

EXHIBIT B



Banish Law

John A. Lee
Banie & Ishimoto LLP
3705 Haven Ave. #137
Menlo Park, CA 94025
Phone: 650-241-2774
Email: jlee@banishlaw.com

VIA U.S. MAIL

February 9, 2018

Mr. Sackett Wood
Moore & Giles, Inc.
1081 Tannery Row
Forest, VA 24551

Re: Infringement of Landmark Technology, LLC's Patent Rights

Dear Mr. Wood:

We are intellectual property counsel for Landmark Technology, LLC ("Landmark"). Landmark has exclusive rights to patents covering certain special-purpose computer, communication and network technologies relating to Internet searching, e-commerce, electronic bill pay, on-line banking services, business-to-business transactions, multimedia data processing networks and mobile technologies. Landmark's widely regarded patented technology covers, among other things, special-purpose hardware and software systems supporting key transaction processes and features used in many electronic commerce systems, including structures which exchange business data amongst trading partners.

Landmark has licensed its patents to over 200 companies across various industries. Landmark's patents rank extremely high in patent citing activity and many have been cited over 200 times by the USPTO whereas the average patent has only five citations during its lifetime. Highly cited patents are generally known to be of greater technical importance, and even fewer rise to the level of "pioneer patents" achieved by the Landmark patents.

Landmark believes that Moore & Giles, Inc. ("Moore & Giles") data processing systems, particularly <https://www.mooreandgiles.com/shop/checkout/> through practices U.S. Patent No. 6,289,319 ("319 Patent"). The '319 Patent has been twice examined and held valid by the USPTO. On May 5, 2003, a request for *ex parte* Reexamination was filed, and on July 17, 2007, the USPTO confirmed the validity of all the claims without amendment, and also found 21 newly asserted claims patentable. On September 14, 2012, another request for *ex parte* Reexamination was filed, and on January 9, 2013, the USPTO again confirmed the validity of all of the claims without cancelling any claims or requiring any amendments.

Page 1 of 2

Plaintiff's EXHIBIT B - 1

You will find that the '319 Patent has been cited by the USPTO 224 times and teaches as well as claims automatic data processing systems for processing business and financial transactions between entities from remote sites. This includes data processing systems wherein a central processor acts on inquiries and orders from terminals [as do Moore & Giles' servers], communicates with terminals which use program instructions and act as the user interface [as do those devices interfaced to Moore & Giles' web servers in communication with Moore & Giles' servers], sequences are retrieved in response to data entered [as seen in devices interfaced to Moore & Giles' web servers], and data is updated in central processor storage [as per the functionality of Moore & Giles' web servers]. For example, the specific functionalities implemented by Moore & Giles using their servers and devices interfaced to Moore & Giles' web servers constitutes use of the technology taught within the meaning of Claim 1 of the '319 patent.

Landmark is currently offering Moore & Giles a non-exclusive license to its '319 patent, for \$65,000. This offer represents a substantial discount to the historic licensing price of Landmark's portfolio, and will not be available in the event of litigation.

We appreciate your attention to this matter and request a response within 15 days of this letter. Please contact me at the phone or email above, or contact my colleague, Jennifer Ishimoto, at ishimoto@banishlaw.com or (650) 241-2773.

Very truly yours,



John A. Lee
Partner
BANIE & ISHIMOTO LLP