

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

| | | |
|--------------------------------|---|------------------------------|
| CORE WIRELESS LICENSING |) | |
| S.A.R.L. |) | |
| |) | CIVIL NO. 6:12-CV-100 |
| Plaintiff, |) | |
| |) | JURY TRIAL DEMANDED |
| v. |) | |
| |) | |
| APPLE, INC., |) | |
| |) | |
| Defendant. |) | |

**CORE WIRELESS LICENSING S.A.R.L.'S COMPLAINT FOR PATENT
INFRINGEMENT**

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff, Core Wireless Licensing S.a.r.l. (“Core Wireless”), for its Complaint against Defendant, Apple, Inc. (“Apple”) alleges:

THE PARTIES

1. Plaintiff, Core Wireless, is a corporation duly organized and existing under the laws of the Grand Duchy of Luxembourg, having a principal place of business at 16, Avenue Pasteur L-2310 Luxembourg. Core Wireless has a regular and established place of business and does business relating to the patents-in-suit in connection with its wholly-owned subsidiary, Core Wireless Licensing Ltd. (“Core Wireless USA”), a corporation duly organized and existing under the laws of the State of Texas, having a principal place of business at 5700 Granite Parkway, Suite 960, Plano, TX 75024, which is within the Eastern District of Texas. All pertinent documents and discovery relevant to this matter either reside at Core Wireless USA’s local address or will be produced at such address.

2. Defendant, Apple, is a corporation duly organized and existing under the laws of the State of California, having a principal place of business at 1 Infinite Loop, Cupertino, CA 95014. Apple’s registered agent, registered with the Texas State Secretary of State’s Office, is CT Corp. Systems at 350 N. St. Paul Street, Suite 2900, Dallas, TX 75201.

JURISDICTION

3. This is an action arising under the patent laws of the United States. Accordingly this Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

4. This Court has personal jurisdiction over Apple because Apple has established minimum contacts with the Eastern District of Texas. Apple manufactures (directly or indirectly through third party manufacturers) and/or assembles products that are and have been used, offered for sale, sold, and purchased in the Eastern District of Texas. Apple, directly and/or

through its distribution network, places wireless communication devices within the stream of commerce, which stream is directed at this district, with the knowledge and/or understanding that such products will be sold in the State of Texas. Jurisdiction over Apple in this matter is also proper inasmuch as Apple has voluntarily submitted itself to the jurisdiction of the courts commencing litigations within the State of Texas and by registering with the Texas Secretary of State, a registered agent. Therefore, the exercise of jurisdiction over Apple is appropriate under the applicable jurisdictional statutes and would not offend traditional notions of fair play and substantial justice.

VENUE

5. Venue is proper in this judicial district pursuant to 28 U.S.C. §§1391(b), (c), (d) and 1400(b) because Apple has committed, and continues to commit, acts of infringement, including providing electronic products that are used, offered for sale, sold, and have been purchased in the State of Texas, including the Eastern District of Texas.

FACTUAL ALLEGATIONS

6. United States Patent No. 6,792,277 (“the ’277 patent”), entitled *Arranging Control Signallings In Telecommunications System*, was duly and lawfully issued September 14, 2004. Core Wireless is the current owner of all rights, title, and interest in the ’277 patent. A true and correct copy of the ’277 patent is attached hereto as Exhibit 1.

7. United States Patent No. 7,606,910 (“the ’910 patent”), entitled *Method For Indicating A UE That It Must Register*, was duly and lawfully issued October 20, 2009. Core Wireless is the current owner of all rights, title, and interest in the ’910 patent. A true and correct copy of the ’910 patent is attached hereto as Exhibit 2.

8. United States Patent No. 6,697,347 (“the ’347 patent”), entitled *Method And Apparatus For Controlling Transmission Of Packets In A Wireless Communication System*, was duly and lawfully issued February 24, 2004. Core Wireless is the current owner of all rights, title, and interest in the ’347 patent. A true and correct copy of the ’347 patent is attached hereto as Exhibit 3.

9. United States Patent No. 7,447,181 (“the ’181 patent”), entitled *Method And Apparatus For Improving A Mobile Station Cell Change Operation In The General Packet Radio System (GPRS)*, was duly and lawfully issued November 4, 2008. Core Wireless is the current owner of all rights, title, and interest in the ’181 patent. A true and correct copy of the ’181 patent is attached hereto as Exhibit 4.

10. United States Patent No. 6,788,959 (“the ’959 patent”), entitled *Method And Apparatus For Transmitting And Receiving Dynamic Configuration Parameters In A Third Generation Cellular Telephone Network*, was duly and lawfully issued September 7, 2004. Core Wireless is the current owner of all rights, title, and interest in the ’959 patent. A true and correct copy of the ’959 patent is attached hereto as Exhibit 5.

11. United States Patent No. 7,529,271 (“the ’271 patent”), entitled *Method And System For Controlling Data Transmission With Connection States*, was duly and lawfully issued May 5, 2009. Core Wireless is the current owner of all rights, title, and interest in the ’271 patent. A true and correct copy of the ’271 patent is attached hereto as Exhibit 6.

12. United States Patent No. 6,266,321 (“the ’321 patent”), entitled *Method For Transmitting Two Parallel Channels Using Code Division And An Apparatus Realizing The Method*, was duly and lawfully issued July 24, 2001. Core Wireless is the current owner of all

rights, title, and interest in the '321 patent. A true and correct copy of the '321 patent is attached hereto as Exhibit 7.

13. United States Patent No. 6,978,143 (“the '143 patent”), entitled *Method And Arrangement For Managing Packet Data Transfer In A Cellular System*, was duly and lawfully issued December 20, 2005. Core Wireless is the current owner of all rights, title, and interest in the '143 patent. A true and correct copy of the '143 patent is attached hereto as Exhibit 8.

FIRST COUNT

(Infringement of the '277 patent)

14. Plaintiff incorporates by reference the allegations set forth in Paragraphs 1-13 of this Complaint as though fully set forth herein.

15. Apple has infringed and is infringing the '277 patent by making, using, offering for sale, and selling in the United States, without authority, products and services including wireless communication devices such as the Apple iPad, Apple iPad 2, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, and Apple iPhone 4S, that are covered by one or more claims of the '277 patent.

16. Apple has induced infringement and/or contributed to the infringement, and is inducing infringement and/or contributing to the infringement of the '277 Patent by importing, making, using, offering for sale, and selling in the United States, without authority, products and services including wireless communication devices such as the Apple iPad, Apple iPad 2, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, and Apple iPhone 4S, that are covered by one or more claims of the '277 patent, including selling the products and services to customers. Apple's customers who purchase products and services thereof and operate such products and

services thereof in accordance with Apple's instructions directly infringe one or more claims of the '277 patent.

17. Apple's infringing activities have been and continue to be willful.

18. Upon information and belief, at least as early as June 14, 2011, upon settlement of all patent litigation between Apple and Nokia through a licensing agreement (*See* Nokia's June 14, 2011 press release attached hereto as Exhibit 9), Apple was aware of the '277 patent, had knowledge of the infringing nature of its activities, and has nevertheless continued its infringing activities.

19. Products made and sold in accordance with the following standards infringe one or more claims of the '277 patent:

a. 3GPP Standard TS 23.060 V10.4.0;

b. 3GPP Standard TS 24.008 V10.3.0.

20. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 23.060 V10.4.0.

21. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V10.3.0.

22. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 23.060 V10.4.0, Section 5.4.0 titled "General."

23. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.4.4.6 titled "Location updating accepted by the network."

24. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.5.1.1 titled “MM connection establishment initiated by the mobile station.”

25. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.5.3.1 titled “Release of associated RR connection.”

26. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.7.3.1 titled “GPRS attach procedure for GPRS services.”

27. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.7.3.1.1 titled “GPRS attach procedure initiation.”

28. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.7.3.1.3 titled “GPRS attach accepted by the network.”

29. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.7.13 titled “Service Request procedure (Iu mode only).”

30. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 9.2.5 titled “CM service accept.”

31. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 9.2.9 titled “CM service request.”

32. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 9.4 titled “GPRS Mobility Management Messages.”

33. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 9.4.1 titled “Attach request.”

34. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.3.3 titled “CM service type.”

35. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.3.7 titled “Follow-on Proceed.”

36. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.5.2 titled “Attach type.”

37. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.060 V10.4.0.

38. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V10.3.0.

39. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.060 V10.4.0, Section 5.4.0 titled “General.”

40. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.4.4.6 titled “Location updating accepted by the network.”

41. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.5.1.1 titled “MM connection establishment initiated by the mobile station.”

42. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.5.3.1 titled “Release of associated RR connection.”

43. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.7.3.1 titled “GPRS attach procedure for GPRS services.”

44. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.7.3.1.1 titled “GPRS attach procedure initiation.”

45. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.7.3.1.3 titled “GPRS attach accepted by the network.”

46. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.7.13 titled “Service Request procedure (Iu mode only).”

47. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 9.2.5 titled “CM service accept.”

48. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 9.2.9 titled “CM service request.”

49. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 9.4 titled “GPRS Mobility Management Messages.”

50. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 9.4.1 titled “Attach request.”

51. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.3.3 titled “CM service type.”

52. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.3.7 titled “Follow-on Proceed.”

53. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.5.2 titled “Attach type.”

54. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 23.060 V10.4.0.

55. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V10.3.0.

56. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 23.060 V10.4.0, Section 5.4.0 titled “General.”

57. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.4.4.6 titled “Location updating accepted by the network.”

58. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.5.1.1 titled “MM connection establishment initiated by the mobile station.”

59. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.5.3.1 titled “Release of associated RR connection.”

60. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.7.3.1 titled “GPRS attach procedure for GPRS services.”

61. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.7.3.1.1 titled “GPRS attach procedure initiation.”

62. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.7.3.1.3 titled “GPRS attach accepted by the network.”

63. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.7.13 titled “Service Request procedure (Iu mode only).”

64. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 9.2.5 titled “CM service accept.”

65. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 9.2.9 titled “CM service request.”

66. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 9.4 titled “GPRS Mobility Management Messages.”

67. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 9.4.1 titled “Attach request.”

68. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.3.3 titled “CM service type.”

69. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.3.7 titled “Follow-on Proceed.”

70. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.5.2 titled “Attach type.”

71. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 23.060 V10.4.0.

72. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V10.3.0.

73. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 23.060 V10.4.0, Section 5.4.0 titled “General.”

74. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.4.4.6 titled “Location updating accepted by the network.”

75. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.5.1.1 titled “MM connection establishment initiated by the mobile station.”

76. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.5.3.1 titled “Release of associated RR connection.”

77. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.7.3.1 titled “GPRS attach procedure for GPRS services.”

78. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.7.3.1.1 titled “GPRS attach procedure initiation.”

79. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.7.3.1.3 titled “GPRS attach accepted by the network.”

80. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.7.13 titled “Service Request procedure (Iu mode only).”

81. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 9.2.5 titled “CM service accept.”

82. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 9.2.9 titled “CM service request.”

83. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 9.4 titled “GPRS Mobility Management Messages.”

84. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 9.4.1 titled “Attach request.”

85. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.3.3 titled “CM service type.”

86. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.3.7 titled “Follow-on Proceed.”

87. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.5.2 titled “Attach type.”

88. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.060 V10.4.0.

89. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V10.3.0.

90. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.060 V10.4.0, Section 5.4.0 titled “General.”

91. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.4.4.6 titled “Location updating accepted by the network.”

92. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.5.1.1 titled “MM connection establishment initiated by the mobile station.”

93. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.5.3.1 titled “Release of associated RR connection.”

94. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.7.3.1 titled “GPRS attach procedure for GPRS services.”

95. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.7.3.1.1 titled “GPRS attach procedure initiation.”

96. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.7.3.1.3 titled “GPRS attach accepted by the network.”

97. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.7.13 titled “Service Request procedure (Iu mode only).”

98. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 9.2.5 titled “CM service accept.”

99. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 9.2.9 titled “CM service request.”

100. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 9.4 titled “GPRS Mobility Management Messages.”

101. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 9.4.1 titled “Attach request.”

102. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.3.3 titled “CM service type.”

103. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.3.7 titled “Follow-on Proceed.”

104. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.5.2 titled “Attach type.”

105. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 23.060 V10.4.0.

106. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V10.3.0.

107. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 23.060 V10.4.0, Section 5.4.0 titled “General.”

108. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.4.4.6 titled “Location updating accepted by the network.”

109. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.5.1.1 titled “MM connection establishment initiated by the mobile station.”

110. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.5.3.1 titled “Release of associated RR connection.”

111. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.7.3.1 titled “GPRS attach procedure for GPRS services.”

112. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.7.3.1.1 titled “GPRS attach procedure initiation.”

113. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.7.3.1.3 titled “GPRS attach accepted by the network.”

114. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 4.7.13 titled “Service Request procedure (Iu mode only).”

115. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 9.2.5 titled “CM service accept.”

116. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 9.2.9 titled “CM service request.”

117. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 9.4 titled “GPRS Mobility Management Messages.”

118. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 9.4.1 titled “Attach request.”

119. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.3.3 titled “CM service type.”

120. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.3.7 titled “Follow-on Proceed.”

121. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.008 V10.3.0, Section 10.5.5.2 titled “Attach type.”

122. Upon information and belief, Apple will continue to directly infringe, induce infringement and/or contribute to the infringement of the ’277 patent.

123. Upon information and belief, Apple’s infringement of the ’277 patent is willful entitling Plaintiff to increased damages under 35 U.S.C. § 284 and to attorneys’ fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

124. Apple’s acts of infringement have caused damage to Plaintiff and Plaintiff is entitled to recover from Apple the damages sustained by Plaintiff as a result of Apple’s wrongful acts in an amount subject to proof at trial.

SECOND COUNT

(Infringement of the '910 patent)

125. Plaintiff incorporates by reference the allegations set forth in Paragraphs 1-124 of this Complaint as though fully set forth herein.

126. Apple has infringed and is infringing the '910 patent by making, using, offering for sale, and selling in the United States, without authority, products and services including wireless communication devices such as the Apple iPad, Apple iPad 2, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, and Apple iPhone 4S, that are covered by one or more claims of the '910 patent.

127. Apple has induced infringement and/or contributed to the infringement, and is inducing infringement and/or contributing to the infringement of the '910 Patent by importing, making, using, offering for sale, and selling in the United States, without authority, products and services including wireless communication devices such as the Apple iPad, Apple iPad 2, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, and Apple iPhone 4S, that are covered by one or more claims of the '910 patent, including selling the products and services to customers. Apple's customers who purchase products and services thereof and operate such products and services thereof in accordance with Apple's instructions directly infringe one or more claims of the '910 patent.

128. Apple's infringing activities have been and continue to be willful.

129. Upon information and belief, at least as early as June 14, 2011, upon settlement of all patent litigation between Apple and Nokia through a licensing agreement (*See* Nokia's June 14, 2011 press release attached hereto as Exhibit 9), Apple was aware of the '910 patent, had

knowledge of the infringing nature of its activities, and has nevertheless continued its infringing activities.

130. Products made and sold in accordance with the following standards infringe one or more claims of the '910 patent:

a. 3GPP Standard TS 24.229 V11.0.0.

131. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 24.229 V11.0.0.

132. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1 titled "Procedures at the UE."

133. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.1.5 titled "Authentication."

134. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.1.5.1 titled "IMS AKA - general."

135. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.1.5.5 titled "SIP digest without TLS – abnormal procedures."

136. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.1.5.7 titled "SIP digest with TLS – abnormal procedures."

137. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.3 titled "Call initiation - UE-originating case."

138. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.3.1 titled “Initial INVITE request.”

139. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.4.3.6 titled “SIP digest authentication procedures for all SIP request methods initiated by the UE excluding REGISTER.”

140. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.4.3.6.1 titled “General.”

141. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.7 titled “Procedures at the Application Server (AS).”

142. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.7.1 titled “Common Application Server (AS) procedures.”

143. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.7.1.4 titled “User identify verification at the AS.”

144. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.7.1.5 titled “Request authorization.”

145. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 24.229 V11.0.0.

146. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1 titled “Procedures at the UE.”

147. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.1.5 titled “Authentication.”

148. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.1.5.1 titled “IMS AKA - general.”

149. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.1.5.5 titled “SIP digest without TLS – abnormal procedures.”

150. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.1.5.7 titled “SIP digest with TLS – abnormal procedures.”

151. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.3 titled “Call initiation - UE-originating case.”

152. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.3.1 titled “Initial INVITE request.”

153. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.4.3.6 titled “SIP digest

authentication procedures for all SIP request methods initiated by the UE excluding REGISTER.”

154. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.4.3.6.1 titled “General.”

155. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.7 titled “Procedures at the Application Server (AS).”

156. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.7.1 titled “Common Application Server (AS) procedures.”

157. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.7.1.4 titled “User identify verification at the AS.”

158. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.7.1.5 titled “Request authorization.”

159. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 24.229 V11.0.0.

160. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1 titled “Procedures at the UE.”

161. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.1.5 titled “Authentication.”

162. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.1.5.1 titled “IMS AKA - general.”

163. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.1.5.5 titled “SIP digest without TLS – abnormal procedures.”

164. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.1.5.7 titled “SIP digest with TLS – abnormal procedures.”

165. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.3 titled “Call initiation - UE-originating case.”

166. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.3.1 titled “Initial INVITE request.”

167. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.4.3.6 titled “SIP digest authentication procedures for all SIP request methods initiated by the UE excluding REGISTER.”

168. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.4.3.6.1 titled “General.”

169. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.7 titled “Procedures at the Application Server (AS).”

170. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.7.1 titled “Common Application Server (AS) procedures.”

171. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.7.1.4 titled “User identify verification at the AS.”

172. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.7.1.5 titled “Request authorization.”

173. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 24.229 V11.0.0.

174. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1 titled “Procedures at the UE.”

175. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.1.5 titled “Authentication.”

176. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.1.5.1 titled “IMS AKA - general.”

177. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.1.5.5 titled “SIP digest without TLS – abnormal procedures.”

178. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.1.5.7 titled “SIP digest with TLS – abnormal procedures.”

179. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.3 titled “Call initiation - UE-originating case.”

180. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.3.1 titled “Initial INVITE request.”

181. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.4.3.6 titled “SIP digest authentication procedures for all SIP request methods initiated by the UE excluding REGISTER.”

182. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.4.3.6.1 titled “General.”

183. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.7 titled “Procedures at the Application Server (AS).”

184. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.7.1 titled “Common Application Server (AS) procedures.”

185. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.7.1.4 titled “User identify verification at the AS.”

186. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.7.1.5 titled “Request authorization.”

187. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 24.229 V11.0.0.

188. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1 titled “Procedures at the UE.”

189. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.1.5 titled “Authentication.”

190. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.1.5.1 titled “IMS AKA - general.”

191. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.1.5.5 titled “SIP digest without TLS – abnormal procedures.”

192. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.1.5.7 titled “SIP digest with TLS – abnormal procedures.”

193. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.3 titled “Call initiation - UE-originating case.”

194. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.3.1 titled “Initial INVITE request.”

195. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.4.3.6 titled “SIP digest authentication procedures for all SIP request methods initiated by the UE excluding REGISTER.”

196. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.4.3.6.1 titled “General.”

197. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.7 titled “Procedures at the Application Server (AS).”

198. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.7.1 titled “Common Application Server (AS) procedures.”

199. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.7.1.4 titled “User identify verification at the AS.”

200. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.7.1.5 titled “Request authorization.”

201. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 24.229 V11.0.0.

202. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1 titled “Procedures at the UE.”

203. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.1.5 titled “Authentication.”

204. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.1.5.1 titled “IMS AKA - general.”

205. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.1.5.5 titled “SIP digest without TLS – abnormal procedures.”

206. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.1.5.7 titled “SIP digest with TLS – abnormal procedures.”

207. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.3 titled “Call initiation - UE-originating case.”

208. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.1.3.1 titled “Initial INVITE request.”

209. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.4.3.6 titled “SIP digest authentication procedures for all SIP request methods initiated by the UE excluding REGISTER.”

210. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.4.3.6.1 titled “General.”

211. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.7 titled “Procedures at the Application Server (AS).”

212. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.7.1 titled “Common Application Server (AS) procedures.”

213. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.7.1.4 titled “User identify verification at the AS.”

214. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard 24.229 V11.0.0, Section 5.7.1.5 titled “Request authorization.”

215. Upon information and belief, Apple will continue to directly infringe, induce infringement and/or contribute to the infringement of the '910 patent.

216. Upon information and belief, Apple's infringement of the '910 patent is willful entitling Plaintiff to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

217. Apple's acts of infringement have caused damage to Plaintiff and Plaintiff is entitled to recover from Apple the damages sustained by Plaintiff as a result of Apple's wrongful acts in an amount subject to proof at trial.

THIRD COUNT

(Infringement of the '347 patent)

218. Plaintiff incorporates by reference the allegations set forth in Paragraphs 1-217 of this Complaint as though fully set forth herein.

219. Apple has infringed and is infringing the '347 patent by making, using, offering for sale, and selling in the United States, without authority, products and services including wireless communication devices such as the Apple iPad, Apple iPad 2, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, and Apple iPhone 4S, that are covered by one or more claims of the '347 patent.

220. Apple has induced infringement and/or contributed to the infringement, and is inducing infringement and/or contributing to the infringement of the '347 Patent by importing, making, using, offering for sale, and selling in the United States, without authority, products and services including wireless communication devices such as the Apple iPad, Apple iPad 2, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, and Apple iPhone 4S, that are covered by one or more claims of the '347 patent, including selling the products and services to customers. Apple's customers who purchase products and services thereof and operate such products and services thereof in accordance with Apple's instructions directly infringe one or more claims of the '347 patent.

221. Apple's infringing activities have been and continue to be willful.

222. Upon information and belief, at least as early as June 14, 2011, upon settlement of all patent litigation between Apple and Nokia through a licensing agreement (*See* Nokia's June 14, 2011 press release attached hereto as Exhibit 9), Apple was aware of the '347 patent, had knowledge of the infringing nature of its activities, and has nevertheless continued its infringing activities.

223. Products made and sold in accordance with the following standards infringe one or more claims of the '347 patent:

- a. 3GPP Standard TS 25.211 V10.0.0;
- b. 3GPP Standard TS 25.214 V10.2.0;
- c. 3GPP Standard TS 25.308 V10.4.0.

224. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.211 V10.0.0.

225. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.214 V10.2.0.

226. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.308 V10.4.0.

227. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.211 V10.0.0, Section 5.3.3.12 titled “Shared Control Channel (HS-SCCH).”

228. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.211 V10.0.0, Section 5.3.3.13 titled “High Speed Physical Downlink Shared Channel (HS-PDSCH).”

229. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.211 V10.0.0, Section 6.1 titled “Mapping of transport channels onto physical channels.”

230. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.211 V10.0.0, Section 7.8 titled “HS-SCCH/HS-PDSCH timing.”

231. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.214 V10.2.0, Section 6A titled “HS-DSCH-related procedures.”

232. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.214 V10.2.0, Section 6A.1.1 titled “UE procedure for receiving HS-DSCH and HS-SCCH in the CELL_DCH state.”

233. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2 titled “Basic physical structure”

234. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.1 titled “HS-DSCH Characteristics.”

235. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.2 titled “DL HS-DSCH Physical layer model.”

236. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.2.1 titled “FDD Downlink Physical layer Model.”

237. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.4 titled “HS-DSCH physical-layer structure in the code domain.”

238. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.4.1 titled “FDD.”

239. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.211 V10.0.0.

240. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.214 V10.2.0.

241. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.308 V10.4.0.

242. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.211 V10.0.0, Section 5.3.3.12 titled “Shared Control Channel (HS-SCCH).”

243. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.211 V10.0.0, Section 5.3.3.13 titled “High Speed Physical Downlink Shared Channel (HS-PDSCH).”

244. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.211 V10.0.0, Section 6.1 titled “Mapping of transport channels onto physical channels.”

245. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.211 V10.0.0, Section 7.8 titled “HS-SCCH/HS-PDSCH timing.”

246. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.214 V10.2.0, Section 6A titled “HS-DSCH-related procedures.”

247. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.214 V10.2.0, Section 6A.1.1 titled “UE procedure for receiving HS-DSCH and HS-SCCH in the CELL_DCH state.”

248. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2 titled “Basic physical structure”

249. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.1 titled “HS-DSCH Characteristics.”

250. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.2 titled “DL HS-DSCH Physical layer model.”

251. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.2.1 titled “FDD Downlink Physical layer Model.”

252. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.4 titled “HS-DSCH physical-layer structure in the code domain.”

253. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.4.1 titled “FDD.”

254. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.211 V10.0.0.

255. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.214 V10.2.0.

256. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.308 V10.4.0.

257. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.211 V10.0.0, Section 5.3.3.12 titled “Shared Control Channel (HS-SCCH).”

258. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.211 V10.0.0, Section 5.3.3.13 titled “High Speed Physical Downlink Shared Channel (HS-PDSCH).”

259. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.211 V10.0.0, Section 6.1 titled “Mapping of transport channels onto physical channels.”

260. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.211 V10.0.0, Section 7.8 titled “HS-SCCH/HS-PDSCH timing.”

261. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.214 V10.2.0, Section 6A titled “HS-DSCH-related procedures.”

262. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.214 V10.2.0, Section 6A.1.1 titled “UE procedure for receiving HS-DSCH and HS-SCCH in the CELL_DCH state.”

263. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2 titled “Basic physical structure”

264. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.1 titled “HS-DSCH Characteristics.”

265. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.2 titled “DL HS-DSCH Physical layer model.”

266. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.2.1 titled “FDD Downlink Physical layer Model.”

267. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.4 titled “HS-DSCH physical-layer structure in the code domain.”

268. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.4.1 titled “FDD.”

269. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.211 V10.0.0.

270. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.214 V10.2.0.

271. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.308 V10.4.0.

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273. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.211 V10.0.0, Section 5.3.3.13 titled “High Speed Physical Downlink Shared Channel (HS-PDSCH).”

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275. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.211 V10.0.0, Section 7.8 titled “HS-SCCH/HS-PDSCH timing.”

276. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.214 V10.2.0, Section 6A titled “HS-DSCH-related procedures.”

277. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.214 V10.2.0, Section 6A.1.1 titled “UE procedure for receiving HS-DSCH and HS-SCCH in the CELL_DCH state.”

278. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2 titled “Basic physical structure”

279. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.1 titled “HS-DSCH Characteristics.”

280. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.2 titled “DL HS-DSCH Physical layer model.”

281. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.2.1 titled “FDD Downlink Physical layer Model.”

282. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.4 titled “HS-DSCH physical-layer structure in the code domain.”

283. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.4.1 titled “FDD.”

284. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.211 V10.0.0.

285. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.214 V10.2.0.

286. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.308 V10.4.0.

287. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.211 V10.0.0, Section 5.3.3.12 titled “Shared Control Channel (HS-SCCH).”

288. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.211 V10.0.0, Section 5.3.3.13 titled “High Speed Physical Downlink Shared Channel (HS-PDSCH).”

289. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.211 V10.0.0, Section 6.1 titled “Mapping of transport channels onto physical channels.”

290. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.211 V10.0.0, Section 7.8 titled “HS-SCCH/HS-PDSCH timing.”

291. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.214 V10.2.0, Section 6A titled “HS-DSCH-related procedures.”

292. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.214 V10.2.0, Section 6A.1.1 titled “UE procedure for receiving HS-DSCH and HS-SCCH in the CELL_DCH state.”

293. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2 titled “Basic physical structure”

294. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.1 titled “HS-DSCH Characteristics.”

295. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.2 titled “DL HS-DSCH Physical layer model.”

296. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.2.1 titled “FDD Downlink Physical layer Model.”

297. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.4 titled “HS-DSCH physical-layer structure in the code domain.”

298. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.4.1 titled “FDD.”

299. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.211 V10.0.0.

300. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.214 V10.2.0.

301. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.308 V10.4.0.

302. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.211 V10.0.0, Section 5.3.3.12 titled “Shared Control Channel (HS-SCCH).”

303. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.211 V10.0.0, Section 5.3.3.13 titled “High Speed Physical Downlink Shared Channel (HS-PDSCH).”

304. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.211 V10.0.0, Section 6.1 titled “Mapping of transport channels onto physical channels.”

305. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.211 V10.0.0, Section 7.8 titled “HS-SCCH/HS-PDSCH timing.”

306. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.214 V10.2.0, Section 6A titled “HS-DSCH-related procedures.”

307. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.214 V10.2.0, Section 6A.1.1 titled “UE procedure for receiving HS-DSCH and HS-SCCH in the CELL_DCH state.”

308. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2 titled “Basic physical structure”

309. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.1 titled “HS-DSCH Characteristics.”

310. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.2 titled “DL HS-DSCH Physical layer model.”

311. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.2.1 titled “FDD Downlink Physical layer Model.”

312. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.4 titled “HS-DSCH physical-layer structure in the code domain.”

313. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.308 V10.4.0, Section 5.2.4.1 titled “FDD.”

314. Upon information and belief, Apple will continue to directly infringe, induce infringement and/or contribute to the infringement of the '347 patent.

315. Upon information and belief, Apple's infringement of the '347 patent is willful entitling Plaintiff to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

316. Apple's acts of infringement have caused damage to Plaintiff and Plaintiff is entitled to recover from Apple the damages sustained by Plaintiff as a result of Apple's wrongful acts in an amount subject to proof at trial.

FOURTH COUNT

(Infringement of the '181 patent)

317. Plaintiff incorporates by reference the allegations set forth in Paragraphs 1-316 of this Complaint as though fully set forth herein.

318. Apple has infringed and is infringing the '181 patent by making, using, offering for sale, and selling in the United States, without authority, products and services including wireless communication devices such as the Apple iPad, Apple iPad 2, Apple iPhone, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, and Apple iPhone 4S, that are covered by one or more claims of the '181 patent.

319. Apple has induced infringement and/or contributed to the infringement, and is inducing infringement and/or contributing to the infringement of the '181 Patent by importing, making, using, offering for sale, and selling in the United States, without authority, products and services including wireless communication devices such as the Apple iPad, Apple iPad 2, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, and Apple iPhone 4S, that are covered by one or more claims of the '181 patent, including selling the products and services to customers.

Apple's customers who purchase products and services thereof and operate such products and services thereof in accordance with Apple's instructions directly infringe one or more claims of the '181 patent.

320. Apple's infringing activities have been and continue to be willful.

321. Upon information and belief, at least as early as June 14, 2011, upon settlement of all patent litigation between Apple and Nokia through a licensing agreement (*See* Nokia's June 14, 2011 press release attached hereto as Exhibit 9), Apple was aware of the '181 patent, had knowledge of the infringing nature of its activities, and has nevertheless continued its infringing activities.

322. Products made and sold in accordance with the following standards infringe one or more claims of the '181 patent:

- a. 3GPP Standards TS 23.060 V9.6.0;
- b. 3GPP Standard TS 44.060 V9.8.0;
- c. 3GPP Standard TS 44.064 V9.0.0.

323. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standards TS 23.060 V9.6.0.

324. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.060 V9.8.0.

325. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.064 V9.0.0.

326. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 23.060 V9.6.0, Section 6.9.1.1 titled "Cell Update Procedure."

327. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 5.5.1.1 titled "Cell reselection."

328. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 7.1 titled "TBF establishment initiated by the mobile station on PCCCH."

329. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 7.1.2.1 titled "Initiation of the packet access procedure."

330. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 7.1.2.1.1 titled "Access persistence control on PRACH."

331. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

332. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 9.1.9.3 titled "RLC buffer."

333. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

334. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 44.064 V9.0.0, Section 6.4.1.7 titled "NULL command."

335. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standards TS 23.060 V9.6.0.

336. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V9.8.0.

337. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.064 V9.0.0.

338. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 23.060 V9.6.0, Section 6.9.1.1 titled "Cell Update Procedure."

339. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 5.5.1.1 titled "Cell reselection."

340. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 7.1 titled "TBF establishment initiated by the mobile station on PCCCH."

341. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 7.1.2.1 titled "Initiation of the packet access procedure."

342. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 7.1.2.1.1 titled "Access persistence control on PRACH."

343. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

344. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 9.1.9.3 titled "RLC buffer."

345. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

346. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 44.064 V9.0.0, Section 6.4.1.7 titled "NULL command."

347. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standards TS 23.060 V9.6.0.

348. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.060 V9.8.0.

349. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.064 V9.0.0.

350. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 23.060 V9.6.0, Section 6.9.1.1 titled "Cell Update Procedure."

351. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 5.5.1.1 titled "Cell reselection."

352. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 7.1 titled "TBF establishment initiated by the mobile station on PCCCH."

353. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 7.1.2.1 titled "Initiation of the packet access procedure."

354. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 7.1.2.1.1 titled "Access persistence control on PRACH."

355. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

356. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 9.1.9.3 titled "RLC buffer."

357. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

358. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP Standard TS 44.064 V9.0.0, Section 6.4.1.7 titled "NULL command."

359. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standards TS 23.060 V9.6.0.

360. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V9.8.0.

361. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.064 V9.0.0.

362. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 23.060 V9.6.0, Section 6.9.1.1 titled "Cell Update Procedure."

363. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 5.5.1.1 titled "Cell reselection."

364. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 7.1 titled "TBF establishment initiated by the mobile station on PCCCH."

365. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 7.1.2.1 titled "Initiation of the packet access procedure."

366. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 7.1.2.1.1 titled "Access persistence control on PRACH."

367. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

368. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 9.1.9.3 titled "RLC buffer."

369. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

370. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 44.064 V9.0.0, Section 6.4.1.7 titled "NULL command."

371. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standards TS 23.060 V9.6.0.

372. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V9.8.0.

373. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.064 V9.0.0.

374. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 23.060 V9.6.0, Section 6.9.1.1 titled "Cell Update Procedure."

375. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 5.5.1.1 titled "Cell reselection."

376. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 7.1 titled "TBF establishment initiated by the mobile station on PCCCH."

377. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 7.1.2.1 titled "Initiation of the packet access procedure."

378. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 7.1.2.1.1 titled "Access persistence control on PRACH."

379. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

380. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 9.1.9.3 titled "RLC buffer."

381. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

382. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 44.064 V9.0.0, Section 6.4.1.7 titled "NULL command."

383. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standards TS 23.060 V9.6.0.

384. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.060 V9.8.0.

385. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.064 V9.0.0.

386. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 23.060 V9.6.0, Section 6.9.1.1 titled "Cell Update Procedure."

387. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 5.5.1.1 titled "Cell reselection."

388. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 7.1 titled "TBF establishment initiated by the mobile station on PCCCH."

389. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 7.1.2.1 titled "Initiation of the packet access procedure."

390. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 7.1.2.1.1 titled "Access persistence control on PRACH."

391. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

392. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 9.1.9.3 titled "RLC buffer."

393. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

394. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 44.064 V9.0.0, Section 6.4.1.7 titled "NULL command."

395. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standards TS 23.060 V9.6.0.

396. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.060 V9.8.0.

397. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.064 V9.0.0.

398. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 23.060 V9.6.0, Section 6.9.1.1 titled "Cell Update Procedure."

399. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 5.5.1.1 titled "Cell reselection."

400. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 7.1 titled "TBF establishment initiated by the mobile station on PCCCH."

401. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 7.1.2.1 titled "Initiation of the packet access procedure."

402. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 7.1.2.1.1 titled "Access persistence control on PRACH."

403. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 8.1.1.1.2 titled "Resource Reallocation for Uplink."

404. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 9.1.9.3 titled "RLC buffer."

405. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.060 V9.8.0, Section 9.1.11 titled "Segmentation of upper layer PDUs into RLC data units."

406. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 44.064 V9.0.0, Section 6.4.1.7 titled "NULL command."

407. Upon information and belief, Apple will continue to directly infringe, induce infringement and/or contribute to the infringement of the '181 patent.

408. Upon information and belief, Apple's infringement of the '181 patent is willful entitling Plaintiff to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

409. Apple's acts of infringement have caused damage to Plaintiff and Plaintiff is entitled to recover from Apple the damages sustained by Plaintiff as a result of Apple's wrongful acts in an amount subject to proof at trial.

FIFTH COUNT

(Infringement of the '959 patent)

410. Plaintiff incorporates by reference the allegations set forth in Paragraphs 1-409 of this Complaint as though fully set forth herein.

411. Apple has infringed and is infringing the '959 patent by making, using, offering for sale, and selling in the United States, without authority, products and services including wireless communication devices such as the Apple iPad, Apple iPad 2, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, and Apple iPhone 4S, that are covered by one or more claims of the '959 patent.

412. Apple has induced infringement and/or contributed to the infringement, and is inducing infringement and/or contributing to the infringement of the '959 Patent by importing, making, using, offering for sale, and selling in the United States, without authority, products and services including wireless communication devices such as the Apple iPad, Apple iPad 2, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, and Apple iPhone 4S, that are covered by one or more claims of the '959 patent, including selling the products and services to customers. Apple's customers who purchase products and services thereof and operate such products and services thereof in accordance with Apple's instructions directly infringe one or more claims of the '959 patent.

413. Apple's infringing activities have been and continue to be willful.

414. Upon information and belief, at least as early as June 14, 2011, upon settlement of all patent litigation between Apple and Nokia through a licensing agreement (*See* Nokia's June 14, 2011 press release attached hereto as Exhibit 9), Apple was aware of the '959 patent, had

knowledge of the infringing nature of its activities, and has nevertheless continued its infringing activities.

415. Products made and sold in accordance with the following standards infringe one or more claims of the '959 patent:

- a. 3GPP TS 05.08 V8.18.0;
- b. 3GPP TS 25.201 V8.1.0;
- c. 3GPP TS 25.302 V8.3.0;
- d. 3GPP TS 25.321 V8.10.0;
- e. 3GPP TS 25.331 V8.14.0.

416. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 05.08 V8.18.0.

417. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.201 V8.1.0.

418. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.302 V8.3.0.

419. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.321 V8.10.0.

420. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.331 V8.14.0.

421. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 05.08 V8.18.0, Section 2 titled "General."

422. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 05.08 V8.18.0, Section 6.6.5 titled “Algorithm for cell re-selection from GSM to UTRAN.”

423. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.201 V8.1.0, Section 4.1.1 titled “General Protocol Architecture.”

424. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.302 V8.3.0, Section 5.3 titled “L1 interactions with L2 retransmission functionality.”

425. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.321 V8.10.0, Section 4.2.3 titled “Traffic Related Architecture - UE Side.”

426. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.321 V8.10.0, Section 10 titled “Handling of unknown, unforeseen and erroneous protocol data.”

427. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.331 V8.14.0, Section 8.1 titled “RRC Connection Management Procedures.”

428. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.331 V8.14.0, Section 8.1.1 titled “Broadcast of system information.”

429. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.331 V8.14.0, Section 8.1.1.1.1 titled “System information structure.”

430. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.331 V8.14.0, Section 8.1.1.1.2 titled “System information blocks.”

431. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.331 V8.14.0, Section 8.1.1.1.3 titled “Segmentation and concatenation of system information blocks.”

432. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.331 V8.14.0, Section 8.1.1.1.4 titled “Re-assembly of segments.”

433. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.331 V8.14.0, Section 8.1.1.1.5 titled “Scheduling of system information.”

434. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.331 V8.14.0, Section 8.1.1.3 titled “Reception of SYSTEM INFORMATION messages by the UE.”

435. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.331 V8.14.0, Section 8.1.1.6.16 titled “System Information Block type 16.”

436. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.331 V8.14.0, Section 8.1.1.6.17 titled “System Information Block type 17.”

437. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.331 V8.14.0, Section 10.2.48.8.19 titled “System Information Block type 16.”

438. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.331 V8.14.0, Section 10.3.4.7 titled “Predefined RB configuration.”

439. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.331 V8.14.0, Section 10.3.4.16 titled “RB identity.”

440. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.331 V8.14.0, Section 10.3.4.21 titled “RB mapping info.”

441. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.331 V8.14.0, Section 10.3.4.23 titled “RLC info.”

442. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.331 V8.14.0, Section 10.3.4.24 titled “Signalling RB information to setup.”

443. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.331 V8.14.0, Section 10.3.8.16 titled “Scheduling information.”

444. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.331 V8.14.0, Section 10.3.8.17 titled “SEG COUNT.”

445. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 05.08 V8.18.0.

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460. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 25.331 V8.14.0, Section 8.1.1.1.3 titled “Segmentation and concatenation of system information blocks.”

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462. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 25.331 V8.14.0, Section 8.1.1.1.5 titled “Scheduling of system information.”

463. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 25.331 V8.14.0, Section 8.1.1.3 titled “Reception of SYSTEM INFORMATION messages by the UE.”

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466. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 25.331 V8.14.0, Section 10.2.48.8.19 titled “System Information Block type 16.”

467. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 25.331 V8.14.0, Section 10.3.4.7 titled “Predefined RB configuration.”

468. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 25.331 V8.14.0, Section 10.3.4.16 titled “RB identity.”

469. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 25.331 V8.14.0, Section 10.3.4.21 titled “RB mapping info.”

470. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 25.331 V8.14.0, Section 10.3.4.23 titled “RLC info.”

471. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 25.331 V8.14.0, Section 10.3.4.24 titled “Signalling RB information to setup.”

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484. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TS 25.321 V8.10.0, Section 10 titled “Handling of unknown, unforeseen and erroneous protocol data.”

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490. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TS 25.331 V8.14.0, Section 8.1.1.1.4 titled “Re-assembly of segments.”

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518. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 25.331 V8.14.0, Section 8.1.1.1.3 titled “Segmentation and concatenation of system information blocks.”

519. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 25.331 V8.14.0, Section 8.1.1.1.4 titled “Re-assembly of segments.”

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527. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 25.331 V8.14.0, Section 10.3.4.21 titled “RB mapping info.”

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574. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 25.331 V8.14.0, Section 8.1.1.1.1 titled “System information structure.”

575. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 25.331 V8.14.0, Section 8.1.1.1.2 titled “System information blocks.”

576. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 25.331 V8.14.0, Section 8.1.1.1.3 titled “Segmentation and concatenation of system information blocks.”

577. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 25.331 V8.14.0, Section 8.1.1.1.4 titled “Re-assembly of segments.”

578. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 25.331 V8.14.0, Section 8.1.1.1.5 titled “Scheduling of system information.”

579. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 25.331 V8.14.0, Section 8.1.1.3 titled “Reception of SYSTEM INFORMATION messages by the UE.”

580. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 25.331 V8.14.0, Section 8.1.1.6.16 titled “System Information Block type 16.”

581. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 25.331 V8.14.0, Section 8.1.1.6.17 titled “System Information Block type 17.”

582. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 25.331 V8.14.0, Section 10.2.48.8.19 titled “System Information Block type 16.”

583. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 25.331 V8.14.0, Section 10.3.4.7 titled “Predefined RB configuration.”

584. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 25.331 V8.14.0, Section 10.3.4.16 titled “RB identity.”

585. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 25.331 V8.14.0, Section 10.3.4.21 titled “RB mapping info.”

586. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 25.331 V8.14.0, Section 10.3.4.23 titled “RLC info.”

587. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 25.331 V8.14.0, Section 10.3.4.24 titled “Signalling RB information to setup.”

588. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 25.331 V8.14.0, Section 10.3.8.16 titled “Scheduling information.”

589. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 25.331 V8.14.0, Section 10.3.8.17 titled “SEG COUNT.”

590. Upon information and belief, Apple will continue to directly infringe, induce infringement and/or contribute to the infringement of the ’959 patent.

591. Upon information and belief, Apple’s infringement of the ’959 patent is willful entitling Plaintiff to increased damages under 35 U.S.C. § 284 and to attorneys’ fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

592. Apple’s acts of infringement have caused damage to Plaintiff and Plaintiff is entitled to recover from Apple the damages sustained by Plaintiff as a result of Apple’s wrongful acts in an amount subject to proof at trial.

SIXTH COUNT

(Infringement of the '271 patent)

593. Plaintiff incorporates by reference the allegations set forth in Paragraphs 1-592 of this Complaint as though fully set forth herein.

594. Apple has infringed and is infringing the '271 patent by making, using, offering for sale, and selling in the United States, without authority, products and services including wireless communication devices such as the Apple iPad, Apple iPad 2, Apple iPhone, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, and Apple iPhone 4S, that are covered by one or more claims of the '271 patent.

595. Apple has induced infringement and/or contributed to the infringement, and is inducing infringement and/or contributing to the infringement of the '271 Patent by importing, making, using, offering for sale, and selling in the United States, without authority, products and services including wireless communication devices such as the Apple iPad, Apple iPad 2, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, and Apple iPhone 4S, that are covered by one or more claims of the '271 patent, including selling the products and services to customers. Apple's customers who purchase products and services thereof and operate such products and services thereof in accordance with Apple's instructions directly infringe one or more claims of the '271 patent.

596. Apple's infringing activities have been and continue to be willful.

597. Upon information and belief, at least as early as June 14, 2011, upon settlement of all patent litigation between Apple and Nokia through a licensing agreement (*See* Nokia's June 14, 2011 press release attached hereto as Exhibit 9), Apple was aware of the '271 patent, had

knowledge of the infringing nature of its activities, and has nevertheless continued its infringing activities.

598. Products made and sold in accordance with the following standards infringe one or more claims of the '271 patent:

- a. 3GPP TS 23.060 V10.4.0;
- b. 3GPP TS 44.060 V10.5.0;
- c. 3GPP TS 44.064 V10.0.0;
- d. 3GPP TS 44.065 V10.0.0.

599. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 23.060 V10.4.0.

600. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 44.060 V10.5.0.

601. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 44.064 V10.0.0.

602. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 44.065 V10.0.0.

603. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 23.060 V10.4.0, Section 4 titled "Main Concept."

604. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 23.060 V10.4.0, Section 5 titled "General GPRS Architecture and Transmission Mechanism."

605. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 23.060 V10.4.0, Section 5.1 titled “GPRS Access Interfaces and Reference Points.”

606. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6 titled “User and Control Planes.”

607. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6.1 titled “User Plane (A/Gb mode).”

608. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6.1.1 titled “MS – P-GW/GGSN.”

609. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6.3.1 titled “MS - SGSN (A/Gb mode).”

610. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 23.060 V10.4.0, Section 9.2.2.1 titled “PDP Context Activation Procedure.”

611. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 23.060 V10.4.0, Section 12.3.2 titled “Subfunctions.”

612. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 44.060 V10.5.0, Section 4.2 titled “Layer functions.”

613. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 44.060 V10.5.0, Section 8.1.1.1.2 titled “Resource Reallocation for Uplink.”

614. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 44.060 V10.5.0, Section 8.1.1.3a.5.2 titled “Change of service demand.”

615. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 44.060 V10.5.0, Section 9.1.11 titled “Segmentation of upper layer PDUs into RLC data units.”

616. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 44.064 V10.0.0, Section 4.1 titled “Reference model.”

617. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 44.064 V10.0.0, Section 4.7 titled “LLC layer structure.”

618. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 44.064 V10.0.0, Section 6.2.3 titled “Service Access Point Identifier (SAPI).”

619. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 44.064 V10.0.0, Section 7.1.2 titled “LLC layer service primitives.”

620. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 44.064 V10.0.0, Section 7.2.3 titled “LLE - RLC/MAC primitives.”

621. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 44.064 V10.0.0, Section 7.2.3.1 titled “GRR-DATA.”

622. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 44.065 V10.0.0, Section 4 titled “General.”

623. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 44.065 V10.0.0, Section 5.2 titled “Service functions.”

624. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 23.060 V10.4.0.

625. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 44.060 V10.5.0.

626. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 44.064 V10.0.0.

627. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 44.065 V10.0.0.

628. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 23.060 V10.4.0, Section 4 titled “Main Concept.”

629. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 23.060 V10.4.0, Section 5 titled “General GPRS Architecture and Transmission Mechanism.”

630. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 23.060 V10.4.0, Section 5.1 titled “GPRS Access Interfaces and Reference Points.”

631. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6 titled “User and Control Planes.”

632. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6.1 titled “User Plane (A/Gb mode).”

633. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6.1.1 titled “MS – P-GW/GGSN.”

634. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6.3.1 titled “MS - SGSN (A/Gb mode).”

635. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 23.060 V10.4.0, Section 9.2.2.1 titled “PDP Context Activation Procedure.”

636. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 23.060 V10.4.0, Section 12.3.2 titled “Subfunctions.”

637. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 44.060 V10.5.0, Section 4.2 titled “Layer functions.”

638. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 44.060 V10.5.0, Section 8.1.1.1.2 titled “Resource Reallocation for Uplink.”

639. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 44.060 V10.5.0, Section 8.1.1.3a.5.2 titled “Change of service demand.”

640. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 44.060 V10.5.0, Section 9.1.11 titled “Segmentation of upper layer PDUs into RLC data units.”

641. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 44.064 V10.0.0, Section 4.1 titled “Reference model.”

642. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 44.064 V10.0.0, Section 4.7 titled “LLC layer structure.”

643. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 44.064 V10.0.0, Section 6.2.3 titled “Service Access Point Identifier (SAPI).”

644. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 44.064 V10.0.0, Section 7.1.2 titled “LLC layer service primitives.”

645. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 44.064 V10.0.0, Section 7.2.3 titled “LLE - RLC/MAC primitives.”

646. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 44.064 V10.0.0, Section 7.2.3.1 titled “GRR-DATA.”

647. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 44.065 V10.0.0, Section 4 titled “General.”

648. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP TS 44.065 V10.0.0, Section 5.2 titled “Service functions.”

649. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP TS 23.060 V10.4.0.

650. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP TS 44.060 V10.5.0.

651. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP TS 44.064 V10.0.0.

652. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP TS 44.065 V10.0.0.

653. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP TS 23.060 V10.4.0, Section 4 titled “Main Concept.”

654. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP TS 23.060 V10.4.0, Section 5 titled “General GPRS Architecture and Transmission Mechanism.”

655. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP TS 23.060 V10.4.0, Section 5.1 titled “GPRS Access Interfaces and Reference Points.”

656. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6 titled “User and Control Planes.”

657. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6.1 titled “User Plane (A/Gb mode).”

658. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6.1.1 titled “MS – P-GW/GGSN.”

659. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6.3.1 titled “MS - SGSN (A/Gb mode).”

660. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP TS 23.060 V10.4.0, Section 9.2.2.1 titled “PDP Context Activation Procedure.”

661. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP TS 23.060 V10.4.0, Section 12.3.2 titled “Subfunctions.”

662. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP TS 44.060 V10.5.0, Section 4.2 titled “Layer functions.”

663. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP TS 44.060 V10.5.0, Section 8.1.1.1.2 titled “Resource Reallocation for Uplink.”

664. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP TS 44.060 V10.5.0, Section 8.1.1.3a.5.2 titled “Change of service demand.”

665. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP TS 44.060 V10.5.0, Section 9.1.11 titled “Segmentation of upper layer PDUs into RLC data units.”

666. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP TS 44.064 V10.0.0, Section 4.1 titled “Reference model.”

667. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP TS 44.064 V10.0.0, Section 4.7 titled “LLC layer structure.”

668. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP TS 44.064 V10.0.0, Section 6.2.3 titled “Service Access Point Identifier (SAPI).”

669. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP TS 44.064 V10.0.0, Section 7.1.2 titled “LLC layer service primitives.”

670. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP TS 44.064 V10.0.0, Section 7.2.3 titled “LLE - RLC/MAC primitives.”

671. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP TS 44.064 V10.0.0, Section 7.2.3.1 titled “GRR-DATA.”

672. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP TS 44.065 V10.0.0, Section 4 titled “General.”

673. Plaintiff is informed and believes, and on such basis alleges, that the iPhone product complies with the 3GPP TS 44.065 V10.0.0, Section 5.2 titled “Service functions.”

674. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TS 23.060 V10.4.0.

675. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TS 44.060 V10.5.0.

676. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TS 44.064 V10.0.0.

677. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TS 44.065 V10.0.0.

678. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TS 23.060 V10.4.0, Section 4 titled “Main Concept.”

679. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TS 23.060 V10.4.0, Section 5 titled “General GPRS Architecture and Transmission Mechanism.”

680. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TS 23.060 V10.4.0, Section 5.1 titled “GPRS Access Interfaces and Reference Points.”

681. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6 titled “User and Control Planes.”

682. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6.1 titled “User Plane (A/Gb mode).”

683. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6.1.1 titled “MS – P-GW/GGSN.”

684. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6.3.1 titled “MS - SGSN (A/Gb mode).”

685. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TS 23.060 V10.4.0, Section 9.2.2.1 titled “PDP Context Activation Procedure.”

686. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TS 23.060 V10.4.0, Section 12.3.2 titled “Subfunctions.”

687. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TS 44.060 V10.5.0, Section 4.2 titled “Layer functions.”

688. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TS 44.060 V10.5.0, Section 8.1.1.1.2 titled “Resource Reallocation for Uplink.”

689. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TS 44.060 V10.5.0, Section 8.1.1.3a.5.2 titled “Change of service demand.”

690. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TS 44.060 V10.5.0, Section 9.1.11 titled “Segmentation of upper layer PDUs into RLC data units.”

691. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TS 44.064 V10.0.0, Section 4.1 titled “Reference model.”

692. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TS 44.064 V10.0.0, Section 4.7 titled “LLC layer structure.”

693. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TS 44.064 V10.0.0, Section 6.2.3 titled “Service Access Point Identifier (SAPI).”

694. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TS 44.064 V10.0.0, Section 7.1.2 titled “LLC layer service primitives.”

695. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TS 44.064 V10.0.0, Section 7.2.3 titled “LLE - RLC/MAC primitives.”

696. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TS 44.064 V10.0.0, Section 7.2.3.1 titled “GRR-DATA.”

697. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TS 44.065 V10.0.0, Section 4 titled “General.”

698. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP TS 44.065 V10.0.0, Section 5.2 titled “Service functions.”

699. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 23.060 V10.4.0.

700. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 44.060 V10.5.0.

701. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 44.064 V10.0.0.

702. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 44.065 V10.0.0.

703. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 23.060 V10.4.0, Section 4 titled “Main Concept.”

704. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 23.060 V10.4.0, Section 5 titled “General GPRS Architecture and Transmission Mechanism.”

705. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 23.060 V10.4.0, Section 5.1 titled “GPRS Access Interfaces and Reference Points.”

706. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6 titled “User and Control Planes.”

707. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6.1 titled “User Plane (A/Gb mode).”

708. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6.1.1 titled “MS – P-GW/GGSN.”

709. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6.3.1 titled “MS - SGSN (A/Gb mode).”

710. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 23.060 V10.4.0, Section 9.2.2.1 titled “PDP Context Activation Procedure.”

711. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 23.060 V10.4.0, Section 12.3.2 titled “Subfunctions.”

712. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 44.060 V10.5.0, Section 4.2 titled “Layer functions.”

713. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 44.060 V10.5.0, Section 8.1.1.1.2 titled “Resource Reallocation for Uplink.”

714. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 44.060 V10.5.0, Section 8.1.1.3a.5.2 titled “Change of service demand.”

715. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 44.060 V10.5.0, Section 9.1.11 titled “Segmentation of upper layer PDUs into RLC data units.”

716. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 44.064 V10.0.0, Section 4.1 titled “Reference model.”

717. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 44.064 V10.0.0, Section 4.7 titled “LLC layer structure.”

718. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 44.064 V10.0.0, Section 6.2.3 titled “Service Access Point Identifier (SAPI).”

719. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 44.064 V10.0.0, Section 7.1.2 titled “LLC layer service primitives.”

720. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 44.064 V10.0.0, Section 7.2.3 titled “LLE - RLC/MAC primitives.”

721. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 44.064 V10.0.0, Section 7.2.3.1 titled “GRR-DATA.”

722. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 44.065 V10.0.0, Section 4 titled “General.”

723. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP TS 44.065 V10.0.0, Section 5.2 titled “Service functions.”

724. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP TS 23.060 V10.4.0.

725. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP TS 44.060 V10.5.0.

726. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP TS 44.064 V10.0.0.

727. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP TS 44.065 V10.0.0.

728. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP TS 23.060 V10.4.0, Section 4 titled “Main Concept.”

729. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP TS 23.060 V10.4.0, Section 5 titled “General GPRS Architecture and Transmission Mechanism.”

730. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP TS 23.060 V10.4.0, Section 5.1 titled “GPRS Access Interfaces and Reference Points.”

731. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6 titled “User and Control Planes.”

732. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6.1 titled “User Plane (A/Gb mode).”

733. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6.1.1 titled “MS – P-GW/GGSN.”

734. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6.3.1 titled “MS - SGSN (A/Gb mode).”

735. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP TS 23.060 V10.4.0, Section 9.2.2.1 titled “PDP Context Activation Procedure.”

736. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP TS 23.060 V10.4.0, Section 12.3.2 titled “Subfunctions.”

737. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP TS 44.060 V10.5.0, Section 4.2 titled “Layer functions.”

738. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP TS 44.060 V10.5.0, Section 8.1.1.1.2 titled “Resource Reallocation for Uplink.”

739. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP TS 44.060 V10.5.0, Section 8.1.1.3a.5.2 titled “Change of service demand.”

740. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP TS 44.060 V10.5.0, Section 9.1.11 titled “Segmentation of upper layer PDUs into RLC data units.”

741. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP TS 44.064 V10.0.0, Section 4.1 titled “Reference model.”

742. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP TS 44.064 V10.0.0, Section 4.7 titled “LLC layer structure.”

743. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP TS 44.064 V10.0.0, Section 6.2.3 titled “Service Access Point Identifier (SAPI).”

744. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP TS 44.064 V10.0.0, Section 7.1.2 titled “LLC layer service primitives.”

745. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP TS 44.064 V10.0.0, Section 7.2.3 titled “LLE - RLC/MAC primitives.”

746. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP TS 44.064 V10.0.0, Section 7.2.3.1 titled “GRR-DATA.”

747. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP TS 44.065 V10.0.0, Section 4 titled “General.”

748. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP TS 44.065 V10.0.0, Section 5.2 titled “Service functions.”

749. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 23.060 V10.4.0.

750. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 44.060 V10.5.0.

751. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 44.064 V10.0.0.

752. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 44.065 V10.0.0.

753. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 23.060 V10.4.0, Section 4 titled “Main Concept.”

754. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 23.060 V10.4.0, Section 5 titled “General GPRS Architecture and Transmission Mechanism.”

755. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 23.060 V10.4.0, Section 5.1 titled “GPRS Access Interfaces and Reference Points.”

756. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6 titled “User and Control Planes.”

757. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6.1 titled “User Plane (A/Gb mode).”

758. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6.1.1 titled “MS – P-GW/GGSN.”

759. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 23.060 V10.4.0, Section 5.6.3.1 titled “MS - SGSN (A/Gb mode).”

760. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 23.060 V10.4.0, Section 9.2.2.1 titled “PDP Context Activation Procedure.”

761. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 23.060 V10.4.0, Section 12.3.2 titled “Subfunctions.”

762. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 44.060 V10.5.0, Section 4.2 titled “Layer functions.”

763. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 44.060 V10.5.0, Section 8.1.1.1.2 titled “Resource Reallocation for Uplink.”

764. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 44.060 V10.5.0, Section 8.1.1.3a.5.2 titled “Change of service demand.”

765. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 44.060 V10.5.0, Section 9.1.11 titled “Segmentation of upper layer PDUs into RLC data units.”

766. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 44.064 V10.0.0, Section 4.1 titled “Reference model.”

767. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 44.064 V10.0.0, Section 4.7 titled “LLC layer structure.”

768. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 44.064 V10.0.0, Section 6.2.3 titled “Service Access Point Identifier (SAPI).”

769. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 44.064 V10.0.0, Section 7.1.2 titled “LLC layer service primitives.”

770. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 44.064 V10.0.0, Section 7.2.3 titled “LLE - RLC/MAC primitives.”

771. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 44.064 V10.0.0, Section 7.2.3.1 titled “GRR-DATA.”

772. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 44.065 V10.0.0, Section 4 titled “General.”

773. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP TS 44.065 V10.0.0, Section 5.2 titled “Service functions.”

774. Upon information and belief, Apple will continue to directly infringe, induce infringement and/or contribute to the infringement of the '271 patent.

775. Upon information and belief, Apple's infringement of the '271 patent is willful entitling Plaintiff to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

776. Apple's acts of infringement have caused damage to Plaintiff and Plaintiff is entitled to recover from Apple the damages sustained by Plaintiff as a result of Apple's wrongful acts in an amount subject to proof at trial.

SEVENTH COUNT

(Infringement of the '321 patent)

777. Plaintiff incorporates by reference the allegations set forth in Paragraphs 1-776 of this Complaint as though fully set forth herein.

778. Apple has infringed and is infringing the '321 patent by making, using, offering for sale, and selling in the United States, without authority, products and services including wireless communication devices such as the Apple iPad, Apple iPad 2, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, and Apple iPhone 4S, that are covered by one or more claims of the '321 patent.

779. Apple has induced infringement and/or contributed to the infringement, and is inducing infringement and/or contributing to the infringement of the '321 Patent by importing, making, using, offering for sale, and selling in the United States, without authority, products and services including wireless communication devices such as the Apple iPad, Apple iPad 2, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, and Apple iPhone 4S, that are covered by one or more claims of the '321 patent, including selling the products and services to customers.

Apple's customers who purchase products and services thereof and operate such products and services thereof in accordance with Apple's instructions directly infringe one or more claims of the '321 patent.

780. Apple's infringing activities have been and continue to be willful.

781. Upon information and belief, at least as early as June 14, 2011, upon settlement of all patent litigation between Apple and Nokia through a licensing agreement (*See* Nokia's June 14, 2011 press release attached hereto as Exhibit 9), Apple was aware of the '321 patent, had knowledge of the infringing nature of its activities, and has nevertheless continued its infringing activities.

782. Products made and sold in accordance with the following standards infringe one or more claims of the '321 patent:

- a. 3GPP TS 25.201 V10.0.0;
- b. 3GPP TS 25.211 V10.0.0;
- c. 3GPP TS 25.213 V10.0.0.

783. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.201 V10.0.0.

784. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.211 V10.0.0.

785. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP TS 25.213 V10.0.0.

786. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 25.201 V10.0.0, Section 4.2.3 titled "Modulation and spreading."

787. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 25.211 V10.0.0, Section 5.2.1 titled “Dedicated uplink physical channels.”

788. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 25.213 V10.0.0, Section 4.2 titled “Spreading.”

789. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 25.213 V10.0.0, Section 4.2.1 titled “Dedicated physical channels.”

790. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 25.213 V10.0.0, Section 4.2.1.1 titled “DPCCH/DPDCH.”

791. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 25.213 V10.0.0, Section 4.3.2.2 titled “Long scrambling sequence.”

792. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 25.213 V10.0.0, Section 4.3.2.3 titled “Short scrambling sequence.”

793. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 25.213 V10.0.0, Section 4.3.2.4 titled “Dedicated physical channels scrambling code.”

794. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 25.213 V10.0.0, Section 4.4.2 titled “Modulation.”

795. Upon information and belief, Apple will continue to directly infringe, induce infringement and/or contribute to the infringement of the ’321 patent.

796. Upon information and belief, Apple’s infringement of the ’321 patent is willful entitling Plaintiff to increased damages under 35 U.S.C. § 284 and to attorneys’ fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

797. Apple's acts of infringement have caused damage to Plaintiff and Plaintiff is entitled to recover from Apple the damages sustained by Plaintiff as a result of Apple's wrongful acts in an amount subject to proof at trial.

EIGHTH COUNT

(Infringement of the '143 patent)

798. Plaintiff incorporates by reference the allegations set forth in Paragraphs 1-797 of this Complaint as though fully set forth herein.

799. Apple has infringed and is infringing the '143 patent by making, using, offering for sale, and selling in the United States, without authority, products and services including wireless communication devices such as the Apple iPad, Apple iPad 2, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, and Apple iPhone 4S, that are covered by one or more claims of the '143 patent.

800. Apple has induced infringement and/or contributed to the infringement, and is inducing infringement and/or contributing to the infringement of the '143 Patent by importing, making, using, offering for sale, and selling in the United States, without authority, products and services including wireless communication devices such as the Apple iPad, Apple iPad 2, Apple iPhone 3G, Apple iPhone 3GS, Apple iPhone 4, and Apple iPhone 4S, that are covered by one or more claims of the '143 patent, including selling the products and services to customers. Apple's customers who purchase products and services thereof and operate such products and services thereof in accordance with Apple's instructions directly infringe one or more claims of the '143 patent.

801. Apple's infringing activities have been and continue to be willful.

802. Upon information and belief, at least as early as June 14, 2011, upon settlement of all patent litigation between Apple and Nokia through a licensing agreement (*See* Nokia's June 14, 2011 press release attached hereto as Exhibit 9), Apple was aware of the '143 patent, had knowledge of the infringing nature of its activities, and has nevertheless continued its infringing activities.

803. Products made and sold in accordance with the following standards infringe one or more claims of the '143 patent:

- a. 3GPP Standard TS 25.303 V9.0.0;
- b. 3GPP Standard TS 25.331 V9.6.0.

804. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standards TS 25.303 V9.0.0.

805. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V9.6.0.

806. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.303 V9.0.0, Section 5.2 titled "Typical configuration cases."

807. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.303 V9.0.0, Section 6.2.3 titled "Physical Channel Reconfiguration."

808. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.303 V9.0.0, Section 6.2.3.1 titled "UE-Originated DCH Activation."

809. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.303 V9.0.0, Section 7 titled “Traffic Volume Monitoring.”

810. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 8.4 titled “Measurement procedures.”

811. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 8.4.0 titled “Measurement related definitions.”

812. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 8.4.1 titled “Measurement control”

813. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 8.4.1.3 titled “Reception of MEASUREMENT CONTROL by the UE.”

814. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 10.3.7 titled “Measurement Information elements.”

815. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 10.3.7.66 titled “Traffic volume event identity.”

816. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 10.3.7.72 titled “Traffic volume measurement reporting criteria.”

817. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 14.4.2 titled “Traffic Volume reporting triggers.”

818. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 14.4.2.1 titled “Reporting event 4 A: Transport Channel Traffic Volume becomes larger than an absolute threshold.”

819. Plaintiff is informed and believes, and on such basis alleges, that the iPad product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 14.4.2.2 titled “Reporting event 4 B: Transport Channel Traffic Volume becomes smaller than an absolute threshold.”

820. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standards TS 25.303 V9.0.0.

821. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V9.6.0.

822. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.303 V9.0.0, Section 5.2 titled “Typical configuration cases.”

823. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.303 V9.0.0, Section 6.2.3 titled “Physical Channel Reconfiguration.”

824. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.303 V9.0.0, Section 6.2.3.1 titled “UE- Originated DCH Activation.”

825. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.303 V9.0.0, Section 7 titled “Traffic Volume Monitoring.”

826. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 8.4 titled “Measurement procedures.”

827. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 8.4.0 titled “Measurement related definitions.”

828. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 8.4.1 titled “Measurement control”

829. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 8.4.1.3 titled “Reception of MEASUREMENT CONTROL by the UE.”

830. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 10.3.7 titled “Measurement Information elements.”

831. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 10.3.7.66 titled “Traffic volume event identity.”

832. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 10.3.7.72 titled “Traffic volume measurement reporting criteria.”

833. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 14.4.2 titled “Traffic Volume reporting triggers.”

834. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 14.4.2.1 titled “Reporting event 4 A: Transport Channel Traffic Volume becomes larger than an absolute threshold.”

835. Plaintiff is informed and believes, and on such basis alleges, that the iPad 2 product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 14.4.2.2 titled “Reporting event 4 B: Transport Channel Traffic Volume becomes smaller than an absolute threshold.”

836. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standards TS 25.303 V9.0.0.

837. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V9.6.0.

838. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.303 V9.0.0, Section 5.2 titled “Typical configuration cases.”

839. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.303 V9.0.0, Section 6.2.3 titled “Physical Channel Reconfiguration.”

840. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.303 V9.0.0, Section 6.2.3.1 titled “UE- Originated DCH Activation.”

841. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.303 V9.0.0, Section 7 titled “Traffic Volume Monitoring.”

842. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 8.4 titled “Measurement procedures.”

843. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 8.4.0 titled “Measurement related definitions.”

844. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 8.4.1 titled “Measurement control”

845. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 8.4.1.3 titled “Reception of MEASUREMENT CONTROL by the UE.”

846. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 10.3.7 titled “Measurement Information elements.”

847. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 10.3.7.66 titled “Traffic volume event identity.”

848. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 10.3.7.72 titled “Traffic volume measurement reporting criteria.”

849. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 14.4.2 titled “Traffic Volume reporting triggers.”

850. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 14.4.2.1 titled “Reporting event 4 A: Transport Channel Traffic Volume becomes larger than an absolute threshold.”

851. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3G product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 14.4.2.2 titled “Reporting event 4 B: Transport Channel Traffic Volume becomes smaller than an absolute threshold.”

852. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standards TS 25.303 V9.0.0.

853. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V9.6.0.

854. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.303 V9.0.0, Section 5.2 titled “Typical configuration cases.”

855. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.303 V9.0.0, Section 6.2.3 titled “Physical Channel Reconfiguration.”

856. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.303 V9.0.0, Section 6.2.3.1 titled “UE- Originated DCH Activation.”

857. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.303 V9.0.0, Section 7 titled “Traffic Volume Monitoring.”

858. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 8.4 titled “Measurement procedures.”

859. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 8.4.0 titled “Measurement related definitions.”

860. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 8.4.1 titled “Measurement control”

861. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 8.4.1.3 titled “Reception of MEASUREMENT CONTROL by the UE.”

862. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 10.3.7 titled “Measurement Information elements.”

863. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 10.3.7.66 titled “Traffic volume event identity.”

864. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 10.3.7.72 titled “Traffic volume measurement reporting criteria.”

865. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 14.4.2 titled “Traffic Volume reporting triggers.”

866. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 14.4.2.1 titled “Reporting event 4 A: Transport Channel Traffic Volume becomes larger than an absolute threshold.”

867. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 3GS product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 14.4.2.2 titled “Reporting event 4 B: Transport Channel Traffic Volume becomes smaller than an absolute threshold.”

868. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standards TS 25.303 V9.0.0.

869. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V9.6.0.

870. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.303 V9.0.0, Section 5.2 titled “Typical configuration cases.”

871. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.303 V9.0.0, Section 6.2.3 titled “Physical Channel Reconfiguration.”

872. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.303 V9.0.0, Section 6.2.3.1 titled “UE- Originated DCH Activation.”

873. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.303 V9.0.0, Section 7 titled “Traffic Volume Monitoring.”

874. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 8.4 titled “Measurement procedures.”

875. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 8.4.0 titled “Measurement related definitions.”

876. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 8.4.1 titled “Measurement control”

877. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 8.4.1.3 titled “Reception of MEASUREMENT CONTROL by the UE.”

878. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 10.3.7 titled “Measurement Information elements.”

879. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 10.3.7.66 titled “Traffic volume event identity.”

880. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 10.3.7.72 titled “Traffic volume measurement reporting criteria.”

881. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 14.4.2 titled “Traffic Volume reporting triggers.”

882. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 14.4.2.1 titled “Reporting event 4 A: Transport Channel Traffic Volume becomes larger than an absolute threshold.”

883. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4 product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 14.4.2.2 titled “Reporting event 4 B: Transport Channel Traffic Volume becomes smaller than an absolute threshold.”

884. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standards TS 25.303 V9.0.0.

885. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V9.6.0.

886. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.303 V9.0.0, Section 5.2 titled “Typical configuration cases.”

887. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.303 V9.0.0, Section 6.2.3 titled “Physical Channel Reconfiguration.”

888. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.303 V9.0.0, Section 6.2.3.1 titled “UE- Originated DCH Activation.”

889. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.303 V9.0.0, Section 7 titled “Traffic Volume Monitoring.”

890. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 8.4 titled “Measurement procedures.”

891. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 8.4.0 titled “Measurement related definitions.”

892. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 8.4.1 titled “Measurement control”

893. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 8.4.1.3 titled “Reception of MEASUREMENT CONTROL by the UE.”

894. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 10.3.7 titled “Measurement Information elements.”

895. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 10.3.7.66 titled “Traffic volume event identity.”

896. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 10.3.7.72 titled “Traffic volume measurement reporting criteria.”

897. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 14.4.2 titled “Traffic Volume reporting triggers.”

898. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 14.4.2.1 titled “Reporting event 4 A: Transport Channel Traffic Volume becomes larger than an absolute threshold.”

899. Plaintiff is informed and believes, and on such basis alleges, that the iPhone 4S product complies with the 3GPP Standard TS 25.331 V9.6.0, Section 14.4.2.2 titled “Reporting event 4 B: Transport Channel Traffic Volume becomes smaller than an absolute threshold.”

900. Upon information and belief, Apple will continue to directly infringe, induce infringement and/or contribute to the infringement of the ’143 patent.

901. Upon information and belief, Apple's infringement of the '143 patent is willful entitling Plaintiff to increased damages under 35 U.S.C. § 284 and to attorneys' fees and costs incurred in prosecuting this action under 35 U.S.C. § 285.

902. Apple's acts of infringement have caused damage to Plaintiff and Plaintiff is entitled to recover from Apple the damages sustained by Plaintiff as a result of Apple's wrongful acts in an amount subject to proof at trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment and seeks relief against Apple as follows:

(a) For judgment that the '277 patent has been and/or continues to be infringed by Apple;

(b) For judgment that the '910 patent has been and/or continues to be infringed by Apple;

(c) For judgment that the '347 patent has been and/or continues to be infringed by Apple;

(d) For judgment that the '181 patent has been and/or continues to be infringed by Apple;

(e) For judgment that the '959 patent has been and/or continues to be infringed by Apple;

(f) For judgment that the '271 patent has been and/or continues to be infringed by Apple;

(g) For judgment that the '321 patent has been and/or continues to be infringed by Apple;

(h) For judgment that the '143 patent has been and/or continues to be infringed by Apple;

- (i) For an accounting of all damages sustained by Plaintiff as the result of Apple's acts of infringement;
- (j) For enhanced damages pursuant to 35 U.S.C. § 284;
- (k) For a mandatory future royalty payable on each and every product sold by Apple in the future that is found to infringe one or more of the patents-in-suit and on all future products which are not colorably different from products found to infringe;
- (l) For an award of attorneys' fees pursuant to 35 U.S.C. § 285 or otherwise permitted by law;
- (m) For all costs of suit; and
- (n) For such other and further relief as the Court may deem just and proper.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure and Local Rule CV-38, Plaintiff demands a trial by jury of this action.

Dated: February 29, 2012

Respectfully Submitted,

By: /s/ Wesley Hill (by permission of Lead Attorney)

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