iii. The technical for placement and location of extended Latin-Characters and tonal marks on keycaps with direct relation to standard characters.

iv. The process of using independent combing tonal marks and standard characters to create combine diacritic characters by direct access typing.

(f) This invention was patented in Nigeria in June 2003 with registration number RD: 8489. The Certificate of Patent issued by the Trademark Registry, Abuja and the Certificate of Extension of the Design are hereby attached as "**Exhibits A and A1**" respectively.

(g) On August 7, 2006, Mr. Nicholas Negroponte, Chairman of the 1st Defendant / Respondent placed an order for 1 (one) KONYIN Nigeria Multilingual Keyboard (KB-201 PW-NG) and 1 (One) KONYIN United States Multilingual Keyboard (KB-201 PW-US). These keyboards were delivered to the 1st Defendant/Respondent on August 8, 2006.

(h) The usual practice is that all Applicants' Keyboard products are shipped with an End User License Agreement (EULA), and no installation and use of the product is allowed without the user first agreeing to all the conditions of the EULA.

(i) On January 9, 2007 the Applicants came across a web link http://wiki.laptop.org//go/image:keyboardnigeria.jpg.

(j) Upon further examination of the website and images on the website, it became apparent to the Applicants that the 1st Respondent has taken the Applicants' work product and used it without the Applicants' permission on their product.

(k) Further examination of the site and development tickets (htt://dev.laptop.org/query) clearly established that the 1st Respondent has engaged in reverse engineering of the Applicants' product in violation of the EULA executed between the Parties.

(l) The 1st Defendant / Respondent infringed on the Applicant's design by duplicating the unique layout of the Applicants' KONYIN Nigeria Multilingual Keyboard on the 1st Defendant / Respondent's XO machine. Furthermore, the 1st Defendant / Respondent reverse engineered Applicants' driver codes to achieve direct access typing of combing diacritic without using the AltGr "dead key" typing process all in violation of the EULA between parties.

(m) While the Keyboard layout and character compilation may look simple now, until the Applicants came up with the idea, invested thousands of man-hours and funds in developing the hardware and software solution, the world was satisfy with AltGr "dead Key" typing process for most Nigerian languages.

(n) Currently, the 1st Defendant / Respondent XO machine is being distributed and display in Nigeria through the 3rd and 5th Defendants/Respondents. The Keyboard layout incorporated into the 1st Defendant / Respondent's XO machines in Nigeria was the result of illegal reverse engineering of the Applicants' codes.