

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

**QUICKER CONNECTIONS LLC,**

Plaintiff,

v.

**CISCO SYSTEMS, INC.,**

Defendant.

Civil Action No. 24-cv-1074

**JURY TRIAL DEMANDED**

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**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Quicker Connections LLC files this Complaint for Patent Infringement and Damages against Defendant Cisco Systems, Inc., and would respectfully show the Court as follows:

**PARTIES**

1. Plaintiff Quicker Connections LLC (“QC” or “Plaintiff”) is a Delaware limited liability company with its principal place of business at 16192 Coastal Hwy, Lewes, DE 19958.

2. On information and belief, Defendant Cisco Systems, Inc. (“Cisco” or “Defendant”) is a corporation duly organized and existing under the laws of the State of Delaware. It has a place of business at 2250 East President George Bush Highway, Richardson, Texas 75082. Cisco may also be served with process through its registered agent, Corporation Service Company d/b/a CSC- Lawyers Incorporating Service Company, at 211 E. 7th Street, Suite 620, Austin, Texas 78701.

3. On information and belief, Cisco directly and/or indirectly develops, designs, manufactures, uses, distributes, markets, offers to sell and/or sells infringing products and services in the United States, including in the Eastern District of Texas, and otherwise direct infringing

activities to this District in connection with its products and services as set forth in this complaint. This includes but is not limited to Cisco's "Catalyst Passive Optical Network Series Switches," "Network Convergence System 2000 Series," "Network Convergence System 2002 Series," "Network Convergence System 2006 Series," "ONS 15454 Multiservice Transport Platform," and "ONS 15600 Multiservice Transport Platform."

### **JURISDICTION AND VENUE**

4. This civil action arises under the Patent Laws of the United States, 35 U.S.C. § 1 *et seq.*, including without limitation 35 U.S.C. §§ 271, 281, 283, 284, and 285.

5. This Court has federal subject matter jurisdiction over this action pursuant to, *inter alia*, 28 U.S.C. §§ 1331, 1332, and 1338(a).

6. QC's causes of action arise, at least in part, from Defendant's contacts with and activities in this District and the State of Texas.

7. Personal jurisdiction exists generally over the Defendant because it has sufficient minimum contacts and/or has engaged in continuous and systematic activities in the forum as a result of business conducted within Texas, including in the Eastern District of Texas. This Court has personal jurisdiction over Defendant pursuant to TEX. CIV. PRAC. & REM. CODE § 17.041 *et seq.* and principles of due process. Personal jurisdiction also exists over Defendant because on information and belief each, directly or through subsidiaries, makes, uses, sells, offers for sale, imports, advertises, makes available, and/or markets products and/or services within Texas, including in the Eastern District of Texas, that infringe one or more claims of United States Patent Nos. 6,813,343, 6,822,943, 6,834,038, 7,054,264, 7,061,859, and 7,483,399 (herein referred to as the "Patents-In-Suit" or the "QC Patents"). Further, on information and belief, Defendant has placed or contributed to placing infringing products and/or services into the stream of commerce

knowing or understanding that such products and/or services would be sold and used in the United States, in Texas, and within this District.

8. Further, upon information and belief, Defendant has induced acts of infringement, and/or advertises, markets, sells, and/or offers to sell products, including infringing products, in this District.

9. All allegations and support thereof regarding jurisdiction herein are hereby incorporated by reference for the purposes of venue.

10. Venue is proper in this Court under 28 U.S.C. §§ 1391(b) and (c) and 1400(b). Defendant makes, uses, sells, offers to sell, and/or imports products and/or services that are accused of infringing the Patents-In-Suit into and/or within this District and has a regular and established place of business within this District.

11. Defendant has solicited business in the Eastern District of Texas, transacted business within this District, and attempted to derive financial benefit from the residents of this District, including benefits directly related to Defendant's infringement of the Patents-In-Suit.

12. On information and belief, Defendant maintains regular and established places of business at 2260 Chelsea Blvd., Allen TX 75013; 2250 East President George Bush Highway, Building 5, Richardson TX; and Cisco Building RCDN-6, Renner Pkwy & W. Renner Rd., Richardson TX 75080.

13. On information and belief, Cisco Defendant employs nearly 500 persons in the Eastern District of Texas, and approximately 1900 persons in or near the Eastern District of Texas throughout the Dallas-Fort Worth Metroplex, including many in positions that relate to the Patents-In-Suit. On information and belief, at least some of the personnel it employs in positions related to the Patents-In-Suit and/or Accused Products are in Defendant's Richardson and/or Allen

facilities in this District, and at least as of this time last year, Defendant was actively seeking to hire additional such personnel. Further, Defendant has filed in the Marshall Division of this District multiple patent cases.

14. Venue is also proper because, on information and belief, Defendant has a regular and established place of business in this District, including facilities in Richardson, Texas and Allen, Texas. Defendant is registered with the Secretary of State to do business in the State of Texas. Defendant also has authorized sellers and sales representatives that offer for sale and sell infringing products to consumers throughout Texas and in this District, including at least Cynergy Technology based in Tyler, Texas and Longview, Texas. On information and belief, Defendant currently operates out of or makes use of leased, work-share, co-op or other arrangements for space, offices or facilities in this District, including through its partners and/or agents.

15. For example, on information and belief, Defendant implements a comprehensive work-from-home policy under which Defendant has adopted or ratified one or more additional places of business in this District, including but not limited to the homes of employees, such that the collection of these locations constitutes an aggregate network of regular and established places in this District, in and from which business is operated. On information and belief, Defendant specifically advertises for and solicits employees to reside and work remotely in this District, including to support its customers in the District, and provides and/or stores literature, equipment and/or inventory at those locations for the purpose of enabling these employees to conduct their jobs and use such literature, equipment and/or inventory specifically in this District. On information and belief, Defendant employs service technicians and sales representatives in this District who provide support and sales services to existing Defendant's customers and prospective

customers residing in this District. The work of these Defendant service technicians and sales representatives is therefore inextricably tied to this District.

16. Further, Defendant has admitted or not contested personal jurisdiction in this District. *See Orckit Corp. v. Cisco Systems, Inc.*, No. 2:22-cv-276-JRG-RSP, Dkt. 26 (E.D. Tex. Oct. 28, 2022).

17. Plaintiff has fulfilled its obligations, if any, under 35 U.S.C. § 287.

### **THE PATENTS-IN-SUIT**

18. On November 23, 2004, United States Patent No. 6,822,943 B1 (“the ‘943 patent”), entitled “Network access multiplexer with protocol address translation,” was duly and legally issued by the United States Patent and Trademark Office (“USPTO”) to Sharon Martin. A true and correct copy of the ‘943 patent is attached hereto as **Exhibit A**.

19. On December 21, 2004, United States Patent No. 6,834,038 B1 (“the ‘038 patent”), entitled “Protection against master unit failure in remote network access multiplexing,” was duly and legally issued by the United States Patent and Trademark Office (“USPTO”) to David Zelig, Eli Aloni, Ron Sdayor, and Menahem Kaplan. A true and correct copy of the ‘038 patent is attached hereto as **Exhibit B**.

20. On May 30, 2006, United States Patent No. 7,054,264 B2 (“the ‘264 patent”), entitled “Interconnect and gateway protection in bidirectional ring networks,” was duly and legally issued by the United States Patent and Trademark Office (“USPTO”) to Gal Mor. A true and correct copy of the ‘264 patent is attached hereto as **Exhibit C**.

21. On June 13, 2006, United States Patent No. 7,061,859 B2 (“the ‘859 patent”), entitled “Fast protection in ring topologies,” was duly and legally issued by the United States

Patent and Trademark Office (“USPTO”) to Yossi Barsheshet. A true and correct copy of the ‘859 patent is attached hereto as **Exhibit D**.

22. On January 27, 2009, United States Patent No. 7,483,399 B2 (“the ‘399 patent”), entitled “Signaling MPLS over RPR rings,” was duly and legally issued by the United States Patent and Trademark Office (“USPTO”) to David Zelig, Leon Bruckman, and Yoav Kotser. A true and correct copy of the ‘399 patent is attached hereto as **Exhibit E**.

23. Each of the Patents-in-Suit – the ‘943, ‘038, ‘264, ‘859, and ‘399 patents – claims patent-eligible subject matter and is presumed valid and enforceable under 35 U.S.C. §282.

24. QC is the exclusive owner by assignment of all rights, title, and interest in each of the Patents-in-Suit, including the right to bring this suit for injunctive relief and damages, and including the right to sue and recover all past, present, and future damages for infringement of the Patents-in-Suit. Marking was not required under 35 U.S.C. § 287, and to the extent it was, such requirement has been fulfilled.

25. Defendant does not have a license to any of the Patents-in-Suit, either expressly or implicitly, nor does Defendant enjoy or benefit from any rights in or to any of the Patents-in-Suit whatsoever.

26. Representative claim charts showing a sample of infringement of one claim of each of the Patents-in-Suit by the Accused Products are appended to this Complaint as Exhibits F-J.

### **ACCUSED PRODUCTS**

27. Defendant makes, uses, sells, offers to sell, tests, designs, distributes, and/or imports into the United States high-speed networking platforms, including both software and hardware components, such as, and without limitation, Cisco Network Convergence System.

Among other things, Cisco's platforms deliver agility, programmability, and massive scale across ultra-long-haul, metro, and enterprise optical networks.

28. Defendant also makes, uses, sells, offers to sell, tests, designs, distributes, and/or imports into the United States other platforms, software, and hardware, such as, and without limitation, Cisco ONS Multiservice Switching Platform and Cisco Catalyst Passive Optical Network. Among other things, Cisco ONS Multiservice Switching Platform allows the service providers to simplify their metro networks while providing complete integration of metro core and edge networks for service provisioning and network management.

29. Hereafter, the term "Accused Products" refers to all products (including but not limited to software, hardware, network architectural design) manufactured, used, tested, imported, sold or offered to sell by or on behalf of Defendant practicing the Patents-in- Suit and all processes employed by Defendant that practice the patents-in-suit, consisting of, without limitation, at least: all series of "Catalyst Passive Optical Network Series Switches," all series of "Network Convergence System 2000 Series," all series of "Network Convergence System 2002 Series," all series of "Network Convergence System 2006 Series," "ONS 15454 Multiservice Transport Platform," and "ONS 15600 Multiservice Transport Platform," and any other Cisco ONS Multiservice Transport Platforms.

30. Defendant has knowingly (since at least the date of this Complaint), intentionally, and actively aided, abetted, and induced others to directly infringe each of the Patents-In-Suit (such as its customers in this District and throughout the United States).

31. Defendant has knowingly (since at least the date of this Complaint) and willfully infringes the Patents-in-Suit and have actively aided, abetted, and induced others to directly infringe the Patents-in-Suit (such as its customers in this District and throughout the United States).

**COUNT I**  
**PATENT INFRINGEMENT OF THE '943 PATENT**

32. Plaintiff restates and realleges the preceding paragraphs of this Complaint, which are incorporated by reference as if fully restated herein.

33. Defendant, under 35 U.S.C. § 271(a), directly, literally, and/or under the doctrine of equivalents infringed one or more claims of the '943 patent, by making, using, testing, selling, offering for sale and/or importing into the United States Defendant's Accused Products.

34. Defendant also indirectly infringed the '943 patent by actively inducing the direct infringement by third parties under 35 U.S.C. § 271(b).

35. Defendant knowingly, intentionally, and actively aided, abetted, and induced others to directly infringe at least one claim of the '943 patent (such as its customers in this District and throughout the United States).

36. Defendant contributorily infringed and is contributory infringers because, with knowledge of the '943 patent, Defendant supplied a material part of a claimed combination, where the material part was not a staple article of commerce and was incapable of substantial non-infringing use.

37. Defendant contributed to its customers' infringement because, with knowledge of the '943 patent, Defendant supplied the technology that allowed its customers to infringe the '943 patent.

38. Defendant had knowledge that its activities concerning the Accused Products infringed one or more claims of the '943 patent.

39. Defendant's customers, such as consumers or end users, actually infringed claims of the '943 patent by using the Accused Products in a manner proscribed by Defendant, and as such, Defendant's customers are direct infringers.



40. Further, Defendant provided information and technical support to its customers, including promotional materials, product manuals, brochures, videos, demonstrations, and website materials encouraging its customers to purchase and instructing them to use Defendant's Accused Products (which are acts of direct infringement of the '943 patent).

41. Alternatively, Defendant knew that there was a high probability that the importation, distribution, sale, offer for sale, and use of the Accused Products constituted direct infringement of the '943 patent but took deliberate actions to avoid learning of these facts.

42. On information and belief, Defendant knew that their activities concerning the Accused Products infringed one or more claims of the '943 patent.

43. On information and belief, Defendant's Accused Products were available to businesses and individuals throughout the United States and in the State of Texas, including in this District.

44. Defendant caused QC irreparable injury and damage by infringing one or more claims of the '943 patent.

45. Defendant's infringement of the '943 patent was willful and merits increased damages.

46. Representative claim chart attached hereto as Exhibit F describes how the elements of an exemplary claim 1 of the '943 patent is infringed by one or more of the Accused Products. This provides details regarding only one example of Defendant's infringement, and only as to a single patent claim, and Plaintiff reserves its right to provide greater detail and scope via its Infringement Contentions at the time required under this Court's scheduling order.

**COUNT II**  
**PATENT INFRINGEMENT OF THE '038 PATENT**

47. Plaintiff restates and realleges the preceding paragraphs of this Complaint, which are incorporated by reference as if fully restated herein.

48. Defendant, under 35 U.S.C. § 271(a), directly, literally, and/or under the doctrine of equivalents infringed one or more claims of the '038 patent, by making, using, testing, selling, offering for sale and/or importing into the United States Defendant's Accused Products.

49. Defendant also indirectly infringed the '038 patent by actively inducing the direct infringement by third parties under 35 U.S.C. § 271(b).

50. Defendant knowingly, intentionally, and actively aided, abetted, and induced others to directly infringe at least one claim of the '038 patent (such as its customers in this District and throughout the United States).

51. Defendant contributorily infringed and is contributory infringers because, with knowledge of the '038 patent, Defendant supplied a material part of a claimed combination, where the material part was not a staple article of commerce and was incapable of substantial non-infringing use.

52. Defendant contributed to its customers' infringement because, with knowledge of the '038 patent, Defendant supplied the technology that allowed its customers to infringe the '038 patent.

53. Defendant had knowledge that its activities concerning the Accused Products infringed one or more claims of the '038 patent.

54. Defendant's customers, such as consumers or end users, actually infringed claims of the '038 patent by using the Accused Products in a manner proscribed by Defendant, and as such, Defendant's customers are direct infringers.

55. Further, Defendant provided information and technical support to its customers, including promotional materials, product manuals, brochures, videos, demonstrations, and website materials encouraging its customers to purchase and instructing them to use Defendant's Accused Products (which are acts of direct infringement of the '038 patent).

56. Alternatively, Defendant knew that there was a high probability that the importation, distribution, sale, offer for sale, and use of the Accused Products constituted direct infringement of the '038 patent but took deliberate actions to avoid learning of these facts.

57. On information and belief, Defendant knew that their activities concerning the Accused Products infringed one or more claims of the '038 patent.

58. On information and belief, Defendant's Accused Products were available to businesses and individuals throughout the United States and in the State of Texas, including in this District.

59. Defendant caused QC irreparable injury and damage by infringing one or more claims of the '038 patent.

60. Defendant's infringement of the '038 patent was willful and merits increased damages.

61. Representative claim chart attached hereto as Exhibit G describes how the elements of an exemplary claims 1-5 of the '038 patent are infringed by one or more of the Accused Products. This provides details regarding only one example of Defendant's infringement, and only as to a single patent claim, and Plaintiff reserves its right to provide greater detail and scope via its Infringement Contentions at the time required under this Court's scheduling order.

**COUNT III**  
**PATENT INFRINGEMENT OF THE '264 PATENT**

62. Plaintiff restates and realleges the preceding paragraphs of this Complaint, which are incorporated by reference as if fully restated herein.

63. Defendant, under 35 U.S.C. § 271(a), directly, literally, and/or under the doctrine of equivalents infringed one or more claims of the '264 patent, by making, using, testing, selling, offering for sale and/or importing into the United States Defendant's Accused Products.

64. Defendant also indirectly infringed the '264 patent by actively inducing the direct infringement by third parties under 35 U.S.C. § 271(b).

65. Defendant knowingly, intentionally, and actively aided, abetted, and induced others to directly infringe at least one claim of the '264 patent (such as its customers in this District and throughout the United States).

66. Defendant contributorily infringed and is contributory infringers because, with knowledge of the '264 patent, Defendant supplied a material part of a claimed combination, where the material part was not a staple article of commerce and was incapable of substantial non-infringing use.

67. Defendant contributed to its customers' infringement because, with knowledge of the '264 patent, Defendant supplied the technology that allowed its customers to infringe the '264 patent.

68. Defendant had knowledge that its activities concerning the Accused Products infringed one or more claims of the '264 patent.

69. Defendant's customers, such as consumers or end users, actually infringed claims of the '264 patent by using the Accused Products in a manner proscribed by Defendant, and as such, Defendant's customers are direct infringers.

70. Further, Defendant provided information and technical support to its customers, including promotional materials, product manuals, brochures, videos, demonstrations, and website materials encouraging its customers to purchase and instructing them to use Defendant's Accused Products (which are acts of direct infringement of the '264 patent).

71. Alternatively, Defendant knew that there was a high probability that the importation, distribution, sale, offer for sale, and use of the Accused Products constituted direct infringement of the '264 patent but took deliberate actions to avoid learning of these facts.

72. On information and belief, Defendant knew that their activities concerning the Accused Products infringed one or more claims of the '264 patent.

73. On information and belief, Defendant's Accused Products were available to businesses and individuals throughout the United States and in the State of Texas, including in this District.

74. Defendant caused QC irreparable injury and damage by infringing one or more claims of the '264 patent.

75. Defendant's infringement of the '264 patent was willful and merits increased damages.

76. Representative claim chart attached hereto as Exhibit H describes how the elements of an exemplary claim 21 of the '264 patent is infringed by one or more of the Accused Products. This provides details regarding only one example of Defendant's infringement, and only as to a single patent claim, and Plaintiff reserves its right to provide greater detail and scope via its Infringement Contentions at the time required under this Court's scheduling order.

**COUNT IV**  
**PATENT INFRINGEMENT OF THE '859 PATENT**

77. Plaintiff restates and realleges the preceding paragraphs of this Complaint, which are incorporated by reference as if fully restated herein.

78. Defendant, under 35 U.S.C. § 271(a), directly, literally, and/or under the doctrine of equivalents infringed one or more claims of the '859 patent, by making, using, testing, selling, offering for sale and/or importing into the United States Defendant's Accused Products.

79. Defendant also indirectly infringed the '859 patent by actively inducing the direct infringement by third parties under 35 U.S.C. § 271(b).

80. Defendant knowingly, intentionally, and actively aided, abetted, and induced others to directly infringe at least one claim of the '859 patent (such as its customers in this District and throughout the United States).

81. Defendant contributorily infringed and is contributory infringers because, with knowledge of the '859 patent, Defendant supplied a material part of a claimed combination, where the material part was not a staple article of commerce and was incapable of substantial non-infringing use.

82. Defendant contributed to its customers' infringement because, with knowledge of the '859 patent, Defendant supplied the technology that allowed its customers to infringe the '859 patent.

83. Defendant had knowledge that its activities concerning the Accused Products infringed one or more claims of the '859 patent.

84. Defendant's customers, such as consumers or end users, actually infringed claims of the '859 patent by using the Accused Products in a manner proscribed by Defendant, and as such, Defendant's customers are direct infringers.

85. Further, Defendant provided information and technical support to its customers, including promotional materials, product manuals, brochures, videos, demonstrations, and website materials encouraging its customers to purchase and instructing them to use Defendant's Accused Products (which are acts of direct infringement of the '859 patent).

86. Alternatively, Defendant knew that there was a high probability that the importation, distribution, sale, offer for sale, and use of the Accused Products constituted direct infringement of the '859 patent but took deliberate actions to avoid learning of these facts.

87. On information and belief, Defendant knew that their activities concerning the Accused Products infringed one or more claims of the '859 patent.

88. On information and belief, Defendant's Accused Products were available to businesses and individuals throughout the United States and in the State of Texas, including in this District.

89. Defendant caused QC irreparable injury and damage by infringing one or more claims of the '859 patent.

90. Defendant's infringement of the '859 patent was willful and merits increased damages.

91. Representative claim chart attached hereto as Exhibit I describes how the elements of an exemplary claims 1 and 3 of the '859 patent are infringed by one or more of the Accused Products. This provides details regarding only one example of Defendant's infringement, and only as to a single patent claim, and Plaintiff reserves its right to provide greater detail and scope via its Infringement Contentions at the time required under this Court's scheduling order.

**COUNT V**  
**PATENT INFRINGEMENT OF THE '399 PATENT**

92. Plaintiff restates and realleges the preceding paragraphs of this Complaint, which are incorporated by reference as if fully restated herein.

93. Defendant has, under 35 U.S.C. § 271(a), directly infringed, and continues to directly infringe, literally and/or under the doctrine of equivalents one or more claims of the '399 patent, by making, using, testing, selling, offering for sale and/or importing into the United States Defendant's Accused Products.

94. Defendant also indirectly infringes the '399 patent by actively inducing the direct infringement by third parties under 35 U.S.C. § 271(b).

95. Defendant has knowingly (since at least the date of this Complaint), intentionally, and actively aided, abetted, and induced others to directly infringe at least one claim of the '399 patent (such as its customers in this District and throughout the United States).

96. Defendant continues to induce infringement of the '399 patent.

97. Defendant has contributorily infringed and is contributory infringer because, with knowledge of the '399 patent (since at least the date of this Complaint), it supplies a material part of a claimed combination, where the material part is not a staple article of commerce and is incapable of substantial non-infringing use.

98. Defendant contributes to its customers' infringement because, with knowledge of the '399 patent, Defendant supplies the technology that allows its customers to infringe the '399 patent.

99. Defendant has knowledge that its activities concerning the Accused Products infringe one or more claims of the '399 patent.



100. Defendant's customers, such as consumers or end users, has actually infringed claims of the '399 patent by using the Accused Products in a manner proscribed by Defendant, and as such, Defendant's customers are direct infringers.

101. On information and belief, Defendant will continue to encourage, aid, or otherwise cause third parties to import, sell, offer for sale, distribute, and use the Accused Products (which are acts of direct infringement of the '399 patent) and Defendant has and will continue to encourage those acts with the specific intent to infringe one or more claims of the '399 patent.

102. Further, Defendant provides information and technical support to its customers, including promotional materials, product manuals, brochures, videos, demonstrations, and website materials encouraging its customers to purchase and instructing them to use Defendant's Accused Products (which are acts of direct infringement of the '399 patent).

103. Alternatively, Defendant knows and/or will know that there is a high probability that the importation, distribution, sale, offer for sale, and use of the Accused Products constitutes direct infringement of the '399 patent but took deliberate actions to avoid learning of these facts.

104. On information and belief, Defendant has known that its activities concerning the Accused Products infringed one or more claims of the '399 patent since at least the date of this Complaint.

105. On information and belief, Defendant's Accused Products are available to businesses and individuals throughout the United States and in the State of Texas, including in this District.

106. Defendant has caused and will continue to cause QC irreparable injury and damage by infringing one or more claims of the '399 patent. QC will suffer further irreparable injury, for

which it has no adequate remedy at law, unless and until Defendant is enjoined from infringing the claims of the '399 patent.

107. Defendant's infringement after at least the date of this Complaint of the '399 patent has been willful and merits increased damages.

108. On information and belief, Defendant has known that its activities concerning the Accused Products infringed one or more claims of the '399 patent since at least the date of this Complaint.

109. Representative claim chart attached hereto as Exhibit J describes how the elements of an exemplary claims 1-3 from the '399 patent are infringed by one or more of the Accused Products. This provides details regarding only one example of Defendant's infringement, and only as to a single patent claim, and Plaintiff reserves its right to provide greater detail and scope via its Infringement Contentions at the time required under this Court's scheduling order.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff Quicker Connection LLC respectfully requests the following relief:

A. A judgment that Defendant has directly infringed either literally and/or under the doctrine of equivalents and continue to directly infringe the QC Patents set forth in this Complaint;

B. A judgment that Defendant has actively induced infringement and continues to induce infringement of the QC Patents set forth in this Complaint;

C. A judgment that Defendant has contributorily infringed and continues to contributorily infringe the QC Patents set forth in this Complaint;

D. A judgment and order requiring Defendant to pay Plaintiff damages under 35 U.S.C. § 284, including without limitation both conveyed and derivative sales, as well as supplemental damages for any continuing post-verdict infringement through entry of the final judgment with an accounting as needed;

E. A judgment that Defendant's infringement of each of the QC Patents is willful;

F. A judgment that Defendant's infringement of enhanced damages pursuant to 35 U.S.C. § 284;

G. A judgment that this is an exceptional case within the meaning of 35 U.S.C. § 285 and Plaintiff is therefore entitled to reasonable attorneys' fees;

H. An accounting for acts of infringement and supplemental damages for infringement and/or damages not presented at trial, including, without limitation, pre-judgment and post-judgment interest on the damages awarded;

I. A judgment and order awarding a compulsory ongoing royalty;

J. A judgment and order awarding Plaintiff costs associated with bringing this action;

K. A judgment granting a preliminary and permanent injunction that restrains and enjoins Defendant, its officers, directors, divisions, employees, agents, servants, parents, subsidiaries, successors, assigns, and all those in privity, concert, or participation with them from directly or indirectly infringing the QC Patents;

L. All equitable relief the Court deems just and proper; and

M. Such other relief which may be requested and to which the Plaintiffs are entitled.

**JURY TRIAL DEMANDED**

Pursuant to FED. R. CIV. P. 38, Plaintiff Quicker Connection LLC hereby demands a trial by jury on all issues so triable.

Date: December 24, 2024

Respectfully Submitted,

/s/ Erick S. Robinson by permission Andrea L. Fair

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