

VENUE

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 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.

10. B.E. owns all right, title, and interest in the '314 patent, and has owned all right, title, and interest throughout the period of the infringement complained of herein.

11. Match has infringed the '314 patent by using a method of providing demographically targeted advertising that directly infringes at least Claim 11 of the '314 patent 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 Match 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 Match 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.

Dated: September 21, 2012

By: s/Robert E. Freitas

Robert E. Freitas
Craig R. Kaufman
FREITAS TSENG & KAUFMAN LLP
100 Marine Parkway, Suite 200
Redwood Shores, CA 94065
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

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.