

**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.,

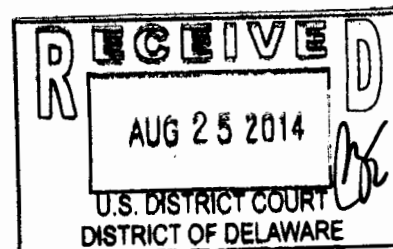
Plaintiff,

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.**

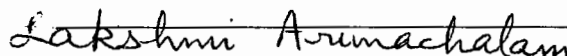
40. **REQUESTS FOR RELIEF:** Pi-Net respectfully requests this court's help for protection from Counsel's ongoing blackmail threats and from Counsel continuing to inflict harm upon Pi-Net and its CEO, defamatory to Pi-Net's CEO. Pi-Net respectfully requests Sanctions against Counsel for his misconduct 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> , 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>FASMX</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"

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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. Nemeč, Principal Litigation Counsel: douglas.nemec@skadden.com,
dmlmcwas@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