

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

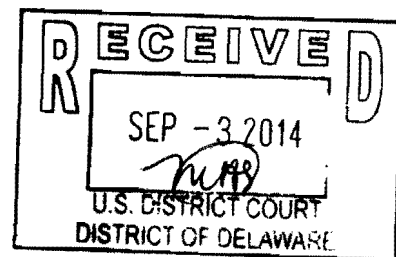
PI-NET INTERNATIONAL, INC.,

Plaintiff,

v.

J.P. MORGAN CHASE AND COMPANY,

Defendant.



C.A. No. 1:12-cv-00282-SLR

**NOTICE OF MOTION AND MOTION TO VACATE JUDGMENT FOR
FRAUD ON THE COURT PURSUANT TO FED. R. CIV. PROC. 60(B) AND
60(D)(3); MEMORANDUM OF POINTS AND AUTHORITIES;
DECLARATION OF DR. LAKSHMI ARUNACHALAM; EXHIBITS**

PLEASE TAKE NOTICE that on September 3, 2014 of the above-entitled Court, Plaintiff Pi-Net International, Inc./Lakshmi Arunachalam, Ph.d. will move this Court under Federal Rule of Civil Procedure 60(d)(3) and 60(B) for an order vacating the judgment entered against them on or about May 19, 2014 on the grounds that, among other things, said judgment was procured through judge bias and fraud on the Court. The Judges had financial holdings in a litigant and Judge Andrews transferred the case inexplicably less than a week before the Markman Hearing to Judge Robinson, who had no familiarity with the case and ruled in less than a month after the Hearing. Plaintiff's attorney, upon discovery of the fact that the Judges had financial holdings in a litigant, refused to inform the Court. Further,

Plaintiff's attorney entered his own incorrect claim construction positions that were not in accord with the specification, prosecution history or any intrinsic or extrinsic evidence, and were against the instructions of the client. Plaintiff's attorney had received written instruction from the inventor that by doing so, against the instruction of the client, he would be committing malpractice. To make matters worse, Plaintiff's Counsel also filed an appeal in the Federal Circuit while he was intoxicated, against the instruction of the client to file a Request for Reconsideration based on the material new evidence of the Judges' financial holdings in a litigant, as more fully set forth in the declaration of Dr. Lakshmi Arunachalam and Exhibits attached thereto.

This motion is made pursuant to Federal Rule of Civil Procedure 60(d)(3) ("Rule 60") and shall be based upon this Notice, the attached Memorandum of Points and Authorities, the declaration of Dr. Lakshmi Arunachalam, and Exhibits attached thereto, the complete files and records of this action, and such other and further oral and documentary evidence as may be presented at the hearing on this Motion.

Dated September 3, 2014

/s/Lakshmi Arunachalam

Dr. Lakshmi Arunachalam
Individual, Inventor and
Owner of Patents-in-Suit

and
CEO,
Pi-Net International, Inc
222 Stanford Avenue
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650 854 3393
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Plaintiff

MEMORANDUM OF POINTS AND AUTHORITIES

I. SUMMARY OF CLAIMS

The Court must vacate all judgments in this case based on an irreparably flawed Markman Hearing and Opinion. The Opinion was prejudiced by the following circumstances:

1. Judge bias and Fraud upon the Court; and
2. Plaintiff's attorney malpractice and failure to follow written instructions.

Judges Andrews, Robinson and Stark held substantial interests and conflicts relationships in the litigants, including but not limited to, J.P. Morgan Chase and Company ("JPMorgan"), in violation of the Code of Conduct for U.S. Judges to avoid impropriety and the appearance of impropriety.

II. FACTS AND ARGUMENT

Plaintiff filed suit against Defendant J.P. Morgan on or about March 12, 2012 alleging patent infringement of the patents-in-suit. See Plaintiff's complaint on file.

Judgment was entered against Plaintiff on or about May 19, 2014. Plaintiff contends that said judgment was procured through judge bias and fraud on the court in that the Judges had financial holdings in a litigant. Judge Andrews transferred the case inexplicably, less than a week before the Markman Hearing,

to Judge Robinson. Judge Robinson had no familiarity with the case, yet ruled nonetheless in less than a month after the Hearing.

Plaintiff's attorney, upon discovery of the fact that the Judges had financial holdings in a litigant, *refused* to inform the Court of this newly discovered conflict. Further, Plaintiff's attorney entered his own *incorrect* claim construction positions that were (a) inconsistent with the specification, (b) inconsistent with the prosecution history or any intrinsic or extrinsic evidence, (c) against the explicit written instruction of the client not to do so, and (d) in defiance of the explicit written instruction from the inventor that by doing so, he would be committing malpractice. If this were not flagrant enough, Plaintiff's attorney filed for an appeal in the Federal Circuit while he was intoxicated; against the instruction of the client to file a Request for Re-consideration following the discovery of the material new evidence that the Judges held financial interests in a litigant.

See the Declaration of Dr. Lakshmi Arunachalam and Exhibits attached thereto filed and served concurrently and incorporated herein by reference.

Judge Bias

The Code of Conduct for U.S. Judges is clear. A judge must disqualify himself or herself even if his or her spouse holds *one share of stock* in a litigant. Canon 2 says a judge must avoid impropriety and the appearance of impropriety. It has come to Plaintiff's attention that Judge Andrews has financial holdings in

JPMorgan, the Defendant. For example, he holds stock in Fidelity Blue Chip Value Fund, BVCVX, which holds **\$10,236,950,000** shares in JP Morgan-- the 8th largest holding in that fund. This clearly dictates recusal.

Judge Robinson's financial disclosure is uninformative since she lists no assets at all, which cannot be. The rules require disclosure of all holdings. Plaintiff requires an updated financial disclosure that includes Judge Robinson's extended family holdings as required by 28 U.S.C. § 455.

Chief Judge Leonard P. Stark is similarly conflicted in matters involving J.P.Morgan. For example, he has considerably large financial holdings in J.P. Morgan. (Exhibit A)

On Apr. 10, 2010, Judge Stark stated in his Senate confirmation hearing regarding conflicts of interest and recusal: "I screen cases as they are referred to me for potential conflicts . . . [m]y practice has been to recuse myself if I have a close relationship with any of the parties, identified witnesses, or counsel."

New material evidence has surfaced in this case after the erroneous and prejudiced Markman Ruling. Judge Andrews and Chief Judge Stark had considerable financial holdings in a litigant, and also tainted Judge Robinson. This conflict of interest required disclosure and recusal, yet those with the knowledge of this conflict were utterly silent. The Judges and Plaintiff's Counsel had unclean hands since the public record shows the Judges' financial holdings in J. P. Morgan.

Plaintiff's Counsel had knowledge of the New Evidence, and failed to disclose it to the Court, and flagrantly ignored t client instruction.

Judge Andrews and Judge Stark did not disclose to Plaintiff that they had financial holdings in a litigant. This violation of their duty to disclose was a mistake. Plaintiff's Counsel refused to bring this to the attention of the Court, despite client instructions to do so. This was willful concealment of a key fact that was material to the outcome of the case and damaged the Plaintiff financially.

That Judge Andrews and Judge Stark had financial holdings in a litigant and did not disclose this to Plaintiff and transferred the case to Judge Robinson after Judge Andrews had been on the case for over 2 years inexplicably less than one week prior to the Markman Hearing and Judge Robinson ruled in less than a month with no familiarity of the case, readily obvious by her own incorrect claim constructions showing a bias to the Defendant, the motivation for this emerged after the Ruling, when it came to Plaintiff's attention that the Judges had financial holdings in a litigant, this was newly discovered evidence. Counsel refused to bring this to the attention of the Court, despite client instructions to do so.

Fraud is a deception deliberately practiced in order to secure unfair or unlawful gain (adjectival form fraudulent; to defraud is the verb). Fraud is both a civil wrong (i.e., a fraud victim may sue the fraud perpetrator to avoid the fraud and/or recover monetary compensation) and a criminal wrong (i.e., a fraud

perpetrator may be prosecuted and imprisoned by governmental authorities).

Defrauding people or organizations of money or valuables is the usual purpose of fraud, but it sometimes instead involves obtaining benefits without actually depriving anyone of money or valuables, such as obtaining a drivers license by way of false statements made in an application for the same.^[2]

The requisite elements of fraud are the intentional misrepresentation or concealment of an important fact upon which the victim is meant to rely, and in fact does rely, to the harm of the victim. The elements include proving the states of mind of the perpetrator and the victim, and that some jurisdictions require the victim to prove fraud with so-called clear and convincing evidence.

The remedies for fraud may include rescission (i.e., reversal) of a fraudulently obtained agreement or transaction, the recovery of a monetary award to compensate for the harm caused, punitive damages to punish or deter the misconduct, and possibly others.^[5]

In cases of a fraudulently induced contract, fraud may serve as a defense in a civil action for breach of contract or specific performance of contract.

Fraud may serve as a basis for a court to invoke its equitable jurisdiction.

Another distinction is the unavailability of a jury in equity: the judge is the trier of fact. In the American legal system, the right of jury trial in civil cases tried in federal court is guaranteed by the Seventh Amendment *in Suits at common*

law, cases that traditionally would have been handled by the law courts. The question of whether a case should be determined by a jury depends largely on the type of relief the plaintiff requests. If a plaintiff requests damages in the form of money or certain other forms of relief, such as the return of a specific item of property, the remedy is considered legal, and a jury is available as the fact-finder. On the other hand, if the plaintiff requests an injunction, declaratory judgment, specific performance, modification of contract, or some other non-monetary relief, the claim would usually be one in equity.

Thus, Plaintiff has required proof by clear and convincing evidence where particularly important individual interests or rights are at stake.

See, e.g., *Santosky v. Kramer*, 455 U. S. 745 (1982) (proceeding to terminate parental rights); *Addington v. Texas*, *supra* (involuntary commitment proceeding); *Woodby v. INS*, 385 U. S. 276, 285-286 (1966) (deportation).^[29]

By contrast, imposition of even severe civil sanctions that do not implicate such interests has been permitted after proof by a 390*390 preponderance of the evidence. See, e. g., *United States v. Regan*, 232 U. S. 37, 48-49 (1914) (proof by a preponderance of the evidence suffices in civil suits involving proof of acts that expose a party to a criminal prosecution).

A preponderance-of-the-evidence standard allows both parties to "share the risk of error in roughly equal fashion." *Addington v. Texas*, *supra*, at 423. Any

other standard expresses a preference for one side's interests. The balance of interests in this case warrants use of the preponderance standard. The interests of defendants in a securities case do not differ qualitatively from the interests of defendants sued for violations of other federal statutes such as the antitrust or civil rights laws, for which proof by a preponderance of the evidence suffices. On the other hand, the interests of plaintiffs in such suits are significant. Defrauded investors are among the very individuals Congress sought to protect in the securities laws. If they prove that it is more likely than not that they were defrauded, they should recover.

Plaintiff therefore declines to depart from the preponderance-of-the-evidence standard generally applicable in civil actions. Accordingly, the Court's decision on an erroneous Markman Ruling and Summary Judgment of non-infringement and invalidity of the patents-in-suit should be reversed.

Propriety Demands an Impartial Tribunal

The extraordinary facts in this matter dictate that this motion be filed in an unbiased court other than the originating District Court of the State of Delaware. One of the alleged offending judges is Judge Richard G. Andrews, the presiding judge in the matter, who transferred the case to Judge Robinson at the last minute. Another Judge is Chief Judge Leonard P. Stark, who approved the transfer of the case from Judge Andrews to Judge Robinson. Therefore, a 60(B) and 60(D)(3)

motion filed in this court, alleging the misconduct by the Judges, is *a prima facie* conflict of interest and would consume the parties resources needlessly. Therefore, in the interest of judicial economy this case must be transferred to a verifiably impartial tribunal.

Corruption

Corruption is the abuse of power by a public official for private gain or any organized, interdependent system in which part of the system is either not performing duties it was originally intended to, or performing them in an improper way, to the detriment of the system's original purpose. The abuse of public offices for private gain is paradigmatic of corruption.

A common belief is that corruption is a judge taking bribes. The definition exceeds this theory. Corruption describes any organized, interdependent system in which part of the system is either not performing duties it was originally intended to, or performing them in an improper way, to the detriment of the system's original purpose. Corrupt judicial systems not only violate the basic right to equality before the law but deny procedural rights guaranteed by the United States Constitution.

See DOJ U.S. Parole Commission Public Announcement, *See* Sunshine Act (Pub. L. 94-409) [5 U.S.C. Section 552b]. Constructive fraud is a contract or act, which not originating in evil design and contrivance to perpetuate a positive fraud

or injury upon other persons, yet by its necessary tendency to deceive or mislead them, or to violate a public or private confidence, or to impair or injure public interest, is deemed equally reprehensible with positive fraud, and is therefore prohibited by law..." Bovier's Law Dictionary- 1856 Edition. See Standard of Review in *Bulloch v. United States*, 763 F. 2d 1115, 1121 (10th Cir. 1985), the court stated:

Fraud upon the court is fraud which is directed to the judicial machinery itself and is not fraud between the parties or fraudulent documents, false statements or perjury...It is where the court or a member is corrupted or influenced or influence or influence is attempted where the judge has not performed his judicial function... thus where the impartial functions of the court have been directly corrupted." In sum, the Ninth Amendment simply lends strong support to the view that the 'liberty' protected by the Fifth and 14th Amendments from infringement by the Federal Government or the States is not restricted to rights specifically mentioned in the first eight amendments." Similarly, in *Palko v. Connecticut*, 302 U.S. 319, 325, 326 (1937), it was said "that this category of fundamental rights includes those fundamental liberties that are "implicit in the concept of ordered liberty," such that "neither liberty nor justice would exist if they were sacrificed." Judges cannot be put above the law. Our own former U.S. Attorney General John Ashcroft condemned the judicial branch of government by characterizing this

branch as “organized crime.” They intentionally go forth to destroy lives. This does not ensure integrity and restore public confidence. The American public, victimized and held hostage, have nowhere to turn.

Judge Andrews failed to act responsibly. Chief Judge Edith Jones at the Fifth Circuit Court of Appeals stated with regard to judicial corruption: “We must all in our own countries, lead the fight to ensure integrity within our police and judicial systems.”

Judge Andrews’ conduct is shocking to the universal sense of justice. A substantive Due Process violation has occurred when judicial misconduct violates “fundamental fairness” and is “shocking to the universal sense of justice.” *Kinsella v. United States ex rel. Singleton* 361 U.S. 234, 246, 4L, Ed. 2d268, 80 S. Ct. 297 (1960). See *Rochin v. California*, 342 U.S. 165, 96 L. Ed. 183, 72 S. Ct. 205 (1952), where the Supreme Court applied the Due Process clause to the “whole course of the proceeding in order to ascertain whether they offend those canons of decency and fairness which express the notions of justice of English-speaking peoples even toward those charged with the most heinous offences.” *Id.* at 169. See also *U.S v. Russell*, 411 U.S. 423, 36 L. Ed 2d 366, 93 S. Ct. 1637 (1973). The aforementioned prosecutorial misconduct and official crime certainly offends the “canons of decency and fairness” spoken of by the Second Circuit. “...Sovereignty itself remains with the people, by whom and for whom all government exists and

acts.” Justice Mathews of the U.S. Supreme Court in the case of *Yick Wo v. Hopkins*, 118 US 356, 370*.

Counsel George Pazuniak, by suppressing the problem of judicial misconduct, damaged the Plaintiff and caused financially measurable damage to the Plaintiff. There is nothing in the Constitution that puts the misconduct of a judge as something less than the misconduct of any other citizen. Judges cannot be placed above ordinary men in the application of American justice. “Breaking the law must be perceived as unethical and subject to discipline and charges, and never an act of judicial discretion.” See *The Report: Judicial Independence, Interdependence and Judicial Accountability: Management of the Courts From the Judges. Perspective*; Institute for Court Management: Court Executive Development Program Phase III Project, May 2006, says on p. 11: When a judge makes a void order and uses fraud to procure it, it becomes both an ethical and legal question for charges of misconduct, and if found guilty, a judge’s ruling should immediately effect the original case by a ruling from the Judicial Council... A void judgment which includes judgment entered by a court which lacks jurisdiction over the parties or the subject matter, or lacks inherent power to enter the particular judgment, or an order procured by fraud, can be attacked at any time in any court, either directly or collaterally, provided that the party is properly before the court.” *Long v. Shorebank Development Corp.*, 182 F. 3d 548 (C.A. 7

Ill. 1999). Irresponsible and improper conduct by Judges erodes public confidence in the judiciary.

Chief Judge Edith Jones of the Fifth Circuit Court of Appeals stated on March 7, 2003 at a Harvard Law School seminar that “the American legal system is corrupt beyond recognition.” Jones said that the question of what is morally right is routinely sacrificed to what is politically expedient.” “The integrity of law, its religious roots, its transcendental quality are disappearing. She cited Blackstone: “The law of nature, dictated by God himself, is binding, in all countries and at all times; no human laws are of any validity if contrary to this; and such of them are valid derive all force and all their authority from this original... the rule of law-that it was dependent on transcendent religious obligation...unalienable rights were given by God to all our fellow citizens. ..The answer is a recovery of moral principle, the sine qua non of an orderly society... The legal system has also been wounded by lawyers who themselves no longer respect the rule of law.” The Judge quoted Kenneth Starr as saying: “It is decidedly unchristian to win at any cost.” “... strategic use of anger and incivility will achieve their aims. Others seem uninhibited about making misstatements to the court or their opponents or destroying or falsifying evidence,” she claimed. “When lawyers cannot be trusted to observe the fair processes essential to maintaining the rule of law, how can we expect the public to respect the process?”

The Judge quoted George Washington: “Where is the security for property, for reputation, for life, if the sense of religious obligation desert the oaths, in courts of justice?” “...how can a system founded on law survive if the administrators of the law daily display their contempt for it?” “Agencies have an inherent tendency to expand their mandate,” says Jones. “At the same time, their decision-making often becomes parochial and short-sighted....none of them addresses the “ought”, the moral foundation or direction of law.”

The Ninth Circuit in *Bagley v. Lumpkin*, 719 F. 2d 1462 (1983) at 1464 stated “[s]tanding alone, the government’s failure to produce requested *Brady* information is a serious due process violation . . . [b]ut a failure to disclose requested Brady information that the defendant could use to conduct an effective cross-examination is even more egregious because it threatens the defendant’s right to confront adverse witnesses, and therefore, his right to a fair trial.”

The U.S. Supreme Court stated in *U.S. v. Bagley* at 682 “a new trial must be granted when evidence is not introduced because of the incompetence of counsel only if ‘there is a reasonable probability that, but for counsel’s unprofessional errors, the result of the proceeding would have been different.’”

**A. THE COURT HAS THE POWER TO VACATE THE JUDGMENT
THAT WAS ENTERED AGAINST THE PLAINTIFF FOR FRAUD ON
THE COURT**

Federal Rule of Civil Procedure 60(d)(3) states in pertinent part that nothing in Rule 60 limits a court's power to set aside a judgment for fraud on the court.

Plaintiff contends that attorney for Plaintiff, George Pazuniak ("Counsel"), Judge Richard G. Andrews, Judge Sue L. Robinson and Chief Judge Leonard P. Stark were biased and committed fraud on the court by the following actions in deliberate and willful omissions that harmed the integrity of the judicial process.

At least Judge Richard G. Andrews and Chief Judge Leonard P. Stark had financial holdings in a litigant.

Judge Andrews, after presiding over the case for over 2 years, inexplicably transferred the case, less than a week before the Markman Hearing, to Judge Sue L. Robinson, who had no familiarity with the case, and yet ruled in less than a month after the Hearing nonetheless. The judge bias is evident to a reasonable person.

Upon discovery of the financial holdings of the Judges in a litigant, Counsel refused to inform the Court of this fact, against the instruction of the client to do so.

Counsel entered his own *incorrect* claim construction positions that were (a) inconsistent with the specification, (b) inconsistent with the prosecution history or any intrinsic or extrinsic evidence, (c) against the explicit written instruction of the client not to do so, and (d) in defiance of the explicit written instruction from the inventor that by doing so, he would be committing

malpractice. If this were not flagrant enough, Plaintiff's attorney filed for an appeal in the Federal Circuit while he was intoxicated; against the instruction of the client to file a Request for Re-consideration following the discovery of the material new evidence that the Judges held financial interests in a litigant.

The afore-mentioned conduct by:

1. Plaintiff's Counsel, George Pazuniak,
2. Judge Richard G. Andrews,
3. Judge Susan L. Robinson,
4. Chief Judge Leonard P. Stark, and
5. Other Officers of this Court,

is directed to the judicial machinery itself. Counsel's conduct is in reckless disregard of the truth, intentionally false and willfully blind to the truth. The conduct of the Judges is also willfully blind to the truth with a reckless disregard for the truth. Counsel's and the Judges' conduct is a concealment when they each have an affirmative duty to disclose. This conduct deceives the court. *See Johnson v. Bell*, 605 F.3d 333, 339 (6th Cir. 2010); (quoting *Carter v. Anderson*, 585 F.3d 1007, 1011-12 (6th Cir. 2009)).

The afore-mentioned conduct subverts or attempts to subvert the integrity of the Court itself and is a fraud perpetrated by officers of the Court so that the judicial machinery cannot perform in the usual manner its impartial task of

adjudging cases that are presented for adjudication. Such egregious conduct and flagrant abuse of the Delaware Rules of Professional Conduct and Federal Rules of Civil Procedure by Counsel and the Judges involves a corruption and distortion of the judicial process itself. Counsel and the Judges failed to disclose exculpatory evidence in violation of their duty to disclose.

The district court abused its discretion and the Judgment must be reversed.

Counsel and the Judges engaged in constructive fraud and the Court must set aside the judgment as collusive. *See Spence-Parker v. Md. Ins. Grp.*, 937 F. Supp. 551, 563 (E.D. Va. 1996).

The non-disclosure by Counsel and the Judges resulted in the Court passing a judgment without reviewing new material evidence that emerged, the non-disclosure of which "impugned" the "integrity of the Court and the judicial process.

B. FUNDAMENTAL CONSTITUTIONAL RIGHTS

This case seeks to protect bedrock American rights of due process and property afforded under the Fifth and Fourteenth Amendments of the Constitution of the United States. Plaintiff has an affirmative constitutional right to impartiality of the judicial process.

C. GOVERNMENT CONDUCT SHOCKS THE CONSCIENCE

The conduct of Plaintiff's attorney, George Pazuniak and the judges ("Offending Parties") in this matter shocks the conscience.

D. JUDGES HELD FINANCIAL HOLDINGS IN A LITIGANT

Judge Richard G. Andrews' and Chief Administrative Judge Leonard P. Stark's financial holdings in a litigant, J.P. Morgan Chase and Company is in Exhibit A.

E. OBSCENELY INCORRECT MARKMAN OPINION

Judge Andrews remarkably transferred the case less than a week before the Markman Hearing to Judge Sue L. Robinson, after being on the case for over two years. This conduct is shocking.

Then Judge Robinson ruled on the Markman Hearing within a month after the Markman Hearing. She had many claim constructions totally incorrect. They were not in accordance with the specification, prosecution history or other intrinsic and extrinsic evidence. Based on her grossly incorrect claim constructions, she then issued a Summary Judgment invalidating the patents-in-suit. She did not give the Parties the opportunity to provide her with additional Briefs to help her understand the claim construction positions of either Party.

Judge Andrews transferred this case over to Judge Robinson under the oversight of Chief Administrative Judge Stark. Therefore, Judge Stark's conduct has prejudiced these proceedings.

Plaintiff's Attorney George Pazuniak ("Counsel") presented claim construction positions, that were his own and expressly against the client's instructions and requests. Counsel did not provide competent representation to Plaintiff, as Dr. Arunachalam delineated in PLAINTIFF RESPONSE TO UNOPPOSED MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFF previously filed at the court on August 25, 2014, in the docket as Paper 93.

F. FRAUD ON THE COURT.

Fraud on the court has occurred in a severe way, prejudicing Plaintiff. This was constructive fraud by both the Judges and Counsel. This damaged the Plaintiff financially and Judge Robinson ruled that the Patents were invalid and passed a Summary Judgment that the patents were not infringed.

Constructive fraud occurred because:

1. The Judges and Counsel failed in their affirmative duties to disclose conflicts pursuant to their codes of conduct.
2. The Judges and Counsel engaged in violation of their duties by remaining silent when they had an affirmative duty to speak. Counsel engaged in deceptive material misrepresentations of past or present facts.
3. Reliance thereon by Plaintiff;
4. Injury to Plaintiff as a proximate result thereof; and

5. The gaining of an advantage by Counsel and Judges at the expense of the Plaintiff.

G. PLAINTIFF'S COUNSEL'S ROGUE BEHAVIOR AND FRAUD ON THE COURT

1. Plaintiff had hired new Appellate Counsel for the Appeal in the Federal Circuit against JP Morgan Chase case on August 13, 2014 and they made entry of appearance in that Court on August 15, 2014. Counsel instigated new Appellate Counsel to leave and interfered with contract and sent them an email intended to scare new Appellate Counsel away, when new Appellate Counsel filed in the Federal Circuit that Counsel had been fired for cause, and not as Counsel stated to that Court and to this Court, giving both Courts a false reason of "irreconcilable differences," when the truth of the matter is Counsel had committed serious malpractice and engaged in willful misconduct, suppressing material evidence. New Appellate Counsel had agreed to take all the Delaware cases, in addition to the Appeal work in the Federal Circuit. But Counsel chased new Appellate Counsel away from taking the Delaware cases, as well as from the Appeal work. New Appellate Counsel were in the process of looking for local Counsel in Delaware, when Counsel sent them an email with the intention of scaring them away, a copy of which was attached as Exhibit B in Paper 93 filed by

Plaintiff to this Court on August 25, 2014 (Exhibit C). He engaged in willful misconduct in order to suppress material evidence.

2. Counsel has been obstructing new counsel from coming on board, not only now, but also several times in the past when he quit in the middle of litigation previously, providing false reasons to the court, when , in fact, he had committed malpractice, instances of which abound: for example, Counsel is not patent bar registered and by himself writing and having another lawyer who was USPTO-bar registered, file in the USPTO, against Plaintiff's instruction not to do so, that the "means for switching" is a "Web page..." and he had canceled over 200 valuable claims Plaintiff had filed in the USPTO in re-exams against Microsoft. He instigated any counsel calling him not to take over the cases for Plaintiff in Delaware. And sure enough, he made sure that new Appellate Counsel did not take over the above-captioned cases in Delaware, even though they had agreed to take them over.

3. When Counsel informed Plaintiff for the first time on August 28, 2014 (even though he received the Order on August 20, 2014) that the Judge's Order entailed default judgment that would dismiss the above-captioned cases on the same day as Counsel is allowed to withdraw by the Judge, if Plaintiff did not bring new Counsel on September 3, immediately on August 28, 2014, the inventor of the Patents-in-suit, Dr. Lakshmi Arunachalam filed a Motion for Substitution of

Parties and informed the Court she would go *pro se* in Court in the above-captioned cases, and by assigning the patents-in-suit to herself from her company Pi-Net International, Inc., thereby allowing her to go *pro se* and indeed presenting new counsel to this Court, namely, herself, as *pro se*.

4. The Judge placed this Motion for Substitution of Parties in the Docket on August 28, 2014 and ordered that the Defendants in the above-captioned cases file their Answering Briefs no later than September 15, 2014.

5. Counsel for Plaintiff refused to inform the Court upon discovery that the Judges had considerable financial holdings in a litigant. He engaged in the judicial misconduct, broadly citing a mutual fund exemption as *carte blanche* and stating that Judges holding financial interests in a litigant happens all the time. He did not inform the court upon discovery of the Judges' financial holdings, for his own personal financial gains to litigate for other clients before the same Judges, instead of doing what is in the best interests of the client.

6. See 28 U.S.C. §455(a); Code of Conduct for United States Judges; *Liljeberg v. Health Services Acquisition Corp.*, 486 US 847, 860 (Supreme Court 1988); *Liteky v. United States*, 510 US 540 (Supreme Court 1994); *Preston v. U.S.*; U.S. Court Judicial Conference guidelines.

IV. RELIEF SOUGHT BY PLAINTIFF

1. Plaintiff requests that this Court vacate the prejudiced Markman Ruling and Summary Judgment, and to allow the case to have the Plaintiff submit the inventor's position on claim construction that is in accord with the specification and intrinsic and extrinsic evidence, and to conduct a new Markman Hearing and to proceed to the Jury Trial, which was only a few weeks away, when Judge Robinson stopped the case from proceeding further.

2. Plaintiff reserves the right to conduct additional discovery on the holdings of the members of the Court pursuant to 28 U.S.C. §455; Code of Conduct for United States Judges; *Liljeberg v. Health Services Acquisition Corp.*, 486 US 847, 860 (Supreme Court 1988); *Liteky v. United States*, 510 US 540 (Supreme Court 1994); and *Preston v. U.S.*; U.S. Court Judicial Conference guidelines.

3. Plaintiff respectfully requests that the Court withdraw Counsel George Pazuniak's claim construction filing *ab initio*, and permit Plaintiff to re-file.

A Certificate of Service is attached here below.

Respectfully submitted,

DATED: September 3, 2014

/s/ Lakshmi Arunachalam

Dr. Lakshmi Arunachalam
Individual and inventor,

and

Dr. Lakshmi Arunachalam
CEO and Inventor
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Plaintiff

*Dr. Lakshmi Arunachalam, and
Pi-Net International, Inc*

EXHIBIT A:**JUDGES' FINANCIAL HOLDINGS IN LITIGANT**

LEONARD P. STARK, Chief Judge, U.S. District Court of Delaware Financial Disclosure, 2012		
Source: <i>Judicial Watch</i> , Leonard P. Stark Source: <i>SEC Edgar</i>		
<i>Ticker</i>	<i>Holding</i>	<i>JPMorgan Conflicts</i>
<u>VINIX</u>	Wachovia Vanguard Institutional Fund	\$2,161,083,000 shares in JPMorgan, the 9 th largest holding in this fund
<u>VMRGX</u>	Vanguard Morgan Growth Fund	\$31,628,000 shares in JPMorgan
<u>FUSEX</u>	Fidelity Investments Spartan 50 Index Investor Class	\$896,713,000 shares in JPMorgan
<u>FDRXX</u>	Fidelity Investments Fidelity Cash Reserves	\$1,960,000,000 commercial paper in JPMorgan
<u>FASMXX</u>	Fidelity Investment Fidelity Asset Manager 50%	<p>\$1,090,000,000 shares in JPMorgan, the 9th largest holding in this fund; represents 0.1% of a fund with assets totaling \$1,090,672,117,000</p> <p>In addition, one of the executive officers of this fund is Stephanie J. Dorsey. Quoting from the 2013 Annual Report, "Prior to joining Fidelity Investments, Ms. Dorsey served as Treasurer (2004-2008) of the JPMorgan Mutual Funds and Vice President (2004-2008) of JPMorgan Chase Bank. In addition, JPMorgan Chase Bank, New York, NY is a "Custodian" of this fund.</p>
<u>FASBX</u>	Fidelity Investment Fidelity Asset Manager 70%	<p>\$1,090,000,000 shares in JPMorgan, the 9th largest holding in this fund; represents 0.1% of a fund with assets totaling \$1,090,672,117,000</p> <p>In addition, one of the executive officers of this fund is Stephanie J. Dorsey. Quoting from the 2013 Annual Report, "Prior to joining Fidelity Investments, Ms. Dorsey served as Treasurer (2004-2008) of the JPMorgan Mutual Funds and Vice President (2004-2008) of JPMorgan Chase Bank. In addition, JPMorgan Chase Bank, New York, NY is a "Custodian" of this fund.</p>

JUDGE RICHARD G. ANDREWS, Judge, U.S. District Court of Delaware
Financial Disclosure, 2012

Source: *Judicial Watch*, Richard G. Andrews - 2012 Source: *SEC Edgar*

<u>BVCVX</u>	Fidelity Blue Chip Value Fund	\$6,961,569,000 shares in JP Morgan-- the 8 th largest holding in this fund. In addition, one of the executive officers of this fund is Stephanie J. Dorsey . Quoting from the 2013 Annual Report, "Prior to joining Fidelity Investments, Ms. Dorsey served as Treasurer (2004-2008) of the JPMorgan Mutual Funds and Vice President (2004-2008) of JPMorgan Chase Bank ."
<u>Overview</u>	Fidelity Delaware Portfolio 2012 (Index) (529 Plan)	This is a "build your own investment mix plan." The rules require disclosure of the funds selected by judicial employees.
<u>FFFDX</u>	Fidelity Freedom 2020	One of the executive officers of this fund is Stephanie J. Dorsey . Quoting from the 2013 Annual Report, "Prior to joining Fidelity Investments, Ms. Dorsey served as Treasurer (2004-2008) of the JPMorgan Mutual Funds and Vice President (2004-2008) of JPMorgan Chase Bank ."
<u>PRRXX</u>	T. Rowe Price Prime Reserve #1	450,000 shares in JP Morgan Chase Putters / Dri Ctfs -- the 10 th largest holding in this fund.
<u>PRRXX</u>	T. Rowe Price Prime Reserve #2	450,000 shares in JP Morgan Chase Putters / Dri Ctfs -- the 10 th largest holding in the fund.
<u>VCVLX</u>	Vanguard Capital Value Fund	\$19,446,000 shares in JP Morgan-- the 10 th largest holding in this fund.
<u>VWEHX</u>	Vanguard High-Yield Corporate Inv	\$1,116,988,000 JPMorgan corporate bonds
<u>VBILX</u>	Vanguard Interim-Term Bond Index Adm	\$23,256,000 JPMorgan corporate bond
<u>VWESX</u>	Vanguard Long-Term Investment-Grade Inv	\$1,116,988,000 JPMorgan corporate bonds
<u>VTSMX</u>	Vanguard Total Stock Mkt Idx Inv	\$3,286,885,000 shares in JP Morgan-- the 10 th largest holding in this fund
<u>VTCLX</u>	Vanguard Tax-Managed Capital Appreciation Fund	\$116,288,000 shares in JP Morgan -- the 9 th largest holding in this fund
<u>Vanguard</u>	Vanguard Tax-Managed Capital Appreciation F Ad (UGMA #1)	Ownership change; holdings uncertain
<u>VWUSX</u>	Vanguard US Growth Inv	\$37,152,000 shares in JP Morgan

<u>VWENX</u>	Vanguard Wellington Admiral	\$1,347,496,000 shares in JP Morgan – the 3 rd largest holding in this fund
<u>VWNFX</u>	Vanguard Windsor II Inv	\$1,348,935,000 shares in JP Morgan – the 2 nd largest holding in this fund
<u>TWEIX</u>	American Century Equity Income	\$151,846,704 shares in JPMorgan
<u>BIGRX</u>	American Century Income & Growth Inv	\$28,811,409 shares in JP Morgan – the 10 th largest holding in this fund
<u>SCMTX</u>	DWS Intermediate Tax/AMT Free S	\$800,000 JPMorgan letter of credit
<u>MUTHX</u>	Franklin Templeton Class Z	\$207,658,971 shares in JP Morgan
<u>HSVFX</u>	Hennessy Select Large Value Original Fund	\$5,880,000 JPMorgan shares represent the 2 nd largest holding in this fund representing 4% of the total assets of \$147,000,000

**JUDGE SUE L. ROBINSON, Judge, U.S. District Court of Delaware
Financial Disclosure, 2012**

Source: *Judicial Watch*, Sue L. Robinson

<http://www.judicialwatch.org/document-archive/sue-l-robinson-2012/>

Judge Robinson lists a checking account, a rental property and Marathon stock as the only holdings. This disclosure appears incomplete, with no updated financial disclosure that includes Judge Robinson's extended family holdings as required by 28 U.S.C. § 455. Given her willingness to issue a Markman decision after only one week on this case raises questions of propriety.

Remarkably, just a week before the Markman Hearing, Judge Andrews reassigned the case to Judge Robinson inexplicably. Judge Robinson had no familiarity with the case, yet ruled on the claim construction nonetheless. This premature action prejudiced the proceedings. The current Markman ruling was untimely, and enough time should have been provided for additional briefings and argument in order for the Judge to become familiar with the claims. A week was not enough time.

Plaintiff reserves the right to conduct additional discovery to determine all financial and other relationships with third parties who may be related to litigants in this matter.

EXHIBIT B:

Paper 93 in case docket in Case 12:cv-00355-RGA, incorporated by reference herewith.

EXHIBIT C:
COUNSEL'S OBSTRUCTIVE AND DEFAMATORY EMAIL
TO PI-NET'S NEW APPELLATE COUNSEL

From: George Pazuniak [mailto:gp@del-iplaw.com]
Sent: Friday, August 22, 2014 1:51 PM
To: john@jwcarpenterlaw.com
Subject: FW: 14-1495-SJ Pi-Net International, Inc. v. JPMorgan Chase & Co. "Clerk's Notice of Deficient Document"

John,

As a professional, I would think twice about re-filing Lakshmi's libel.

George

From: FilingNotice@cafc.uscourts.gov [mailto:FilingNotice@cafc.uscourts.gov]
Sent: Friday, August 22, 2014 1:28 PM
To: George Pazuniak
Subject: 14-1495-SJ Pi-Net International, Inc. v. JPMorgan Chase & Co. "Clerk's Notice of Deficient Document"

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing.

United States Court of Appeals for the Federal Circuit

Notice of Docket Activity

The following transaction was entered on 08/22/2014 at 1:28:51 PM EDT and filed on 08/22/2014

Case Name: Pi-Net International, Inc. v. JPMorgan Chase & Co.

Case Number: 14-1495

Docket Text:

NOTICE OF DEFICIENCY: The response Docket No. [28] filed by Appellant Pi-Net International, Inc. in 14-1495 is submitted using the incorrect event and therefore cannot be accepted for filing at this time. You are being afforded the opportunity to correct the deficiency. At the discretion of the court, the corrected document may be accepted for filing if received before midnight (EST) on the date of this notice. [177143]

Notice will be electronically mailed to:

Ms. Victoria Elisabeth Brieant, Attorney: victoria@brieantlaw.com, vbrieant@aol.com
Daniel Alexander DeVito: daniel.devito@skadden.com, Nicholas.Mireles@skadden.com
Andrew D. Gish, -: andrew.gish@skadden.com
Jessica Raatz Kunz, -: jessica.kunz@skadden.com
Mr. Douglas R. Nemec, Principal Litigation Counsel: douglas.nemec@skadden.com,
dlmlcwas@skadden.com, andrew.gish@skadden.com
Mr. George Pazuniak, Attorney: gp@del-iplaw.com
Robert Scott Saunders: rob.saunders@skadden.com
Edward L. Tulin, -: edward.tulin@skadden.com

EXHIBIT D:

Numerous emails between Dr. Lakshmi Arunachalam and George Pazuniak, which will be shown to the Judge in camera in order to maintain privileges and confidentiality pursuant to the Federal Rules of Evidence. This evidence includes emails of July 9, 2013, October 22, 2013, November 11, 2013, and many more.

Hospital Records from Kaiser Permanente to evidence the effect on the inventor from Counsel's harassment and flagrantly work counter to client instructions will be produced. All this will be produced in camera at the appropriate time pursuant to the Federal Rules of Evidence.

DECLARATION OF INVENTOR DR. LAKSHMI ARUNACHALAM

I, Dr. Lakshmi Arunachalam, inventor of the patents-in-suit and CEO of Pi-Net International, Inc., hereby declare that what I filed in this Court as Paper 93 in Case 12:cv-00355 on August 25, 2014 is true. I incorporate by reference herewith this Paper 93 from Case 12:cv-00355. I have proof and evidence in the form of emails, witnesses and other forms of testimony to evidence each and every one of my statements I made in the afore-mentioned Paper 93.

I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true.

Date: September 3, 2014

/s/Lakshmi Arunachalam

Dr. Lakshmi Arunachalam

222 Stanford Avenue

Menlo Park, California 94025

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE
CERTIFICATE OF SERVICE**

I, Dr. Lakshmi Arunachalam, hereby certify that on September 3, 2014, the attached “Notice of Motion and Motion to Vacate Judgment for Fraud on the Court Pursuant to Fed. R. Civ. Proc. 60(B) and 60(D)(3); Memorandum of Points and Authorities; Declaration of Dr. Lakshmi Arunachalam; Exhibits,” was delivered **by hand** to Judge Robinson and Clerk of the Court for filing.

I further certify that on September 3, 2014, the attached “Notice of Motion and Motion to Vacate Judgment for Fraud on the Court Pursuant to Fed. R. Civ. Proc. 60(B) and 60(D)(3); Memorandum of Points and Authorities; Declaration of Dr. Lakshmi Arunachalam; Exhibits,” was delivered **by hand** to Counsel for Defendant J.P. Morgan Chase.

DATED: September 3, 2014 /s/Lakshmi Arunachalam

Dr. Lakshmi Arunachalam
222 Stanford Avenue
Menlo Park, CA 94025
650 854 3393
Laks22002@yahoo.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

PI-NET INTERNATIONAL, INC.,

Plaintiff,

v.

CITIZENS FINANCIAL GROUP, INC.,

Defendant.

**C.A. No. 1:12-cv-00355-RGA
(Stayed)**

PI-NET INTERNATIONAL, INC.,

Plaintiff,

v.

KRONOS INCORPORATED,

Defendant.

**C.A. No. 1:14-cv-00091-RGA
(Stayed)**

PI-NET INTERNATIONAL, INC.,

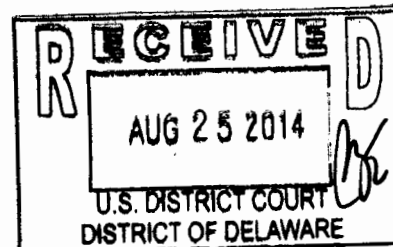
Plaintiff,

v.

**CITI GROUP, INC., CITICORP, and
CITIBANK, N.A.,,**

Defendants.

**C.A. No. 1:14-cv-00373-RGA
(Stayed)**



PI-NET INTERNATIONAL, INC.,

**Plaintiff,
v.**

TD BANK, NATIONAL ASSOCIATION,

Defendant.

C.A. No. 1:12-cv-00493-RGA

PI-NET INTERNATIONAL, INC.,

**Plaintiff,
v.**

**PAYDAY ONE, LLC; and
THINK FINANCE, INC.,**

Defendants.

C.A. No. 1:12-cv-00495-RGA

PI-NET INTERNATIONAL, INC.,

**Plaintiff,
v.**

**ENOVA INTERNATIONAL, INC., and
CASH AMERICA INTERNATIONAL,**

Defendants.

C.A. No. 1:12-cv-00496-RGA

PI-NET INTERNATIONAL, INC.,

Plaintiff,

v.

WELLS FARGO BANK, N.A.

Defendant.

C.A. No. 1:13-cv-01812-RGA

**PLAINTIFF RESPONSE TO UNOPPOSED MOTION TO WITHDRAW AS COUNSEL
FOR PLAINTIFF**

Plaintiff Pi-Net International, Inc. ("Pi-Net") hereby notifies the court that:

- i. Plaintiff's Attorney, George Pazuniak ("Counsel") was fired for cause on August 12, 2014 from representing Plaintiff Pi-Net International, Inc. in the above captioned patent cases and all other matters.
- ii. Counsel made knowingly non-factual statements to this Court providing false grounds for withdrawal.
- iii. Flagrantly working contrary to client instruction, combined with negligence, missing deadlines, failing to provide competent, prompt and diligent representation and subjecting the client to precipitously extreme situations of jeopardy caused measurable financial damage to Pi-Net. These constitute malpractice and may hardly be called "irreconcilable differences," as Counsel misrepresented to this Court and to the Court of Appeals for the Federal Circuit ("CAFC").

- iv. Counsel engaged in **conduct that adversely reflects on the lawyer's fitness as a lawyer**. He was drinking when he brashly filed the Appeal in the CAFC very quickly after the Markman Ruling, against client instruction. Counsel failed to withdraw from the representation when **his mental condition materially impairs his ability to represent the client**.
- v. Counsel is engaged in conduct intended to disrupt the administration of justice, blackmail, coercion, duress, harassment, threats, tortuous interference with contract and obstruction of justice.
- vi. Counsel is engaged in conduct obstructing the hiring of new counsel for the above-captioned cases ("new counsel") and new Appellate Counsel ("New Appellate Counsel"), instigating new counsel and New Appellate Counsel to leave, obstructing New Appellate Counsel from doing their job and interfering with Pi-Net's business. Counsel has been sending threats to New Appellate Counsel, defamatory to Pi-Net's CEO and inventor. (Exhibit B)

Pi-Net seeks help from this court in any manner that reasonably aids the administration of justice, including a Restraining Order preventing Counsel from sending threats, blackmail, obstructing the hiring of new counsel for the above-captioned cases and New Appellate Counsel, instigating new counsel and New Appellate Counsel to leave, obstructing New Appellate Counsel from doing their job and interfering with Pi-Net's business.

- 1. Counsel **consistently did not follow client instructions** and flagrantly worked contrary to client instructions.
- 2. Counsel flagrantly worked against Pi-Net's best interest. He refused to file a Motion for Extension of Time in the Federal Circuit for filing the Appeal Brief due on August

22, 2014, even until three days prior to the deadline of August 15, 2014 to file for such extension, despite being repeatedly instructed to do so for good and urgent reason, while Pi-Net was seeking new appellate counsel, subjecting Pi-Net to extreme jeopardy of the case dying.

3 **NEGLIGENCE:** Counsel missed important deadlines. He did not act with reasonable diligence and promptness in representing Pi-Net, the client. He failed to use the skill and care normally expected of a competent attorney. He failed to follow several critical Federal Rules of Civil Procedure that prejudiced a number of Pi-Net's litigations.

4. Counsel failed to serve summons on at least one Defendant within the required period after filing the complaint, until this was brought to Pi-Net's attention by an order by the Judge on the 119th day.

5. Counsel dismissed a case that was in the inventor's name against a Defendant, then failed to re-file the case against that Defendant in the name of Pi-Net, as he had done with the remaining Defendants, and that Defendant filed a Declaratory Judgment action in Ohio.

6. **BREACH OF FIDUCIARY DUTY:** Counsel repeatedly refused to return client IOLTA trust funds, despite repeated requests.

7. Counsel failed to disburse to Pi-Net all the monies due Pi-Net from recent settlement amounts that were deposited into the IOLTA account, despite repeated requests to do so.

8. Despite repeated requests for over a year, Counsel refused to refund the amount he double dipped by selling copies of Pi-Net documents to Pi-Net's other lawyers on Pi-Net's other cases. When Pi-Net instructed him to stop doing this when he tried to repeat this with one more of Pi-Net's law firms working on Pi-Net cases, and that Pi-Net would have to report him to

the appropriate authorities and the DE Bar Association, Counsel threatened Pi-Net's CEO and inventor of the patents-in-suit that he would "tear her apart" and "damage her reputation professionally," if Pi-Net were to do so.

9. Counsel has made a private market in Pi-Net client files without Pi-Net's authorization.

10. Counsel entered into an arrangement to charge fees for document management with other law firms without informing the client and without client approval and without the client agreeing to the arrangement, nor including the share each law firm will receive, and without the agreement confirmed in writing; and especially when the total fee was unreasonable and involved double-dipping. e.g., Counsel collected money from Andy Jardini and tried to collect from Hopkins Carley for Pi-Net documents and files, without Pi-Net authorization, double-dipping, even though Counsel had already been reimbursed, as per the contingency fee agreement.

11. Counsel used money without Pi-Net's permission or knowledge – e.g. He paid the damage consultant \$70K for just two weeks of work, by coercing Pi-Net's CEO and subjecting her to duress, and then sent him more without Pi-Net's permission or knowledge. When Pi-Net requested him why the damage expert was paid more than the \$70K paid for the mere two weeks of work, which was the agreed to amount, already far too excessive for two weeks of work, and why he paid him another exorbitant amount without Pi-Net's knowledge or pre-authorization, he refused to address why he did not seek informed consent from Pi-Net's CEO. Counsel had been provided expense guidelines which he refused to follow. Counsel charged Pi-Net \$195K as expenses for just a few months of expenses, and refused to explain why his expenses were so exorbitant. ~~He~~ spent \$185 for dinner.

12. Counsel settled more than one Pi-Net case for less than it was worth by proposing settlement numbers to Defendant(s) without first getting Pi-Net's prior approval for the proposed settlement number on the price or terms for the specific Defendant: for example, ([amount] per user, instead of [amount] per Web transaction), even though Pi-Net had instructed him that the user has nothing to do with the patent claims. This damaged Pi-Net financially. Counsel threatened Pi-Net's CEO while one of Pi-Net employees was on the call that he would put a lien on her patents if she did not take it. Pi-Net advisors talked to him for hours about the right metric and he refused to follow client instruction.

13. Counsel did not promptly inform the client of any decision to get the client's informed consent on numerous occasions.

14. Upon termination of representation, Counsel did not take steps to protect the client's interests in surrendering digital files, particularly client digital files and property to which the client is entitled and refunding any advance payment of fee or expense that has not been earned or incurred. Counsel has not returned client files, client digital files or client funds in the client Trust Fund. Counsel has held client digital files, for which Counsel has been reimbursed as per the contingency fee agreement for payments to the document management company, despite repeated requests. He is in breach of contract and has failed to reimburse Pi-Net from the client IOLTA trust account for PTO fees and legal fees paid by Pi-Net from settlements.

15. **COUNSEL DID NOT FOLLOW CLIENT INSTRUCTIONS: Counsel did not follow client instructions on numerous occasions and consistently worked contrary to client instructions and without even informing the client.**

16. Counsel dismissed a case against a Defendant without ever informing Pi-Net prior to or after dismissing the case and without Pi-Net's authorization, even though the principals of the Defendant had called Pi-Net's CEO to negotiate a settlement.

17. Counsel previously made entry of appearance on two cases without informing the client. He dropped out in the middle of litigation and caused the Judge to dismiss those cases with prejudice. The financial damage he caused is completely measurable.

18. He refused to file a Request for Re-consideration that Pi-Net instructed him to file in the JPM case and he refused to take remedial measures. Instead, he filed an Appeal in the Federal Circuit immediately after the Markman Ruling, against Pi-Net's express instruction not to do so and not to do anything brash when he was not in a good state of mind and appeared to be drinking after losing.

19. Counsel refused to make a disclosure to the court upon the discovery of financial holdings of the judges in a litigant. (Exhibit A).

20. In spite of Pi-Net expressly instructing Counsel in writing not to file certain of his claim constructions that were technically incorrect and not in accord with the specification, prosecution history, diagrams or any intrinsic or extrinsic evidence, and that doing so against Pi-Net's instruction would constitute malpractice, he went ahead and filed it, ignoring client instructions. Counsel wrote expert reports to support the incorrect positions that he took, in spite of my instruction to him not to do so. His not following Pi-Net instructions have caused huge financial damage to Pi-Net.

21. After he sent Pi-Net his appeal brief on Aug 4, 2014, Pi-Net instructed him that what he had written was not in accord with the record, specification, the Judge's Opinion or the prosecution history and to make changes in several sections. He refused to follow instructions

and he fought it, as he simply wanted to cover up the incorrect positions he took against Pi-Net's instructions on some key terms, both at the Markman as well as what he previously wrote and previously caused to be filed incorrectly at the PTO (even though he is not legally allowed to give advice in patent law, as he is not a patent-bar registered attorney), despite client instruction to him not to do so. Counsel threatened to file a very poor Appeal Brief, in spite of Pi-Net instructing him not to do so.

22. Counsel refused to file the arguments Pi-Net gave him to file in his sur-reply and response to JP Morgan's Motion for Attorney's Fees. He wanted to cover some of his wrong actions that he had committed previously and dug a deeper hole for himself and the client by not following client instructions. Counsel advised Pi-Net to take its money and put it in the Cayman Islands and to talk to an accountant to show Pi-Net how to do so. Pi-Net's CEO did not do this, as this was outrageous.

23. Counsel is not a patent-bar registered attorney, yet gave patent legal advice. He caused to be filed at the PTO a cancellation of over 200 new claims the inventor had written in the re-exams at the PTO despite client instruction based on advice from competent patent-bar registered attorneys not to do so. He wrote and caused to be filed at the PTO that the "means for switching" is "a Web page...", ignoring Pi-Net's repeated instructions that he was incorrect and prosecution history estoppel prevents the PTO or the Patentee to change what had already been agreed to between the inventor and the original Examiner to allow the claims to issue. This damaged the client and drove up costs and fees exorbitantly for the client and the client had to file numerous petitions at the Patent Office to correct this and it is still not yet corrected, as he has created an uphill battle.

24. Counsel filed incorrect claim construction for many key terms, contrary to the specification and the prosecution history, against client instruction not to do so. Counsel did not abide by the client's decisions concerning the objectives of representation and did not consult with the client as to the means by which they are to be pursued. Counsel took such action on behalf of Pi-Net, the client as was not even impliedly authorized to carry out the representation.

25. **COMPETENCE:** Counsel failed to provide competent representation to Pi-Net, the client. Counsel should not have handled a legal matter that Counsel as a lawyer knew or should have known that Counsel, as a lawyer is not competent to handle, without associating with a lawyer who is competent to handle it. He is not a patent-bar registered attorney and is not competent in patent law, nor did he seek to hire a patent lawyer competent to handle it or a technically proficient lawyer to help him on cases of such big magnitude, as he had promised. Competent representation required legal knowledge in patent law, legal knowledge of software and technology, skill, thoroughness and preparation reasonably necessary for the representation. He was neither a patent lawyer, nor was he technical. He did not have any patent lawyer assisting him in his cases for Pi-Net, or any technical help that he hired to help him, especially on a case of this magnitude. Nor would he listen when he was told that he was making not only technical errors but more specifically errors not in accord with the specification. He filed embarrassingly incorrect claim constructions, knowingly ignoring the inventor/Pi-Net CEO's instructions, as he did not provide competent legal representation, materially misperceiving the many valuable technical and correct patent legal suggestions from the inventor/Pi-Net CEO, an Internet pioneer.

26. When Pi-Net's CEO and inventor of the patents-in-suit instructed him that a service network, as per the patent specification, is an OSI application layer network that offers

VAN services or POSvc applications displayed on a Web page as online services on the Web, and not to file in the court that a service network is an “online network or facility,” he filed it against Pi-Net’s instruction not to do so even though Pi-Net’s CEO put it down in writing to him that if he were to file it against Pi-Net’s instruction, that would constitute malpractice.

27. The inventor instructed him that column 5 of the patents-in-suit and ‘178:5:33-46 clearly talks about a dial-up network using a modem and that online networks have existed for eons of years. He refused to follow client instruction that this term “service network” is a crucial term and he flagrantly dismissed client instruction. Even though the patent specification itself abounds with text and diagrams to support a clear claim construction for this term, he refused to listen and filed his own incorrect claim construction against Pi-Net’s CEO’s repeated verbal and written instruction not to do so.

28. Counsel intentionally failed to seek the objectives of the client through reasonably available means. Counsel intentionally prejudiced or damaged the client during the course of the representation. Counsel failed to abide by the client’s decisions concerning the objectives of representation and failed to consult with the client as to the means by which they are to be pursued. He failed to assert a right or position of the client. The Markman claim construction positions he took on many claim terms are *not* the positions of the inventor and he filed his own incorrect positions, despite repeated verbal and written instructions that he was not authorized to file those incorrect positions.

29. Counsel failed to obtain the technical and patent law competency needed to represent Pi-Net, the client properly, which he promised. He did not provide competent representation to Pi-Net, the client, nor was he willing to listen to reason, technical or legal, and lacked knowledge of fundamental principles of patent law. When he insisted on filing that

“means for switching” is a “Web page...” and Pi-Net instructed him that patent prosecution history estoppel prevents him from changing the construction agreed to between the inventor and the original Examiner in allowing the claims to issue, namely, that the means for switching is switching service 702 in a VAN switch, which is an application layer switch, that is distinct from a network layer switch, he refused to listen and caused to be filed his incorrect construction at the PTO against Pi-Net/inventor instruction. Here, he exhibited both technical and legal incompetence, as a child could have told him that the Web page is for display.

30. Counsel owed Pi-Net a duty to competently represent Pi-Net, the client and he did not. He made mistakes or otherwise breached the duty owed to Pi-Net. This harmed Pi-Net in a way that can be measured financially. The probability of Pi-Net winning the underlying case would have been much higher if Counsel had provided Pi-Net competent representation. Pi-Net would have been able to collect on a judgment on Pi-Net’s underlying case after winning the case. Counsel bullied Pi-Net’s CEO not to take the settlement offer on the table prior to the Markman Ruling and that he would fetch \$165 million at trial, and subjected her to duress and bullying her to advance him more funds.

31. INTIMIDATION, HARASSMENT, BLACKMAIL AND THREATS:

Counsel used intimidating threats repeatedly. His communication toward Pi-Net’s CEO consistently involved misrepresentation, coercion, duress and harassment. He was abusive and tyrannical. This caused Pi-Net’s CEO and inventor’s health to deteriorate. The inventor of the patents-in-suit is a 66-year old female professional and is diabetic and his behavior drove her blood pressure and blood sugar up. Counsel bullied her, stymied her, harassed her and tried

scare tactics on her, despite Pi-Net instructing him that his tyrannical bullying was damaging her health and killing her.

32. In the middle of a deposition, Counsel pulled the inventor aside and out of the room and bullied her and used profanity and asked her to lie to protect the incorrect position he took and Pi-Net's CEO and inventor refused to lie. He failed to file the inventor's corrections to her deposition transcripts.

33. After Pi-Net fired Counsel for cause, Pi-Net hired New Appellate Counsel and Counsel has interfered with Pi-Net's relationship with New Appellate Counsel by repeatedly calling Pi-Net's New Appellate Counsel after they made entry of appearance at the Court of Appeals for the Federal Circuit ("CAFC") and **sent threatening communication to Pi-Net's New Appellate Counsel in a destructive way and defamatory toward Pi-Net's CEO/inventor.** (Exhibit B).

34. Counsel breached attorney-client privilege by sending emails to New Appellate Counsel on matters for which New Appellate Counsel was not hired. He did not maintain confidentiality of information. He revealed information relating to the representation of the client even though he did not get informed consent from the client, nor was the disclosure impliedly authorized in order to carry out the representation.

35. Counsel filed a knowingly false declaration at the CAFC in his Motion to Withdraw regarding his reasons for withdrawal. As an officer of the Court, Counsel failed to correct a false statement of material fact.

36. Counsel offered to pay a portion of new client revenues to Pi-Net to induce Pi-Net to bring in a new client for his services.

37. Counsel is engaged in conduct intended to disrupt the administration of justice, blackmail, coercion, duress, harassment, threats, tortuous interference with contract and obstruction of justice. He violated many Rules of Professional Conduct. He engaged in conduct involving dishonesty, deceit and misrepresentation.

38. Pi-Net's New Appellate Counsel filed a paper on August 22, 2014 in the CAFC, informing the Court that "Counsel's reliance on "irreconcilable differences" as grounds for withdrawal is knowingly non-factual, and at best, misleading" and that Counsel's Declaration to the CAFC "includes the same knowingly non-factual statement. It would be sufficient under Fed. Cir. Rule 47.3(c)(5), and more accurate, for Counsel to notify the Court that on August 12, 2014, **Counsel was terminated for cause** as counsel for Pi-Net in this proceeding and all other matters. Pi-Net will address the bases for Counsel's termination for cause if needed here and as it becomes relevant in other proceedings." The CAFC sent a notice to Pi-Net that Pi-Net's New Appellate Counsel at the CAFC had made some administrative error in her filing and to re-file the paper before midnight on August 22, 2014. Counsel sent an email threat to New Appellate Counsel, defamatory to the inventor and Pi-Net's CEO, as follows, instigating New Appellate Counsel to freak out, as follows: "John, As a professional, I would think twice about re-filing Lakshmi's libel. George"

39. Counsel engaged in **conduct that adversely reflects on the lawyer's fitness as a lawyer**. He was drinking when he brashly filed the Appeal in the CAFC very quickly after the Markman Ruling, without the clients knowledge or permission. He used abusive language during a drunken phone call with Pi-Net's CEO after losing the Markman. Counsel failed to withdraw from the representation when **the lawyer's mental condition materially impaired the lawyer's ability to represent the client**.

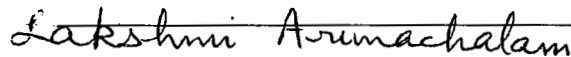
40. **REQUESTS FOR RELIEF:** Pi-Net respectfully requests this court's help for protection from Counsel's ongoing blackmail threats and from Counsel continuing to inflict harm upon Pi-Net and its CEO, defamatory to Pi-Net's CEO. Pi-Net respectfully requests Sanctions against Counsel for his misconduct and irresponsible, erratic behavior which has damaged the company financially and its legal representation. Counsel's undignified and discourteous conduct toward Pi-Net's CEO is downright harassment that is degrading.

41. He consistently used sexually profane language in conversation with Pi-Net's CEO. She is an older, single, ethnic female and he took advantage of her. He stymied her, coerced her, subjected her to duress, bullied her and consistently lied to her. Pi-Net's CEO's church encouraged her to not be afraid of Counsel's blackmail and threats and to fire Counsel to get away from Counsel's tyranny and erratic, irresponsible behavior, that has caused the inventor's physical health to deteriorate and end the failure of Counsel to provide competent representation to the client that caused severe financial damage to Pi-Net and Counsel's consistent and flagrant ignoring of client instructions left Pi-Net in a severely compromised position, which could have been avoided if Counsel would have only followed client instructions.

42. Pi-Net respectfully requests a Restraining Order preventing Counsel from further obstruction, coercion and interference in Pi-Net's business and legal representation. Pi-Net seeks help from this court to prevent Counsel from obstructing the hiring of new counsel for the above-captioned cases and Appellate counsel, instigating new counsel and New Appellate Counsel to leave, obstructing New Appellate Counsel from doing their job and interfering with Pi-Net's business.

43. Pi-Net respectfully requests the Judge to order Counsel to return client IOLTA trust funds immediately and to return all client files and computers, including digital files, email files and all other files to Pi-Net and those files including Attorney Work Product, and files with confidential information of the Defendants to Pi-Net's new counsel and the Appendix of Exhibits already prepared by Counsel for the Appeal Brief to Pi-Net's New Appellate Counsel immediately.

Respectfully submitted,



DATED: August 25, 2014

/s/ Lakshmi Arunachalam

Dr. Lakshmi Arunachalam
CEO and Inventor
Pi-Net International, Inc
222 Stanford Avenue
Menlo Park, CA 94025
650 854 3393
laks22002@yahoo.com

Plaintiff
Pi-Net International, Inc.

Attachments:

Exhibit A: Judges' Financial Holdings in Litigant

Exhibit B: Counsel's Obstructive and Defamatory Email to Pi-Net's New Appellate Counsel

EXHIBIT A:**JUDGES' FINANCIAL HOLDINGS IN LITIGANT**

LEONARD P. STARK, Chief Judge, U.S. District Court of Delaware Financial Disclosure, 2012		
Source: <i>Judicial Watch</i> , <u>Leonard P. Stark</u> Source: <i>SEC Edgar</i>		
<u>Ticker</u>	<u>Holding</u>	<u>JPMorgan Conflicts</u>
<u>VINIX</u>	Wachovia Vanguard Institutional Fund	\$2,161,083,000 shares in JPMorgan, the 9 th largest holding in this fund
<u>VMRGX</u>	Vanguard Morgan Growth Fund	\$31,628,000 shares in JPMorgan
<u>FUSEX</u>	Fidelity Investments Spartan 50 Index Investor Class	\$896,713,000 shares in JPMorgan
<u>FDRXX</u>	Fidelity Investments Fidelity Cash Reserves	\$1,960,000,000 commercial paper in JPMorgan
<u>FASMXX</u>	Fidelity Investment Fidelity Asset Manager 50%	<p>\$1,090,000,000 shares in JPMorgan, the 9th largest holding in this fund; represents 0.1% of a fund with assets totaling \$1,090,672,117,000</p> <p>In addition, one of the executive officers of this fund is Stephanie J. Dorsey. Quoting from the 2013 Annual Report, "Prior to joining Fidelity Investments, Ms. Dorsey served as Treasurer (2004-2008) of the JPMorgan Mutual Funds and Vice President (2004-2008) of JPMorgan Chase Bank. In addition, JPMorgan Chase Bank, New York, NY is a "Custodian" of this fund.</p>
<u>FASBX</u>	Fidelity Investment Fidelity Asset Manager 70%	<p>\$1,090,000,000 shares in JPMorgan, the 9th largest holding in this fund; represents 0.1% of a fund with assets totaling \$1,090,672,117,000</p> <p>In addition, one of the executive officers of this fund is Stephanie J. Dorsey. Quoting from the 2013 Annual Report, "Prior to joining Fidelity Investments, Ms. Dorsey served as Treasurer (2004-2008) of the JPMorgan Mutual Funds and Vice President (2004-2008) of JPMorgan Chase Bank. In addition, JPMorgan Chase Bank, New York, NY is a "Custodian" of this fund.</p>

JUDGE RICHARD G. ANDREWS, Judge, U.S. District Court of Delaware Financial Disclosure, 2012 Source: <i>Judicial Watch</i> , Richard G. Andrews - 2012 Source: <i>SEC Edgar</i>		
<u>BVCVX</u>	Fidelity Blue Chip Value Fund	\$6,961,569,000 shares in JP Morgan-- the 8 th largest holding in this fund. In addition, one of the executive officers of this fund is Stephanie J. Dorsey . Quoting from the 2013 Annual Report, "Prior to joining Fidelity Investments, Ms. Dorsey served as Treasurer (2004-2008) of the JPMorgan Mutual Funds and Vice President (2004-2008) of JPMorgan Chase Bank ."
<u>Overview</u>	Fidelity Delaware Portfolio 2012 (Index) (529 Plan)	This is a "build your own investment mix plan." The rules require disclosure of the funds selected by judicial employees.
<u>FFFDX</u>	Fidelity Freedom 2020	One of the executive officers of this fund is Stephanie J. Dorsey . Quoting from the 2013 Annual Report, "Prior to joining Fidelity Investments, Ms. Dorsey served as Treasurer (2004-2008) of the JPMorgan Mutual Funds and Vice President (2004-2008) of JPMorgan Chase Bank ."
<u>PRRXX</u>	T. Rowe Price Prime Reserve #1	450,000 shares in JP Morgan Chase Putters / Dri Ctfs -- the 10 th largest holding in this fund.
<u>PRRXX</u>	T. Rowe Price Prime Reserve #2	450,000 shares in JP Morgan Chase Putters / Dri Ctfs -- the 10 th largest holding in the fund.
<u>VCVLX</u>	Vanguard Capital Value Fund	\$19,446,000 shares in JP Morgan-- the 10 th largest holding in this fund.
<u>VWEHX</u>	Vanguard High-Yield Corporate Inv	\$1,116,988,000 JPMorgan corporate bonds
<u>VBILX</u>	Vanguard Interim-Term Bond Index Adm	\$23,256,000 JPMorgan corporate bond
<u>VWESX</u>	Vanguard Long-Term Investment-Grade Inv	\$1,116,988,000 JPMorgan corporate bonds
<u>VTSMX</u>	Vanguard Total Stock Mkt Idx Inv	\$3,286,885,000 shares in JP Morgan-- the 10 th largest holding in this fund
<u>VTCLX</u>	Vanguard Tax-Managed Capital Appreciation Fund	\$116,288,000 shares in JP Morgan -- the 9 th largest holding in this fund
<u>Vanguard</u>	Vanguard Tax-Managed Capital Appreciation F Ad (UGMA #1)	Ownership change; holdings uncertain

<u>VWUSX</u>	Vanguard US Growth Inv	\$37,152,000 shares in JP Morgan
<u>VWENX</u>	Vanguard Wellington Admiral	\$1,347,496,000 shares in JP Morgan – the 3 rd largest holding in this fund
<u>VWNFX</u>	Vanguard Windsor II Inv	\$1,348,935,000 shares in JP Morgan – the 2 nd largest holding in this fund
<u>TWEIX</u>	American Century Equity Income	\$151,846,704 shares in JPMorgan
<u>BIGRX</u>	American Century Income & Growth Inv	\$28,811,409 shares in JP Morgan – the 10 th largest holding in this fund
<u>SCMTX</u>	DWS Intermediate Tax/AMT Free S	\$800,000 JPMorgan letter of credit
<u>MUTHX</u>	Franklin Templeton Class Z	\$207,658,971 shares in JP Morgan
<u>HSVFX</u>	Hennessy Select Large Value Original Fund	\$5,880,000 JPMorgan shares represent the 2 nd largest holding in this fund representing 4% of the total assets of \$147,000,000

**JUDGE SUE L. ROBINSON, Judge, U.S. District Court of Delaware
Financial Disclosure, 2012**

Source: *Judicial Watch*, [Sue L. Robinson](#)

Judge Robinson lists a checking account, a rental property and Marathon stock as the only holdings. This disclosure appears incomplete, with no updated financial disclosure that includes Judge Robinson's extended family holdings as required by 28 U.S.C. § 455. Given her willingness to issue a Markman decision after only one week on this case raises questions of propriety.

Remarkably, just a week before the Markman Hearing, Judge Andrews reassigned the case to Judge Robinson inexplicably. Judge Robinson had no familiarity with the case, yet ruled on the claim construction nonetheless. This premature action prejudiced the proceedings. The current Markman ruling was untimely, and enough time should have been provided for additional briefings and argument in order for the Judge to become familiar with the claims. A week was not enough time.

EXHIBIT B:

COUNSEL'S OBSTRUCTIVE AND DEFAMATORY EMAIL

TO PI-NET'S NEW APPELLATE COUNSEL

From: George Pazuniak [mailto:gp@del-iplaw.com]
Sent: Friday, August 22, 2014 1:51 PM
To: john@jwcarpenterlaw.com
Subject: FW: 14-1495-SJ Pi-Net International, Inc. v. JPMorgan Chase & Co. "Clerk's Notice of Deficient Document"

John,

As a professional, I would think twice about re-filing Lakshmi's libel.

George

From: FilingNotice@cafc.uscourts.gov [mailto:FilingNotice@cafc.uscourts.gov]
Sent: Friday, August 22, 2014 1:28 PM
To: George Pazuniak
Subject: 14-1495-SJ Pi-Net International, Inc. v. JPMorgan Chase & Co. "Clerk's Notice of Deficient Document"

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing.

United States Court of Appeals for the Federal Circuit

Notice of Docket Activity

The following transaction was entered on 08/22/2014 at 1:28:51 PM EDT and filed on 08/22/2014

Case Name: Pi-Net International, Inc. v. JPMorgan Chase & Co.

Case Number: 14-1495

Docket Text:

NOTICE OF DEFICIENCY: The response Docket No. [28] filed by Appellant Pi-Net International, Inc. in 14-1495 is submitted using the incorrect event and therefore cannot be accepted for filing at this time. You are being afforded the opportunity to correct the deficiency. At the discretion of the court, the corrected document may be accepted for filing if received before midnight (EST) on the date of this notice. [177143]

Notice will be electronically mailed to:

Ms. Victoria Elisabeth Brieant, Attorney: victoria@brieantlaw.com, vbrieant@aol.com
Daniel Alexander DeVito: daniel.devito@skadden.com, Nicholas.Mireles@skadden.com
Andrew D. Gish, -: andrew.gish@skadden.com
Jessica Raatz Kunz, -: jessica.kunz@skadden.com
Mr. Douglas R. Nemec, Principal Litigation Counsel: douglas.nemec@skadden.com,
dmlcwas@skadden.com, andrew.gish@skadden.com
Mr. George Pazuniak, Attorney: gp@del-iplaw.com
Robert Scott Saunders: rob.saunders@skadden.com
Edward L. Tulin, -: edward.tulin@skadden.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CERTIFICATE OF SERVICE

I, Dr. Lakshmi Arunachalam, hereby certify that on August 25, 2014, the attached document was sent by PARCELS Inc. Courier Service of Wilmington, DE to the Clerk of the Court for filing and I sent notification by email to the following registered attorneys of record that the document has been sent by PARCELS Inc. Courier Service of Wilmington, DE to the Clerk of the Court for filing.

I further certify that on August 25, 2014, the attached document was Electronically Mailed to the following Counsel for Defendants:

Greg Lanier
JONES DAY
glanier@jonesday.com for Citizen's Financial Group

dgattuso@proctorheyman.com for Kronos

JCP@pgslaw.com for Wells Fargo and Company

bschladweiler@seitzross.com for CitiGroup, Inc, Citicorp and CitiBank N.A.

jwietjes@BJLLP.com for PayDay1

briopelle@mcguirewoods.com for TD Bank

jleja@polsinelli.com for Enova International, Inc.

DATED: August 25, 2014

Lakshmi Arunachalam

Dr. Lakshmi Arunachalam
CEO and Inventor
Pi-Net International, Inc
222 Stanford Avenue
Menlo Park, CA 94025
650 854 3393
laks@webxchange.com

CLOSED,APPEAL,[MEDIATION-MPT](#),[PATENT](#)

**U.S. District Court
District of Delaware (Wilmington)
CIVIL DOCKET FOR CASE #: 1:12-cv-00282-SLR**

Pi-Net International Inc. v. JPMorgan Chase & Co.

Assigned to: Judge Sue L. Robinson

Related Cases: [1:08-cv-00132-RGA](#)[1:08-cv-00133-RGA](#)[1:13-cv-01350-RGA](#)[1:12-cv-00280-RGA](#)[1:13-cv-01351-RGA](#)[1:12-cv-00281-RGA](#)[1:13-cv-01347-RGA](#)[1:13-cv-01348-RGA](#)[1:13-cv-01349-RGA](#)[1:13-cv-01335-RGA](#)[1:12-cv-00354-RGA](#)[1:13-cv-01336-RGA](#)[1:12-cv-00355-RGA](#)[1:13-cv-01337-RGA](#)[1:12-cv-00352-RGA](#)[1:12-cv-00356-RGA](#)[1:12-cv-00353-RGA](#)[1:13-cv-01333-RGA](#)[1:13-cv-01328-RGA](#)[1:13-cv-01812-RGA](#)[1:14-cv-00091-RGA](#)[1:13-cv-01334-RGA](#)[1:13-cv-01352-RGA](#)

Date Filed: 03/07/2012

Date Terminated: 05/19/2014

Jury Demand: Plaintiff

Nature of Suit: 830 Patent

Jurisdiction: Federal Question

Case in other court: USCA for the Federal Circuit, 14-01495

Cause: 35:271 Patent Infringement

Plaintiff**Pi-Net International Inc.**represented by **George Pazuniak**

O'Kelly, Ernst, & Bielli, LLC

901 N. Market Street, Suite 1000

Wilmington, DE 19801

(302) 478-4230

Email: GP@del-iplaw.com

LEAD ATTORNEY**ATTORNEY TO BE NOTICED**

Defendant**JPMorgan Chase & Co.**represented by **Robert Scott Saunders**

Skadden, Arps, Slate, Meagher & Flom
 One Rodney Square
 P.O. Box 636
 Wilmington, DE 19899
 (302) 651-3000
 Email: rob.saunders@skadden.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Movant**Dr. Lakshmi Arunachalam**represented by **Lakshmi Arunachalam**

222 Stanford Avenue
 Menlo Park, CA 94025
 (650) 854-3393
 PRO SE

Date Filed	#	Docket Text
03/07/2012	<u>1</u>	COMPLAINT FOR PATENT INFRINGEMENT filed with Jury Demand against JPMorgan Chase & Co. - Magistrate Consent Notice to Pltf. (Filing fee \$ 350, receipt number 0311-1034666.) - filed by Pi-Net International Inc.. (Attachments: # <u>1</u> Exhibit A, # <u>2</u> Exhibit B, # <u>3</u> Exhibit C, # <u>4</u> Civil Cover Sheet)(lih) (Entered: 03/08/2012)
03/07/2012	<u>2</u>	Notice, Consent and Referral forms re: U.S. Magistrate Judge jurisdiction (lih) (Entered: 03/08/2012)
03/07/2012		Summons Issued with Magistrate Consent Notice attached as to JPMorgan Chase & Co. on 3/7/2012. (lih) (Entered: 03/08/2012)
03/07/2012	<u>3</u>	Report to the Commissioner of Patents and Trademarks for Patent/Trademark Number(s) 5,987,500; 8,037,158B2; 8,108,492B2. (lih) (Entered: 03/08/2012)
03/11/2012	<u>4</u>	Return of Service Executed by Pi-Net International Inc.. JPMorgan Chase & Co. served on 3/7/2012, answer due 3/28/2012. (Pazuniak, George) (Entered: 03/11/2012)
03/14/2012		Case Assigned to Judge Richard G. Andrews. Please include the initials of the Judge (RGA) after the case number on all documents filed. Associated Cases: 1:12-cv-00280-RGA, 1:12-cv-00281-RGA, 1:12-cv-00282-RGA (rjb) (Entered: 03/14/2012)
03/26/2012	<u>5</u>	STIPULATION for Extension of Time to File Answer - filed by Pi-Net International Inc.. (Pazuniak, George) Modified on 3/27/2012 (nms). (Entered: 03/26/2012)
03/26/2012	<u>6</u>	Disclosure Statement pursuant to Rule 7.1 filed by Pi-Net International Inc.. (Pazuniak, George) (Entered: 03/26/2012)
03/27/2012		SO ORDERED, re <u>5</u> STIPULATION for Extension of Time to File Answer, filed by Pi-Net International Inc. (Reset Answer Deadlines: JPMorgan Chase & Co. answer due 4/30/2012). Signed by Judge Richard G. Andrews on 3/27/2012. (nms) (Entered: 03/27/2012)

04/26/2012	<u>7</u>	NOTICE of Appearance by Robert Scott Saunders on behalf of JPMorgan Chase & Co. (Saunders, Robert) (Entered: 04/26/2012)
04/26/2012	<u>8</u>	Disclosure Statement pursuant to Rule 7.1 filed by JPMorgan Chase & Co.. (Saunders, Robert) (Entered: 04/26/2012)
04/26/2012	<u>9</u>	STIPULATION TO EXTEND TIME to answer, move or otherwise plead to May 14, 2012 - filed by JPMorgan Chase & Co., Pi-Net International Inc.. (Saunders, Robert) (Entered: 04/26/2012)
04/27/2012		SO ORDERED, re <u>9</u> STIPULATION TO EXTEND TIME to answer, move or otherwise plead to May 14, 2012, filed by Pi-Net International Inc., JPMorgan Chase & Co. (Reset Answer Deadlines: JPMorgan Chase & Co. answer due 5/14/2012). Signed by Judge Richard G. Andrews on 4/27/2012. (nms) (Entered: 04/27/2012)
05/11/2012	<u>10</u>	STIPULATION TO EXTEND TIME to Answer, Move or otherwise Plead to May 23, 2012 - filed by JPMorgan Chase & Co., Pi-Net International Inc.. (Saunders, Robert) (Entered: 05/11/2012)
05/14/2012		SO RDERED re <u>10</u> STIPULATION TO EXTEND TIME to Answer, Move or otherwise Plead to May 23, 2012, filed by Pi-Net International Inc., JPMorgan Chase & Co. (Reset Answer Deadlines: JPMorgan Chase & Co. answer due 5/23/2012). Signed by Judge Richard G. Andrews on 5/14/2012. (nms) (Entered: 05/14/2012)
05/23/2012	<u>11</u>	ANSWER to <u>1</u> Complaint, with Jury Demand by JPMorgan Chase & Co..(Saunders, Robert) (Entered: 05/23/2012)
06/07/2012	<u>12</u>	Order Setting Rule 16(b) Conference: A Scheduling Conference is set for 7/12/2012, at 10:00 AM in Chambers before Judge Richard G. Andrews (see Order for further details). Signed by Judge Richard G. Andrews on 6/7/2012. (nms) (Entered: 06/07/2012)
07/10/2012	<u>13</u>	Letter to The Honorable Judge Richard G. Andrews from Richard L. Horwitz regarding proposed scheduling order. (Horwitz, Richard) (Entered: 07/10/2012)
07/10/2012	<u>14</u>	PROPOSED scheduling order, by JPMorgan Chase & Co.. (Horwitz, Richard) Modified on 7/10/2012 (nms). (Entered: 07/10/2012)
07/12/2012		Minute Entry for proceedings held before Judge Richard G. Andrews - Scheduling Conference held on 7/12/2012. Court finalized dates during the Rule 16(b) Conference. Counsel will submit revised Order with agreed upon dates. (Court Reporter Leonard Dibbs.) Associated Cases: 1:12-cv-00280-RGA et al.(ksr,) (Entered: 07/12/2012)
07/13/2012	<u>15</u>	Official Transcript of Rule 16 Conference held on 07-12-12 before Judge Richard G. Andrews. Court Reporter/Transcriber Leonard A. Dibbs. Transcript may be viewed at the court public terminal or purchased through the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through PACER. Redaction Request due 8/3/2012. Redacted Transcript Deadline set for 8/13/2012. Release of Transcript Restriction set for 10/11/2012. (lad) (Entered: 07/13/2012)
07/17/2012	<u>16</u>	Letter to Honorable Richard G. Andrews from George Pazuniak regarding Scheduling Order. (Attachments: # <u>1</u> Text of Proposed Order Scheduling Order)(Pazuniak, George) (Entered: 07/17/2012)

07/17/2012	17	SCHEDULING ORDER: Case referred to the Magistrate Judge for the purpose of exploring ADR. Joinder of Parties due by 12/12/2012. Amended Pleadings due by 12/12/2012. All Fact Discovery due by 7/12/2013. Dispositive Motions due by 2/21/2014. Joint Claim Construction Brief due by 5/15/2013. A Markman Hearing is set for 6/21/2013, at 9:00 AM in Courtroom 6A before Judge Richard G. Andrews. A Pretrial Conference is set for 5/23/2014, at 9:00 AM in Courtroom 6A before Judge Richard G. Andrews. A 5 day Jury Trial is set to commence on 6/2/2014, at 9:30 AM in Courtroom 6A before Judge Richard G. Andrews (see Order for further details). Signed by Judge Richard G. Andrews on 7/17/2012. Associated Cases: 1:12-cv-00280-RGA et al.(nms) (Entered: 07/17/2012)
07/24/2012		CASE REFERRED to Judge Thyng for Mediation. Associated Cases: 1:12-cv-00280-RGA et al.(cak) (Entered: 07/24/2012)
07/26/2012	18	ORDER Setting Teleconference (Plaintiff's counsel to initiate the call): A Telephone Conference is set for 8/9/2012 at 12:00 PM before Judge Mary Pat Thyng to discuss ADR. See Order for details. Signed by Judge Mary Pat Thyng on 7/26/2012. (cak) (Entered: 07/26/2012)
08/06/2012	19	STIPULATION for Extension of Time to File Proposed Protective Order - filed by Pi-Net International Inc.. (Pazuniak, George) Modified on 8/7/2012 (nms). (Entered: 08/06/2012)
08/07/2012		SO ORDERED Granting(D.I. 16 in 1:12-cv-00353-RGA, D.I. 19 in 1:12-cv-00355-RGA, D.I. 19 in 1:12-cv-00282-RGA, D.I. 21 in 1:12-cv-00354-RGA, D.I. 26 in 1:12-cv-00280-RGA, D.I. 20 in 1:12-cv-00281-RGA, and D.I. 26 in 1:12-cv-00356-RGA) Stipulation for Extension of Time to File Proposed Protective Order to August 20, 2012, filed by Pi-Net International Inc.. Signed by Judge Richard G. Andrews on 8/7/2012. Associated Cases: 1:12-cv-00280-RGA et al.(nms) (Entered: 08/07/2012)
08/09/2012	20	ORDER Setting Teleconference: a teleconference has been scheduled for Tuesday, September 11, 2012 at 2:00 p.m. Eastern Time with Magistrate Judge Thyng. Counsel for Bank of America shall initiate the teleconference call. Signed by Judge Mary Pat Thyng on 8/9/2012. (cak) (Entered: 08/09/2012)
08/14/2012	21	NOTICE OF SERVICE of Plaintiff's Initial Disclosures by Pi-Net International Inc..(Pazuniak, George) (Entered: 08/14/2012)
08/14/2012	22	NOTICE OF SERVICE of JPMorgan Chase & Co.'s Initial Disclosures by JPMorgan Chase & Co..(Saunders, Robert) (Entered: 08/14/2012)
08/20/2012	23	Letter to The Honorable Richard G. Andrews from George Pazuniak regarding Protective Order. (Attachments: # 1 Proposed Order)(Pazuniak, George) Modified on 8/21/2012 (nms). (Entered: 08/20/2012)
08/21/2012	24	SO ORDERED Approving Stipulated Protective Order. Signed by Judge Richard G. Andrews on 8/21/2012. Associated Cases: 1:12-cv-00280-RGA et al.(nms) (Entered: 08/21/2012)
08/31/2012	25	NOTICE OF SERVICE of JP Morgan Chase & Co.'s First Set of Requests For The Production Of Documents by JPMorgan Chase & Co..(Saunders, Robert) (Entered: 08/31/2012)

08/31/2012	26	NOTICE OF SERVICE of Defendants' First Set of Common Interrogatories by JPMorgan Chase & Co..(Saunders, Robert) (Entered: 08/31/2012)
09/12/2012	27	ORDER Setting Mediation Conferences: A Telephone Conference is set for 12/20/2012 at 11:00 AM before Judge Mary Pat Thyng. Mediation conferences are scheduled for 2/4/2013 through 2/7/2013. See Order for details. Signed by Judge Mary Pat Thyng on 9/12/2012. (cak) (Entered: 09/12/2012)
10/02/2012	28	NOTICE OF SERVICE of Plaintiffs Response to First Set of Common Interrogatories; Plaintiff's Response To Requests For Production Of Documents by Pi-Net International Inc..(Pazuniak, George) (Entered: 10/02/2012)
10/02/2012	29	NOTICE OF SERVICE of JPMorgan Chase & Co.'s Second Set Of Requests For The Production Of Documents And Things by JPMorgan Chase & Co..(Saunders, Robert) (Entered: 10/02/2012)
10/03/2012		ORAL ORDER: The parties have advised that a dispute has arisen requiring judicial attention. The Court will hold a hearing on 10/10/2012, at 1:00 PM in Courtroom 6A before Judge Richard G. Andrews to take up this issue. In preparation for this hearing the parties shall file the Discovery Matters and Disputes procedure as set forth in the Scheduling Order. Ordered by Judge Richard G. Andrews on 10/3/2012. Associated Cases: 1:12-cv-00280-RGA et al.(nms) (Entered: 10/03/2012)
10/05/2012	30	STIPULATION TO EXTEND TIME for Defendants to produce core technical documents pursuant to Section 3(b) of the Scheduling Order to October 17, 2012 - filed by JPMorgan Chase & Co., Pi-Net International Inc.. (Saunders, Robert) (Entered: 10/05/2012)
10/08/2012	31	Letter to The Honorable Richard G. Andrews from Robert S. Saunders regarding the letter with exhibits filed today by Potter Anderson & Corroon LLP in related civil action numbers 12-280 and 12-355, relating to initial disclosures. (Attachments: # 1 Exhibit A)(Saunders, Robert) (Entered: 10/08/2012)
10/08/2012	32	Letter to Hon. Richard G. Andrews from George Pazuniak regarding Response to Defendants' Letter - re 31 Letter,. (Attachments: # 1 Exhibit A Part 1, # 2 Exhibit A Part 2, # 3 Exhibit A Part 3, # 4 Exhibit B, # 5 Exhibit C)(Pazuniak, George) (Entered: 10/08/2012)
10/09/2012		SO ORDERED, re (D.I. 30 in 1:12-cv-00282-RGA, D.I. 33 in 1:12-cv-00354-RGA, D.I. 29 in 1:12-cv-00355-RGA, D.I. 37 in 1:12-cv-00356-RGA, D.I. 26 in 1:12-cv-00353-RGA, D.I. 36 in 1:12-cv-00280-RGA) STIPULATION TO EXTEND TIME to Product Core Technical Documents to October 17, 2012, filed by Bank of America N.A., Merrill Lynch Pierce Fenner & Smith Incorporated. Signed by Judge Richard G. Andrews on 10/9/2012. Associated Cases: 1:12-cv-00280-RGA et al.(nms) (Entered: 10/09/2012)
10/09/2012	33	MOTION for Pro Hac Vice Appearance of Attorney Andrew D. Gish - filed by JPMorgan Chase & Co.. (Saunders, Robert) (Entered: 10/09/2012)
10/09/2012	34	MOTION for Pro Hac Vice Appearance of Attorney Douglas R. Nemec - filed by JPMorgan Chase & Co.. (Saunders, Robert) (Entered: 10/09/2012)
10/09/2012	35	MOTION for Pro Hac Vice Appearance of Attorney Edward L. Tulin - filed by JPMorgan Chase & Co.. (Saunders, Robert) (Entered: 10/09/2012)

10/10/2012		SO ORDERED, re 33 MOTION for Pro Hac Vice Appearance of Attorney Andrew D. Gish, filed by JPMorgan Chase & Co.. Signed by Judge Richard G. Andrews on 10/10/2012. (nms) (Entered: 10/10/2012)
10/10/2012		SO ORDERED, re 34 MOTION for Pro Hac Vice Appearance of Attorney Douglas R. Nemec, filed by JPMorgan Chase & Co.. Signed by Judge Richard G. Andrews on 10/10/2012. (nms) (Entered: 10/10/2012)
10/10/2012		SO ORDERED, re 35 MOTION for Pro Hac Vice Appearance of Attorney Edward L. Tulin, filed by JPMorgan Chase & Co.. Signed by Judge Richard G. Andrews on 10/10/2012. (nms) (Entered: 10/10/2012)
10/10/2012		Minute Entry for proceedings held before Judge Richard G. Andrews - Discovery Hearing held on 10/10/2012. (Court Reporter Deanna Warner - Hawkins Reporting Service.) Associated Cases: 1:12-cv-00280-RGA et al.(ksr,) (Entered: 10/10/2012)
10/11/2012	36	MOTION for Pro Hac Vice Appearance of Attorney Daniel A. DeVito - filed by JPMorgan Chase & Co.. (Saunders, Robert) (Entered: 10/11/2012)
10/12/2012		SO ORDERED, re 36 MOTION for Pro Hac Vice Appearance of Attorney Daniel A. DeVito, filed by JPMorgan Chase & Co.. Signed by Judge Richard G. Andrews on 10/12/2012. (nms) (Entered: 10/12/2012)
11/05/2012	37	NOTICE Of Service of Plaintiff Pi-Net International, Inc.s Response to Defendant JPMorgan Chase & Co.'s Second Set of Requests for the Production of Documents and Things (NOS. 3-5), by Pi-Net International Inc..(Pazuniak, George) Modified on 11/5/2012 (nms). (Entered: 11/05/2012)
11/09/2012	38	NOTICE OF SERVICE of Plaintiffs Initial Discovery Pursuant To § 3(A) Of August 2, 2012 Scheduling Order And Court Order Of October 10, 2012 by Pi-Net International Inc..(Pazuniak, George) (Main Document 38 replaced on 11/13/2012) (nms). (Entered: 11/09/2012)
11/13/2012		CORRECTING ENTRY: The PDF for D.I. 38 has been replaced. The discovery has been removed and a notice of service has been added. (nms) (Entered: 11/13/2012)
12/07/2012	39	NOTICE OF SERVICE of Defendant JPMorgan Chase & Co.s Third Set of Requests for the Production of Documents and Things from Pi-Net (Nos. 6-110) by JPMorgan Chase & Co..(Saunders, Robert) (Entered: 12/07/2012)
12/10/2012	40	STIPULATION to Amend Scheduling Order - filed by Pi-Net International Inc.. (Pazuniak, George) Modified on 12/11/2012 (nms). (Entered: 12/10/2012)
12/11/2012		SO ORDERED, re (39 in 1:12-cv-00354-RGA, 42 in 1:12-cv-00356-RGA, 42 in 1:12-cv-00280-RGA, 40 in 1:12-cv-00282-RGA, 31 in 1:12-cv-00353-RGA, 34 in 1:12-cv-00355-RGA) STIPULATION to Amend Scheduling Order filed by Pi-Net International Inc. (see Stipulation for further details). Signed by Judge Richard G. Andrews on 12/11/2012. Associated Cases: 1:12-cv-00280-RGA et al.(nms) (Entered: 12/11/2012)
12/13/2012	41	NOTICE OF SERVICE of Defendant JPMorgan Chase & Co.s Production of Core Technical Documents Pursuant to Paragraph 3(b) of the Scheduling Order by JPMorgan Chase & Co..(Saunders, Robert) (Entered: 12/13/2012)
12/19/2012	42	NOTICE OF SERVICE of Plaintiffs First Set Of Requests To Defendant JPMorgan Chase & Co. For The Production Of Documents And Things (Nos. 1-33) by Pi-Net

		International Inc..(Pazuniak, George) (Entered: 12/19/2012)
01/08/2013	43	ORDER Setting Mediation Conferences: The mediation conferences scheduled for 2/4/13 through 2/7/13 are rescheduled for 4/8/13 through 4/11/13. See Order for details. Signed by Judge Mary Pat Thyng on 1/8/13. (cak) (Entered: 01/08/2013)
01/10/2013	44	NOTICE OF SERVICE of Plaintiff Pi-Net International, Inc.s Response To Defendant JPMorgan Chase & Co.s Third Set Of Requests For The Production Of Documents And Things From Pi-Net (Nos. 6-110) by Pi-Net International Inc..(Pazuniak, George) (Entered: 01/10/2013)
01/18/2013	45	MOTION for Leave to File Motion for Partial Summary Judgment - filed by JPMorgan Chase & Co.. (Attachments: # 1 Proposed Order re Altering Schedule, # 2 Proposed Order re Motion for Leave to File, # 3 Exhibit A - Motion for Partial Summary Judgment, # 4 Exhibit B - Brief in Support of Motion for Partial Summary Judgment, # 6 Exhibit D - Proposed Order re Partial Summary Judgment)(Saunders, Robert) Modified on 1/22/2013 (nms). (Additional attachment(s) added on 1/24/2013: # 7 Transmittal Declaration) (nms). (Entered: 01/18/2013)
01/18/2013	46	Letter to The Honorable Richard G. Andrews from Robert S. Saunders regarding Motion for Leave to File Motion for Partial Summary Judgment. (Saunders, Robert) Modified on 1/22/2013 (nms). (Entered: 01/18/2013)
01/22/2013		CORRECTING ENTRY: Exhibit C - Notice of Paper filing has been removed from D.I. 45 . Counsel shall re-file this document as a separate D.I. entry. (nms) (Entered: 01/22/2013)
01/22/2013		Remark: Set Answering Brief Deadline re 45 MOTION for Leave to File Motion for Partial Summary Judgment. Answering Brief/Response due date per Local Rules is 2/4/2013. (nms) (Entered: 01/22/2013)
01/22/2013	47	NOTICE of filing the following document(s) in paper format: Exhibits A-P to the Transmittal Declaration of Robert S. Saunders. Original document(s) to be filed with the Clerk's Office. Notice filed by Robert Scott Saunders on behalf of JPMorgan Chase & Co. (Saunders, Robert) Modified on 1/24/2013 (nms). (Entered: 01/22/2013)
01/22/2013		CORRECTING ENTRY: Pursuant to Counsel's request, D.I. 48 has been removed from the docket as it was inadvertently filed in this case. (ksr,) (Entered: 01/22/2013)
01/22/2013	48	NOTICE OF SERVICE of Defendant JPMorgan Chase & Co.'s Responses and Objections to Plaintiff's First Set of Requests for the Production of Documents and Things (Nos. 1-33) by JPMorgan Chase & Co..(Saunders, Robert) (Entered: 01/22/2013)
01/24/2013	49	EXHIBITS A-E, Volume 1 of 2, to the Transmittal Declaration filed with the MOTION for Leave to File a Motion for Partial Summary Judgment of Indefiniteness (see D.I. 48 in 12cv280-RGA, D.I. 45 in 12cv282-RGA, D.I. 36 in 12cv353-RGA, D.I. 44 in 12cv354-RGA, and D.I. 41 in 12cv355-RGA), by UBS Financial Services Inc., Bank of America N.A., Merrill Lynch Pierce Fenner & Smith Incorporated, JPMorgan Chase & Co., Citizens Financial Group Inc., Sovereign Bank N.A.. (*This filing is available in paper format only and is on file in the Clerk's Office in CA 12-280 RGA ONLY). (nms) Modified on 6/23/2014 (rbe). (Entered: 01/24/2013)
01/24/2013	50	EXHIBITS F-P, Volume 2 of 2, to the Transmittal Declaration filed with the MOTION for Leave to File a Motion for Partial Summary Judgment of Indefiniteness (see D.I. 48

		in 12cv280-RGA, D.I. 45 in 12cv282-RGA, D.I. 36 in 12cv353-RGA, D.I. 44 in 12cv354-RGA, and D.I. 41 in 12cv355-RGA), by UBS Financial Services Inc., Bank of America N.A., Merrill Lynch Pierce Fenner & Smith Incorporated, JPMorgan Chase & Co., Citizens Financial Group Inc., Sovereign Bank N.A.. (*This filing is in paper format only and is on file with the Clerk's Office in CA 12-280 RGA ONLY).). (nms) Modified on 6/23/2014 (rbe). (Entered: 01/24/2013)
01/24/2013		CORRECTING ENTRY: A pdf of the Transmittal Declaration has been added to the Motion for Leave to File a Motion for Partial Summary Judgment (see D.I. 48 in 12cv280-RGA, D.I. 45 in 12cv282-RGA, D.I. 36 in 12cv353-RGA, D.I. 44 in 12cv354-RGA, and D.I. 41 in 12cv355-RGA), Associated Cases: 1:12-cv-00280-RGA, 1:12-cv-00282-RGA, 1:12-cv-00353-RGA, 1:12-cv-00354-RGA, 1:12-cv-00355-RGA(nms) (Entered: 01/24/2013)
02/01/2013	<u>51</u>	NOTICE OF SERVICE of Plaintiffs Initial Infringement Contentions Pursuant To § 4 Of Scheduling Order by Pi-Net International Inc..(Pazuniak, George) (Entered: 02/01/2013)
02/04/2013	<u>52</u>	ANSWERING BRIEF in Opposition re <u>45</u> MOTION for Leave to File Motion for Partial Summary Judgment filed by Pi-Net International Inc..Reply Brief due date per Local Rules is 2/14/2013. (Attachments: # <u>1</u> Exhibit 1 - USPTO Search)(Pazuniak, George) (Entered: 02/04/2013)
02/14/2013	<u>53</u>	REPLY BRIEF re <u>45</u> MOTION for Leave to File Motion for Partial Summary Judgment filed by JPMorgan Chase & Co.. (Saunders, Robert) (Entered: 02/14/2013)
02/14/2013	<u>54</u>	NOTICE OF SERVICE of JPMorgan Chase & Co.'s List Of Claim Terms And Phrases That Need Construction with Exhibit A by JPMorgan Chase & Co..(Saunders, Robert) (Entered: 02/14/2013)
02/15/2013	<u>55</u>	NOTICE OF SERVICE of (1) Plaintiffs third document production served February 13, 2013; and (2) Plaintiffs List Of Claim Terms And Phrases That Need Construction on February 14, 2013 by Pi-Net International Inc..(Pazuniak, George) (Entered: 02/15/2013)
03/01/2013	<u>56</u>	NOTICE OF SERVICE of Plaintiffs Construction Of Claim Terms And Phrases by Pi-Net International Inc..(Pazuniak, George) (Entered: 03/01/2013)
03/01/2013	<u>57</u>	NOTICE OF SERVICE of Defendants' List Of Proposed Claim Constructions by JPMorgan Chase & Co..(Saunders, Robert) (Entered: 03/01/2013)
03/04/2013	<u>58</u>	ORDER Granting (48 in 1:12-cv-00280-RGA, 41 in 1:12-cv-00355-RGA, 45 in 1:12-cv-00282-RGA) MOTIONS for Leave to File Motion for Partial Summary Judgment (see Order for further details). Signed by Judge Richard G. Andrews on 3/4/2013. Associated Cases: 1:12-cv-00280-RGA, 1:12-cv-00282-RGA, 1:12-cv-00355-RGA(nms) (Entered: 03/04/2013)
03/05/2013	<u>59</u>	MOTION for Partial Summary Judgment of Indefiniteness - filed by JPMorgan Chase & Co.. (Attachments: # <u>1</u> Proposed Order)(Saunders, Robert) Modified on 3/6/2013 (nms). (Entered: 03/05/2013)
03/05/2013	<u>60</u>	OPENING BRIEF in Support re <u>59</u> MOTION for Partial Summary Judgment of Indefiniteness, filed by JPMorgan Chase & Co..Answering Brief/Response due date per Local Rules is 3/22/2013. (Saunders, Robert) Modified on 3/6/2013 (nms). (Entered: 03/05/2013)

03/05/2013	61	DECLARATION of Robert S. Saunders re 59 Motion for Partial Summary Judgment of Indefiniteness, by JPMorgan Chase & Co.. (Saunders, Robert) Modified on 3/6/2013 (nms). (Entered: 03/05/2013)
03/06/2013	62	NOTICE OF SERVICE of Defendants' Initial Invalidity Contentions regarding the asserted U.S. Patent Nos. 5,987,500, 8,037,158, and 8,108,492 by JPMorgan Chase & Co..(Saunders, Robert) (Entered: 03/06/2013)
03/08/2013	63	Stipulation to Amend Scheduling Order - filed by Pi-Net International Inc.. (Pazuniak, George) Modified on 3/8/2013 (nms). (Entered: 03/08/2013)
03/08/2013		SO ORDERED, re (58 in 1:12-cv-00355-RGA, 63 in 1:12-cv-00282-RGA, 64 in 1:12-cv-00280-RGA, 62 in 1:12-cv-00356-RGA) Stipulation to Amend Scheduling Order. (Set Deadline: Joint Claim Construction Chart Due 3/13/2013). Signed by Judge Richard G. Andrews on 3/8/2013. Associated Cases: 1:12-cv-00280-RGA, 1:12-cv-00282-RGA, 1:12-cv-00355-RGA, 1:12-cv-00356-RGA(nms) (Entered: 03/08/2013)
03/13/2013	64	Joint CLAIM Construction Chart, by Pi-Net International Inc.. (Pazuniak, George) Modified on 3/14/2013 (nms). (Entered: 03/13/2013)
03/19/2013	65	STIPULATION for Extension of Time to File Briefs re Motions for Summary Judgment of Indefiniteness - filed by Pi-Net International Inc.. (Pazuniak, George) Modified on 3/20/2013 (nms). (Entered: 03/19/2013)
03/20/2013		SO ORDERED, re (60 in 1:12-cv-00355-RGA, 67 in 1:12-cv-00280-RGA, 65 in 1:12-cv-00282-RGA) STIPULATION for Extension of Time to File Briefs regarding Motions for Summary Judgment, filed by Pi-Net International Inc. (Reset Briefing Schedule: re(59 in 1:12-cv-00282-RGA) MOTION for Summary Judgment of Indefiniteness, (60 in 1:12-cv-00280-RGA) MOTION for Partial Summary Judgment of Indefiniteness, (54 in 1:12-cv-00355-RGA) MOTION for Partial Summary Judgment of Indefiniteness. Answering Brief due 4/1/2013., Reply Brief due 4/11/2013). Signed by Judge Richard G. Andrews on 3/20/2013. Associated Cases: 1:12-cv-00280-RGA, 1:12-cv-00282-RGA, 1:12-cv-00355-RGA(nms) (Entered: 03/20/2013)
04/01/2013	66	ANSWERING BRIEF in Opposition re 59 MOTION for Summary Judgment, filed by Pi-Net International Inc..Reply Brief due date per Local Rules is 4/11/2013. (Attachments: # 1 Affidavit Dr. Michael Bardash, # 2 Exhibit A, # 3 Appendix A, # 4 Appendix B, # 5 Appendix C, # 6 Appendix D, # 7 Appendix E part 1, # 8 Appendix E part 2, # 9 Appendix F)(Pazuniak, George) Modified on 4/2/2013 (nms). (Entered: 04/01/2013)
04/11/2013	67	REPLY BRIEF re 59 MOTION for Summary Judgment of Indefiniteness filed by JPMorgan Chase & Co.. (Saunders, Robert) (Entered: 04/11/2013)
04/15/2013	68	NOTICE OF SERVICE of Defendant JPMorgan Chase & Co.'s Second Production of Documents by JPMorgan Chase & Co..(Saunders, Robert) (Entered: 04/15/2013)
04/15/2013	69	NOTICE OF SERVICE of Defendant JPMorgan Chase & Co.'s Third Production of Documents by JPMorgan Chase & Co..(Saunders, Robert) (Entered: 04/15/2013)
04/23/2013	70	NOTICE OF SERVICE of Defendants' Answering Claim Construction Brief by JPMorgan Chase & Co..(Saunders, Robert) (Entered: 04/23/2013)
04/26/2013	71	STIPULATION for Extension of Time to Complete Discovery - filed by Pi-Net International Inc.. (Pazuniak, George) Modified on 4/29/2013 (nms). (Entered: 04/26/2013)

		04/26/2013)
04/29/2013		SO ORDERED, re (64 in 1:12-cv-00356-RGA, 71 in 1:12-cv-00280-RGA, 71 in 1:12-cv-00282-RGA, 69 in 1:12-cv-00355-RGA) Stipulation for Extension of Time to Complete Discovery, filed by Pi-Net International Inc.. Signed by Judge Richard G. Andrews on 4/29/2013. Associated Cases: 1:12-cv-00280-RGA, 1:12-cv-00282-RGA, 1:12-cv-00355-RGA, 1:12-cv-00356-RGA(nms) (Entered: 04/30/2013)
05/13/2013	72	NOTICE OF SERVICE of Defendant JPMorgan Chase & Co.'s Claim Construction Surreply by JPMorgan Chase & Co..(Saunders, Robert) (Entered: 05/13/2013)
05/15/2013	73	NOTICE OF SERVICE of Set of document production by Pi-Net International Inc..(Pazuniak, George) (Entered: 05/15/2013)
05/15/2013	74	Joint Claim Construction Brief, filed by Pi-Net International Inc.. (Pazuniak, George) Modified on 5/16/2013 (nms). (Entered: 05/15/2013)
05/16/2013	75	Joint APPENDIX re (73 in 1:12-cv-00280-RGA) Joint Claim Construction Brief, by Pi-Net International Inc.. (Attachments: # 1 Part A, # 2 Part B, # 3 Part C, # 4 Part D, # 5 Part E, # 6 Part F, # 7 Part G, # 8 Part H, # 9 Part I, # 10 Part J, # 11 Part K, # 12 Appendix L, # 13 Part M, # 14 Part N, # 15 Part O, # 16 Part P, # 17 Part Q)(Pazuniak, George) Modified on 5/17/2013 (nms). (Entered: 05/16/2013)
05/20/2013	76	ORDER Continuing the Markman Hearing. The parties shall file a joint status report no later than two weeks from the date of this Order (see Order for further details). Signed by Judge Richard G. Andrews on 5/20/2013. Associated Cases: 1:12-cv-00280-RGA, 1:12-cv-00282-RGA, 1:12-cv-00355-RGA(nms) (Entered: 05/20/2013)
05/21/2013	77	NOTICE OF SERVICE of Defendants' Second Set of Common Interrogatories (Nos. 3-10) by JPMorgan Chase & Co..(Saunders, Robert) (Entered: 05/21/2013)
05/21/2013	78	NOTICE OF SERVICE of Plaintiffs First Set of Interrogatories; and Second Set of Requests for Documents by Pi-Net International Inc..(Pazuniak, George) (Entered: 05/21/2013)
06/03/2013	79	Joint Status Letter to The Honorable Richard G. Andrews from George Pazuniak as requested by Court (see Order at 75 in 1:12-cv-00280-RGA, 75 in 1:12-cv-00280-RGA). (Attachments: # 1 Exhibit)(Pazuniak, George) Modified on 6/4/2013 (nms). (Entered: 06/03/2013)
06/03/2013	80	STIPULATION for Extension of Time to Complete Discovery - filed by Pi-Net International Inc.. (Pazuniak, George) Modified on 6/4/2013 (nms). (Entered: 06/03/2013)
06/10/2013		SO ORDERED, re (78 in 1:12-cv-00280-RGA, 80 in 1:12-cv-00282-RGA, 79 in 1:12-cv-00355-RGA, 71 in 1:12-cv-00356-RGA) STIPULATION for Extension of Time to Complete Discovery, filed by Pi-Net International Inc.. Signed by Judge Richard G. Andrews on 6/10/2013. Associated Cases: 1:12-cv-00280-RGA, 1:12-cv-00282-RGA, 1:12-cv-00355-RGA, 1:12-cv-00356-RGA(nms) (Entered: 06/10/2013)
06/12/2013	81	NOTICE to Take Deposition of Plaintiff Pi-Net International, Inc. on July 12, 2013 by JPMorgan Chase & Co..(Saunders, Robert) (Entered: 06/12/2013)
06/20/2013	82	NOTICE OF SERVICE of Plaintiffs Responses To Defendants Second Set Of Common Interrogatories (Nos. 3-10) by Pi-Net International Inc..(Pazuniak, George) (Entered: 06/20/2013)

06/24/2013	83	NOTICE OF SERVICE of (i) Defendant JPMorgan Chase & Co.'s Responses and Objections to Plaintiff's First Set of Interrogatories (Nos. 1-5), and (ii) Defendant JPMorgan Chase & Co.'s Responses and Objections to Plaintiff's Second Set of Requests for the Production of Documents and Things (Nos. 34-37) by JPMorgan Chase & Co..(Saunders, Robert) (Entered: 06/24/2013)
07/02/2013	84	Letter to The Honorable Richard G. Andrews from Robert S. Saunders, Esquire regarding request for oral hearing. (Saunders, Robert) (Entered: 07/02/2013)
07/17/2013		ORAL ORDER: The Court will set oral argument on the MOTION for Summary Judgment of Indefiniteness (D.I. 59) for 11/25/2013, at 2:00 AM in Courtroom 6A before Judge Richard G. Andrews. The Court will also set a Markman Hearing for 3/6/2014, at 9:30 AM in Courtroom 6A before Judge Richard G. Andrews. Ordered by Judge Richard G. Andrews on 7/17/2013. (nms) (Entered: 07/17/2013)
08/05/2013	85	NOTICE OF SERVICE of On August 3, 2013, Plaintiffs Second Set of Interrogatories; Third Set of Requests for Documents; and on August 5, 2013, Plaintiff served Plaintiffs Notice Of Deposition Of Defendant Pursuant To Rule 30(B)(6) by Pi-Net International Inc..(Pazuniak, George) (Entered: 08/05/2013)
08/21/2013	86	Joint Letter to The Honorable Richard G. Andrews from George Pazuniak and Robert S. Saunders regarding the parties' positions as to whether the current schedule should be modified. (Saunders, Robert) (Entered: 08/21/2013)
08/22/2013	87	Letter to The Honorable Richard G. Andrews from George Pazuniak responding to 86 JPMorgan's Letter. (Pazuniak, George) Modified on 8/22/2013 (nms). (Entered: 08/22/2013)
08/22/2013	88	Letter to The Honorable Richard G. Andrews from Robert S. Saunders regarding response to the letter from George Pazuniak dated August 22, 2013. (Attachments: # 1 Exhibit A)(Saunders, Robert) (Entered: 08/22/2013)
08/23/2013	89	Letter to The Honorable Richard G. Andrews from George Pazuniak regarding Response to DI 88 - re 88 Letter. (Pazuniak, George) (Entered: 08/23/2013)
08/23/2013	90	ORDER Canceling the conference set for 3/14/2013. The parties shall meet and confer and submit a jointly proposed scheduling order consistent with the above no later than September 6, 2013 (see Order for further details). Signed by Judge Richard G. Andrews on 8/23/2013. (nms) (Entered: 08/26/2013)
08/28/2013	91	NOTICE OF SERVICE of A. Plaintiff served Plaintiffs Second Notice Of Deposition Of Defendant Pursuant To Rule 30(B)(6); B. Plaintiffs Third Notice Of Deposition Of Individual Witnesses by Pi-Net International Inc..(Pazuniak, George) (Entered: 08/28/2013)
08/30/2013	92	NOTICE OF SERVICE of (i) Defendant JPMorgan Chase & Co.'s Notice of Deposition and Issuance of a Subpoena to Martin Wade, c/o George Pazuniak; and (ii) Subpoena to Martin Wade with Schedule A by JPMorgan Chase & Co..(Saunders, Robert) (Entered: 08/30/2013)
08/30/2013	93	NOTICE OF SERVICE of (i) Defendant JPMorgan Chase & Co.'s Objections and Responses to Plaintiff's Notice of Deposition Pursuant To Fed. R. Civ. P. 30(B)(6); (ii) Defendant JPMorgan Chase & Co.'s Fourth Set of Requests for the Production of Documents and Things From Pi-Net (Nos. 111-113); and (iii) Defendant JP Morgan Chase & Co.'s First Set of Individual Interrogatories (Nos. 1-4) by JPMorgan Chase &

		Co..(Saunders, Robert) (Entered: 08/30/2013)
09/09/2013	94	Stipulation Amending Scheduling Order, by Pi-Net International Inc.. (Pazuniak, George) Modified on 9/9/2013 (nms). (Entered: 09/09/2013)
09/09/2013	95	SO ORDERED, re 94 Proposed Stipulated Amendment to Scheduling Order, filed by Pi-Net International Inc. (Reset Deadlines: Dispositive Motions due by 1/29/2014, Answer Briefs due by 2/14/2014, Reply Briefs due by 2/26/2014)(see Stipulation for further details). Signed by Judge Richard G. Andrews on 9/9/2013. (nms) (Entered: 09/10/2013)
09/13/2013	96	NOTICE OF SERVICE of Plaintiffs Revised Third And Fourth Notice Of Deposition Of Individual Witnesses by Pi-Net International Inc..(Pazuniak, George) (Entered: 09/13/2013)
09/26/2013		Remark: The Court notes CBM review of '158 patent, and inter partes review of '492 and '500 patents (see Civil Action 12-355, D.I. 74). (nms) (Entered: 09/26/2013)
09/26/2013	97	NOTICE OF SERVICE of Subpoena for Production of Documents from ACI Worldwide, Inc. by JPMorgan Chase & Co..(Saunders, Robert) (Entered: 09/26/2013)
10/16/2013		ORAL ORDER: The parties have advised that a discovery dispute has arisen requiring judicial attention. The Court will hold a Discovery Hearing on 11/12/2013, at 1:00 PM in Courtroom 6A before Judge Richard G. Andrews, to take up this issue. In preparation for this conference the parties shall follow the Discovery Matters and Disputes procedure as set forth in the Scheduling Order. Ordered by Judge Richard G. Andrews on 10/16/2013. (nms) (Entered: 10/16/2013)
11/08/2013	98	Letter to The Honorable Richard G. Andrews from Robert S. Saunders, Esquire regarding a discovery dispute. (Attachments: # 1 Exhibit A, # 2 Exhibit D, # 3 Exhibit E, # 4 Certificate of Service)(Saunders, Robert) Modified on 11/8/2013 (nms). (Entered: 11/08/2013)
11/08/2013		CORRECTING ENTRY: The exhibits filed at D.I. 99 and D.I. 100 have been removed from the docket. Counsel shall refile these exhibits adding a captioned cover page and filing both exhibits under one docket item number. (nms) (Entered: 11/08/2013)
11/08/2013	99	[SEALED] EXHIBITS B and C re 98 Letter, by JPMorgan Chase & Co.. (Attachments: # 1 Certificate of Service)(Saunders, Robert) Modified on 11/8/2013 (nms). (Entered: 11/08/2013)
11/11/2013	100	Letter to The Honorable Richard G. Andrews from George Pazuniak regarding Response to Letter form JPMorgan dated Nov. 8 - re 98 Letter,. (Pazuniak, George) (Entered: 11/11/2013)
11/12/2013		Minute Entry for proceedings held before Judge Richard G. Andrews - Discovery Conference held on 11/12/2013. (Court Reporter Leonard Dibbs.) (ksr,) (Entered: 11/12/2013)
11/15/2013	101	REDACTED VERSION of 99 Exhibits B and C to Letter, by JPMorgan Chase & Co.. (Saunders, Robert) Modified on 11/18/2013 (nms). (Entered: 11/15/2013)
11/16/2013	102	Official Transcript of Discovery Dispute held on 11-12-13 before Judge Richard G. Andrews. Court Reporter/Transcriber Leonard A. Dibbs. Transcript may be viewed at the court public terminal or purchased through the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained

		through PACER. Redaction Request due 12/9/2013. Redacted Transcript Deadline set for 12/17/2013. Release of Transcript Restriction set for 2/14/2014. (lad) (Entered: 11/16/2013)
11/27/2013	103	Consent Letter to The Honorable Richard G. Andrews from George Pazuniak regarding Hearing on Summary Judgment. (Pazuniak, George) (Entered: 11/27/2013)
11/29/2013	104	Official Transcript of Partial Summary Judgment of Indefiniteness held on 11-25-13 before Judge Richard G. Andrews. Court Reporter/Transcriber Leonard A. Dibbs. Transcript may be viewed at the court public terminal or purchased through the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through PACER. Redaction Request due 12/20/2013. Redacted Transcript Deadline set for 12/30/2013. Release of Transcript Restriction set for 2/27/2014. (lad) (Entered: 11/29/2013)
12/05/2013		ORAL ORDER: The parties have advised that a discovery dispute has arisen requiring judicial attention. The Court will hold a Discovery conference on 12/18/2013, at 4:00 PM in Chambers before Judge Richard G. Andrews, to take up this issue. In preparation for this conference the parties shall follow the Discovery Matters and Disputes procedure as set forth in the Scheduling Order. Ordered by Judge Richard G. Andrews on 12/5/2013. (nms) (Entered: 12/05/2013)
12/13/2013	105	Letter to The Honorable Richard G. Andrews from Robert S. Saunders, Esq. regarding discovery dispute between Defendant JPMorgan Chase & Co and Plaintiff Pi-Net International, Inc.. (Attachments: # 1 Exhibit B, # 2 Exhibit C, # 3 Certificate of Service)(Saunders, Robert) Modified on 12/16/2013 (nms). (Entered: 12/13/2013)
12/13/2013	106	[SEALED] EXHIBIT A re 105 Letter, by JPMorgan Chase & Co.. (Attachments: # 1 Certificate of Service)(Saunders, Robert) Modified on 12/16/2013 (nms). (Entered: 12/13/2013)
12/16/2013	107	Letter to The Honorable Richard G. Andrews from George Pazuniak regarding discovery hearing December 18. (Attachments: # 1 Exhibit '500 Patent, # 2 Exhibit '506 Patent, # 3 Exhibit Discovery Responses)(Pazuniak, George) Modified on 12/17/2013 (nms). (Entered: 12/16/2013)
12/18/2013		Minute Entry for proceedings held before Judge Richard G. Andrews - Discovery Conference held on 12/18/2013. (Court Reporter Heather Triozzi - Hawkins Reporting Service.) (ksr,) (Entered: 12/18/2013)
12/23/2013		REDACTION NOTICE: In accordance with section G of the Administrative Procedures Governing Filing and Service by Electronic Means, redacted versions of sealed documents shall be filed electronically within 7 days of the filing of the sealed document. The records of this case do not reflect the filing of a redacted version of DI # 106 . (nms) (Entered: 12/23/2013)
01/02/2014		SECOND REDACTION NOTICE: In accordance with section G of the Administrative Procedures Governing Filing and Service by Electronic Means, redacted versions of sealed documents shall be filed electronically within 7 days of the filing of the sealed document. The records of this case do not reflect the filing of a redacted version of DI # 106 . (nms) (Entered: 01/02/2014)
01/02/2014	108	REDACTED VERSION of 106 Exhibit A to 105 Letter, by JPMorgan Chase & Co.. (Saunders, Robert) Modified on 1/3/2014 (nms). (Entered: 01/02/2014)

01/29/2014	109	MOTION To Exclude Certain Testimony Of Stevan Porter - filed by JPMorgan Chase & Co.. (Attachments: # 1 Proposed Order)(Saunders, Robert) Modified on 1/30/2014 (nms). (Entered: 01/29/2014)
01/29/2014	110	[SEALED] OPENING BRIEF in Support re 109 MOTION To Exclude Certain Testimony Of Stevan Porter, filed by JPMorgan Chase & Co..Answering Brief/Response due date per Local Rules is 2/18/2014. (Attachments: # 1 Certificate of Service)(Saunders, Robert) Modified on 1/30/2014 (nms). (Entered: 01/29/2014)
01/29/2014	111	MOTION for Partial Summary Judgment Of Laches For U.S. Patent No. 5,987,500 - filed by JPMorgan Chase & Co.. (Attachments: # 1 Proposed Order)(Saunders, Robert) Modified on 1/30/2014 (nms). (Entered: 01/29/2014)
01/29/2014	112	[SEALED] OPENING BRIEF in Support re 111 MOTION for Partial Summary Judgment Of Laches For U.S. Patent No. 5,987,500, filed by JPMorgan Chase & Co..Answering Brief/Response due date per Local Rules is 2/18/2014. (Attachments: # 1 Certificate of Service)(Saunders, Robert) Modified on 1/30/2014 (nms). (Entered: 01/29/2014)
01/29/2014	113	MOTION for Summary Judgment Of Non-Infringement - filed by JPMorgan Chase & Co.. (Attachments: # 1 Proposed Order)(Saunders, Robert) Modified on 1/30/2014 (nms). (Entered: 01/29/2014)
01/29/2014	114	[SEALED] OPENING BRIEF in Support re 113 MOTION for Summary Judgment Of Non-Infringement, filed by JPMorgan Chase & Co..Answering Brief/Response due date per Local Rules is 2/18/2014. (Attachments: # 1 Certificate of Service)(Saunders, Robert) Modified on 1/30/2014 (nms). (Entered: 01/29/2014)
01/29/2014	115	MOTION to Exclude Expert Testimony of Susan Spielman - filed by Pi-Net International Inc.. (Attachments: # 1 Proposed Order)(Pazuniak, George) Modified on 1/30/2014 (nms). (Entered: 01/29/2014)
01/29/2014	116	OPENING BRIEF in Support re 115 MOTION in Limine to Exclude Expert Testimony of Susan Spielman, filed by Pi-Net International Inc..Answering Brief/Response due date per Local Rules is 2/18/2014. (Pazuniak, George) Modified on 1/30/2014 (nms). (Entered: 01/29/2014)
01/29/2014	117	MOTION to Exclude Certain Testimony by Dr. Michael Siegel - filed by Pi-Net International Inc.. (Attachments: # 1 Proposed Order)(Pazuniak, George) Modified on 1/30/2014 (nms). (Entered: 01/29/2014)
01/29/2014	118	OPENING BRIEF in Support re 117 MOTION to Exclude Certain Testimony by Dr. Michael Siegel, filed by Pi-Net International Inc..Answering Brief/Response due date per Local Rules is 2/18/2014. (Pazuniak, George) Modified on 1/30/2014 (nms). (Entered: 01/29/2014)
01/29/2014	119	MOTION to Exclude Certain Testimony by Dawn Hall - filed by Pi-Net International Inc.. (Attachments: # 1 Proposed Order)(Pazuniak, George) Modified on 1/30/2014 (nms). (Entered: 01/29/2014)
01/29/2014	120	OPENING BRIEF in Support re 119 MOTION to Exclude Certain Testimony by Dawn Hall, filed by Pi-Net International Inc..Answering Brief/Response due date per Local Rules is 2/18/2014. (Pazuniak, George) Modified on 1/30/2014 (nms). (Entered: 01/29/2014)

01/29/2014	121	MOTION for Summary Judgment Of Indefiniteness, Lack Of Enablement, And Lack Of Written Description Under 35 U.S.C. § 112 - filed by JPMorgan Chase & Co.. (Attachments: # 1 Proposed Order)(Saunders, Robert) Modified on 1/30/2014 (nms). (Entered: 01/29/2014)
01/29/2014	122	OPENING BRIEF in Support re 121 MOTION for Summary Judgment Of Indefiniteness, Lack Of Enablement, And Lack Of Written Description Under 35 U.S.C. § 112, filed by JPMorgan Chase & Co..Answering Brief/Response due date per Local Rules is 2/18/2014. (Saunders, Robert) Modified on 1/30/2014 (nms). (Entered: 01/29/2014)
02/05/2014	123	REDACTED VERSION of 110 Opening Brief in Support, by JPMorgan Chase & Co.. (Saunders, Robert) Modified on 2/6/2014 (nms). (Entered: 02/05/2014)
02/05/2014	124	REDACTED VERSION of 112 Opening Brief in Support, by JPMorgan Chase & Co.. (Saunders, Robert) Modified on 2/6/2014 (nms). (Entered: 02/05/2014)
02/05/2014	125	REDACTED VERSION of 114 Opening Brief in Support, by JPMorgan Chase & Co.. (Saunders, Robert) Modified on 2/6/2014 (nms). (Entered: 02/05/2014)
02/14/2014	126	ANSWERING BRIEF in Opposition re 115 MOTION to Exclude Expert Testimony of Susan Spielman <i>On Validity</i> filed by JPMorgan Chase & Co..Reply Brief due date per Local Rules is 2/24/2014. (Saunders, Robert) (Entered: 02/14/2014)
02/14/2014	127	[SEALED] ANSWERING BRIEF in Opposition re 117 MOTION to Exclude Certain Testimony by Dr. Michael Siegel filed by JPMorgan Chase & Co..Reply Brief due date per Local Rules is 2/24/2014. (Attachments: # 1 Certificate of Service)(Saunders, Robert) (Entered: 02/14/2014)
02/14/2014	128	[SEALED] ANSWERING BRIEF in Opposition re 119 MOTION to Exclude Certain Testimony by Dawn Hall filed by JPMorgan Chase & Co..Reply Brief due date per Local Rules is 2/24/2014. (Attachments: # 1 Certificate of Service)(Saunders, Robert) (Entered: 02/14/2014)
02/14/2014	129	[SEALED] ANSWERING BRIEF in Opposition re 109 MOTION To Exclude Certain Testimony Of Stevan Porter filed by Pi-Net International Inc..Reply Brief due date per Local Rules is 2/24/2014. (Pazuniak, George) (Entered: 02/14/2014)
02/14/2014	130	[SEALED] ANSWERING BRIEF in Opposition re 113 MOTION for Summary Judgment Of Non-Infringement filed by Pi-Net International Inc..Reply Brief due date per Local Rules is 2/24/2014. (Pazuniak, George) (Entered: 02/14/2014)
02/14/2014	131	ANSWERING BRIEF in Opposition re 121 MOTION for Summary Judgment Of Indefiniteness, Lack Of Enablement, And Lack Of Written Description Under 35 U.S.C. § 112 filed by Pi-Net International Inc..Reply Brief due date per Local Rules is 2/24/2014. (Pazuniak, George) (Entered: 02/14/2014)
02/14/2014	132	MOTION to Strike 112 Opening Brief in Support, 111 MOTION for Partial Summary Judgment Of Laches For U.S. Patent No. 5,987,500 - filed by Pi-Net International Inc.. (Attachments: # 1 Text of Proposed Order)(Pazuniak, George) (Entered: 02/14/2014)
02/14/2014	133	BRIEF (Combined Opening and Answering) re 132 MOTION to Strike, and 111 MOTION for Partial Summary Judgment Of Laches For U.S. Patent No. 5,987,500, filed by Pi-Net International Inc..Answering Brief/Response due date per Local Rules is 3/3/2014. Reply Brief due date per Local Rules is 2/24/2014. (Pazuniak, George)

		Modified on 2/18/2014 (nms). (Entered: 02/14/2014)
02/21/2014	134	REDACTED VERSION of 127 Answering Brief in Opposition, by JPMorgan Chase & Co.. (Saunders, Robert) Modified on 2/24/2014 (nms). (Entered: 02/21/2014)
02/21/2014	135	REDACTED VERSION of 128 Answering Brief in Opposition, by JPMorgan Chase & Co.. (Saunders, Robert) Modified on 2/24/2014 (nms). (Entered: 02/21/2014)
02/24/2014	136	REDACTED VERSION of 129 Answering Brief in Opposition, by Pi-Net International Inc.. (Pazuniak, George) Modified on 2/24/2014 (nms). (Entered: 02/24/2014)
02/24/2014	137	REDACTED VERSION of 130 Answering Brief in Opposition, by Pi-Net International Inc.. (Pazuniak, George) Modified on 2/24/2014 (nms). (Entered: 02/24/2014)
02/26/2014	138	REPLY BRIEF re 115 MOTION to Exclude Expert Testimony of Susan Spielman filed by Pi-Net International Inc.. (Pazuniak, George) (Entered: 02/26/2014)
02/26/2014	139	REPLY BRIEF re 117 MOTION to Exclude Certain Testimony by Dr. Michael Siegel filed by Pi-Net International Inc.. (Pazuniak, George) (Entered: 02/26/2014)
02/26/2014	140	REPLY BRIEF re 119 MOTION to Exclude Certain Testimony by Dawn Hall filed by Pi-Net International Inc.. (Pazuniak, George) (Entered: 02/26/2014)
02/26/2014	141	[SEALED] APPENDIX re 115 MOTION to Exclude Expert Testimony of Susan Spielman, 119 MOTION to Exclude Certain Testimony by Dawn Hall, 117 MOTION to Exclude Certain Testimony by Dr. Michael Siegel, by Pi-Net International Inc.. (Attachments: # 1 Exhibit BA, # 2 Exhibit BB, # 3 Exhibit BC, # 4 Exhibit BD, # 5 Declaration of Dr. Bardash, # 6 1st Declaration of George Pazuniak, # 7 Exhibit BG, # 8 Exhibit BH, # 9 2d Declaration of George Pazuniak, # 10 Exhibit BJ, # 11 Exhibit BK, # 12 Exhibit BL)(Pazuniak, George) Modified on 2/27/2014 (nms). (Entered: 02/26/2014)
02/26/2014	142	[SEALED] REPLY BRIEF re 109 MOTION To Exclude Certain Testimony Of Stevan Porter filed by JPMorgan Chase & Co.. (Attachments: # 1 Certificate of Service) (Saunders, Robert) (Entered: 02/26/2014)
02/26/2014	143	[SEALED] BRIEF (Combined Answering and Reply) re 132 MOTION to Strike, 111 MOTION for Partial Summary Judgment Of Laches For U.S. Patent No. 5,987,500, 111 MOTION for Partial Summary Judgment Of Laches For U.S. Patent No. 5,987,500, filed by JPMorgan Chase & Co..Reply Brief due date per Local Rules is 3/10/2014. (Attachments: # 1 Certificate of Service)(Saunders, Robert) Modified on 2/27/2014 (nms). (Entered: 02/26/2014)
02/26/2014	144	[SEALED] REPLY BRIEF re 113 MOTION for Summary Judgment Of Non-Infringement filed by JPMorgan Chase & Co.. (Attachments: # 1 Certificate of Service)(Saunders, Robert) (Entered: 02/26/2014)
02/26/2014	145	REPLY BRIEF re 121 MOTION for Summary Judgment Of Indefiniteness, Lack Of Enablement, And Lack Of Written Description Under 35 U.S.C. § 112 filed by JPMorgan Chase & Co.. (Saunders, Robert) (Entered: 02/26/2014)
02/26/2014	146	DECLARATION of Jessica Raatz Kunz, by JPMorgan Chase & Co.. (Attachments: # 1 Exhibit DAC, # 2 Exhibit DAD, # 3 Exhibit DAE, # 4 Exhibit DAF, # 5 Exhibit DAG, # 6 Exhibit DAH, # 7 Exhibit DAI, # 8 Exhibit DAM, # 9 Exhibit DAN, # 10 Exhibit DAO, # 11 Exhibit DAW, # 12 Exhibit DAX, # 13 Exhibit DAY, # 14 Exhibit DBF, # 15 Exhibit DBH, # 16 Exhibit DBI, # 17 Exhibit DBJ, # 18 Exhibit DBK, # 19 Exhibit

		DBL, # 20 Exhibit DBM)(Saunders, Robert) Modified on 2/27/2014 (nms). (Entered: 02/26/2014)
02/26/2014	147	[SEALED] EXHIBITS re 146 Declaration of Jessica Raatz Kunz, by JPMorgan Chase & Co.. (Attachments: # 1 Certificate of Service)(Saunders, Robert) Modified on 2/27/2014 (nms). (Entered: 02/26/2014)
02/26/2014	148	[SEALED] EXHIBITS re 146 Declaration of Jessica Raatz Kunz, by JPMorgan Chase & Co.. (Attachments: # 1 Certificate of Service)(Saunders, Robert) Modified on 2/27/2014 (nms). (Entered: 02/26/2014)
02/26/2014	150	[SEALED] Joint APPENDIX by JPMorgan Chase & Co.. (Attachments: # 1 Exhibit AA-AC, # 2 Exhibit AD-AG, # 3 Exhibit AH-AM, # 4 Exhibit AN-AS, # 5 Certificate of Service)(Saunders, Robert) (Entered: 02/27/2014)
02/27/2014		CORRECTING ENTRY: Docket item 149 has been removed from the docket as it was a partial duplication of the filing found at docket item 150 . (nms) (Entered: 02/27/2014)
03/04/2014		ORAL ORDER: Due to a scheduling conflict the Markman/Dispositive Motion hearing set for 3/6/2014, is CANCELED and will be rescheduled for a date to be determined. Ordered by Judge Richard G. Andrews on 3/4/2014. (nms) (Entered: 03/04/2014)
03/05/2014	151	REDACTED VERSION of 142 Reply Brief, by JPMorgan Chase & Co.. (Saunders, Robert) Modified on 3/6/2014 (nms). (Entered: 03/05/2014)
03/05/2014	152	REDACTED VERSION of 143 Combined Answering and Reply, by JPMorgan Chase & Co.. (Saunders, Robert) Modified on 3/6/2014 (nms). (Entered: 03/05/2014)
03/05/2014	153	REDACTED VERSION of 144 Reply Brief, by JPMorgan Chase & Co.. (Saunders, Robert) Modified on 3/6/2014 (nms). (Entered: 03/05/2014)
03/05/2014	154	REDACTED VERSION of 147 Transmittal Declaration of Jessica Raatz Kunz, by JPMorgan Chase & Co.. (Attachments: # 1 Exhibit part 1 of 2, # 2 Exhibit part 2 of 2)(Saunders, Robert) Modified on 3/6/2014 (nms). (Entered: 03/05/2014)
03/05/2014	155	REDACTED VERSION of 148 Transmittal Declaration of Jessica Raatz Kunz, by JPMorgan Chase & Co.. (Saunders, Robert) Modified on 3/6/2014 (nms). (Entered: 03/05/2014)
03/05/2014	156	REQUEST for Oral Argument by JPMorgan Chase & Co.. (Saunders, Robert) (Entered: 03/05/2014)
03/06/2014	157	REDACTED VERSION of 150 Joint Appendix, by JPMorgan Chase & Co.. (Attachments: # 1 Exhibit AA-AC part 1 of 3, # 2 Exhibit AA-AC part 2 of 3, # 3 Exhibit AA-AC part 3 of 3, # 4 Exhibit AD-AG part 1 of 2, # 5 Exhibit AD-AG part 2 of 2, # 6 Exhibit AH-AM part 1 of 4, # 7 Exhibit AH-AM part 2 of 4, # 8 Exhibit AH-AM part 3 of 4, # 9 Exhibit AH-AM part 4 of 4, # 10 Exhibit AN-AS)(Saunders, Robert) Modified on 3/6/2014 (nms). (Entered: 03/06/2014)
03/06/2014	158	REDACTED VERSION of 141 Appendix, by Pi-Net International Inc.. (Pazuniak, George) Modified on 3/7/2014 (nms). (Entered: 03/06/2014)
03/06/2014		ORAL ORDER: The Court will now hold a Markman and Dispositive Motion Hearing on 4/15/2014, at 9:00 AM in Courtroom 6A before Judge Richard G. Andrews. Ordered by Judge Richard G. Andrews on 3/6/2014. (nms) (Entered: 03/06/2014)

03/10/2014	159	REPLY BRIEF re 132 MOTION to Strike 112 Opening Brief in Support, 111 MOTION for Partial Summary Judgment Of Laches For U.S. Patent No. 5,987,500 filed by Pi-Net International Inc.. (Pazuniak, George) (Entered: 03/10/2014)
04/07/2014	160	MEMORANDUM OPINION re 59 MOTION for Partial Summary Judgment of Indefiniteness. Signed by Judge Richard G. Andrews on 4/7/2014. (nms) (Entered: 04/07/2014)
04/07/2014	161	ORDER Denying 59 MOTION for Summary Judgment of Indefiniteness, filed by JPMorgan Chase & Co.. Signed by Judge Richard G. Andrews on 4/7/2014. (nms) (Entered: 04/07/2014)
04/08/2014		Case Reassigned to Judge Sue L. Robinson. Please include the initials of the Judge (SLR) after the case number on all documents filed. (rjb) (Entered: 04/08/2014)
04/08/2014		Set/Reset Hearings: The Markman and Dispositive Motions Hearing will be held as scheduled on 4/15/2014 at 09:00 AM in Courtroom 4B before Judge Sue L. Robinson. (nmfn) (Entered: 04/08/2014)
04/15/2014		Minute Entry for proceedings held before Judge Sue L. Robinson - Oral Argument held on 4/15/2014. (Court Reporter V. Gunning.) (nmfn) (Entered: 04/15/2014)
04/17/2014	162	SCHEDULING ORDER: A Final Pretrial Conference is set for 5/21/2014 at 03:30 PM in Courtroom 4B before Judge Sue L. Robinson. A Jury Trial is set for 6/2/2014 at 09:00 AM in Courtroom 4B before Judge Sue L. Robinson. Signed by Judge Sue L. Robinson on 4/17/2014. (nmfn) (Entered: 04/17/2014)
05/14/2014	163	MEMORANDUM OPINION. Signed by Judge Sue L. Robinson on 5/14/2014. (fms) (Entered: 05/14/2014)
05/14/2014	164	ORDER - IT IS ORDERED that the disputed claim language of U.S. Patent Nos. 8,108,492 (the "'492 patent"), 5,987,500 (the "'500 patent"), and 8,037,158 (the "'158 patent") shall be construed consistent with the memorandum opinion issued this same date. Signed by Judge Sue L. Robinson on 5/14/2014. (fms) (Entered: 05/14/2014)
05/14/2014	165	MEMORANDUM OPINION. Signed by Judge Sue L. Robinson on 5/14/2014. (fms) (Entered: 05/14/2014)
05/14/2014	166	ORDER denying as moot 109 Motion in Limine; denying as moot 111 Motion for Partial Summary Judgment; granting 113 Motion for Summary Judgment ; denying 115 Motion in Limine; denying as moot 117 Motion in Limine; denying as moot 119 Motion in Limine; granting 121 Motion for Summary Judgment ; denying as moot 132 Motion to Strike. Signed by Judge Sue L. Robinson on 5/14/2014. (fms) (Entered: 05/14/2014)
05/19/2014	167	JUDGMENT in favor of JPMorgan Chase & Co. against Pi-Net International Inc. (CASE CLOSED). Signed by Judge Sue L. Robinson on 5/19/2014. (nmfn) (Entered: 05/19/2014)
05/19/2014	168	Report to the Commissioner of Patents and Trademarks for Patent/Trademark Number(s) 5,987,500; 8,037,158 B2; 8,108,492 B2. (nmfn) (Entered: 05/19/2014)
05/21/2014	169	APPENDIX <i>Lodging of copy of the presentation which was handed to the Court and used during the Markman and Dispositive Motions hearing held on April 15, 2014</i> by Pi-Net International Inc.. (Pazuniak, George) (Entered: 05/21/2014)

05/21/2014	170	NOTICE OF APPEAL to the Federal Circuit of 166 Order on Motion in Limine, Order on Motion for Partial Summary Judgment, Order on Motion for Summary Judgment,,,,, Order on Motion to Strike,,,,,, 167 Judgment, 163 Memorandum Opinion, 165 Memorandum Opinion, 164 Order, . Appeal filed by Pi-Net International Inc.. (Pazuniak, George) (Entered: 05/21/2014)
05/21/2014		APPEAL - Credit Card Payment of \$505.00 received re 170 Notice of Appeal (Federal Circuit), filed by Pi-Net International Inc.. (Filing fee \$505, receipt number 0311-1519438.) (Pazuniak, George) (Entered: 05/21/2014)
05/21/2014		Notice of Appeal and Docket Sheet to US Court of Appeals for the Federal Circuit re 170 Notice of Appeal (Federal Circuit),. (els) (Entered: 05/21/2014)
05/21/2014		Notification regarding 170 Notice of Appeal (Federal Circuit), sent to Reporter Dibbs (els) (Entered: 05/21/2014)
05/23/2014	171	NOTICE of Docketing Record on Appeal from USCA for the Federal Circuit re 170 Notice of Appeal (Federal Circuit), filed by Pi-Net International Inc.. USCA Case Number 14-1495. (fms) (Entered: 05/23/2014)
05/30/2014	172	MOTION to Amend/Correct <i>an Omission from the Record Pursuant to F.R.A.P. 10(e)</i> - filed by JPMorgan Chase & Co.. (Attachments: # 1 Text of Proposed Order, # 2 Exhibit A, # 3 Exhibit B)(Saunders, Robert) (Entered: 05/30/2014)
06/02/2014	173	MOTION for Attorney Fees <i>Pursuant to 35 U.S.C. Section 285 and Fed. R. Civ. P. 54(d)(2)</i> - filed by JPMorgan Chase & Co.. (Saunders, Robert) (Entered: 06/02/2014)
06/02/2014	174	[SEALED] OPENING BRIEF in Support re 173 MOTION for Attorney Fees <i>Pursuant to 35 U.S.C. Section 285 and Fed. R. Civ. P. 54(d)(2)</i> filed by JPMorgan Chase & Co.. Answering Brief/Response due date per Local Rules is 6/19/2014. (Attachments: # 1 Certificate of Service)(Saunders, Robert) (Entered: 06/02/2014)
06/02/2014	175	DECLARATION re 174 Opening Brief in Support, 173 MOTION for Attorney Fees <i>Pursuant to 35 U.S.C. Section 285 and Fed. R. Civ. P. 54(d)(2)</i> by JPMorgan Chase & Co.. (Attachments: # 1 Exhibit EA, # 2 Exhibit EB)(Saunders, Robert) (Entered: 06/02/2014)
06/02/2014	176	[SEALED] EXHIBIT re 175 Declaration, <i>Exhibits EC-EI to Transmittal Declaration of Robert S. Saunders in Support of Defendant's Motion for Attorney Fees Pursuant to 35 U.S.C. Section 285 and Fed. R. Civ. P. 54(d)(2)</i> by JPMorgan Chase & Co.. (Attachments: # 1 Certificate of Service)(Saunders, Robert) (Entered: 06/02/2014)
06/03/2014	177	NOTICE of Defendant's Lodging of Presentations by JPMorgan Chase & Co. (Attachments: # 1 Defendant's Presentation from the November 25, 2013 Hearing on Defendant's Motion for Summary Judgment of Indefiniteness, # 2 Defendant's Presentation from the April 15, 2014 Markman and Dispositive Motions Hearing) (Saunders, Robert) (Entered: 06/03/2014)
06/11/2014	178	REDACTED VERSION of 174 Opening Brief in Support, <i>of MOTION for Attorney Fees Pursuant to 35 U.S.C. Section 285 and Fed. R. Civ. P. 54(d)(2)</i> by JPMorgan Chase & Co.. (Saunders, Robert) (Entered: 06/11/2014)
06/11/2014	179	REDACTED VERSION of 176 Exhibit to a Document, <i>Exhibits EC-EI to Transmittal Declaration of Robert S. Saunders</i> by JPMorgan Chase & Co.. (Saunders, Robert) (Entered: 06/11/2014)

06/19/2014	180	ANSWERING BRIEF in Opposition re 173 MOTION for Attorney Fees <i>Pursuant to 35 U.S.C. Section 285 and Fed. R. Civ. P. 54(d)(2)</i> filed by Pi-Net International Inc..Reply Brief due date per Local Rules is 6/30/2014. (Pazuniak, George) (Entered: 06/19/2014)
06/30/2014	181	[SEALED] REPLY BRIEF re 173 MOTION for Attorney Fees <i>Pursuant to 35 U.S.C. Section 285 and Fed. R. Civ. P. 54(d)(2)</i> filed by JPMorgan Chase & Co.. (Attachments: # 1 Certificate of Service)(Saunders, Robert) (Entered: 06/30/2014)
06/30/2014	182	DECLARATION of Robert S. Saunders by JPMorgan Chase & Co.. (Attachments: # 1 Exhibit FA, # 2 Exhibit FB part 1 of 3, # 3 Exhibit FB part 2 of 3, # 4 Exhibit FB part 3 of 3, # 5 Exhibit FC, # 6 Exhibit FD, # 7 Exhibit FE, # 8 Exhibit FF, # 9 Exhibit FH, # 10 Exhibit FI part 1 of 2, # 11 Exhibit FI part 2 of 2, # 12 Exhibit FJ part 1 of 3, # 13 Exhibit FJ part 2 of 3, # 14 Exhibit FJ part 3 of 3)(Saunders, Robert) (Entered: 06/30/2014)
06/30/2014	183	[SEALED] EXHIBIT re 182 Declaration, <i>Exhibit FG to Declaration of Robert S. Saunders</i> by JPMorgan Chase & Co.. (Attachments: # 1 Certificate of Service) (Saunders, Robert) (Entered: 06/30/2014)
07/08/2014	184	REDACTED VERSION of 181 Reply Brief re <i>MOTION for Attorney Fees Pursuant to 35 U.S.C. Section 285 and Fed. R. Civ. P. 54(d)(2)</i> by JPMorgan Chase & Co.. (Saunders, Robert) (Entered: 07/08/2014)
07/08/2014	185	REDACTED VERSION of 183 Exhibit to a Document - <i>Exhibit FG to Declaration of Robert S. Saunders</i> by JPMorgan Chase & Co.. (Saunders, Robert) (Entered: 07/08/2014)
07/09/2014	186	Consent MOTION for Leave to File a <i>Sur-Reply Brief on Defendant's Motion for Attorney Fees</i> - filed by Pi-Net International Inc.. (Attachments: # 1 Appendix Proposed Sur-Reply Brief, # 2 Affidavit Proposed Declaration of George Pazuniak, # 3 Exhibit Proposed Exh A, # 4 Exhibit Proposed Exh B)(Pazuniak, George) (Entered: 07/09/2014)
07/11/2014		SO ORDERED, re 186 Consent MOTION for Leave to File a <i>Sur-Reply Brief on Defendant's Motion for Attorney Fees</i> filed by Pi-Net International Inc. Signed by Judge Sue L. Robinson on 7/11/2014. (fms) (Entered: 07/11/2014)
07/11/2014	187	SUR-REPLY BRIEF re 173 MOTION for Attorney Fees <i>Pursuant to 35 U.S.C. Section 285 and Fed. R. Civ. P. 54(d)(2)</i> filed by Pi-Net International Inc. (fms) (Entered: 07/11/2014)
07/11/2014	188	DECLARATION re 187 Sur-Reply Brief by Pi-Net International Inc. (Attachments: # 1 Exhibit A, # 2 Exhibit B)(fms) (Entered: 07/11/2014)
08/12/2014	189	NOTICE of SUPPLEMENTAL AUTHORITY by Pi-Net International Inc. re 173 MOTION for Attorney Fees <i>Pursuant to 35 U.S.C. Section 285 and Fed. R. Civ. P. 54(d)(2)</i> (Pazuniak, George) (Entered: 08/12/2014)
08/28/2014	190	Letter to George Pazuniak, Esquire from Deputy Clerk enclosing document sent to the clerk's office from client. (nmfn) (Entered: 08/28/2014)
09/03/2014	191	MOTION to Vacate 167 Judgment for Fraud on the Court Pursuant to FRCP 60(b) and Memorandum of Points and Authorities and Declaration of Dr. Lakshmi Arunachalam - filed by Lakshmi Arunachalam. (rwc) Modified on 9/3/2014 (rwc). (Entered: 09/03/2014)

		09/03/2014)
09/03/2014	192	[SEALED] - NOTICE of of Assignment Agreement - filed by Lakshmi Arunachalam (rwc) (Entered: 09/03/2014)

PACER Service Center			
Transaction Receipt			
09/03/2014			
PACER Login:		Client Code:	
Description:	Docket Report	Search Criteria:	1:12-cv-00282-SLR Start date: 1/1/1970 End date: 9/3/2014
Billable Pages:	18	Cost:	1.80