

Case No. IPR2013-00010  
Patent No. 7,516,484  
Exhibit 2003

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

2011 JUN 16 PM 4: 18

BY \_\_\_\_\_ CLERK KAC  
DEPUTY CLERK

ARNOUSE DIGITAL DEVICES CORP., )  
Plaintiff )  
 )  
v. )  
 )  
MOTOROLA MOBILITY, INC, )  
Defendant )

Case No. 5:11-cv-155

**COMPLAINT FOR PATENT INFRINGEMENT  
AND DEMAND FOR JURY TRIAL**

Plaintiff Arnouse Digital Devices Corp. (“ADD”), as exclusive licensee of United States Patent No. 7,516,484 (“the ’484 Patent”), complains against the Defendant Motorola Mobility, Inc. (“Motorola”) for patent infringement as follows:

**PARTIES**

1. Plaintiff ADD is a Delaware corporation.
2. Defendant Motorola is a Delaware corporation.
3. Defendant has committed acts of patent infringement in Vermont, does business in Vermont on a regular basis and, pursuant to 28 U.S.C. § 1391(c), is deemed to reside in Vermont.

**JURISDICTION AND VENUE**

4. This is an action for patent infringement arising under the patent laws of the United States, more specifically 35 U.S.C. § 271, *et seq.* This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338.

5. Venue in this judicial district is proper according to 28 U.S.C. § 1391(b)(1) and (c) because Defendant is deemed to reside in Vermont.

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6. Motorola is in the business of manufacturing, distributing, and/or selling the MOTOROLA ATRIX 4G portable computer/smartphone (the "ATRIX") in combination with the MOTOROLA LAPDOCK reader ("LAPDOCK") throughout the world, including in the United States and this judicial district.

7. The ATRIX and the LAPDOCK have been and are being offered together and individually for sale within this judicial district.

8. The ATRIX and the LAPDOCK have been and are being sold together and individually within this judicial district.

INFRINGEMENT OF U.S. PATENT NO. 7,516,484

9. Michael Arnouse, the sole owner of the '484 patent, has exclusively licensed ADD under the '484 Patent in a License Agreement effective January 2, 2011, as amended in a First Amendment effective June 15, 2011. A copy of the '484 patent is attached as Exhibit A.

10. ADD's exclusive license runs for the full term of the '484 patent and includes all substantial rights in such patent, including the explicit right to sue and recover damages for infringement of the '484 patent and to otherwise seek enforcement of the rights it owns under the '484 patent.

11. Defendant Motorola has directly infringed and is still directly infringing and is contributing to and actively inducing infringement of the '484 patent by making, offering for sale and selling the ATRIX and LAPDOCK together which, in combination, embody the subject matter and include each and every element of one or more of the claims of the '484 patent.

12. Defendant Motorola has directly infringed and is still directly infringing and is contributing to and actively inducing infringement of the '484 patent by making, offering for sale

and selling the LAPDOCK separately to be used with the ATRIX, which LAPDOCK alone embodies the subject matter and includes each and every element of one or more of the claims of the '484 patent.

13. Motorola has had knowledge of the '484 patent since at least February 15, 2011, and has no license for use of the '484 patent. Accordingly, Motorola's infringement of the '484 patent has been and continues to be willful, wanton, deliberate and without license.

14. Unless enjoined by this Court, Defendant Motorola will continue its acts of infringement to Plaintiff ADD's immediate, substantial and irreparable harm.

THEREFORE, the Plaintiff demands:

- (a) a permanent injunction against the Defendant's continued infringement of the '484 patent;
- (b) an accounting for damages;
- (c) damages;
- (d) enhanced and/or treble damages;
- (e) attorneys fees;
- (f) interest and costs; and
- (g) such other and further relief as the Court deems appropriate.

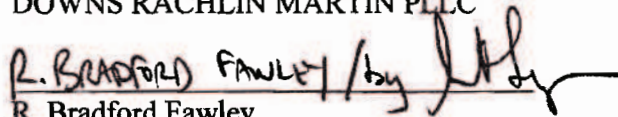
**JURY DEMAND**

Plaintiff ADD demands trial by jury of all issues so triable with respect to the

Complaint.

Brattleboro, Vermont  
June 16, 2011

DOWNS RACHLIN MARTIN PLLC

  
R. Bradford Fawley  
Lawrence H. Meier  
28 Vernon Street,  
Brattleboro, VT 05301  
(P) (802) 258-3070  
(F) (802) 258-4875  
bfawley@drm.com  
lmeier@drm.com

ATTORNEYS FOR PLAINTIFF  
ARNOUSE DIGITAL DEVICES CORP.

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