aspire C24 All-in-One Desktops (C24-1300-UR31, C24-1300-UR32), Nitro 70 Gaming Desktop (N70-130-UR13), Chromebook Laptops, Aspire Laptops, TravelMate Laptops, Nitro Laptops, Swift Edge Laptops, Swift Go Laptops, Swift X Laptops) (the “Accused Products”), that directly infringe, literally and/or under the doctrine of equivalents, one or more claims of the ’870 Patent. Identification of the accused products will be provided in Plaintiff’s infringement contentions pursuant to the Court’s scheduling order.

22. The Accused Products satisfy all claim limitations of one or more claims of the ’870 Patent. A claim chart comparing exemplary independent claim 1 of the ’870 Patent to representative Accused Products is attached as Exhibits 6 and 7.

23. By making, using, offering for sale, selling and/or importing into the United States the Accused Products, Acer has injured Plaintiff and is liable for infringement of the '870 Patent pursuant to 35 U.S.C. § 271(a).

24. Acer also knowingly and intentionally induces infringement of one or more claims of the '870 Patent in violation of 35 U.S.C. § 271(b). At least as of the filing and service of this complaint, Acer has knowledge of the '870 Patent and the infringing nature of the Accused Products through, for example, the '870 Patent claim charts served therewith. Despite this knowledge of the '870 Patent, Acer continues to actively encourage and instruct its customers and end users (for example, through user manuals and online instruction materials on its website and materials cited in Exhibits 6 and 7) to use the Accused Products in ways that directly infringe the '870 Patent. For example, Acer advertises the benefits of Intel Core and AMD Ryzen processors and their impact on Acer's products, such as the accused Swift, Nitro, and Aspire Laptops, among others. See <https://www.acer.com/us-en/laptops/aspire/aspire-intel>; <https://www.acer.com/us-en/laptops/aspire/aspire-3-intel>; <https://www.acer.com/us-en/amd-ryzen-series-laptops>; and <https://www.acer.com/us-en/laptops/aspire/aspire-amd>. Further, Acer provides customers with instructions and user manuals detailing how to setup, configure, and utilize the Accused Products to utilize the infringing functionality. See, e.g., https://global-download.acer.com/GDFiles/Document/User%20Manual/User%20Manual_Acer_1.0_A_A.pdf?acerid=638300975371438680&Step1=&Step2=&Step3=NITRO%20ANV15-41&OS=ALL&LC=en&BC=ACER&SC=PA_6 and https://global-download.acer.com/GDFiles/Document/User%20Manual/User%20Manual_Acer_1.0_A_A.pdf?acerid=638236073410415425&Step1=&Step2=&Step3=SFX16-61G&OS=ALL&LC=en&BC=ACER&SC=PA_6. Acer provides these instructions, user

manuals, and other materials knowing and intending (or with willful blindness to the fact) that its customers and end users will commit these infringing acts. Acer also continues to make, use, offer for sale, sell, and/or import the Accused Products, despite its knowledge of the '870 Patent, thereby specifically intending for and inducing its customers to infringe the '870 Patent through the customers' normal and customary use of the Accused Products.

25. Acer has also infringed, and continues to infringe, one or more claims of the '870 Patent by selling, offering for sale, or importing into the United States, the Accused Products, knowing that the Accused Products constitute a material part of the inventions claimed in the '870 Patent, are especially made or adapted to infringe the '870 Patent, and are not staple articles or commodities of commerce suitable for non-infringing use. At least as of the filing and service of this complaint, Acer has knowledge of the '870 Patent and the infringing nature of the Accused Products through, for example, the '870 Patent claim chart served therewith. Acer has been, and currently is, contributorily infringing the '870 Patent in violation of 35 U.S.C. §§ 271(c) and/or (f). For example, the accused processor interrupt management features constitute a material part of the inventions claimed in the '870 Patent, are especially made or adapted to infringe the '870 Patent, and are not staple articles or commodities of commerce suitable for non-infringing use, as demonstrated by the evidence in Exhibits 6 and 7.

26. On information and belief, Plaintiff (including its predecessors and any licensees) complied with 35 U.S.C. § 287 during the relevant time period because Plaintiff, any predecessor assignees to the '870 Patent, and any licensees did not make, offer for sale, or sell products that practice(d) the '870 Patent during the relevant time period or were not required to mark during the relevant time period.

27. As a result of Acer's direct infringement of the '870 Patent, Plaintiff is entitled to monetary damages (past, present, and future) in an amount adequate to compensate for Acer's infringement, but in no event less than a reasonable royalty for the use made of the invention by Acer, together with interest and costs as fixed by the Court.

28. As a result of Acer's indirect infringement of the '870 Patent, Plaintiff is entitled to monetary damages (present and future) in an amount adequate to compensate for Acer's infringement, but in no event less than a reasonable royalty for the use made of the invention by Acer, together with interest and costs as fixed by the Court, accruing as of the time Acer obtained knowledge of the '870 Patent.

COUNT III

INFRINGEMENT OF U.S. PATENT NO. 9,335,805

29. Plaintiff realleges and incorporates by reference the foregoing paragraphs as if fully set forth herein.

30. Plaintiff owns by assignment all rights, title, and interest, including the right to recover damages for past, present, and future infringement, in U.S. Patent No. 9,335,805, titled "Method and apparatus for managing power in a multi-core processor." The '805 Patent was duly and legally issued by the United States Patent and Trademark Office on May 10, 2016. The '805 Patent is valid and enforceable. A true and correct copy of the '805 Patent is attached hereto as Exhibit 8.

31. Acer makes, uses, offers for sale, sells, and/or imports certain products, including without limitation Acer's products using Intel Core CPUs (12th Generation (Alder Lake) and newer) (including but not limited to Aspire All-in-One Desktops (C22, C24), Aspire TC Desktops, Chromebox Tower Desktops, Nitro 50 Desktop, Predator Orion Gaming Desktops (3000, 5000,

7000), Veriton K8 Workstation PCs, Chromebook Laptops, Aspire Laptops, Nitro Laptops) (the “Accused Products”), that directly infringe, literally and/or under the doctrine of equivalents, one or more claims of the ’805 Patent. Identification of the accused products will be provided in Plaintiff’s infringement contentions pursuant to the Court’s scheduling order.

32. The Accused Products satisfy all claim limitations of one or more claims of the ’805 Patent. A claim chart comparing exemplary independent claim 6 of the ’805 Patent to representative Accused Products is attached as Exhibit 9.

33. By making, using, offering for sale, selling and/or importing into the United States the Accused Products, Acer has injured Plaintiff and is liable for infringement of the ’805 Patent pursuant to 35 U.S.C. § 271(a).

34. Acer also knowingly and intentionally induces infringement of one or more claims of the ’805 Patent in violation of 35 U.S.C. § 271(b). At least as of the filing and service of this complaint, Acer has knowledge of the ’805 Patent and the infringing nature of the Accused Products through, for example, the ’805 Patent claim charts served therewith. Despite this knowledge of the ’805 Patent, Acer continues to actively encourage and instruct its customers and end users (for example, through user manuals and online instruction materials on its website and materials cited in Exhibit 9) to use the Accused Products in ways that directly infringe the ’805 Patent. For example, Acer advertises the benefits of Intel Core processors and their impact on Acer’s products, such as the accused Aspire Laptops. *See* <https://www.acer.com/us-en/laptops/aspire/aspire-intel>; and <https://www.acer.com/us-en/laptops/aspire/aspire-3-intel>. Further, Acer provides customers with instructions and user manuals detailing how to setup, configure, and utilize the Accused Products to utilize the infringing functionality. *See, e.g.*, [12](https://global-</p></div><div data-bbox=)

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35. Acer has also infringed, and continues to infringe, one or more claims of the '805 Patent by selling, offering for sale, or importing into the United States, the Accused Products, knowing that the Accused Products constitute a material part of the inventions claimed in the '805 Patent, are especially made or adapted to infringe the '805 Patent, and are not staple articles or commodities of commerce suitable for non-infringing use. At least as of the filing and service of this complaint, Acer has knowledge of the '805 Patent and the infringing nature of the Accused Products through, for example, the '805 Patent claim chart served therewith. Acer has been, and currently is, contributorily infringing the '805 Patent in violation of 35 U.S.C. §§ 271(c) and/or (f). For example, the accused processor power management features constitute a material part of the inventions claimed in the '805 Patent, are especially made or adapted to infringe the '805 Patent, and are not staple articles or commodities of commerce suitable for non-infringing use, as demonstrated by the evidence in Exhibit 9.

36. On information and belief, Plaintiff (including its predecessors and any licensees) complied with 35 U.S.C. § 287 during the relevant time period because Plaintiff, any predecessor assignees to the '805 Patent, and any licensees did not make, offer for sale, or sell products that practice(d) the '805 Patent during the relevant time period or were not required to mark during the relevant time period.

37. As a result of Acer's direct infringement of the '805 Patent, Plaintiff is entitled to monetary damages (past, present, and future) in an amount adequate to compensate for Acer's infringement, but in no event less than a reasonable royalty for the use made of the invention by Acer, together with interest and costs as fixed by the Court.

38. As a result of Acer's indirect infringement of the '805 Patent, Plaintiff is entitled to monetary damages (present and future) in an amount adequate to compensate for Acer's infringement, but in no event less than a reasonable royalty for the use made of the invention by Acer, together with interest and costs as fixed by the Court, accruing as of the time Acer obtained knowledge of the '805 Patent.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter:

- a. A judgment in favor of Plaintiff that Acer has infringed, either literally and/or under the doctrine of equivalents, the '626, '870, and '805 Patents;
- b. A judgment and order requiring Acer to pay Plaintiff its damages (past, present, and future), costs, expenses, and pre-judgment and post-judgment interest for Acer's infringement of the '626, '870, and '805 Patents;
- c. A judgment and order requiring Acer to pay Plaintiff compulsory ongoing licensing fees, as determined by the Court in equity.

d. A judgment and order requiring Acer to provide an accounting and to pay supplemental damages to Plaintiff, including without limitation, pre-judgment and post-judgment interest and compensation for infringing products released after the filing of this case that are not colorably different from the accused products;

e. A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to Plaintiff its reasonable attorneys' fees against Acer; and

f. Any and all other relief as the Court may deem appropriate and just under the circumstances.

DEMAND FOR JURY TRIAL

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

Dated: June 17, 2024

Respectfully submitted,

By: /s/ Brett E. Cooper

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