

FACTS COMMON TO ALL CLAIMS FOR RELIEF

A. The ARDUINO Trademark

33. Massimo Banzi was an associate professor at the Interaction Design Institute Ivrea (“IDII”) which was a graduate design program in Ivrea, in Northern Italy. Banzi would frequent a bar named Bar di Re Arduino, named after Arduino, the King of Italy from 1001 to 1014.

34. Banzi is the creator of the Programma 2003 Development Platform, a precursor of the many ARDUINO-branded products. See <http://sourceforge.net/projects/programma2003/>. Banzi was also the Master’s Thesis advisor of Hernando Barragan whose work would result in the Wiring Development Platform which inspired Arduino.

35. Banzi met David Cuartielles, a professor at Malmö University, when he was engaged by IDII as a visiting researcher to work on extending the Wiring Development Project.

36. In 2005, Banzi invited Tom Igoe, a leading authority in the field of Physical Computing and professor at New York University, to work on a research project at IDII.

37. Banzi also met David Mellis, a student in the Master’s program at IDII between 2004 and 2006, at IDII.

38. Banzi, Cuartielles, Igoe and Mellis will collectively be referred to as the “Founders.”

39. The Founders, assisted by Nicholas Zambetti, another student at IDII, undertook and developed a project in which they designed a platform and environment for microcontroller boards (“Boards”) to replace the Wiring Development Project. Banzi gave the project its name, the ARDUINO Project.

40. The goal of the ARDUINO Project was to create an easy-to-use electronics