

IN THE COURT OF THE CITY CIVIL JUDGE AT
BANGALORE (CCH-10)
O. S. No. 0004961 / 2018

BETWEEN

Srinivas Devathi

...Plaintiff

AND:

Janssen Pharmaceuticals Inc.,

and others

...Defendants

AFFIDAVIT

I, Srinivas Devathi, aged about 42 years, S/o. Late D. Satyanarayana, residing at No. 63, 11th B Cross, 3rd Main, Prashanthnagar, Bengaluru – 560079, state that I am the Plaintiff in this case, and I represent myself in front of the Hon'ble Court / Judge and do not have any lawyers / advocates representing me.

Pertaining to this case matter, I am submitting the following documents to the Hon'ble court and Defendants:

- 1) Current status of all patent applications and defendant's liability as of today (30/7/2019); as Document O (3 Pages).
- 2) Objections to IA filed by D1; as Document P (7 Pages).
- 3) Objections to IA filed by D3; as Document Q (7 Pages).
- 4) Response to Written Statement filed by D3; as Document R (20 Pages).
- 5) Related e-mail communications with IP lawyers; as Document S (8 Pages).
- 6) Fraud of defendants shown as one-page view; in Document T (1 Page).

Identified by me,

DEPONENT

Advocate

Place: Bangalore

Date:

IN THE COURT OF THE CITY CIVIL JUDGE AT

BANGALORE (CCH-10)

O. S. No. 0004961 / 2018

BETWEEN

Srinivas Devathi

...Plaintiff

AND:

Janssen Pharmaceuticals Inc.,

and others

...Defendants

ALL PATENT APPLICATIONS CURRENT STATUS AND DEFENDANTS LIABILITY

I, Srinivas Devathi, Plaintiff in this case, provide the current status of all my national patent applications and the defendant's liability to me as of this date.

COUNTRY	Application Status	Valuation (sale price)
USA – Priority / Original app	Vehicle sector Grant	11.5 T
USA – Continuation app	Non-Vehicle sectors; linked to D1-D4 and USPTO fraud *	3.5 T
New Zealand	Lost	0.3 T
Eurasia (8 countries)	Lost	0.3 T
Korea	Lost	5 T
Japan	Lost ^	8 T
Australia	Lost	2.7 T
Brazil	Lost	1 T
Canada	Lost	3 T
China	Lost *	3 T
Europe (38 Countries)	Lost *	18 T
Defendants liability as of 30/07/2019		56.3 T
India	Active	1 T
Mexico	Active *	1 T
Thailand	Active ^	0.2 T
Philippines	Active ^	0.2 T
Malaysia	Active ^	0.2 T
Indonesia	Active ^	0.2 T
Nigeria	Grant ^	0.1 T
South Africa	Grant *	0.3 T
Total value of invention (as sale price) - *^ Due to partial territories left, their value diminished, and it is full liability to defendants now		59.5 Trillion \$

Comments / Observations pertaining in loss of applications

- 1) China is one of the largest markets in the World, manufacturing one out of every four cars (automobiles) manufactured in the World. That application (valued at 3 Trillion \$) has lapsed on July 28, 2019, as plaintiff is unable to sustain (or pay for) the repeat office actions. The defendants are liable for this territory now. The European patent application (covering 38 countries) will lapse on July 31, 2019 for non-payment of annuity (to keep the application active). Again, Plaintiff is unable to sustain the repeat office actions and keep these applications alive and active. The defendants are liable for this PTO jurisdiction losses now (valued at 18 Trillion \$).
- 2) With China application lost, it becomes 'IP safe haven' for OEM's who have manufacturing set-up and establishments in China. USA OEM's have manufacturing plants / set-up in China. Thus, diminishing the value of USA patent grant (and continuation application) valued at 15 Trillion \$; making defendants liable for (loss / diminished value) of USA patent and continuation application. Even European OEM's have manufacturing plants / set-up in China. This link is indicated by * in the table.
- 3) Further, due to the indirect relationship Mexico application (valued at 1 Trillion \$) and South Africa patent (grant valued at 0.3 Trillion \$) have with the Chinese application; as primarily USA and Europe OEM's operate in these territories, their value has also diminished. Making the defendants liable for the additional 1.3 Trillion \$. This link is indicated by * in the table.
- 4) Thailand, Philippines, Malaysia, Indonesia applications and Nigeria patent grant – These applications and patent are linked to Japanese OEM's. With the loss of Japan application, the defendants have already become liable for the value of all these territories put together, 0.9 Trillion \$. This link is indicated by ^ in the table.
- 5) The India patent application 'Office action response' is coming due on Sep 14, 2019. A payment of Rs. 40,000/- is to be made before then; otherwise the patent application will be lost. Further, this may continue in repeat office actions even if pursued, until the sabotaging ISR is not cleared. Given the loss of IP applications and diminished value of most global territories, Plaintiff will look to do the sale of India application to defendants at the additional value of 1 Trillion \$.
- 6) All the above points make USA defendants liable to the Plaintiff for the full value of 59.5 Trillion \$.

The related IP lawyer communications have been submitted to the Hon'ble court as Document S. This includes communications with Chadha & Chadha lawyers pertaining to China and Europe applications. Communication from LR Swami lawyers pertaining to India application.

Downstream businesses for 100-years:

Plaintiff would like to inform Hon'ble court that in the lost territories or PTO jurisdictions as listed above, he would be unable to establish and develop the 100-year worth downstream businesses for the entire eco-system required for the 'Color change technology'. Hence the full value (the buy-out or sale price listed in the table) becomes liability of the defendants.

Even when partial territories are retained, the 'IP safe havens' due to lost IP territories will compete (for not having to pay related royalties in IP tenure) and get a head start in the full eco-system of downstream businesses as compared to the retained territories. Because of this, Plaintiff states that Defendants are liable for full buy-out price by territories including the ones that have diminished in value as listed above; making their total liability as 59.5 Trillion \$.

Place: Bangalore

PLAINTIFF

Date:

IN THE COURT OF THE CITY CIVIL JUDGE AT
BANGALORE (CCH-10)
O. S. No. 0004961 / 2018

BETWEEN

Srinivas Devathi

...Plaintiff

AND:

Janssen Pharmaceuticals Inc.,

and others

...Defendants

OBJECTIONS TO ‘APPLICATION UNDER ORDER VII RULE 11 FILED BY
DEFENDANT NO. 1 DATED NOV 14, 2018’

I, Srinivas Devathi, Plaintiff in this case, provide my Objections to ‘Application under order VII Rule 11 read with sections 17 to 21 & 151 of the code of civil procedure, 1908’ filed by defendant no. 1; to the Hon’ble court, starting from page 2 of this document.

Place: Bangalore

PLAINTIFF

Date:

The plaintiff respectfully submits as follows:

For the reasons stated in this document, Plaintiff requests the Hon'ble court to dismiss the Interlocutory application filed by Defendant No. 1 (D1).

The plaintiff requests that all cited grounds (Order 1, Rule 3; Order 1, Rule 9; Order 2, Rule 2; Order 2, Rule 7; Order 6, Rule 2; Order 6, Rule 4; Order 7, Rule 1; Order 7, Rule 7; Order 7, Rule 11; to be read with Sections 17 to 21 & 151 of Code of Civil Procedure, 1908) must be rejected and dismissed, as there is complete clarity in involvement, role and participation of D1; in the collusion of all four defendants who together committed this global fraud, that has implications in 61 countries including India and outside of USA.

In the subsequent passages, Plaintiff indicates the relationship he had with D1, events that occurred while working at offices of D1, their involvement in the fraud, how they colluded and teamed up with other defendants to commit this global fraud; that has impacted 61 non-USA PCT contracting states (including India). The Plaintiff also indicates the exact role D1 played in the team of colluded defendants to commit the fraud.

1. **Plaintiff's relationship with D1** - Plaintiff was employed by D3, and D1 were his clients from Nov 2006 until Jan 2010. Plaintiff worked at their NJ, USA offices physically during this time. Plaintiff worked out of Ortho biotech office facility and mostly from Janssen Pharmaceuticals USA facility in Titusville, NJ, USA.
2. Plaintiff's work was primarily with Directors Michael Comprelli and Randy McDaniels; and their team members Kevin Shea and Scott Wearley. The executives this division reported to were Larry Jones and Arun Bhaskar-Baba; who plaintiff very rarely interacted with or met. His day to day work and transactions were with the first named four people.
3. In years of 2008 and 2009, Plaintiff was repeatedly threatened, harassed, racially discriminated, verbally abused and professionally attacked despite the Plaintiff's professional work being of impeccable record; by deliberately fabricating situations to attack in a planned way. Plaintiff had enough of their planned attacks and targeting; and finally decided to quit his employment with D3, thus ending going to work for D1 or their offices in

NJ, USA. All of these threats, harassment, racial discrimination, verbal abuse and planned attacks on professional work began after Plaintiff invented 'Vehicle color change technology' upon the purchase of his third used silver car (as he could not find the car in the choice of his color within his budget) in Jan-Feb of 2007. He made a note of this invention in the laptop (issued by D3) in an excel sheet and did not realize that they were routinely scanned and subjected to automatic back-ups into D3 servers.

4. Outside of making a log in the laptop, he had conversations about the invention in Q1 2007 with a few of his then friends and his then wife, who has now been divorced (divorce concluded in July 2012).
5. Due to the unbearable attacks in USA, Plaintiff left the country and came back to India in 2010. Upon a surprising issue of his 'Green card' in 2013, he decided to go to USA and then filed for the 'Vehicle color change technology' invention patent application in March 2014 that was issued as grant by USPTO; and the same USPTO destroys Plaintiff's prospects by fabricating prior art and issuing a sabotaging ISR on an exact replica PCT application; which is the subject matter of this court case.
6. **D1's relationship with USPTO** - Janssen pharmaceutical USA company (with a research division) is patent (IP) based business. It was founded in Belgium in 1953; bought by Johnson & Johnson USA (now the parent company) in year 1961. Patenting of new drugs ensures royalty and keeps competitors away from replicating the drug for 20 years. Hence, D1 and their parent company file patent applications for new drugs on a regular basis. Hence D1 and its parent company have relationship with USPTO since 1886, the year J&J USA was founded. They have regular day to day discussions, ongoing conversations with USPTO director (Head of USPTO); and hence their critical (important) role in this collusion of defendants. D2 and D3, do not have regular daily business or interactions with USPTO. D2 and D3 do not file for patent applications. While D3 was plaintiff's employer during the stay in USA, D2 was the financial muscle to fund this collusion and their activities in the fraud. D1 came in because of their interactions and strong relationship with USPTO. So, the primary role of D1, was to handle all USPTO communications pertaining to this invention, fabricating the prior art and to have them issue the sabotaging ISR. Additionally, D1 has complete network of Doctors, KOLs (Key opinion leaders who give expert opinion in courts), drug research labs and

production facilities. Being one of the older pharmaceutical companies in USA, they have multiple offices in NJ; and they joke about how they run the state of NJ.

7. D1 alone has the relationship with USPTO, to make something like this happen by very close communications, instructions to fabricate, insert data / records (of fabricated prior art Cobb and Price); with past dates into the system and issue a fabricated sabotaging ISR. Plaintiff has worked in 'Business Intelligence and Data Warehousing' field himself and knows very well about 'Hot penning' technology to insert data / records into 'Production database' with past (historic dates). Technically it is very much possible and any technology company / technical expert in the field of Business Intelligence / Data Warehousing can come in and vouch for this.
8. Plaintiff adds that he never interacted with USPTO directly, at least until EOY 2015; before when the fabricated / sabotaging ISR was received by plaintiff. Plaintiff's hired lawyer for this subject D4, delivered the fabricated ISR 9 months later (from the fabricated issue date) upon repeated questioning and asking. You only interact with USPTO through your lawyer, in this case D4 - Who has committed fraud by breaking law and not delivering a communication on time; as they are held accountable to the issue date on the report (fabricated in this case). The fact that the ISR is dated before the USA grant and yet D4 delivers it to the Plaintiff after repeated requests and questioning; 9 months later from the report issue date; is glaringly visible to the entire World and all 61 Non-USA PCT contracting states. Additionally, Plaintiff cannot make USPTO a party in such a lawsuit; as it is a government body. Further, if USPTO were to be brought in, it could become a Govt VS Govt matter or inventor (Indian citizen) VS USA Govt (USPTO) matter, when Plaintiff himself had no interactions directly with USPTO. D4 was responsible for all interactions with USPTO and has been caught red-handed by breaking the law and D4 must explain USPTO's actions and their (D4's) actions in relation with USPTO's actions in this lawsuit that effects the entire world (starting with 61 non-USA PCT contracting states).
9. The write up of Mr. Eric Jung is nothing but rhetorical, nice statements about D1 only to file an IA; fully detached from the fact set plaintiff has provided in the plaint, the documents submitted; when in reality the IA application itself is irrelevant to this case; and must be dismissed.

10. **Global impact of this lawsuit - 61 Non-USA PCT contracting states, including India have been impacted. Their economies and businesses have been impacted. Use of 'Vehicle color change technology' to develop their economies has been blocked** - Plaintiff would like to state that if defendants D1 to D4 had responded and acted on time, when the case was filed on July 10, 2018 and summons served by Aug 15, 2018; and met the Plaintiff's prayer demands, the Plaintiff would have had patent grants in most jurisdictions (16 apps / 60 non-USA PCT contracting states, as he had lost only New Zealand territory for lack of being able to pay the OA response filing fees and lawyer fees). As the Defendants have delayed their arrival to court (especially D2 and D4); Plaintiff has lost more applications due to the fraudulent prior art and ISR causing repetitive OA's; thus, causing liability to all defendants. D1 is instructed to look at all the past documents submitted to Court and Document O, to know their combined current liability in numbers. They have all the data (numbers) they need now.
11. The fraud committed impacts 61 Non-USA country IP rights (due to the fabricated prior art and fabricated sabotaging ISR); including India.
12. India's economy and a total of 61 other (Non-USA) country economies are linked to this fabulous invention of the Plaintiff. The Defendants have blocked all 61 countries from progressing, developing, energizing their economies, businesses and corporate worlds. This matter has global implications and D1 must consider meeting Plaintiff's prayer demands immediately, so that they do not block the World from developing and moving forward.
13. **USA and defendant's hatred towards India and Indian citizens** - The motive of these four USA defendants is to block India's progress and development. It is to block the royalty and downstream business income from 61 non-USA PCT contracting states to come into India through plaintiff.
14. Out of jealousy, USA corporations do not want India to progress and become the largest economy in the World in years to come. On the same lines, USA's richest people (Mr. Jeff Bezos, Mr. Bill Gates, Mr. Warren Buffett) do not want the plaintiff an Indian citizen to become the richest man in the World.
15. Due to this feeling of jealousy, hatred; the defendants came together, and in a completely planned way, fabricated the prior art cobb and price and issued

a sabotaging ISR to destroy India's future and wealth prospects from 61 other non-USA PCT contracting states. Further destroying the future of 1.32 Billion Indian citizens living in India.

16. **Jurisdiction for lawsuit is Bangalore, India** - Plaintiff states that he is an Indian citizen, born and raised in Bangalore, India; and his inventions / Intellectual Property as per 'Patent Cooperation Treaty' (signed by India) is very much enforceable in all PCT nations in the World. This fact by itself makes Bangalore, India the jurisdiction for this legal matter. Not to mention, the other PCT applications, pertaining to other sectors (non-vehicle) have been filed with Plaintiff's India residential address in Bangalore (the ISR's of which cite Plaintiff's USPTO Vehicle patent grant, further linking the defendants fraud to plaintiff's PCT applications for other sectors globally), which further confirms the jurisdiction of this lawsuit in Bangalore, India. Plaintiff would like to inform D1 that Bangalore, India is the jurisdiction for all sectors (Vehicle or other) color change technology; across the world (in all PCT nations) starting with the 61 non-USA PCT contracting states where applications have been filed via 17 non-USA national stage applications, that have been effected by this fraud.

17. **Capitalism and USA – Corporations give orders to White House (Federal government) and State governments** - In this passage Plaintiff would like to mention how USA has turned into a capitalism world historically. Maynard Keyes, introduced capitalism in USA and in 70-80's Raegan economics took capitalism to a whole another level in USA. Giving tax breaks to large corporations (with multi-Billion \$ income'; who pay Billions of \$ in taxes) to allow them to reach even higher levels; thus, making USA Central Government and State Governments fully under the command and control of USA corporations. Another factor to be considered here is USA Central Government elections (Presidential) happen once in 4 years; whereas the corporations are permanent and generating the kind of money they do and pay taxes. Capitalism and USA corporations have come to a point, where the Corporations decide who comes to power at center and states; and during the 4-year term of Government, they are under the order and command of the corporations that financed them. Janssen USA (J&J USA) have regular ongoing work with Govt bodies such as USPTO and fully finance the election process (fund both parties) to ensure they control, maneuver and get what they want from USPTO or other govt organizations

to generate more wealth. There are media reports wherein Janssen USA have said to put intense pressure on USPTO to issue a patent grant on drug molecules / medicine that have truly not passed all the (CT) Clinical Trials (all stages) and have partial efficacy and with many side effects; and forced a patent issue with partial CT data or worse fudged data (especially in international CT's). The reason is that they invest in over 1 Billion \$ to bring one new drug / molecule into the market (full cost of the pharma product life cycle in USA); and after bulk of the R&D expense and CT's; when CT's fail in last stages; the company comes under pressure whether or not to release the drug into market; finally comes into ethical questions which have been blurred for wealth, patent grant and issue. Janssen's many mental / brain drugs have come under intense criticism and in few cases the patients have committed suicide when the drug is supposed to have helped them. Many lawsuits have been filed against them as well.

WHEREFORE, the plaintiff requests the Hon'ble court to dismiss the "Application under order VII rule 11 read with sections 17 to 21 & 151 of the code of civil procedure, 1908" filed by D1; and further requests the Hon'ble court to indict D1 with the fraud and take this court proceeding forward.

Place: Bangalore

PLAINTIFF

Date:

IN THE COURT OF THE CITY CIVIL JUDGE AT

BANGALORE (CCH-10)

O. S. No. 0004961 / 2018

BETWEEN

Srinivas Devathi

...Plaintiff

AND:

Janssen Pharmaceuticals Inc.,

and others

...Defendants

OBJECTIONS TO 'INTERLOCUTORY APPLICATION UNDER ORDER 7 RULE 11

OF THE CODE OF CIVIL PROCEDURE, 1908' FILED BY DEFENDANT NO. 3

DATED NOV 16, 2018'

I, Srinivas Devathi, Plaintiff in this case, provide my Objections to 'Interlocutory Application under order 7 Rule 11 of the code of civil procedure, 1908' filed by defendant no. 3; to the Hon'ble court, starting from page 2 of this document.

Place: Bangalore

PLAINTIFF

Date:

The plaintiff respectfully submits as follows:

For the reasons stated in this document, Plaintiff requests the Hon'ble court to reject and dismiss the Interlocutory application under order 7 rule 11 of the code of civil procedure, 1908; filed by Defendant No. 3 (D3); as there is complete clarity in involvement, role and participation of D3; in the collusion of all four defendants who together committed this global fraud, that has implications in 61 countries including India and outside of USA.

In the subsequent passages, Plaintiff indicates the relationship he had with D3, events that occurred while being employed with D3, their involvement in the fraud, how they colluded and teamed up with other defendants to commit this global fraud; that has impacted 61 non-USA PCT contracting states (including India).

1. **Plaintiff's relationship with D3** - Plaintiff was employed by D3 from Oct 2000 until Jan 2010. While being employed by D3, Plaintiff consulted to their clients D1 and D2, and worked out of D1 and D2's offices based in NJ, USA. Plaintiff consulted for D2 by physically working at their office in NJ, USA from Oct 2000 to June 2006. Plaintiff consulted for D1 by physically working at their office in NJ, USA from Nov 2006 to Jan 2010. As an IT consulting firm, D3 goes out of their way to please their large account clients which generate millions in revenue every month. D1 and D2 were D3's large client accounts and for their client's relationship and projected revenue for subsequent quarters, D3 would do anything that is asked off them by D1 and/or D2; such as threatening, harassing, racially abusing, targeting professional work of plaintiff, their employee. Simply put, D3 is at the command and order of D1 and/or D2.
2. Plaintiff worked with many individuals employed by D3, however, the key people who he interacted and have relevance to this case are William (Bill) Schreiner, Joseph Moye, Roy Stansbury, Scott Sweet, Robert Haarsgaard, Jeffrey Deyerle, John Buly and Barry O'Brien. D3 ensured Plaintiff worked in USA by filing for his work visa and in year 2007, they filed and initiated the process and paperwork for 'Green Card' to Plaintiff and his then spouse.
3. In years of 2008 and 2009, Plaintiff was repeatedly threatened, harassed, racially discriminated, verbally abused and professionally attacked despite

the Plaintiff's professional work being of impeccable record; by deliberately fabricating situations to attack in a planned way. The Plaintiff was professionally attacked by a combined team effort of D3 and D1 (client at the time). D3 people listed above would deliberately ensure team members of Plaintiff would underperform, sabotage a project / task assigned to them; thus, deliberately inciting client D1's complaints to higher ups at D3. This combined, fully planned methodical attack on all projects executed by Plaintiff, went totally out of control and became unbearable. Plaintiff had enough of their planned / combined attacks and targeting; and finally decided to quit his employment with D3, thus ending going to work for D1 or their offices in NJ, USA. All of these threats, harassment, racial discrimination, verbal abuse and planned attacks on professional work began after Plaintiff invented 'Vehicle color change technology' upon the purchase of his third used silver car (as he could not find the car in the choice of his color within his budget) in Jan-Feb of 2007. He made a note of this invention in the laptop (issued by D3) in an excel sheet and did not realize that they were routinely scanned and subjected to automatic back-ups into D3 servers.

4. Outside of making a log in the laptop, he had conversations about the invention in Q1 2007 with a few of his then friends and his then wife, who has now been divorced (divorce concluded in July 2012).
5. In years 2008, 2009 and first half of 2010 (while searching for another job), when plaintiff had some conversations with contacts at earlier client D2, he was meted with similar kind of harassing, threatening, racially abusive and leave our country type of comments.
6. Due to the unbearable attacks in USA, Plaintiff left the country and came back to India in 2010. Upon a surprising issue of his 'Green card' in 2013, he decided to go to USA and then filed for the 'Vehicle color change technology' invention patent application in March 2014 that was issued as grant by USPTO; and the same USPTO destroys Plaintiff's prospects by fabricating prior art and issuing a sabotaging ISR on an exact replica PCT application; which is the subject matter of this court case.
7. **Jurisdiction for lawsuit is Bangalore, India** - Plaintiff states that he is an Indian citizen, born and raised in Bangalore, India; and his inventions / Intellectual Property as per 'Patent Cooperation Treaty' (signed by India) is very much enforceable in all PCT nations in the World. This fact by itself

makes Bangalore, India the jurisdiction for this legal matter. Not to mention, the other PCT applications, pertaining to other sectors (non-vehicle) have been filed with Plaintiff's India residential address in Bangalore (the ISR's of which cite Plaintiff's USPTO Vehicle patent grant, further linking the defendants fraud to plaintiff's PCT applications for other sectors globally), which further confirms the jurisdiction of this lawsuit in Bangalore, India. Plaintiff would like to inform D3 that Bangalore, India is the jurisdiction for all sectors (Vehicle or other) color change technology; across the world (in all PCT nations) starting with the 61 non-USA PCT contracting states where applications have been filed via 17 non-USA national stage applications, that have been effected by this fraud.

8. **The roles of D1, D2, D3 and D4 in this fraud** – D3 an IT consulting firm, is a relatively large corporation, however they do not have the necessary relationship with USPTO. They only have local political network and influence with Illinois state government (politicians in Chicago, IL) and later built network with Governments of NJ, NY. However, as plaintiff's employer they ensured they targeted, harassed, racially abused and professionally attacked him; as part of the colluded team effort. It must be noted that plaintiff's relationship with D1 and D2, is through the employment with D3; and hence D3 shall stay on this case matter, until the fraud has been accepted, resolved, plaintiff's prayer demands met, and liability paid out fully.
9. While D3 is an IT consulting firm at the order and command of D1 and D2; D1 - Janssen pharmaceutical USA company (with a research division) is patent (IP) based business. Patenting of new drugs ensures royalty and keeps competitors away from replicating the drug for 20 years. Hence, D1 and their parent company file patent applications for new drugs on a regular basis. They have regular day to day discussions, ongoing conversations with USPTO director (Head of USPTO); and hence their critical (important) role in this collusion of defendants. So, the primary role of D1, was to handle all USPTO communications pertaining to this invention, fabricating the prior art and to have them issue the sabotaging ISR. D2 – HSBC Bank USA does not have regular interactions with USPTO. However, D2 was the financial muscle to fund this collusion and their activities in the global fraud.
10. D1 alone has the relationship with USPTO, to make something like this happen by very close communications, instructions to fabricate, insert data /

records (of fabricated prior art Cobb and Price); with past dates into the system and issue a fabricated sabotaging ISR. Plaintiff has worked in 'Business Intelligence and Data Warehousing' field himself and knows very well about 'Hot penning' technology to insert data / records into 'Production database' with past (historic dates). Technically it is very much possible and any technology company / technical expert in the field of Business Intelligence / Data Warehousing can come in and vouch for this.

11. Role of D4 - Plaintiff never directly communicated with USPTO -

Plaintiff adds that he never interacted with USPTO directly, at least until EOY 2015; before when the fabricated / sabotaging ISR was received by plaintiff. Plaintiff's hired lawyer for this subject D4, delivered the fabricated ISR 9 months later (from the fabricated issue date) upon repeated questioning and asking. You only interact with USPTO through your lawyer, in this case D4 - Who has committed fraud by breaking law and not delivering a communication on time; as they are held accountable to the issue date on the report (fabricated in this case). The fact that the ISR is dated before the USA patent grant and yet D4 delivers it to the Plaintiff after repeated requests and questioning; 9 months later from the report issue date; is glaringly visible to the entire World and all 61 Non-USA PCT contracting states. Additionally, Plaintiff cannot make USPTO a party in such a lawsuit; as it is a government body. Further, if USPTO were to be brought in, it could become a Govt VS Govt matter or inventor (Indian citizen) VS USA Govt (USPTO) matter, when Plaintiff himself had no interactions directly with USPTO. D4 was responsible for all interactions with USPTO and has been caught red-handed by breaking the law and D4 must explain USPTO's actions and their (D4's) actions in relation with USPTO's actions in this lawsuit that effects the entire world (starting with 61 non-USA PCT contracting states).

12. Global impact of this lawsuit - 61 Non-USA PCT contracting states, including India have been impacted. Their economies and businesses have been impacted. Use of 'Vehicle color change technology' to develop their economies has been blocked - Plaintiff would like to state that if

defendants D1 to D4 had responded and acted on time, when the case was filed on July 10, 2018 and summons served by Aug 15, 2018; and met the Plaintiff's prayer demands, the Plaintiff would have had patent grants in most jurisdictions (16 apps / 60 non-USA PCT contracting states, as he had

lost only New Zealand territory for lack of being able to pay the OA response filing fees and lawyer fees). As the Defendants have delayed their arrival to court (especially D2 and D4); Plaintiff has lost more applications due to the fraudulent prior art and ISR causing repetitive OA's; thus, causing liability to all defendants. D3 is instructed to look at all the documents submitted to the court in the past court dates, to know their combined current liability in numbers. They have all the data (numbers) they need now.

13. The fraud committed impacts 61 Non-USA country IP rights (due to the fabricated prior art and fabricated sabotaging ISR); including India.

14. India's economy and a total of 61 other (Non-USA) country economies are linked to this fabulous invention of the Plaintiff. The Defendants have blocked all 61 countries from progressing, developing, energizing their economies, businesses and corporate worlds. This matter has global implications and D3 must consider meeting Plaintiff's prayer demands immediately, so that they do not block the World from developing and moving forward.

15. **USA and defendant's hatred towards India and Indian citizens** - The motive of these four USA defendants is to block India's progress and development. It is to block the royalty and downstream business income from 61 non-USA PCT contracting states to come into India through plaintiff.

16. Out of jealousy, USA corporations do not want India to progress and become the largest economy in the World in years to come. On the same lines, USA's richest people (Mr. Jeff Bezos, Mr. Bill Gates, Mr. Warren Buffett) do not want the plaintiff an Indian citizen to become the richest man in the World.

17. Due to this feeling of jealousy, hatred; the defendants came together, and in a completely planned way, fabricated the prior art cobb and price and issued a sabotaging ISR to destroy India's future and wealth prospects from 61 other non-USA PCT contracting states. Further destroying the future of 1.32 Billion Indian citizens living in India.

18. **Capitalism and USA – Corporations give orders to White House (Federal government) and State governments** - In this passage Plaintiff would like to mention how USA has turned into a capitalism world historically. Maynard Keynes introduced capitalism in USA and in 70-80's Raegan economics took capitalism to a whole another level in USA. Giving

tax breaks to large corporations (with multi-Billion \$ income'; who pay Billions of \$ in taxes) to allow them to reach even higher levels; thus, making USA Central Government and State Governments fully under the command and control of USA corporations. Another factor to be considered here is USA Central Government elections (Presidential) happen once in 4 years; whereas the corporations are permanent and generating the kind of money they do and pay taxes. Capitalism and USA corporations have come to a point, where the Corporations decide who comes to power at center and states; and during the 4-year term of Government, they are under the order and command of the corporations that financed them. In this context, D1 and D2 can command and order White House, state governments of NJ and NY. D3 can command and order Illinois state government and had network into White House through a recent President who entered White House from that state.

WHEREFORE, the plaintiff requests the Hon'ble court to dismiss the "Interlocutory Application under order 7 rule 11 of the code of civil procedure, 1908" filed by D3; and further requests the Hon'ble court to indict D3 with the fraud and take this court proceeding forward.

Place: Bangalore

PLAINTIFF

Date:

IN THE COURT OF THE CITY CIVIL JUDGE AT
BANGALORE (CCH-10)
O. S. No. 0004961 / 2018

BETWEEN

Srinivas Devathi

...Plaintiff

AND:

Janssen Pharmaceuticals Inc.,

and others

...Defendants

PLAINTIFF'S RESPONSE TO THE 'WRITTEN STATEMENT OF DEFENDANT NO. 3
DATED NOV 12, 2018'

I, Srinivas Devathi, Plaintiff in this case, provide my response to the 'Written statement' filed by defendant no. 3 dated November 12, 2018. My response submitted to the Hon'ble court starts from page 2 of this document.

Place: Bangalore

PLAINTIFF

Date:

RESPONSE TO THE 'WRITTEN STATEMENT OF DEFENDANT NO. 3

The plaintiff respectfully submits as follows:

Defendant No. 3 (D3) was plaintiff's employer from October 2000 to Jan 2010. The written statement of D3 between paragraphs 1 to 20, seem to ask for Cause of action against D3, they seem to need clarity on Jurisdiction of plaintiff being the Hon'ble Bangalore city civil court, and seem to advise the plaintiff on PCT application process. Plaintiff would like to address these topics with specifically marked sections alphabetically. These will address and answer the broad set of questions of D3. Plaintiff further advises D3 to hire lawyers who practice IP law and understand PCT the treaty and impact of ISR's in global PCT territory IP.

Section A - Cause of action against D3

1. Plaintiff was employed by D3 from Oct 2000 until Jan 2010. While being employed by D3, Plaintiff consulted to their clients D1 and D2, and worked out of D1 and D2's offices based in NJ, USA. Plaintiff consulted for D2 by physically working at their office in NJ, USA from Oct 2000 to June 2006. Plaintiff consulted for D1 by physically working at their office in NJ, USA from Nov 2006 to Jan 2010. As an IT consulting firm, D3 goes out of their way to please their large account clients which generate millions in revenue every month. D1 and D2 were D3's large client accounts and for their client's relationship and projected revenue for subsequent quarters, D3 would do anything that is asked off them by D1 and/or D2; such as threatening, harassing, racially abusing, targeting professional work of plaintiff, their employee. Simply put, D3 is at the command and order of D1 and/or D2.
2. Plaintiff worked with many individuals employed by D3, however, the key people who he interacted and have relevance to this case are William (Bill) Schreiner, Joseph Moye, Roy Stansbury, Scott Sweet, Robert Haarsgaard, Jeffrey Deyerle, John Buly and Barry O'Brien. D3 ensured Plaintiff worked in USA by filing for his work visa and in year 2007, they filed and initiated the process and paperwork for 'Green Card' to Plaintiff and his then spouse.

3. In years of 2008 and 2009, Plaintiff was repeatedly threatened, harassed, racially discriminated, verbally abused and professionally attacked despite the Plaintiff's professional work being of impeccable record; by deliberately fabricating situations to attack in a planned way. The Plaintiff was professionally attacked by a combined team effort of D3 and D1 (client at the time). D3 people listed above would deliberately ensure team members of Plaintiff would underperform, sabotage a project / task assigned to them; thus, deliberately inciting client D1's complaints to higher ups at D3. This combined, fully planned methodical attack on all projects executed by Plaintiff, went totally out of control and became unbearable. Plaintiff had enough of their planned / combined attacks and targeting; and finally decided to quit his employment with D3, thus ending going to work for D1 or their offices in NJ, USA. All of these threats, harassment, racial discrimination, verbal abuse and planned attacks on professional work began after Plaintiff invented 'Vehicle color change technology' upon the purchase of his third used silver car (as he could not find the car in the choice of his color within his budget) in Jan-Feb of 2007. He made a note of this invention in the laptop (issued by D3) in an excel sheet and did not realize that they were routinely scanned and subjected to automatic back-ups into D3 servers.
4. Outside of making a log in the laptop, he had conversations about the invention in Q1 2007 with a few of his then friends and his then wife, who has now been divorced (divorce concluded in July 2012).
5. In years 2008, 2009 and first half of 2010 (while searching for another job), when plaintiff had some conversations with contacts at earlier client D2, he was meted with similar kind of harassing, threatening, racially abusive and leave our country type of comments.
6. Due to the unbearable attacks in USA, Plaintiff left the country and came back to India in 2010. Upon a surprising issue of his 'Green card' in 2013, he decided to go to USA and then filed for the 'Vehicle color change technology' invention patent application in March 2014 that was issued as grant by USPTO; and the same USPTO destroys Plaintiff's prospects by fabricating prior art and issuing a sabotaging ISR on an exact replica PCT application; which is the subject matter of this court case.

Section B - Jurisdiction for lawsuit (for global color change technology for all sectors including Vehicles) is Bangalore, India

7. Plaintiff states that he is an Indian citizen, born and raised in Bangalore, India; and his inventions / Intellectual Property as per 'Patent Cooperation Treaty' (signed by India) is very much enforceable in all PCT nations in the World. This fact by itself makes Bangalore, India the jurisdiction for this legal matter. Not to mention, the other PCT applications, pertaining to other sectors (non-vehicle) have been filed with Plaintiff's India residential address in Bangalore (the ISR's of which cite Plaintiff's USPTO Vehicle patent grant, further linking the defendants fraud to plaintiff's PCT applications for other sectors globally), which further confirms the jurisdiction of this lawsuit in Bangalore, India. Plaintiff would like to inform D3 that Bangalore, India is the jurisdiction for all sectors (Vehicle or other) color change technology; across the world (in all PCT nations) starting with the 61 non-USA PCT contracting states where applications have been filed via 17 non-USA national stage applications, that have been effected by this fraud.
8. The summary on PCT application process – Plaintiff would like to mention that he has worked with half a dozen IP law firms and has filed multiple patent applications globally pertaining to his invention of 'Vehicle color change technology'. Plaintiff is well versed on the PCT application process, which is available on WIPO website for all people around the world. Plaintiff would like to add that outside of filing the priority patent application with USPTO (in March 2014) and a PCT application with USPTO (in the same year), he has entered 17 other PTO jurisdictions, covering 61 Non-USA PCT contracting states. After Plaintiff has entered so many jurisdictions in the world with a national stage application, it is shocking that D3 tries to advise PCT application process to Plaintiff; to cover up their fraud. Not to mention, there is an active continuation application with USPTO. Further, Plaintiff has filed PCT applications for non-vehicle sectors from his residential address in India, the ISR's of which refer to his Vehicle color change patent grant from USPTO. Thus, making Bangalore, India the jurisdiction for any matter related to 'Color change technology, globally'. Plaintiff takes the liberty of providing some guidance

to D3 on the 'Patent Co-operation Treaty' and its original intended purpose in the subsequent paragraph.

Section C - Patent Cooperation Treaty

9. As of the drafting date of this document, there are 152 PCT contracting states, as in countries that have signed the PCT treaty and became bound by the PCT. D3 must note that while USA was bound to PCT on Jan 24, 1978; India signed the treaty and became bound by PCT on Dec 7, 1998. Plaintiff would like to inform D3 that inventors use PCT system, to file one international patent application under PCT and simultaneously seek protection for their invention in a very large number of countries (which could potentially be all 152 PCT contracting states). Plaintiff however, based on his inventions applicability and revenue potential has sought protection for his invention in 61 Non-USA PCT contracting states by filing 17 national stage applications using his PCT application. Plaintiff would like to direct D3 to visit WIPO.org website and learn more about the Treaty and its purpose.
10. In the treaty, Plaintiff would like to point D3 to the purpose of the Treaty which is as follows. To encourage citizens from all over the World to contribute to the progress of science and technology, to provide legal protection to inventions, simplify global protection process, to foster and accelerate the economic development of developing countries and to provide ease of access to all technical information contained in documents describing new inventions to public. Cooperation among nations will facilitate achieving all the goals, and thus the PCT was drafted and rolled out.
11. D3 is further instructed to review Article 9 of PCT which states that any resident or national of a contracting state may file an international application. Further D3 is instructed to review Article 15 which defines International search and Article 16 which defines International Search Authority (ISA). D3 must note that USPTO is a designated ISA and must act as a responsible ISA, upholding the intent, objective, values of PCT, the treaty. USPTO failed to stand up to the objectives of PCT, due to jealousy and hatred towards an Indian citizen inventor. D3 is advised to review Article 21 which defines International publication. This international

publication has been done by WIPO pertaining to plaintiff's patent application related to 'Vehicle color change technology' with the publication ID 'WO2015147900', that could be searched on WIPO Patent scope database and all related documents could be read. This means the fraud of D3, other defendants and USPTO is now available to read by everyone globally. Many have read the documents as well. D3 must clearly understand that everything (all documents, including the sabotaging ISR) pertaining to plaintiff's PCT application are in public domain for all citizens to access globally. All national PTOs have also completed their respective PTO publications. D3 is advised to review PCT articles 29 and 30.

12. The true original intent of the PCT – Implied by the text, purpose and objective of PCT is to provide a global application platform / procedure for people from across the World; irrespective of race, religion, caste, ethnicity, nationality, skin color or economic status (of the inventor), to apply and seek protection to his/her inventions globally. USPTO and defendants D1 to D4 have failed to uphold the purpose, objective and intended value of PCT, the treaty despite signing the Treaty and becoming a contracting state; thus, violating the rules and guidelines established by PCT, the Treaty. Defendants D1 to D4 and USPTO are answerable on their fraud to all 152 PCT contracting states. Plaintiff advises D3 to immediately admit their fraud, and meet his prayer demands in plaint and resolve the matter in court at the earliest, before this goes into the eye of global media houses.

13. USPTO has contradicted themselves as search authority and International Search Authority (ISA), by issuing different reports/outcomes to national and PCT applications. Thus, committing fraud on a global scale, impacting the economics of 61 non-USA PCT contracting states; including that of India. USPTO issues a national grant patent # 8,910,998, issued on Dec 16, 2014; on Plaintiff's national stage application. If the citations list is closely observed in the pages 1 and 2 of patent grant document (attached as Document 1 in the plaint); there is no citation reference to Cobb, Price, Saenger or Hale. Nor do these citations / prior art (Cobb, Price, Saenger or Hale) show up in D4's paid services search results (attached as document 4 in the plaint). These documents factually prove that at least Cobb and Price were non existing at the time of USPTO patent grant dated Dec 16, 2014. Then, it is the same USPTO as PCT application ISA, issues a sabotaging ISR (International search report) after fabrication and inserting

records/documents into USPTO production database by ‘Hot penning’; on a replica application to the USA national patent application that was issued as a grant. It is crystal clear and proven beyond any reasonable doubt that USPTO has fabricated and inserted prior art Cobb and Price (at least) and issued the fabricated ISR on the PCT application.

14. Simply put, USPTO (the same office) has issued two outcomes / results on replica patent applications one a national application and other a PCT application. This is nothing but fraud, committed by USA corporations (D1, D2, D3 and D4) in collusion with USPTO. Further, D3 must note that the PCT application # PCT/US2014/046619, with WIPO Patent scope publication ID WO2015147900; has all documents pertaining to the PCT application published online; accessible to citizens all over the World and certainly the 61 non-USA PCT contracting states where Plaintiff has sought protection, including India. These paragraphs clearly highlight the fraud of defendants D1 to D4, who conspired with USPTO to deliberately sabotage the plaintiff’s income prospects from his invention from all non-USA countries; thus, destroying the future of India and its citizens. D3 must note that this fraud is now globally documented as published online documents and the fraud of D1 to D4 along with USPTO is globally visible and provable in all global jurisdictions. The Plaintiff wants to highlight to D3 and the Hon’ble court that the subsequent paragraphs provide the thinking / reasoning of USA, its citizens and in particular defendants D1 to D4, along with USPTO; as to why they committed the fraud:

Section D - USA and defendant’s hatred towards India and Indian citizens

15. The motive of these four USA defendants is to block India’s progress and development. It is to block the royalty and downstream business income from 61 non-USA PCT contracting states to come into India through plaintiff.

16. Out of jealousy, USA corporations do not want India to progress and become the largest economy in the World in years to come. On the same lines, USA’s richest people (Mr. Jeff Bezos, Mr. Bill Gates, Mr. Warren Buffett) do not want the plaintiff an Indian citizen to become the richest man in the World.

17. Due to this feeling of jealousy, hatred; the defendants came together, and in a completely planned way, fabricated the prior art cobb and price and issued a sabotaging ISR to destroy India's future and wealth prospects from 61 other non-USA PCT contracting states. Further destroying the future of 1.32 Billion Indian citizens living in India.

Section E - Cause of action to D4; Plaintiff never directly communicated with USPTO

18. Plaintiff adds that he never interacted with USPTO directly, at least until EOY 2015; before when the fabricated / sabotaging ISR was received by plaintiff. Plaintiff's hired lawyer for this subject D4, delivered the fabricated ISR 9 months later (from the fabricated issue date) upon repeated questioning and asking. You only interact with USPTO through your lawyer, in this case D4 - Who has committed fraud by breaking law and not delivering a communication on time; as they are held accountable to the issue date on the report (fabricated in this case). The fact that the ISR is dated before the USA patent grant and yet D4 delivers it to the Plaintiff after repeated requests and questioning; 9 months later from the report issue date; is glaringly visible to the entire World and all 61 Non-USA PCT contracting states. Additionally, Plaintiff cannot make USPTO a party in such a lawsuit; as it is a government body. Further, if USPTO were to be brought in, it could become a Govt VS Govt matter or inventor (Indian citizen) VS USA Govt (USPTO) matter, when Plaintiff himself had no interactions directly with USPTO. D4 was responsible for all interactions with USPTO and has been caught red-handed by breaking the law and D4 must explain USPTO's actions and their (D4's) actions in relation with USPTO's actions in this lawsuit that effects the entire world (starting with 61 non-USA PCT contracting states including India).

Section F - Global impact of this lawsuit: 61 Non-USA PCT contracting states, including India have been impacted. Their economies and businesses have been impacted. Use of 'Vehicle color change technology' to develop their economies has been blocked

19. Plaintiff would like to state that if defendants D1 to D4 had responded and acted on time, when the case was filed on July 10, 2018 and summons served by Aug 15, 2018; and met the Plaintiff's prayer demands, the

Plaintiff would have had patent grants in most jurisdictions (16 apps / 60 non-USA PCT contracting states, as he had lost only New Zealand territory for lack of being able to pay the OA response filing fees and lawyer fees). As the Defendants have delayed their arrival to court (especially D2 and D4); Plaintiff has lost more applications due to the fraudulent prior art and ISR causing repetitive OA's; thus, causing liability to all defendants. D3 is instructed to look at all the documents submitted to the court in the past court dates, to know their combined current liability in numbers. They have all the data (numbers) they need now.

20. The fraud committed impacts 61 Non-USA PCT contracting states IP rights (due to the fabricated prior art and fabricated sabotaging ISR); including India.

21. India's economy and a total of 61 other country (Non-USA PCT contracting states) economies are linked to this fabulous invention of the Plaintiff. The Defendants have blocked all 61 countries from progressing, developing, energizing their economies, businesses and corporate worlds. This matter has global implications and D3 must consider meeting Plaintiff's prayer demands immediately, so that they do not block the World from developing and moving forward.

Section G - The roles of D1, D2, D3 and D4 in this fraud

22. D3, an IT consulting firm, is a relatively large corporation, however they do not have the necessary relationship with USPTO. They only have local political network and influence with Illinois state government (politicians in Chicago, IL) and later built network with Governments of NJ, NY. However, as plaintiff's employer they ensured they targeted, harassed, racially abused and professionally attacked him; as part of the colluded team effort. It must be noted that plaintiff's relationship with D1 and D2, is through the employment with D3; and hence D3 shall stay on this case matter, until the fraud has been accepted, resolved, plaintiff's prayer demands met, and liability paid out fully.

23. While D3 is an IT consulting firm at the order and command of D1 and D2; D1 - Janssen pharmaceutical USA company (with a research division) is patent (IP) based business. Patenting of new drugs ensures royalty and keeps competitors away from replicating the drug for 20 years. Hence, D1 and their parent company file patent applications for new drugs on a regular

basis. They have regular day to day discussions, ongoing conversations with USPTO director (Head of USPTO); and hence their critical (important) role in this collusion of defendants. So, the primary role of D1, was to handle all USPTO communications pertaining to this invention, fabricating the prior art and to have them issue the sabotaging ISR. D2 – HSBC Bank USA does not have regular interactions with USPTO. However, D2 was the financial muscle to fund this collusion and their activities in the global fraud. The role of D4 has been covered in Section E above.

24.D1 alone has the relationship with USPTO, to make something like this happen by very close communications, instructions to fabricate, insert data / records (of fabricated prior art Cobb and Price); with past dates into the system and issue a fabricated sabotaging ISR. Plaintiff has worked in ‘Business Intelligence and Data Warehousing’ field himself and knows very well about ‘Hot penning’ technology to insert data / records into ‘Production database’ with past (historic dates). Technically it is very much possible and any technology company / technical expert in the field of Business Intelligence / Data Warehousing can come in and vouch for this.

Section H - Capitalism and USA: Corporations give orders to White House (Federal government) and all State governments, including USPTO

25.In this passage Plaintiff would like to mention how USA has turned into a capitalism world historically. Maynard Keyes introduced capitalism in USA and in 70-80’s Raegan economics took capitalism to a whole another level in USA. Giving tax breaks to large corporations (with multi-Billion \$ income’; who pay Billions of \$ in taxes) to allow them to reach even higher levels; thus, making USA Central Government and State Governments fully under the command and control of USA corporations. Another factor to be considered here is USA Central Government elections (Presidential) happen once in 4 years; whereas the corporations are permanent and generating the kind of money they do and pay taxes. Capitalism and USA corporations have come to a point, where the Corporations decide who comes to power at center and states; and during the 4-year term of Government, they are under the order and command of the corporations that financed them. In this context, D1 and D2 can command and order White House, state governments of NJ and NY. D3 can command and order Illinois state

government and had network into White House through a recent President who entered White House from that state.

Section I – Response to Written statement paragraph wise

26. The Plaintiff would like to provide response to ‘Written statement of D3’ paragraph wise and states as follows:

- a. Paragraph 1 of ‘Written statement of D3’ (WS); states a few facts about D3, however their actions and fraud pertaining to plaintiff’s ‘Vehicle color change technology’; clearly indicate D3’s hidden motives of sabotaging plaintiff’s invention in all Non-USA nations, destroy his wealth prospects globally and can very clearly be termed as anti-India economic activity or anti-India economic terrorism. Their hidden intent to retain USA’s GDP pole position and not allow the great nation of India to develop and progress is visible very clearly to the entire world.
- b. Paragraphs 2 to 11 of WS, have already been addressed in Plaintiff’s response in this document in Sections A to H above.
- c. Paragraph 12 and 13 of WS, have been clearly addressed by Plaintiff in Sections A, B, C and F above. D3 must clearly understand that their fraud has global impact and not only to plaintiff and India. Plaintiff adds that in several documents submitted to court on previous court dates and in Document O, he has listed all the non-USA applications, their current status / disposition and the defendant’s liability to Plaintiff in this global fraud. D3 must also note that, the combined defendant’s fraud has caused repeated office actions from most of the 17 PTO’s, the costs of filing responses to which were high and non-sustainable by the plaintiff / inventor. Due to the costs involved in keeping applications active by filing repeat office action responses, and plaintiff’s debt in the market, he started to lose applications causing liability to defendants due to the fraud committed. The current liability has been submitted to Hon’ble court as a separate document. If not for the defendants D1 to D4 combined fraud in collusion with USPTO, the ‘repeat office actions’ based on sabotaging ISR would have not been there in first place, and the patent applications in all 17 non-USA PTO jurisdictions would have come in as straight patent grants. This would have meant full development and progress of India

through the wealth attracted by Plaintiff by his invention patent grants from all over the world.

- d. In reference to paragraph 14 of WS, it is true that Plaintiff after entering national stage with 17 non-USA applications (covering 61 countries in the PCT contracting states); out of no other choice (because of the fraud committed by D3 and their allies) had to resort to ‘filing amendments to each national stage application’s PTO Pending/Rejected office actions’, which were citing the fabricated prior art (Cobb, Price and other) listed in the fabricated ISR (International Search report) which is used as reference by PTO’s; as he wanted to keep the applications alive and active until this lawsuit prayer demands are met by fraudulent defendants D1 to D4 along with USPTO. However, after investing most of his personal wealth, and further taking loans and favors from IP law firms, Plaintiff has a total current market debt of over an estimated 50 lakhs Indian Rupees. After this, Plaintiff was unable to raise any more debt given his fixed income, he started to lose applications causing liability to defendants D1 to D4. If D3 along with other defendants responded to served summons and acted immediately to meet prayer demands, plaintiff could have saved all his 17 non-USA applications and they would have been issued as grants. The delay of defendants showing up in the court and meeting prayer demands has caused loss of more applications in the last several months. Now, Plaintiff states that D3 (along with other defendants) must pay full liability to all the IP application losses of his and their current liability numbers have been provided in Document O submitted to Hon’ble court. Plaintiff made all efforts to keep applications in all non-USA jurisdictions active, and despite, defendants have caused application losses and thus they must pay for the liability.
- e. Additionally, in reference to paragraph 14 of WS, Plaintiff states that he mentioned ‘as it truly deserved’ in paragraph 14 of plaint in the first sentence. Plaintiff likes to provide additional clarity to D3 and Hon’ble court that USPTO followed the rules, law and protocol in rightfully issuing the USA national patent grant on the original priority application. Whether or not defendants 1, 2 and 3 instructed them is not relevant as the search results of USPTO until Dec 16,

2014 are consistent with the paid services - search results of D4, issued in Feb 2014. Facts are clear and for everyone in the World to see that search results and outcome are true, real and consistent until Dec 16, 2014. If not for thorough validated search results, confirmation and subsequent discussions with D4, Plaintiff would not have embarked on pursuing 'Global invention IP rights' to his invention in first place. The second part of USPTO's actions on the replica PCT application indicate global fraud that has been caught red-handed; and certainly, upon the instructions, complete co-ordination and teamwork of D1 to D4 alongside with USPTO. This is consistent with the threats, harassment, racial discrimination D1, D2 and D3 meted upon Plaintiff after the invention. They worked with USPTO and committed this fraud. This is to destroy the wealth from non-USA PCT countries from coming into India via the plaintiff. Nothing in Plaintiff's statement is false or concocted; as the fact set, the documents are available for the entire world to see. Why would D4 not deliver a report dated Nov 4, 2014 (with 2 months response filing deadline) to plaintiff if he had really received the report on that date? Secondly, why would USPTO give two outcomes on same replica applications, one outcome for national application and another outcome for PCT global application? The fact that D4 delivers the sabotaging ISR after repeated questioning / asking in Aug 2015 (with a past date of Nov 4, 2014 with 2 months deadline to file a response, which had long gone in the past); clearly states that the team of defendants and USPTO needed those months of January 2015 to July 2015 to draft, design, create fictitious non-existent prior art of Cobb and Price at least; care fully 'Hot pen' the data into USPTO production database with past / historic dates and then fabricate a sabotaging ISR, is glaringly visible to the entire world. D3 must note that their fraud and teamwork with other defendants is now exposed to entire world.

- f. Further, Plaintiff would like to direct D3 to documents submitted to Hon'ble court on dates 18/2/2019 and 28/3/2019 (copies given to D3), to see the valuation of all 18 applications (including USA) and the buy-out / sale price for each of these applications which includes IP royalties for the IP tenure and control rights/ownership of downstream

businesses for 100 years. Based on these numbers, the motive of defendants and USPTO in numbers is crystal clear. The Vehicle sector patent grant by USPTO is valued at 15 Trillion \$ and the rest of the World (coming under PCT application and effected by the fraud) is valued at 44.5 Trillion \$. It is more than clear that USA, USPTO and defendants D1 to D4, wanted to deny that kind of wealth (at least 44.5 Trillion \$) coming into India thru the inventor / Plaintiff. The motives are many for USA defendants; to stay the wealthiest country in the World, not allow India to get rich, not allow Plaintiff to become the richest man in the World going above America's richest, deny progress and development for 1.32 Billion Indian citizens. Controlling the World and retaining pole positions on economic indicators, treasury wealth and the dream of most USA citizens to be on richest people's list; all of which have been shattered by plaintiff and India. This fraud is an attempt to retain USA supremacy over India and the World. However, the defendants have been caught red-handed in the global fraud and that too in the World's eye / global eye as visible to all PCT nations via the WIPO publication of all documents.

- g. Paragraphs 15, 16 and 18 have been addressed in Sections A and B above.
- h. Paragraph 17 has been addressed by Plaintiff in Section E above.
- i. Paragraph 19 is factually incorrect statement. D3 states that 'Supreme court as well as various high courts have rejected...'. NO supreme court or High court 'have' rejected this plaint. To clarify, the complete 'Cause of action' and 'jurisdiction' matter that has been repeatedly brought up and written by D3 in the WS has already been addressed in above Sections A and B.
- j. Paragraph 20 of WS 'Jurisdiction' question has been addressed already in Section B. Further Plaintiff states that he has filed Objections to 'Interlocutory application under order 7 rule 11 of CPC' filed by D3, with all necessary details.
- k. In reference to Paragraph 22 of WS, plaintiff states that the plaint is global in nature, and based on documented facts, D3 (along with other defendants) is advised to meet the Plaintiff's prayer demands. Plaintiff adds that there was a 'Dispute resolution arbitration clause' in the employment agreement of the Plaintiff with D3; however, that is

limited to USA only related disputes and not global in nature. Plaintiff draws the attention of D3 to the fact that this plaint is a global matter linked to economics, future of 61 non-USA PCT contracting states and Inventors global IP rights. The employment agreement arbitration clause is of no value as it relates to this suit. Further, D3 is drawn to the attention of settling the lawsuit liability caused by defendants and to discuss the payment of liability in the Hon'ble court or in Bangalore Arbitration Center. The employment agreement arbitration clause is irrelevant to this global lawsuit; as employment agreement and its scope was USA, one country out of the 152 PCT contracting states. This distinction between USA and a global matter must be understood by D3. Plaintiff advises D3 to stop blocking the future prospect of 61 non-USA PCT contracting states and that of India, and meet the prayer demands and pay the liability through the Hon'ble court or via discussion in Bangalore Arbitration center, where the jurisdiction to this suit belongs.

1. In reference to Paragraph 23, 26 and 27 of WS, Plaintiff states that this suit cannot be dismissed / rejected as 62 countries IP rights are integrated in the lawsuit and D3 must immediately look to meet plaintiff's prayer demands and pay liability caused by D3 and their ally defendants. The matter of cause of action and jurisdiction that have been repeatedly brought up by D3 in the WS have been very clearly addressed in the sections A and B above.

m. Paragraphs 24 and 25 do not get any response.

27. Paragraph 21 of the WS has several sub-paragraphs and they have been addressed in this section:

- a. Paragraphs 21a and 21b get no response.
- b. In reference to paragraph 21c, Plaintiff advises the authorized representative of D3, Mr. Aliff Fazelbhoy to discuss and know the clients of his client. Paragraphs 3 and 4 in plaint speak about customers of D3 for whom Plaintiff consulted while in NJ, USA at their offices. D3 employees listed in paragraph 5 of the plaint know all facts mentioned in paragraphs 3 and 4 of plaint. Mr. Joe Moye, Mr. Bill Schreiner, Mr. Roy Stansbury can confirm the facts mentioned in paragraphs 3 and 4 of plaint.

- c. Paragraph 21d gets no response with advice to Mr. Aliff to discuss the details with D3 people listed in paragraph 5 of plaintiff.
- d. In reference to paragraph 21e, Plaintiff advises D3 to look at 'Cause of action' Section A above. For this multi-Trillion \$ fraud, the CEO's of D1, D2 and D3 were fully aware and involved.
- e. In reference to paragraph 21f, D3 is instructed to speak with people listed in paragraph 5 of the plaintiff and its CEO. Either they or their clients D1 and D2 know D4.
- f. For paragraph 21g, D3 is instructed to read patent grant attached as document 1 with plaintiff; and all WIPO publications listed in the plaintiff. Only then will D3 know the potential of the invention and how it is linked to future of India. Just writing a response without reading the attached documents and understanding the subject matter will only add more to D3 and the other defendant's liability.
- g. For paragraph 21h, Plaintiff states that D3 must note the conservative valuations provided by Plaintiff (global valuation of the invention across sectors at 59.5 Trillion \$), which is greater than USA GDP; and thus, has attracted the attention of richest men of USA and USA Presidents as well. While Plaintiff may not be able to produce conversation evidence for such fact; however, the circumstantial evidence is overwhelmingly pointing to overall USA motive. Plaintiff can refer to certain media reports about the richest men listed visiting India after his invention was outlined in Q1 of 2007. Further D3 is advised to refer Section D above.
- h. For paragraph 21i, Plaintiff wants to state that his invention of 'Hands Free Shopping' from year 2004 was in fact attacked and targeted by D2 and D3 at the time. There was a civil suit filed in Bangalore court, that went into arbitration in USA, as that patent application and 'service exclusive rights' were just within USA territory at the time. The Bangalore suit was moved to arbitration in USA and settled with a paltry settlement. Plaintiff could not attend arbitration himself as he could not be physically present in USA due to financial constraints at the time and took the settlement awarded. All case details and arbitration details are recorded in courts and with lawyers. Plaintiff considers that matter as closed. Plaintiff does not have 'Exclusive legal rights to that service offering' in USA anymore and just owns a

registered Trademark in USA for ‘Hands Free Shopping®’. If D3 wants to re-open that subject, the details of where ‘HFS Service is being offered in USA’, the income being generated from across USA out of the service and who has made the earnings from the services in last 10 years would be requested by any Indian court or Judge. Plaintiff advises D3 to concentrate on the global matter (and not the closed local USA subject of Hands Free Shopping service) of ‘Vehicle color change technology’ invention; the main subject matter of this plaint which impacts 61 non-USA PCT contracting states with Bangalore being the jurisdiction, and pay the liability.

- i. For paragraph 21j, Plaintiff advises D3 to look into Section A above.
- j. For paragraph 21k, Plaintiff advises D3 to look at Section A listed above, and other documents submitted in previous court dates that give the inventions royalty potential and how it is linked to making India a developed country.
- k. For paragraph 21l, Plaintiff advises D3 to refer to Sections E, G and H above. When D4, the lawyer who was the liaison between plaintiff and USPTO is marked as a defendant in the court matter and linked to the fraud, D4 has to explain USPTO’s actions and his (D4’s) actions in response or in relation to that of USPTO’s actions; as IP law firms are accountable and by law must deliver PTO communications to the inventor within one or two weeks, especially when the response filing date for the communication has a 2 months deadline.
- l. For paragraphs 21m, Plaintiff advises D3 to understand global IP law and PCT process. USPTO has issued two outcomes on the same replica applications one at national level and the other at global PCT level. Defendant D3 is involved in this as they along with D1 and D2 threatened Plaintiff repeatedly after the invention was done by Plaintiff in Q1-2007; and further they instructed USPTO to issue the sabotaging ISR to destroy India’s prospects. D3 needs to read up the Treaty – PCT and more information on global IP at WIPO.org before giving a single reply (a lie) to each paragraph ‘that they deny’.
- m. For paragraphs 21n, Plaintiff advises D3 to read the documents attached with the plaint, understand them and respond. It seems like D3 has not read the documents nor has understood them.

- n. For paragraph 21o, Plaintiff states that D3 and their clients D1, D2 have repeatedly threatened him after the invention. When the invention of Plaintiff is given two different outcomes by the same institution (USPTO) one at national level and one at global level (impacting 61 non-USA PCT contracting states where Plaintiff has sought IP rights protection), the motive must be questioned. In this case, it is nothing else but greed to block wealth from coming to Plaintiff and India. These fully correlate to the threats he received by D1, D2, D3 earlier. Further it is well known fact that in USA which is driven by Capitalism, Corporations command and order White House and government institutions as they fund political parties before elections against results and favors in their term. D1 and D2 (clients of D3) who also threatened Plaintiff on the matter, are long known to control, command and order White house, NJ state government and USPTO. Read the sections G and H related to 'Role of D1, D2, D3 and D4' and 'Capitalism section' above.
- o. In reference to paragraph 21p, Plaintiff again states that USPTO has given two different outcomes, one on national application and one on global PCT application. Read the documents attached with the plaint. USPTO's actions are fully consistent with D1, D2 and D3's threats to Plaintiff after the invention was made and recorded on his laptop in Q1 – 2007. D4 joined hands with D1, D2 and D3 to commit the fraud as they had White House, NJ state Government, Illinois state government and USPTO on board with the plan to deny Plaintiff and India the wealth from the invention. Read 'Role of D1, D2, D3 and D4' and 'Capitalism' in sections G and H above.
- p. In reference to paragraph 21q, it seems D3 does not know the importance of PCT publications. Plaintiff advises D3 to read all the documents for the PCT publication listed at WIPO Patent scope. This paragraph mentions to D3, that their fraud is now globally accessible by people in all 193 UN member states. It seems D3 does not understand the importance of IP / patent document publications and their accessibility across the World via internet. This paragraph 19 of plaint is a two-line paragraph, but a very powerful one that states that your fraud in collusion with USPTO is now globally visible and all 8 billion plus humans can access it and know about it. The 61 non-USA

PCT contracting states have done similar IP publications and have access to the fraud done by USPTO, to deny IP rights and related income to Plaintiff and thus destroy the future of India. D3 must consult an IP lawyer to understand this clearly. They do not seem to understand IP law and global IP law.

- q. In reference to paragraph 21r, Plaintiff advises D3 to read paragraphs 26c, 26d, 26e and 26f of this document in the pages above.
- r. In reference to paragraph 21s, it seems D3 does not understand PCT application process, IP law, global IP law, USPTO giving two different outcomes on same replica applications. If they understood they would know how D3 along with other defendants and USPTO by fabricating prior art and issuing sabotaging ISR, have denied (other word for stolen / sabotage in this case) Trillions of Dollars in income and revenue from the Plaintiff's invention to him and thus to India.
- s. In reference to paragraph 21t, Plaintiff advises D3 to understand global IP law, read the documents attached with the plaint and also read the WIPO publications listed online at WIPO.org website (at WIPO Patent Scope database by searching on Publication ID's given), understand the application of 'Color change technology' to other sectors and further see the 'International search reports' issued to these PCT applications - they have been rejected citing USPTO patent grant to Plaintiff. This additionally makes Bangalore the jurisdiction for 'Global color change technology'. It seems D3 needs to hire an IP law firm that understand global IP law and PCT process.
- t. In reference to paragraph 21u, Plaintiff states that D3's understanding level of global economics, world IP law, wealth creation, understanding the aspirations of Indian citizens is non-existent. Plaintiff advises D3 to read up a little and understand the world and not commit fraud that destroys humanity, India's future and the economies of 61 non-USA PCT contracting states whose IP is linked to this lawsuit.
- u. In reference to paragraph 21v, Plaintiff states that only defendants D1 to D4 can ensure the correction communications can go to USPTO and have them remove the fabricated prior art, issue new corrected ISR and communicate the same to global PTO's. Plaintiff advises D3 to read 'role of D1-D4' sections and 'Capitalism' section on how D3

and their allies committed this global fraud. These are Sections G and H above.

28. Plaintiff states that D3 must look to understand the overall subject of the lawsuit, PCT the treaty, PCT application filed in this case, USPTO issuing two outcomes on replica applications, one at national level and one at global PCT level, global economics, how the invention is linked to each individual country's economy, how D3 and defendants are blocking the progress of 61 Non-USA PCT contracting states linked to this lawsuit, the fraud committed and respond to the lawsuit at a wholistic level; and not plain simply deny or reject all paragraphs in the plaint.

29. Further Plaintiff requests D3 to read documents submitted to Hon'ble court on 7/6/2019; pertaining to Plaintiffs authored content 'Project Earthling©' which will be introduced at United Nations soon and 'Goal Year 2050', 'Z3Foundations work' of Plaintiff to make India a developed country by year 2050; and build the largest treasury in the World for India in Earthlings currency. Try to understand the content, subject and vision of Plaintiff in these documents.

30. Finally, Plaintiff advises D3 to combine all the information read and understood as parts of points 28 and 29 listed above and get a wholistic perspective in the global lawsuit, that will transform the World as we know. Understanding the subject and content at this level alone, will help D3 to immediately resolve the matter, pay the liability and move away respectfully without getting their fraud further exposed, discussed and dragged around at all UN member nations.

Place: Bangalore

PLAINTIFF

Date:

**Re: China Office Action: Application number: 201480079105.9 (PCT/US2014/046619);
Our Ref. : P/17680**

Tarun Gandhi <tarun.gandhi@iprattorneys.com>

Fri 7/26/2019 5:02 PM

To: Srinivas DS <srinivas@z3cars.com>

Cc: Garima Sethi <garima.sethi@iprattorneys.com>

Dear Mr. Devathi,

This is in furtherance to your email below.

Please note that, as mentioned earlier, we cannot accommodate any of your requests until the outstanding dues are cleared.

Therefore, you are called upon to clear the outstanding dues as soon as possible or else, we would be constrained to initiate civil/criminal action against you.

We can at best extend the time until first week of August for clearing outstanding dues and please treat this as a last and final opportunity for any settlement in the matter. Meanwhile, until the payment of outstanding dues are cleared, as mentioned earlier, we are not taking any steps in connection with your IP matters and we shall not be responsible for any adverse order or consequences whatsoever

We look forward to hearing from you and early resolution of the matter.

Best Regards

Tarun Gandhi

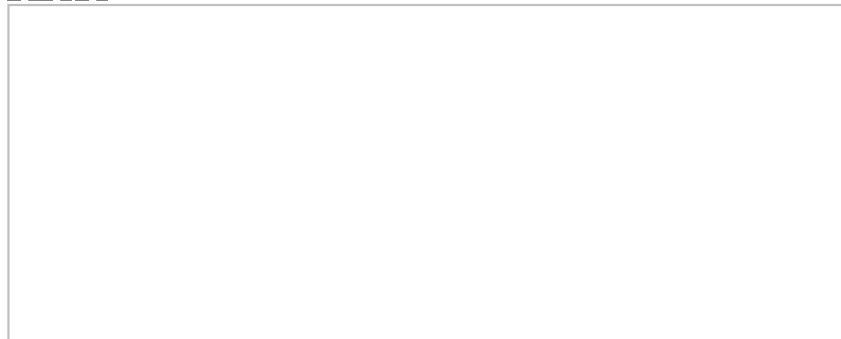
Partner | Attorney at Law and Patent Attorney

CHADHA & CHADHA | Intellectual Property Law Firm

Head Office: Level 18, One Horizon Center, Golf Course Road, DLF Phase 5, Sector 43, Gurgaon, Haryana 122002 (National Capital Region), INDIA

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On Thu, Jul 25, 2019 at 11:39 PM Srinivas DS <srinivas@z3cars.com> wrote:

Dear Tarun, Garima,

Have you made a decision on allowing these two payments by keeping the current outstanding balance outside? If so, do raise the invoice for these two payments - China two month extension and Europe annuity?

This allows two more months time for us to keep most of Europe and Asia active.

In any case the matter of fraudulent ISR is expected to be resolved on the 30th.

That will deliver grants in these territories.

Thanks,

Srinivas DS

Sent from my iPad

On Jul 23, 2019, at 4:27 PM, Srinivas DS <srinivas@z3cars.com> wrote:

Dear Garima,

The notice periods have gone shorter from your end. I am given (near by) dates for payments. This happened for both China and Europe, which have suddenly come upon by the end of this month. I realize my account is frozen, and hence the short notices.

I do not have the funds to pay for this annuity and may have to let the application lapse, as I cannot sustain repeat office actions with the fraudulent ISR issued on PCT application.

One important question - If I were to borrow / raise debt for the funds, would you be able to accommodate the annuity payment by keeping the 4 lakhs due to your firm on the side? I am still waiting for Mr. Tarun's response if he would accommodate such a payment for China's two month extension? Let me know if you have his response?

It must be noted that both applications are related; and retaining one makes no sense. So, we must try to keep both active, or lose both.

The truth is, despite keeping these applications alive, the repeat office actions will not be sustained by me, given the financial position as outlined in the active lawsuit. Only the **'Fraud admission by defendants and USPTO sending corrected ISR to all PTO's in the World will issue a grant in these territories'**. It is expected to happen by this month end court date.

Srinivas DS

Website: www.Z3Cars.com

From: Garima Sethi <garima.sethi@iprattorneys.com>
Sent: Monday, July 22, 2019 7:05 PM
To: Srinivas DS <srinivas@z3cars.com>
Cc: Tarun Gandhi <tarun.gandhi@iprattorneys.com>
Subject: Re: China Office Action: Application number: 201480079105.9 (PCT/US2014/046619);
Our Ref. : P/17680

Dear Mr. Devathi,

In furtherance to below please note that the deadline for payment of annuity fee for European application is July 31, 2019 and the amount for the same is EUR 1240.

Best Regards

Garima Sethi (Ms.)

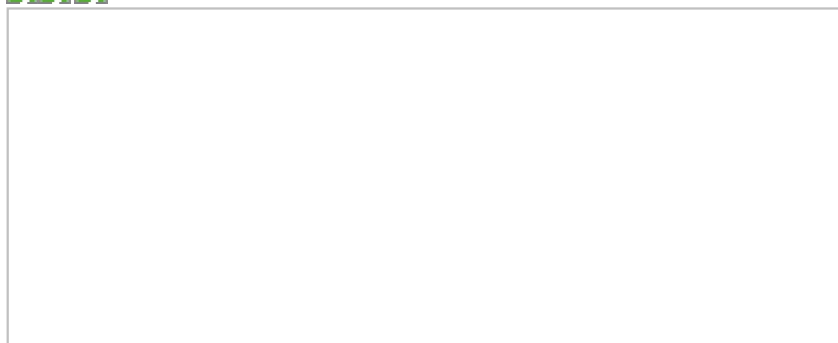
Partner | Attorney at Law and Patent Attorney

CHADHA & CHADHA | Intellectual Property Law Firm

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On Fri, Jul 19, 2019 at 6:20 PM Tarun Gandhi <tarun.gandhi@iprattorneys.com> wrote:

Dear Mr. Devathi,

This is in furtherance to your email below.

As requested please take note of the below in respect of European and Chinese application:

- 1) European Application: Response to the office action was filed on August 23, 2017 and the same is under examination.
- 2) Chinese Application: Estimated cost for requesting 2 months extension: **USD 250**

With regards making payment at our end for the extension, please note that the same is absolutely not possible on account of huge outstanding dues on your part and expenses that our firm has incurred on your behalf, upon your specific instructions.

Further, please note that going forward we shall *not take any steps* concerning your IP matters, until the outstanding dues are cleared and communication would only resume thereafter. *We may add that we shall not be responsible for any adverse order or consequences whatsoever.*

Therefore, you are requested to kindly clear all outstanding dues by **July 24, 2019** or else we would be constrained to explore legal options for recovery of outstanding dues.

We look forward to hearing from you at the earliest.

Best Regards

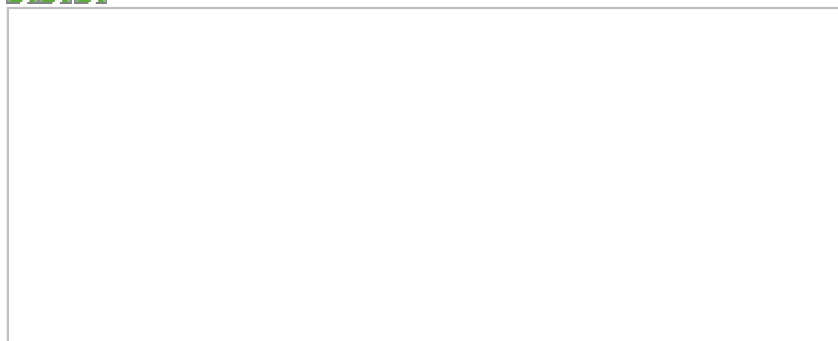
Tarun Gandhi
Partner | Attorney at Law and Patent Attorney

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On Mon, Jul 15, 2019 at 3:20 PM Srinivas DS <srinivas@z3cars.com> wrote:

Dear Garima,

I am not in a position to keep funding these 'Repeat office actions' due to the fabricated prior art. The related lawsuit will ensure a complete one time settlement and payout in court. Given my financial constraint, I will have to lose this application.

One important question - What is the status of European application? Is there an OA due? Or is it in process.

The reason is EPO app and China app are related given the production spread of large OEM's. Retaining one of the two apps makes no sense; as the other territory becomes safe haven. If I lose China app, it is as good as EPO patent not having any value (due to all European OEM's having production set-up in China and vice versa).

If you share the detail on EPO app, that would help me make a decision on China app. Knowing that my account is frozen, if you can tell me the cost of 2-months extension for China and EPO app status, I shall see if I can source the extension funds in these couple weeks and pay.

However, would you file for extension, by keeping my 4 lakhs due pending on the side? Paying that off will take couple months.

Thanks,

Srinivas DS

Website: www.Z3Cars.com

From: Garima Sethi <garima.sethi@jprattorneys.com>

Sent: Monday, July 15, 2019 10:23 AM

To: Srinivas DS

Cc: Tarun Gandhi; Rachna Budhiraja; Gargi Bhattacharjee; CHA212

Subject: Re: China Office Action: Application number: 201480079105.9 (PCT/US2014/046619); Our Ref. : P/17680

Dear Mr. Devathi,

For your reference please find enclosed second office action regarding the above-identified patent application issued by the National Intellectual Property Administration (CNIPA).

The time limit for making a response to this office action is set for **July 28, 2019**, for which one-or- two-month extension can be obtained once only.

Best Regards

Garima Sethi (Ms.)

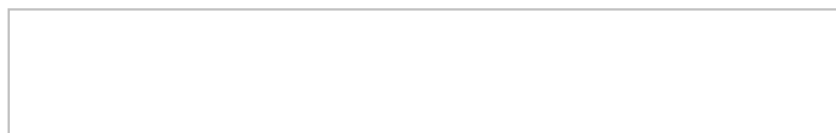
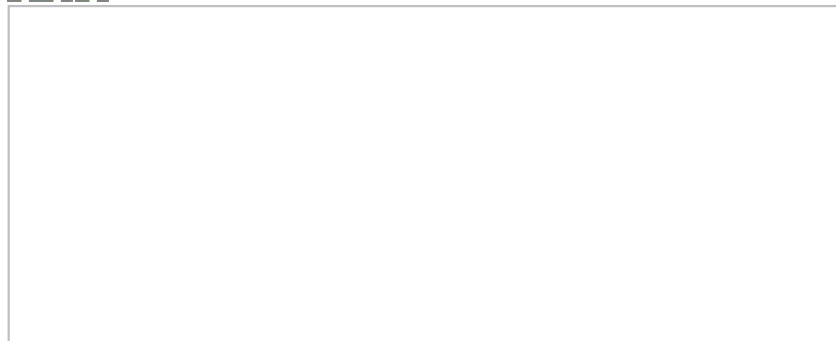
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On Tue, Nov 6, 2018 at 1:58 PM Garima Sethi <garima.sethi@iprattorneys.com> wrote:

[DEADLINE: JANUARY 10, 2019 \(NON - EXTENDABLE\)\)](#)

[RESPONSE REQUESTED BY: NOVEMBER 30, 2018](#)

Dear Mr. Devathi,

In accordance with your instructions, a request for a **2-months extension** of the time limit with the China National Intellectual Property Administration (CNIPA) has been filed **November 02, 2018.**

The new time limit expires on **January 10, 2019, which is not allowed to be extended any more.**

Deadline: 14/09/2019 Patent Application No. 6623/CHE/2014 for the Invention Entitled SYSTEMS AND METHODS FOR ALTERING THE COLOR, APPEARANCE, OR FEEL OF A VEHICLE SURFACE

L.R.Swami Trademark, India <trademark@lrswami.com>

Tue 3/19/2019 7:08 PM

To: Srinivas DS <srinivas@z3cars.com>

 3 attachments (1 MB)

6623-CHE-2014 first examination report.pdf; 6623-CHE-2014 drawings.pdf; 6623-CHE-2014 complete specification and claims on record.pdf;

Our Ref. P-450

Dear Sir,

Re: Patent Application No. 6623/CHE/2014 for the Invention Entitled SYSTEMS AND METHODS FOR ALTERING THE COLOR, APPEARANCE, OR FEEL OF A VEHICLE SURFACE

Deadline: 14/09/2019

We have received a First Examination Report (FER) in respect of the above patent application. We enclose a copy of the FER and the specification/claims on record for your ready reference.

The due date for filing response to this examination report will expire on **14 September 2019**. This due date can be extended only once up to 3 months. We prefer to have your instructions **before 14 July 2019**.

Please note that the attached FER is in the form of a pattern containing all the possible objections which may arise for any patent application. Accordingly, we are requesting you to provide comments only for the following objections:

Technical Objections:

Novely and Inventive Step: The Controller has considered that claims 1-23 meet the requirements for novelty and industrial applicability but lack inventive steps in view of the cited documents D1, D2, D3 and D4 and thus it is not allowable under sections 2(1)(j) and 2(1)(ja) of The Patents Act, 1970. We request you to refer the Controller's contents of these objections.

Accordingly, in order to overcome these objections, please provide us your detailed arguments on the patentability of the present invention over all the cited documents D1, D2, D3 and D4.

We look forward your specific instruction in this regard.

In case of any claim amendments, we request you to provide us the marked-up version of amended claims. Also, note that claim amendments should be within the scope of original claims and supported by the description of the as filed specification, as required under The Patents Act, 1970.

Please also send us the list and status of corresponding foreign applications along with its prosecution details.

Please be noted that our charges towards reporting and filing a response to the FER is **Rs. 40,000/-**.

Therefore, we look forward to your confirmation and instructions well in advance to the said due date to enable us to file a response to the FER in a timely manner.

Please feel free to contact us for any further clarification on this subject matter.

Kind regards,

S. Srinath | Patent Attorney | 9841266788



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View of fraud pertaining to 'Vehicle Color change technology invention'. Inventor Srinivas DS.

