	)
v.	)
	) **Civil Action No._____**
LINKEDIN CORPORATION,	)
	) **JURY TRIAL DEMANDED**
Defendant.	)
	)
	)
	)
	)
	)
_____	)

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff B.E. Technology, L.L.C. ("B.E.") hereby brings this action against LinkedIn Corporation ("LinkedIn") for infringement of United States Patent No. 6,628,314 ("'314 patent"), and alleges as follows:

NATURE OF THE ACTION AND PARTIES

1.   This is an action for patent infringement arising under the patent laws of the United States.

2.   B.E. is a limited liability company organized and existing under the laws of the State of Delaware with its principal place of business in Memphis, Tennessee.

3.   LinkedIn is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business in Mountain View, California.

5.   Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b), 1391(c), 1391(d), and 1400(b).

FACTUAL BACKGROUND

6.   The '314 patent is entitled "Computer Interface Method And Apparatus With Portable Network Organization System And Targeted Advertising." A copy of the '314 patent is attached hereto as Exhibit A.

7.   The invention of the '314 patent generally relates to user interfaces for accessing computer applications and information resources and, in particular, to user interfaces that provide advertising obtained over a global computer network such as the Internet. The invention of the '314 patent also relates to user interfaces for maintaining, organizing and communicating information accessible to a computer network such as the Internet and, in particular, to user interfaces that provide the user with availability to that information in a personalized manner.

8.   The application that issued as the '314 patent was filed on October 30, 2000, and the United States Patent and Trademark Office duly and legally issued the '314 patent on September 30, 2003. The '314 patent claims priority to U.S. Patent Application No. 09/118,351, filed on July 17, 1998.

COUNT I: INFRINGEMENT OF U.S. PATENT NO. 6,628,314

9.   B.E. realleges and incorporates by reference the allegations of paragraphs 1-8.

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either literally or under the doctrine of equivalents.

JURY DEMAND

B.E. requests a trial by jury for all issues so triable.

PRAYER FOR RELIEF

B.E. prays for relief as follows:

1.   Judgment that LinkedIn has infringed the '314 patent as alleged herein;

2.   Compensatory damages in an amount according to proof, and in no event less than a reasonable royalty;

3.   Prejudgment interest on the compensatory damages awarded to B.E.;

4.   Post-judgment interest on all sums awarded to B.E. from the date of judgment;

5.   A preliminary and permanent injunction forbidding LinkedIn and its officers, agents, servants, employees, and attorneys, and all those in active concert or participation with them, from further infringing the '314 patent;

6.   Costs of suit incurred herein; and

7.   Any and all other relief that the Court deems just and equitable.

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Telephone: (650) 593-6300
Facsimile: (650) 593-6301
rfreitas@ftklaw.com
ckaufman@ftklaw.com

Richard M. Carter (TN B.P.R. #7285)
Adam C. Simpson (TN B.P.R. #24705)
MARTIN, TATE, MORROW & MARSTON, P.C.
6410 Poplar Avenue, Suite 1000
Memphis, TN 38119-4839
Telephone: (901) 522-9000
Facsimile: (901) 527-3746
rcarter@martintate.com
asimpson@martintate.com

Attorneys for Plaintiff
B.E. Technology, L.L.C.

EXHIBIT A

DOCKET ALARM

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