Exhibit A

William J. O'Brien (Bar No. 99526)
wobrien@onellp.com
ONE LLP
9301 Wilshire Boulevard
Beverly Hills, California 90401
Telephone: (310) 866-5158
Facsimile: (310) 943- 2085

Joseph K. Liu (Bar No. 216227)
<jliu@onellp.com>
ONE LLP
4000 MacArthur Boulevard
East Tower, Suite 500
Newport Beach, California 92660
Telephone: (949) 502-2870
Facsimile: (949) 258-5081

Attorneys for Plaintiff,
Secured Mail Solutions, LLC

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

SECURED MAIL SOLUTIONS, LLC,	Case No.
Plaintiff,	**COMPLAINT FOR PATENT INFRINGEMENT, INJUNCTION, AND DAMAGES**
v.	
UNIVERSAL WILDE, INC.,	**DEMAND FOR JURY TRIAL**
Defendant.	

Plaintiff, Secured Mail Solutions, LLC ("SMS"), alleges:

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction of this case under 28 U.S.C. §§ 1338(a), because this case arises under the patent laws of the United States, 35 U.S.C. §§ 1 *et seq*. Venue is proper in this district under 28 U.S.C. §§ 1391(b)-(c) and 1400(b) in that a substantial part of the events giving rise to the claims occurred in this district.

SMS is informed and believes, and on that basis alleges, that Defendant, Universal Wilde, Inc. ("UW"), has a regular and established practice of business in this district and has committed acts of infringement in this district.

THE PARTIES

2.   SMS is a limited liability company duly organized under the laws of the state of Nevada. SMS also does business in this judicial district.

3.   SMS was founded by Todd Fitzsimmons to pursue the using and licensing of his inventions in the field of mail and mail information services and technology. Mr. Fitzsimmons's inventions resulted in each of the seven United States patents that are asserted in this case.

3.   SMS is informed and believes, and on that basis alleges, that Defendant UW is a corporation duly organized and existing under the laws of the state of Massachusetts, with its principal place of business at 26 Dartmouth Street, Westwood, MA 02090.

4.   UW describes its business as "provid[ing] technology-enabled, data-driven marketing communication solutions from thought to distribution." UW says on its website that its "full-service capabilities include offset and digital print – variable print and print-on-demand; direct mail services; automated fulfillment and distribution programs; and agency services." UW further says that it "service[s] a wide range of industries including Financial Services, Healthcare, Pharmaceutical, Insurance, Education, Large Commercial and Retail."

5.   SMS alleges below that Defendant UW infringes numerous claims of SMS's seven patents in suit.

SMS'S PATENTS AND UW'S INFRINGEMENT

Overview

6.   Todd Fitzsimmons is an electrical engineer and a patent attorney who previously worked in the shipping and courier industry. After the September 11 terrorist attacks, and the anthrax attacks via U.S. mail thereafter, Mr. Fitzsimmons

began developing new technologies to identify, track, and provide information on mail objects, such as letters and packages.

7. On October 16, 2001, Mr. Fitzsimmons filed a provisional patent application, followed by a non-provisional patent application on October 15, 2002, and an ongoing series of continuation applications thereafter. After years of examination by the United States Patent and Trademark Office, Mr. Fitzsimmons has received the following seven patents, all of which he has assigned to SMS:

Patent Number	Title	Issued	Copy Attached to Complaint as
7,814,032	SYSTEM AND METHOD FOR MAIL VERIFICATION	Oct. 12, 2010	Exhibit A
7,818,268	SYSTEM AND METHOD FOR MAIL VERIFICATION	Oct. 19, 2010	Exhibit B
8,073,787	SYSTEM AND METHOD FOR MAIL VERIFICATION	Dec. 6, 2011	Exhibit C
8,260,629	SYSTEM AND METHOD FOR PROVIDING AN ADVERTISEMENT TO A RECIPIENT OF A PHYSICAL MAIL OBJECT	Sept. 4, 2012	Exhibit D
8,429,093	SYSTEM AND METHOD FOR PROVIDING INFORMATION TO A RECIPIENT OF A PHYSICAL MAIL OBJECT	Apr. 23, 2013	Exhibit E
8,910,860	SYSTEMS AND METHOD FOR PROVIDING INFORMATION TO A RECIPIENT OF A PHYSICAL MAIL OBJECT	Dec. 16, 2014	Exhibit F
9,105,002	SYSTEM AND METHOD FOR PROVIDING INFORMATION TO A RECIPIENT OF A PHYSICAL MAIL OBJECT	Aug. 11, 2015	Exhibit G

8.   These seven patents in suit disclose and claim various systems and methods for processing, verifying, or authenticating mail data. In some embodiments of the claimed inventions, mail data is affixed to a mail object and includes (or is linked to) information related to the mail object (for example, information on the sender of the mail object or the contents of the mail object). This information can then be used by various individuals or entities (for example, a mailing service, a mail carrier, or a recipient) to ensure that the mail object is secure and can safely be processed, routed and opened. In fact, the Patent Office granted special examination status to the application for U.S. Patent No. 7,818,268, because it related to "counter terrorism" technology that "reduces the risk of [a] terrorist attack." In addition to ensuring safety and security of mail, mail data claimed in the patents in suit can be used by mailing services to more effectively process and route mail objects and can also be used by recipients to obtain additional information related to mail objects.

Intelligent Mail Barcodes

9.   SMS's patents in suit contain claims that cover technology used by UW in connection with what the United States Postal Service calls "Intelligent Mail Barcodes" (IMb's). The Postal Service adopted IMb's in 2009, long after Mr. Fitzsimmons invented the subject matters of the patents in suit and long after he filed his initial patent application in 2001. SMS's patents containing claims related to IMb technology include U.S. Patents Nos. 7,814,032, 7,818,268, and 8,073,787 (collectively, the "IMb-Related Patents").

10.   One example of the IMb-Related Patents' claims, and UW's infringement of those patents, is provided by Claim 1 of U.S. Patent No. 7,818,268. That claim reads as follows (with bracketed letters added for reference):

1.   A method of verifying mail identification data, comprising:

[a]   affixing mail identification data to at least one mail object, said mail identification data comprising a single set of encoded data that includes at least a unique identifier, sender data, recipient data and shipping method data, wherein

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