

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SIPCO, LLC,)	
)	
Plaintiff,)	C.A. No. _____
)	JURY TRIAL DEMANDED
v.)	
)	
FIBAR USA LLC,)	
FIBAR GROUP S.A.,)	
)	
Defendants.)	

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff SIPCO, LLC (“SIPCO” or “Plaintiff”), for its Complaint against Fibar USA LLC and Fibar Group S.A. (collectively, “FIBARO” or “Defendants”) alleges the following:

NATURE OF THE ACTION

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

THE PARTIES

2. Plaintiff is a limited liability company organized and existing under the laws of the State of Georgia with a place of business at 20638 Duxbury Terrace, Ashburn, Virginia 20147.

3. On information and belief, Defendant Fibar USA LLC is a company organized under the laws of Illinois with a place of business at 1245 N. Milwaukee Avenue, Chicago, IL 60025.

4. On information and belief, Defendant Fibar Group S.A. is a company organized under the laws of Poland with places of business at ul. Lotnicza 1, 60-421, Poznan, Poland and Serdeczna 3 Street, 62-081, Wysogotowo, Poland.

5. On information and belief, Defendants sell and offer to sell products and services throughout the United States, including in this District, and introduce products and services into the stream of commerce and that incorporate infringing technology knowing that they would be sold in this District and elsewhere in the United States.

6. On information and belief, Defendants conduct a significant, persistent and regular amount of business in this District through product sales by its distributors, customers, and resellers and through online marketing, and derive substantial revenue from such business.

JURISDICTION AND VENUE

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

8. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

9. Venue is proper in this District against Defendant Fibar USA LLC under 28 U.S.C. § 1400(b) because it is incorporated in Illinois and its principle place of business is located within this District, at 1245 N. Milwaukee Avenue, Chicago, IL 60025.

10. Venue is proper in this District against Defendant Fibar Group S.A. under 28 U.S.C. § 1391(c)(3) because it is a foreign company organized under the laws of Poland.

11. On information and belief, this Court has personal jurisdiction over Defendant Fibar USA LLC because it is incorporated in Illinois and has purposefully availed itself of the privileges and benefits of the laws of the State of Illinois. Further, Defendant Fibar USA LLC is subject to this Court's general and specific personal jurisdiction because Defendant Fibar USA LLC has sufficient minimum contacts within the State of Illinois, pursuant to due process and/or the Illinois Long Arm Statute, because Defendant Fibar USA LLC purposefully availed itself of

the privileges of conducting business in the State of Illinois, and because Plaintiff's causes of action arise directly from Defendant Fibar USA LLC's business contacts and other activities in the State of Illinois, including regularly doing or soliciting business and deriving substantial revenue from products and services provided to individuals in this District. The exercise of jurisdiction over Defendant Fibar USA LLC would not offend traditional notions of fair play and substantial justice.

12. On information and belief, Defendant Fibar Group S.A. is subject to this Court's general and specific personal jurisdiction because Defendant Fibar Group S.A. has sufficient minimum contacts within the State of Illinois, pursuant to due process and/or the Illinois Long Arm Statute, because Plaintiff's causes of action arise directly from Defendant Fibar Group S.A.'s business contacts and other activities in the State of Illinois. Defendant Fibar Group S.A. is a foreign corporation and, pursuant to § 1391(c)(3), may be sued in any judicial district. The exercise of jurisdiction over Defendant Fibar Group S.A. would not offend traditional notions of fair play and substantial justice.

13. Plaintiff's right to relief against Defendants arises out of the same series of transactions or occurrences, namely their cooperation in planning, developing, designing, testing, operating, manufacturing, selling, maintaining, marketing, and offering customer support for the infringing products. Defendants are corporate affiliates. Joinder of Defendants is proper pursuant to 35 § U.S.C. 299(a).

BACKGROUND

14. SIPCO is a small research, development and technology company originally based in Atlanta, Georgia. T. David Petite was its founding member.

15. In the 1990s, through his own individual research and development efforts, Mr. Petite invented a large number of wireless control and distribution technology applications. The inventions resulting from Mr. Petite's efforts include, but are not limited to, various ways of moving data as economically and seamlessly as possible over both wired and wireless networks.

16. Through the 1990s and early 2000s investors contributed tens of millions of dollars for technology development and implementation of networks. Clients included Georgia Power, Alabama Power, Newnan Utilities GA, Johnson Controls, Synovus Bank, and Grand Court Lifestyles residential living facilities.

17. After proving that the technology worked in the field, several companies competed to purchase an exclusive license to Mr. Petite's technology for the market known as "smart grid." Landis+Gyr (<http://www.landisgyr.com/>) (previously Siemens Metering) took an exclusive license to the smart grid technology in 2002 and in 2005 purchased rights to the technology for utility applications for \$30,000,000. Mr. Petite's technology has been deployed in millions of meters deployed across North America and throughout the world.

18. SIPCO retained the rights to the mesh network patents, and for use of the technology outside of the utility space. It still maintains ownership of the software, firmware, hardware and patent portfolio that resulted from Mr. Petite's research and development efforts.

19. SIPCO's patent portfolios (of which the patents in suit are a part) include inventions that are widely recognized as pioneering in various fields of use. As a result, more than 100 corporations have taken licenses to them. Licensees include companies operating in the vertical markets of Industrial Controls, Lighting, Smart Grid, Building

Automation, Network Backhaul, Home Appliance, Home Automation and Entertainment, Sensor Monitoring, and Internet Service Provisioning. Licensed products include products using standard wireless mesh protocols such as ZigBee and Z-Wave.

20. SIPCO is the exclusive owner of all rights, title, and interest in the patents in suit, including the right to exclude others and to enforce, sue and recover damages for past and future infringement thereof.

INFRINGEMENT OF U.S. PATENT NO. 6,044,062

21. The allegations set forth in the foregoing paragraphs 1 through 19 are incorporated by reference into this claim for relief.

22. On March 28, 2000, U.S. Patent No. 6,044,062 (“the ‘062 Patent”), entitled “Wireless Network System and Method for Providing Same,” was duly and legally issued by the United States Patent and Trademark Office. A true and correct copy of the ‘062 Patent is attached as Exhibit 1. Related U.S. application data is set forth on the face of the patent.

23. Plaintiff is the assignee and owner of the right, title, and interest in and to the ‘062 Patent, including the right to assert all causes of action arising under the ‘062 Patent and the right to any remedies for infringement of the ‘062 Patent.

24. Defendants have infringed and continue to infringe the ‘062 Patent under 35 U.S.C. § 271, literally or under the doctrine of equivalents, by making, using, selling, and/or offering for sale in the United States, and/or importing into the United States, infringing products without authorization (hereafter “‘062 Infringing Systems”). At a minimum, ‘062 Infringing Systems include systems with FIBARO gateways that operate pursuant to the Z-Wave Protocol and FIBARO Z-Wave devices used with such FIBARO gateways. The FIBARO gateways

include gateways such as the FIBARO Home Center 2 Gateway and FIBARO Home Center Lite Gateway. The FIBARO Z-Wave devices include devices such as motion sensors, flood sensors, door/window sensors, wall plugs, switches, dimmers, RGBW controllers, key fobs, buttons and swipes.

25. Defendants directly infringed and continue to directly infringe at least claim 2¹ of the '062 Patent by making, using, selling, offering to sell, importing and/or providing and causing to be used the FIBARO Home Center 2 Gateway with FIBARO Z-Wave motion sensors, flood sensors, door/window sensors, wall plugs, switches, dimmers, RGBW controllers, key fobs, buttons and/or swipes, which satisfy, literally or under the doctrine of equivalents, each and every claim limitation of claim 2 of the '062 Patent. The correspondence between the limitations of claim 2 of the '062 Patent and the FIBARO Home Center 2 Gateway with FIBARO Z-Wave motion sensors, flood sensors, door/window sensors, wall plugs, switches, dimmers, RGBW controllers, key fobs, buttons and/or swipes is shown in the claim chart attached hereto as Exhibit 2. The claim chart is incorporated by reference as if set forth herein. The citations to the Z-Wave Protocol in the claim chart are required for a product configured to operate pursuant to the Z-Wave Protocol. Additional details relating to FIBARO Home Center 2 Gateway and FIBARO Z-Wave motion sensors, flood sensors, door/window sensors, wall plugs, switches, dimmers, RGBW controllers, key fobs, buttons and swipes and their infringement are within the possession, custody or control of Defendants.

¹ Plaintiff reserves the right to identify additional asserted claims and accused products as this litigation proceeds. For example, Plaintiff expressly reserves the right to identify additional asserted claims and accused products in its infringement contentions to be served during the discovery process.

26. Defendants provide users of the FIBARO Home Center 2 Gateway, FIBARO Home Center Lite Gateway and FIBARO Z-Wave motion sensors, flood sensors, door/window sensors, wall plugs, switches, dimmers, RGBW controllers, key fobs, buttons and swipes with instructions on how to operate within a Z-Wave network and markets Z-Wave connectivity in their promotional materials for such products. To operate within a Z-Wave network, the FIBARO Home Center 2 Gateway, FIBARO Home Center Lite Gateway and FIBARO Z-Wave motion sensors, flood sensors, door/window sensors, wall plugs, switches, dimmers, RGBW controllers, key fobs, buttons and swipes need to operate pursuant to the Z-Wave Protocol and the required portions of the Z-Wave Protocol necessarily practice at least claim 2 of the '062 Patent.

27. On information and belief, the identified structure and functionality of the FIBARO Home Center 2 Gateway that are shown in the claim chart are also representative of the structure and functionality present in the FIBARO Home Center Lite Gateway. Thus, the claim chart is representative of the infringement of claim 2 of the '062 Patent by the FIBARO Home Center Lite Gateway used with FIBARO Z-Wave motion sensors, flood sensors, door/window sensors, wall plugs, switches, dimmers, RGBW controllers, key fobs, buttons and/or swipes.

28. On information and belief, the identified structure and functionality of the FIBARO Z-Wave devices (motion sensors, flood sensors, door/window sensors, wall plugs, switches, dimmers, RGBW controllers, key fobs, buttons and swipes) that are shown in the claim chart are also representative of the structure and functionality present in non-FIBARO Z-Wave devices. Thus, the claim chart is representative of the infringement of claim 2 of the '062 Patent by the FIBARO Home Center 2 Gateway used with non-FIBARO Z-Wave devices. Further to

Paragraph 26, the claim chart is also representative of the infringement of claim 2 of the '062 Patent by the FIBARO Home Center Lite Gateway used with non-FIBARO Z-Wave devices.

29. Plaintiff offers this preliminary identification and description of infringement without the benefit of discovery or claim construction in this action, and expressly reserves the right to augment, supplement, and revise its identification and description of infringement based on additional information obtained through discovery or otherwise.

30. On information and belief, Defendants had knowledge and became aware of the '062 Patent prior to the filing of this Complaint. Discovery in this matter may reveal that Defendants are liable for willful infringement and/or have induced others to infringe the '062 Patent.

31. Defendants' acts of infringement involving the '062 Patent have caused damage to Plaintiff, and Plaintiff is entitled to recover from Defendants the damages it has sustained as a result of Defendants' wrongful acts in an amount subject to proof at trial.

INFRINGEMENT OF U.S. PATENT NO. 8,924,588

32. The allegations set forth in the foregoing paragraphs 1 through 19 are incorporated by reference into this claim for relief.

33. On December 30, 2014, U.S. Patent No. 8,924,588 ("the '588 Patent"), entitled "Systems And Methods For Controlling Communication Between A Host Computer and Communication Devices," was duly and legally issued by the United States Patent and Trademark Office. A true and correct copy of the '588 Patent is attached as Exhibit 3. Related U.S. application data is set forth on the face of the patent.

34. Plaintiff is the assignee and owner of the right, title, and interest in and to the ‘588 Patent, including the right to assert all causes of action arising under the ‘588 Patent and the right to any remedies for infringement of the ‘588 Patent.

35. Defendants have infringed and continue to infringe the ‘588 Patent under 35 U.S.C. § 271, literally or under the doctrine of equivalents, by making, using, selling, and/or offering for sale in the United States, and/or importing into the United States, infringing products without authorization (hereafter “‘588 Infringing Instrumentalities”). At a minimum, ‘588 Infringing Instrumentalities include all FIBARO gateways that operate pursuant to the Z-Wave Protocol. This includes products like the FIBARO Home Center 2 Gateway and FIBARO Home Center Lite Gateway.

36. Defendants directly infringed and continue to directly infringe at least claim 1² of the ‘588 Patent by making, using, selling, offering to sell, importing and/or providing and causing to be used the FIBARO Home Center 2 Gateway which satisfies, literally or under the doctrine of equivalents, each and every claim limitation of claim 1 of the ‘588 Patent. The correspondence between the limitations of claim 1 of the ‘588 Patent and the FIBARO Home Center 2 Gateway is shown in the claim chart attached hereto as Exhibit 4. The claim chart is incorporated by reference as if set forth herein. The citations to the Z-Wave Protocol in the claim chart are required for a product configured to operate pursuant to the Z-Wave Protocol. Additional details relating to the FIBARO Home Center 2 Gateway and its infringement are within the possession, custody or control of Defendants.

² Plaintiff reserves the right to identify additional asserted claims and accused products as this litigation proceeds. For example, Plaintiff expressly reserves the right to identify additional asserted claims and accused products in its infringement contentions to be served during the discovery process.

37. Defendants provide users of the FIBARO Home Center 2 Gateway with instructions on how to operate within a Z-Wave network and markets Z-Wave connectivity in its promotional materials for the gateway. To operate within a Z-Wave network, the FIBARO Home Center 2 Gateway needs to operate pursuant to the Z-Wave Protocol and the required portions of the Z-Wave Protocol necessarily practice at least claim 1 of the '588 Patent.

38. On information and belief, any other gateway of Defendants that operates pursuant to the Z-Wave Protocol such as the FIBARO Home Center Lite Gateway is also a '588 Infringing Instrumentality. Additional details relating to '588 Infringing Instrumentalities and their infringement are within the possession, custody or control of Defendants.

39. On information and belief, the identified structure and functionality of the FIBARO Home Center 2 Gateway that are shown in the claim chart are also representative of the structure and functionality present in the FIBARO Home Center Lite Gateway. Thus, the claim chart is representative of the infringement of claim 1 of the '588 Patent by the FIBARO Home Center Lite Gateway.

40. Plaintiff offers this preliminary identification and description of infringement without the benefit of discovery or claim construction in this action, and expressly reserves the right to augment, supplement, and revise its identification and description of infringement based on additional information obtained through discovery or otherwise.

41. On information and belief, Defendants had knowledge and became aware of the '588 Patent prior to the filing of this Complaint. Discovery in this matter may reveal that Defendants are liable for willful infringement and/or have induced others to infringe the '588 Patent.

42. Defendants' acts of infringement involving the '588 Patent have caused damage to Plaintiff, and Plaintiff is entitled to recover from Defendants the damages it has sustained as a result of Defendants' wrongful acts in an amount subject to proof at trial.

INFRINGEMENT OF U.S. PATENT NO. 9,430,936

43. The allegations set forth in the foregoing paragraphs 1 through 19 are incorporated by reference into this claim for relief.

44. On August 30, 2016, U.S. Patent No. 9,430,936 ("the '936 Patent"), entitled "Systems And Methods For Monitoring And Controlling Remote Devices," was duly and legally issued by the United States Patent and Trademark Office. A true and correct copy of the '936 Patent is attached as Exhibit 5. Related U.S. application data is set forth on the face of the patent.

45. Plaintiff is the assignee and owner of the right, title, and interest in and to the '936 Patent, including the right to assert all causes of action arising under the '936 Patent and the right to any remedies for infringement of the '936 Patent.

46. Defendants have infringed and continue to infringe the '936 Patent under 35 U.S.C. § 271, literally or under the doctrine of equivalents, by making, using, selling, and/or offering for sale in the United States, and/or importing into the United States, infringing products without authorization (hereafter "'936 Infringing Systems"). At a minimum, '936 Infringing Systems include FIBARO gateways that operate pursuant to the Z-Wave Protocol and FIBARO Z-Wave devices used with such FIBARO gateways. The FIBARO gateways include gateways such as the FIBARO Home Center 2 Gateway and FIBARO Home Center Lite Gateway. The FIBARO Z-Wave devices include FIBARO devices such as motion sensors, flood sensors,

door/window sensors, wall plugs, switches, dimmers, RGBW controllers, key fobs, buttons and swipes.

47. Defendants directly infringed and continue to directly infringe at least claim 1³ of the '936 Patent by making, using, selling, offering to sell, importing and/or providing and causing to be used the FIBARO Home Center 2 Gateway with FIBARO Z-Wave motion sensors, flood sensors, door/window sensors, wall plugs, switches, dimmers, RGBW controllers, key fobs, buttons and/or swipes, which satisfy, literally or under the doctrine of equivalents, each and every claim limitation of claim 1 of the '936 Patent. The correspondence between the limitations of claim 1 of the '936 Patent and the FIBARO Home Center 2 Gateway with FIBARO Z-Wave motion sensors, flood sensors, door/window sensors, wall plugs, switches, dimmers, RGBW controllers, key fobs, buttons and/or swipes is shown in the claim chart attached hereto as Exhibit 6. The claim chart is incorporated by reference as if set forth herein. The citations to the Z-Wave Protocol in the claim chart are required for a product configured to operate pursuant to the Z-Wave Protocol. Additional details relating to FIBARO Home Center 2 Gateway and FIBARO Z-Wave motion sensors, flood sensors, door/window sensors, wall plugs, switches, dimmers, RGBW controllers, key fobs, buttons and swipes and their infringement are within the possession, custody or control of Defendants.

48. Defendants provide users of the FIBARO Home Center 2 Gateway, FIBARO Home Center Lite Gateway and FIBARO Z-Wave motion sensors, flood sensors, door/window sensors, wall plugs, switches, dimmers, RGBW controllers, key fobs, buttons and swipes with

³ Plaintiff reserves the right to identify additional asserted claims and accused products as this litigation proceeds. For example, Plaintiff expressly reserves the right to identify additional asserted claims and accused products in its infringement contentions to be served during the discovery process.

instructions on how to operate within a Z-Wave network and markets Z-Wave connectivity in their promotional materials for such products. To operate within a Z-Wave network, the FIBARO Home Center 2 Gateway, FIBARO Home Center Lite Gateway and FIBARO Z-Wave motion sensors, flood sensors, door/window sensors, wall plugs, switches, dimmers, RGBW controllers, key fobs, buttons and swipes need to operate pursuant to the Z-Wave Protocol and the required portions of the Z-Wave Protocol necessarily practice at least claim 1 of the '936 Patent.

49. On information and belief, the identified structure and functionality of the FIBARO Home Center 2 Gateway that are shown in the claim chart are also representative of the structure and functionality present in the FIBARO Home Center Lite Gateway. Thus, the claim chart is representative of the infringement of claim 1 of the '936 Patent by the FIBARO Home Center Lite Gateway used with FIBARO Z-Wave motion sensors, flood sensors, door/window sensors, wall plugs, switches, dimmers, RGBW controllers, key fobs, buttons and/or swipes.

50. On information and belief, the identified structure and functionality of the FIBARO Z-Wave devices (motion sensors, flood sensors, door/window sensors, wall plugs, switches, dimmers, RGBW controllers, key fobs, buttons and swipes) that are shown in the claim chart are also representative of the structure and functionality present in non-FIBARO Z-Wave devices. Thus, the claim chart is representative of the infringement of claim 1 of the '936 Patent by the FIBARO Home Center 2 Gateway used with non-FIBARO Z-Wave devices. Further to Paragraph 48, the claim chart is also representative of the infringement of claim 1 of the '936 Patent by the FIBARO Home Center Lite Gateway used with non-FIBARO Z-Wave devices.

51. Plaintiff offers this preliminary identification and description of infringement without the benefit of discovery or claim construction in this action, and expressly reserves the

right to augment, supplement, and revise its identification and description of infringement based on additional information obtained through discovery or otherwise.

52. On information and belief, Defendants had knowledge and became aware of the ‘936 Patent prior to the filing of this Complaint. Discovery in this matter may reveal that Defendants are liable for willful infringement and/or have induced others to infringe the ‘936 Patent.

53. Defendants’ acts of infringement involving the ‘936 Patent have caused damage to Plaintiff, and Plaintiff is entitled to recover from Defendants the damages it has sustained as a result of Defendants’ wrongful acts in an amount subject to proof at trial.

INFRINGEMENT OF U.S. PATENT NO. 8,964,708

54. The allegations set forth in the foregoing paragraphs 1 through 19 are incorporated by reference into this claim for relief.

55. On February 24, 2015, U.S. Patent No. 8,964,708 (“the ‘708 Patent”), entitled “Systems And Methods For Monitoring and Controlling Remote Devices,” was duly and legally issued by the United States Patent and Trademark Office. A true and correct copy of the ‘708 Patent is attached as Exhibit 7. Related U.S. application data is set forth on the face of the patent.

56. Plaintiff is the assignee and owner of the right, title, and interest in and to the ‘708 Patent, including the right to assert all causes of action arising under the ‘708 Patent and the right to any remedies for infringement of the ‘708 Patent.

57. Defendants have infringed and continue to infringe the ‘708 Patent under 35 U.S.C. § 271, literally or under the doctrine of equivalents, by making, using, selling, and/or offering for sale in the United States, and/or importing into the United States, infringing products

without authorization (hereafter “‘708 Infringing Instrumentalities”). At a minimum, ‘708 Infringing Instrumentalities include all FIBARO devices that operate pursuant to the Z-Wave Protocol. This includes products like FIBARO motion sensors, flood sensors, door/window sensors, wall plugs, switches, dimmers, RGBW controllers, key fobs, buttons and swipes, the FIBARO Home Center 2 Gateway and FIBARO Home Center Lite Gateway.

58. Defendants directly infringed and continue to directly infringe at least claim 1⁴ of the ‘708 Patent by making, using, selling, offering to sell, importing and/or providing and causing to be used FIBARO Z-Wave devices which satisfy, literally or under the doctrine of equivalents, each and every claim limitation of claim 1 of the ‘708 Patent. The correspondence between the limitations of claim 1 of the ‘708 Patent and the FIBARO Z-Wave devices is shown in the claim chart attached hereto as Exhibit 8. The claim chart is incorporated by reference as if set forth herein. The citations to the Z-Wave Protocol in the claim chart are required for a product configured to operate pursuant to the Z-Wave Protocol. Additional details relating to FIBARO Z-Wave devices and their infringement are within the possession, custody or control of Defendants.

59. Defendants provide users of FIBARO Z-Wave devices with instructions on how to operate within a Z-Wave network and markets Z-Wave connectivity in its promotional materials for such devices. To operate within a Z-Wave network, the FIBARO Z-Wave devices need to operate pursuant to the Z-Wave Protocol and the required portions of the Z-Wave Protocol necessarily practice at least claim 1 of the ‘708 Patent.

⁴ Plaintiff reserves the right to identify additional asserted claims and accused products as this litigation proceeds. For example, Plaintiff expressly reserves the right to identify additional asserted claims and accused products in its infringement contentions to be served during the discovery process.

60. Plaintiff offers this preliminary identification and description of infringement without the benefit of discovery or claim construction in this action, and expressly reserves the right to augment, supplement, and revise its identification and description of infringement based on additional information obtained through discovery or otherwise.

61. On information and belief, Defendants had knowledge and became aware of the '708 Patent prior to the filing of this Complaint. Discovery in this matter may reveal that Defendants are liable for willful infringement and/or have induced others to infringe the '708 Patent.

62. Defendants' acts of infringement involving the '708 Patent have caused damage to Plaintiff, and Plaintiff is entitled to recover from Defendants the damages it has sustained as a result of Defendants' wrongful acts in an amount subject to proof at trial.

JURY DEMAND

63. Plaintiff requests a jury trial of all issues in this action so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment as follows:

A. Declaring that Defendants have infringed the '062, '588, '936 and '708 Patents.

B. Awarding damages arising out of Defendants' infringement of the '062, '588, '936 and '708 Patents to SIPCO, together with prejudgment and post-judgment interest, in an amount according to proof.

C. Awarding attorneys' fees to SIPCO pursuant to 35 U.S.C. § 285 or as otherwise permitted by law.

D. Awarding such other costs and further relief as the Court may deem just and proper.

DATED: August 24, 2018

RABICOFF LAW LLC

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