

# Exhibit 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

|                  |   |                            |
|------------------|---|----------------------------|
| ARENDI S.A.R.L., | : |                            |
|                  | : |                            |
| Plaintiff,       | : |                            |
|                  | : | C.A. No. 13-919-LPS        |
| v.               | : |                            |
|                  | : | <b>JURY TRIAL DEMANDED</b> |
| GOOGLE LLC,      | : |                            |
|                  | : |                            |
| Defendant.       | : |                            |

**AMENDED COMPLAINT**

Plaintiff Arendi S.A.R.L. (“Arendi”) for its Complaint against Defendant hereby demands a jury trial and alleges as follows:

**Related Actions**

1. This case is related to two cases previously consolidated before Judge Stark, 09-cv-00119 (D. Del.) (LPS) and 11-cv-00260 (D. Del.) (LPS), both of which settled after extensive dispositive motion practice. This case is also related to the action filed by Arendi today against Yahoo Inc!, and the actions filed on November 29, 2012 in this District by Arendi, No. 12-1595 (LPS), No. 12-1596 (LPS), No. 12-1597 (LPS), No. 12-1598 (LPS), No. 12-1599 (LPS), No. 12-1600 (LPS), No. 12-1601 (LPS), No. 12-1602 (LPS), which involve the same patents-in-suit and common facts..

**The Parties and Accused Products**

2. Plaintiff Arendi is a corporation organized under the laws of Luxembourg with its principal place of business in Luxembourg.

3. On information and belief, Defendant Google LLC (“Google”) is a Delaware corporation with a principal place of business at 1600 Amphitheatre Parkway, Mountain View,

California 94043. Google has appointed The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801, as its agent for service of process.

4. Google transacts substantial business, either directly or through its agents, on an ongoing basis in this judicial district and elsewhere in the United States.

5. Google makes, uses, imports, offers to sell, and sells (and/or has made, used, imported, offered to sell, and sold) in the United States and in this judicial district, Gmail, Google Documents/Docs, Google Sheets, Google Slides, Google Chrome, Google Translate, Google Calendar, Google Hangout, the Google App, Nexus, Pixel, Chromebook Pixel, Pixelbook, and other products and devices containing the same or similar information handling technology disclosed in the asserted patents described herein (collectively, the “Accused Products”).

#### **Nature of the Action**

6. This is a civil action for infringement of United States Patents No. 7,917,843 (the “843 Patent”), No. 7,496,854 (the “854 Patent”), No. 7,921,356 (the “356 Patent”), and No. 8,306,993 (the “993 Patent”). This action arises under the Patent Laws of the United States, 35 U.S.C. § 1 *et seq.*

#### **Jurisdiction and Venue**

7. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

8. Personal jurisdiction is proper in this district because, among other reasons, Google has a continuous presence in this District, Google committed acts of infringement in this District and a substantial part of the events or omissions giving rise to this claim occurred in this District. Google placed, and continues to place, Accused Products into the stream of commerce,

through an established distribution channel, with the knowledge and/or understanding that such products are used and sold in this District. This causes injury to Arendi in this District. On information and belief, Defendant derives substantial revenue from the sale of Accused Products distributed within the District, and derives substantial revenue from interstate and international commerce.

9. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b) and (c), and 1400(b), because Google resides in this District, and has committed acts of infringement in this district and, upon information and belief, has a regular and established place of business in this District.

#### **The Patents-In-Suit**

10. United States Patent No. 7,917,843, entitled “Method, System and Computer Readable Medium for Addressing Handling from a Computer Program,” was duly and legally issued on March 29, 2011, by the United States Patent and Trademark Office. A copy of the ‘843 Patent is attached hereto as Exhibit A.

11. United States Patent No. 7,496,854, entitled “Method, System and Computer Readable Medium for Addressing Handling from a Computer Program,” was duly and legally issued on February 24, 2009, by the United States Patent and Trademark Office. A copy of the ‘854 Patent is attached hereto as Exhibit B.

12. United States Patent No. 7,921,356, entitled “Method, System and Computer Readable Medium for Addressing Handling from a Computer Program,” was duly and legally issued on April 5, 2011, by the United States Patent and Trademark Office. A copy of the ‘356 Patent is attached hereto as Exhibit C.

13. United States Patent No. 8,306,993, entitled “Method, System and Computer Readable Medium for Addressing Handling from an Operating System,” was duly and legally issued on November 6, 2012, by the United States Patent and Trademark Office. A copy of the ‘993 Patent is attached hereto as Exhibit D.

14. Arendi is the exclusive owner of all rights, title, and interest in the ‘843 Patent, ‘854 Patent, ‘356 Patent and ‘993 Patent, including the right to bring this suit for injunctive relief and damages.

15. The ‘843 Patent, ‘854 Patent, ‘356 Patent and ‘993 Patent are valid and enforceable.

### **BACKGROUND**

16. Arendi filed suit in this District against Microsoft Corporation and Dell Inc. for infringement of the ‘854 Patent on February 24, 2009. 09-cv-00119 (D. Del.) (LPS). The case was assigned to the Honorable Leonard P. Stark, who held two Markman Hearings, on February 25, 2011 and November 21, 2011, and denied several summary judgment motions. The case was resolved by settlement and dismissed on November 29, 2011.

17. Arendi filed suit in this District against Microsoft Corporation for infringement of the ‘843 Patent on March 29, 2011. 11-cv-00260 (D. Del.) (LPS). The case was assigned to the Honorable Leonard P. Stark, who consolidated the 11-cv-260 case with the above-referenced case on May 10, 2011. After Judge Stark held a Markman Hearing on November 21, 2011, this case was also resolved by settlement and dismissed on November 29, 2011.

### **COUNT I**

#### **(Infringement of United States Patent No. 7,917,843)**

18. The preceding paragraphs are incorporated by reference as if stated fully herein.

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